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PLANNING STATEMENT

PROPOSED REGULARISATION AND EXTENSION TO THE EXISTING GREEN WASTE OPEN WINDROW COMPOST MATURATION PAD

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

WEST LONDON COMPOSTING LTD

MARCH 2023

GP Planning Ltd.
iCon Innovation Centre • Eastern Way • Daventry
Northamptonshire • NN11 0QB • 01604 771123

www.gpplanning.co.uk

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Mr Christian Smith DipTP MRTPI MCMI
Miss Maureen Darrie BSc (Hons) MRTPI

Registered in England
Number 6019666

Registered Office:
iCon Innovation Centre, Eastern Way,
Daventry, Northamptonshire, NN11 0QB

Planning Statement		
Highview Farm – Extension to Compost Maturation Area	West London Composting Ltd	E001-19

Revision	Comments	Author	Date
1	Initial Draft	CS	Nov 2022
2	Updates following	CS	March 2023

Contents

Appendices

1 INTRODUCTION

1.1 Context

1.1.1 This Planning Statement accompanies a Planning Application submitted to Hillingdon Borough Council (as Waste Planning Authority) on behalf of West London Composting Ltd ("the Applicant") 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 The need for additional space to manage, store and open windrow green waste is set out at section 2.3 of this report but primarily the Applicant is required to move away from more traditional composting techniques, comply with recent Environment Agency Guidance, namely BAT and Appropriate Measures Guidance - (https://www.gov.uk/guidance/biological-waste-treatment-appropriate-measures-for-permitted-facilities) and minimise odour generation and fire risk. There is also an additional opportunity to reduce local amenity impacts due to the proposed extension and reorganisation of the site.

1.1.3 This submission is supported by the following documents and drawings:

- Planning Form/Certificates
- Planning Statement (this document)
- Screening Opinion (Appendix 1)
- Landscape & Visual Impact (Appendix 2)
- Preliminary Ecological Assessment & Biodiversity Net Gain Report (Appendix 3)
- Odour Assessment Report (Appendix 4)
- Noise Assessment Report (Appendix 5)
- Flood Risk & Surface Water Drainage (Appendix 6)
- Energy Efficiency Plan (Appendix 7)
- Circular Economy Statement (Appendix 8)

Drawings

- GPP/W/WLC/EX/22/01 v3- Site Location Plan;
- GPP/W/WLC/EX/22/02 v3 - Site Layout Plan;

- GPP/W/WLC/EX/22/03 v2 – Site Location Plan and HS2 Development Boundary;
- GPP/W/WLC/EX/22/04 v1 - Leachate Tank Elevations;
- GPP/W/WLC/EX/23/05 v0- Shipping Container (Storage);
- GPP/W/WLC/EX/23/06 v0 - Welfare Cabin;
- GPP/W/WLC/EX/23/07 v0 - Site Offices;
- GPP/W/WLC/EX/23/08 v0 - Weighbridge Office, and
- GPP/W/WLC/EX/23/09 v1 - Site Layout Plan including BNG area

1.2 The Application Site and its Setting

1.2.1 The Application Site is 7.2 hectares in size. The land subject of this Planning Application is shown edged red on drawing GPP/E/WLC/EX/22/01 v3 – Site Location Plan. Other land within the Applicant's control is shown edged blue. This drawing also shows (see black dotted line) the extent of land that benefits from planning permission (reference 12579/APP/2021/2010) for green waste open windrow composting.

1.2.2 Access to the site is via the eastern end of Newyears Green Lane, which links to the A4180 to the east, which provides access to the Rickmansworth to the north and the A40/M40 and M25 motorway to the south and south west. The southern site is bounded by open land to the south, east and west with Elm tree farm situated to the north east of the site.

1.2.3 The Application Site lies within land designated as Green Belt in the Hillingdon Borough Local Plan.

1.2.4 There are a number of Sites of Special Scientific Interest (SSSI) in the vicinity of the Application Site, the nearest being Ruislip Woods (Specifically Bayhust Woods Country Park), which is adjacent to the proposed Biodiversity Net Gain area forming part of the proposal to the north.

1.3 Planning History

Introduction

1.3.1 The most recent and relevant planning permission in relation to the proposed development was granted by Hillington Borough Council on 31st August 2022 under planning reference 12579/APP/2021/2010 for the following:

"The permanent residency of the land to the North and South of Newyears Green Lane for the continued use of an organic composting facility operation to handle a maximum throughput

of 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."

1.3.2 This consolidating planning permission covered land to north and south of Newyears Lane. This proposal was subject to a Stage 2 Referral to the GLA and also the Secretary of State in terms of being a departure from the Development Plan (Green Belt). Neither the GLA or the Secretary of State called the application in.

1.3.3 On 17th September 2015, planning permission (LPA ref: 12579/APP/2012/2366) was granted for the continuation and formalization of existing recycling operations at land to the North and South of Newyears Green Lane for an In-Vessel Composting Facility (IVC) operation to handle a maximum throughput of 75,000 tonnes per annum of organic waste for a temporary period of five years. The application was supported by the previous Mayor. However, the temporary approval expired in September 2020 and a further one year extension was granted in May 2021.

Highview Farm (South of Newyears Green Lane)

1.3.4 The planning history relating to the area the subject of this pre-application submission is set out below.

- 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 approved (reference 12579/APP/2016/4099) to discharge condition 3, 8, 9, 13, 15 and 16 of application reference - 12579/APP/2012/2366 (Details pursuant to the full discharge of condition 3, 8 and 9 and partial discharge of condition 13 (Landscape maintenance plan, a Construction Logistics Plan (CLP) and a delivery and Servicing Plan (DSP), bio filters, and Travel Plan), of planning permission ref: 12579/APP/2012/2366 dated 15-09-2015 (Increase in throughput from 50,000 tpa to 75,000 tpa of green waste material for a temporary period of five years)).

Pylon Farm (North of Newyears Green Lane)

1.3.5 To provide the context to this pre-application submission, the planning history relating to the maturation area north of Newyears Green Lane is set out below.

- 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 on18/8/2006 for increasing the size of the maturation area (to allow operations to become more efficient). The permission expired on 17 August 2011.0n 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, 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, the site has 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. This approval expired in September 2020, and a further temporary one year permission was granted in 2021.
- 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 that remains outstanding is condition 15 - Hydrogeological Risk Assessment (HRA).

- 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.

2 PROPOSED DEVELOPMENT

2.1 Introduction & Background

2.1.1 Envar Composting Limited acquired the West London Composting business (West London Composting Ltd) in May 2021. The site has planning permission for a throughput of up to 75,000 tonnes of green and food waste per annum. The main source of incoming material is green waste from the West London Waste Authority which accounts for 60,000 tonnes per annum (20,000t of which currently goes to a third-Party site for 12 months only but will also be processed at the West London site after this time).

2.1.2 The existing waste management site straddles both sides (north and south) of Newyears Green Lane. On the southern side of the road there is the Weighbridge, Reception, In Vessel Units and a glass, wood and bulky waste transfer station. The northern area contains the compost screening/shredding and maturation area (by open windrows).

2.1.3 West London Composting Ltd 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).

2.1.4 This Planning Application seeks planning permission to regularise the buildings/infrastructure on the existing green waste composting site and extend the maturation yard to the north and east. On the basis that this Planning Application is successful, one consolidating planning permission will control the green waste composting operations together with the proposed Ecological Enhancement area to the north of the existing site designed to achieve Biodiversity Net Gain.

2.2 Application Site & Layout

2.2.1 The Application Site is approximately 7.2 hectares in size and is shown edged red on the enclosed Site Location Plan (reference GPP/W/WLC/EX/22/01 v3). Other land within the ownership of the Applicant is shown edged blue on this drawing. The Planning Application boundary includes the existing green waste composting operation (permitted under planning permission no.12579/APP/2021/2010)

2.2.2 The Application Site includes an area of land to the north east, which will be 'non-operational' land, and is proposed to be set aside for landscape planting and ecological enhancement to ensure that biodiversity

net gain is achieved in accordance with the Development Plan, forthcoming legislation, and the National Planning Policy Framework.

2.2.3 The proposed development, as shown of the enclosed Site Layout Plan (drawing reference GPP/W/WLC/EX/22/02 v3), involves the following main elements:

- Laying of an impermeable concrete surface for screening, shredding, processing, storing and maturing green waste material. The site's surface will be bunded around its perimeter with a concrete curb to ensure total surface water containment;
- Construction of a perimeter landscaped screening mound using stripped soils (southern boundary only);
- The relocation and regularisation of the Applicant's Site Office, Welfare Cabin, Store, Weighbridge and Weighbridge Office;
- x2 500 cubic metre leachate tanks;
- Regularisation of x2 180kV generators;
- Car Parking;
- Maintenance area for plant/equipment, and
- Landscape planting and areas of ecological enhancement.

2.3 Requirements for Appropriate Measures, BAT & AELs

2.3.1 The Environment Agency published guidance on 21st September 2021 relating to 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.

2.3.2 The EA's appropriate measures for biological treatment guidance applies to both new and existing sites. Any new facilities must have relevant appropriate measures in place before their operations commence; complying with Best Available Technique (BAT), Associated Emission Level (AEL). Existing sites must comply with their relevant appropriate measures, BAT and AELs by August 2022.

2.3.3 In order to comply with the Environment Agency's permitting requirements, additional compost stabilisation, maturation and product storage area is required at the Site. This will enable the Applicant to improve compost maturation by investing in a specialist mechanical windrow turner, minimise fire risk and effectively manage odour and bioaerosols.

2.3.4 The proposed Site Layout Plan (drawing reference GPP/HC/R/CP/22/02 v3) shows that Pad 1 (the existing permitted maturation area) and Pad 2 (the proposed extension area the subject of this planning application) is capable of managing approximately 14 windrows, the longest of which is 210 metres long. This will enable the Applicant to maximise the 75,000 tonnes per annum throughput of green waste, whilst complying with the Environment Agency's permitting requirements and associated guidance.

2.4 Site Office, Weighbridge and Weighbridge Office

2.4.1 This proposal also seeks retrospective planning permission for the construction of the following portable buildings that are located within the existing permitted area of the site:

- Store coloured dark green (shipping container) (6.06 metres long by 2.44 metres wide and 2.59 metres high (see elevation / floor plan drawing GPP/W/WLC/EX/23/05 v0 and photograph below)

- Welfare Cabin coloured grey (15.24 metres long by 4.57 metres wide and 2.59 metres high (see elevation / floor plan drawing GPP/W/WLC/EX/23/06 v0 and photograph below)

- Site Offices coloured grey (15.24 metres long by 4.57 metres wide and 2.59 metres high (see elevation and floor plan drawing GPP/W/WLC/EX/23/07 v0 and photograph below)

- Weighbridge and Weighbridge Office (15.24 metres long by 4.57 metres wide and 2.59 metres high (see elevation and floor plan drawing GPP/W/WLC/EX/23/08 v0)

2.5 Overview - Green Waste Management

2.5.1 Having been booked in and weighed on the weighbridge, vehicles will transport the green waste material to the waste reception and shredding area on the southern site boundary for processing.

2.5.2 Once the material is in a suitable condition for maturing, the green waste material will be placed in windrows across the maturation yard in rows approximately 1 metre apart. The windrow piles will have approximate dimensions of 2 metres high and 6 metres wide (at the base).

2.5.3 The last part of the process involves screening the compost to remove contaminants such as plastics and metals, and to also grade the compost for various end uses. The green waste material will then be taken to the northern end of the site for screening using a mobile plant. Oversized materials will also be removed and can be put back through the whole process until they have composted down sufficiently.

2.6 Windrow Management & Control

Size and Location

2.6.1 The proposed windrowing extension area is roughly 80 metres by 75 metres in size and will allow for approximately 8 windrow piles comprising approximately 225 cubic metres of material in each pile. The windrow pile dimensions will typically be 6 metres wide at the base by 2 metres high and 175 metres in

length. The compost windrowing area is shown on the attached Site Layout drawing reference GPP/HC/R/CP/22/02 v3.

Moisture & Temperature Control

2.6.2 The composting material will be maintained with suitable moisture content to encourage decomposition. However, the windrow material being composted will be regularly monitored as per the sites approved HACCP (Hazard analysis and critical control procedure) for moisture content, CO2 evolution and temperature to ensure that optimum degradation conditions are maintained, and sanitation and subsequent stabilisation of the compost occurs. The temperature of the compost will be monitored by use of a long stem thermometer. Temperature readings will be taken at several points on a regular basis throughout the composting mass to enable a temperature profile to be built up during the life of the windrow.

2.6.3 The moisture content of the windrows will be monitored by a" squeeze test" and also by using a specialist moisture probe provided by 'freeland scientific' or similar appropriate source. This test will ensure that when the material is held in the palm of the hand and gently squeezed the materials are moist enough to stick together, but do not drip (if water seeps out, it is too wet, and if the materials do not stick together, it is too dry). If the material becomes too dry water will be added using a bowser or spray hose (normally during turning) or from the on site storage tanks where rain water is recycled and used on site. Composting piles will not become soaked throughout (and become too wet) because rainwater usually runs off the surface of the pile or evaporates or is collected on site for re-use, however, if during high rainfall the windrows become too wet the material will either (or both) be turned more frequently to allow natural drying or mixed with drier material from another feed stock to obtain the appropriate moisture content. All surface water is collected and there are no off site discharges. All water is recycled or taken off site for treatment. The is an opportunity to install a specialist water treatment plant to clean the water in line with the Environment Agencies requirements to allow it to be discharged. A permit would be required for this from the Environment Agency.

Turning

2.6.4 The composting process is aerobic and therefore requires oxygen to break down the feedstock. The windrows will therefore be turned regularly, at least once a week as a general rule, for the first 6 weeks, to introduce oxygen and prevent the material becoming anaerobic and therefore reduce the potential of odours caused through anaerobic conditions. The windrows will be turned using a specialist mechanical turner as shown on the photograph below. The use of a turner increases the energy efficiency of the

turning process significantly whilst also reducing the time taken to complete a turn of a row from roughly one day to fewer than 45 minutes.

2.6.5 Feedstocks will be mixed and screened to create the right properties for composting ensuring that an appropriate carbon to nitrogen ratio (circa 25:1 to 40:1) is maintained. The proposed composting facility is a low-key operation, and its corresponding windrows will be relatively small in size (2 metres) and therefore easy to manage and control.

Completion of the Composting Process

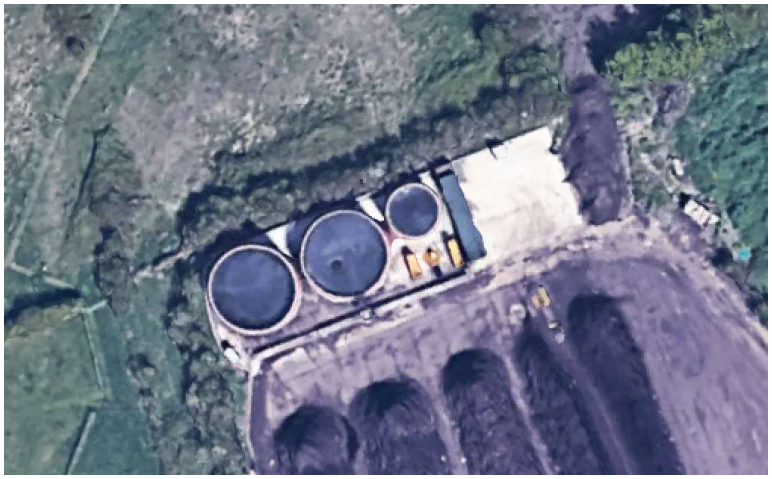
2.6.6 Windrows will be composted in approximately 8 weeks, by which time the volume of the windrows will have considerably reduced. At this stage microbiological and chemical activity will be significantly reduced. Checks, however, will be made to ensure that temperature continues to fall, material is the screened (size graded) to produce a quality organic product which is made available and sold to local farmers and horticultural suppliers. The material benefits these local producers by replacing or reducing the requirement for fossil based artificial fertilisers or quarry extracted peat.

2.7 Leachate Storage Tanks & Surface Water Drainage

2.7.1 The Environment Agency's Flood Maps show that the entire site is indicated to lie within in Flood Zone 1, 'low probability', which represents an annual probability of less than 0.1% of a flood occurring in any one year. The site is therefore deemed not to be at flood risk from fluvial or tidal sources.

2.7.2 An existing surface water management system is present within the existing site which includes attenuation, storage and bunded / isolated floodable areas to ensure that existing surface water runoff rates are maintained, and the containment of contaminated water within the site, which is then either recycled or tankered off site as leachate.

2.7.3 The two above ground leachate storage tanks (12.9 metres by 3.84 metres) and a clean water tank (10.14 metres by 2.28 metres) as shown on the aerial photo below.



2.7.4 It is proposed to add two identical additional above ground leachate storage tanks to deal with surface water runoff from the proposed extension to the compost maturation pad. The pad will be laid with an impermeable concrete surface which is curbed around its perimeter to ensure that there is no pollution to groundwaters. The proposed compost maturation pad will therefore demonstrate total containment of surface water and leachate from the pad.

2.8 Access, Throughput & Traffic Movements

2.8.1 The proposed development will utilise the existing vehicle access from Newyears Green Lane to the south. The existing access has suitable geometry and visibility for HGVs.

2.8.2 Condition 2 of planning permission no.12579/APP/2021/2010 states that:

"The cumulative total of waste input for the facility shall not exceed a maximum of 75,000 tonnes per annum."

2.8.3 The proposed development will not result in an increase in annual throughput beyond the permitted maximum of 75,000 tonnes per annum and therefore the Applicant intends to work within the parameters of the current restriction.

2.8.4 In addition, condition number 5 of the main planning permission restricts the movement of Heavy Goods Vehicles (HGVs) as follows:

> *"There shall be no more than a total of 100 HGV movements (one way) per day, of which no more than 41 one-way HGV (vehicles above 7.5 tonnes) movements in any one working say, involving a cumulative total not exceeding a maximum of 75,000 tonnes of waste input each year."*

2.8.5 Again, the Applicant does not seek to amend the restricted HGV movements to and from the site. Vehicular access/egress will be gained from the existing entrance off Newyears Green Lane. No changes to the restriction of vehicle movements or changes to the access point are therefore proposed.

2.9 Hours of Use

2.9.1 The proposed hours of use are as follows:

- 0730-1800 hours Monday to Friday
- 0730-1800 hours Saturdays
- With no working on Sundays, Bank or Public Holidays

2.10 Public Rights of Way

2.10.1 The proposal will not affect any public rights of way in the vicinity of the Site.

2.11 Generator Sets

2.11.1 The Applicant proposes to install two new 180 kV JCB power generators near to the existing and proposed leachate tanks as shown on drawing reference GPP/W/WLC/EX/22/02 v3. The model numbers are

- JCB 9175Q
- JCB G175QX

2.11.2 The proposed 180 kV JCB generators will supply three phase power for the operations during the day. At night they switch on and off automatically as and when the sump on site fills with water. Water is pumped from the sump to the above ground tanks. When the water level in the sump drops the generator (only one works at a time) turns off again.

2.11.3 The appearance of the two new generators will be similar to the image shown below.

2.12 High Pressure Gas Main

2.12.1 Two high-pressure gas mains cross the Application Site as shown on the enclosed Site Layout Plan (drawing reference GPP/W/WLC/EX/22/02 v3). Prior to the submission of this Planning Application, the Applicant has liaised with Cadent, who is responsible for the high-pressure gas mains, and have confirmed that, subject to appropriate construction of the proposed concrete maturation pad, they raise no objection in principle to the proposed development. No unacceptable impacts upon the high-pressure gas mains infrastructure are therefore likely to arise.

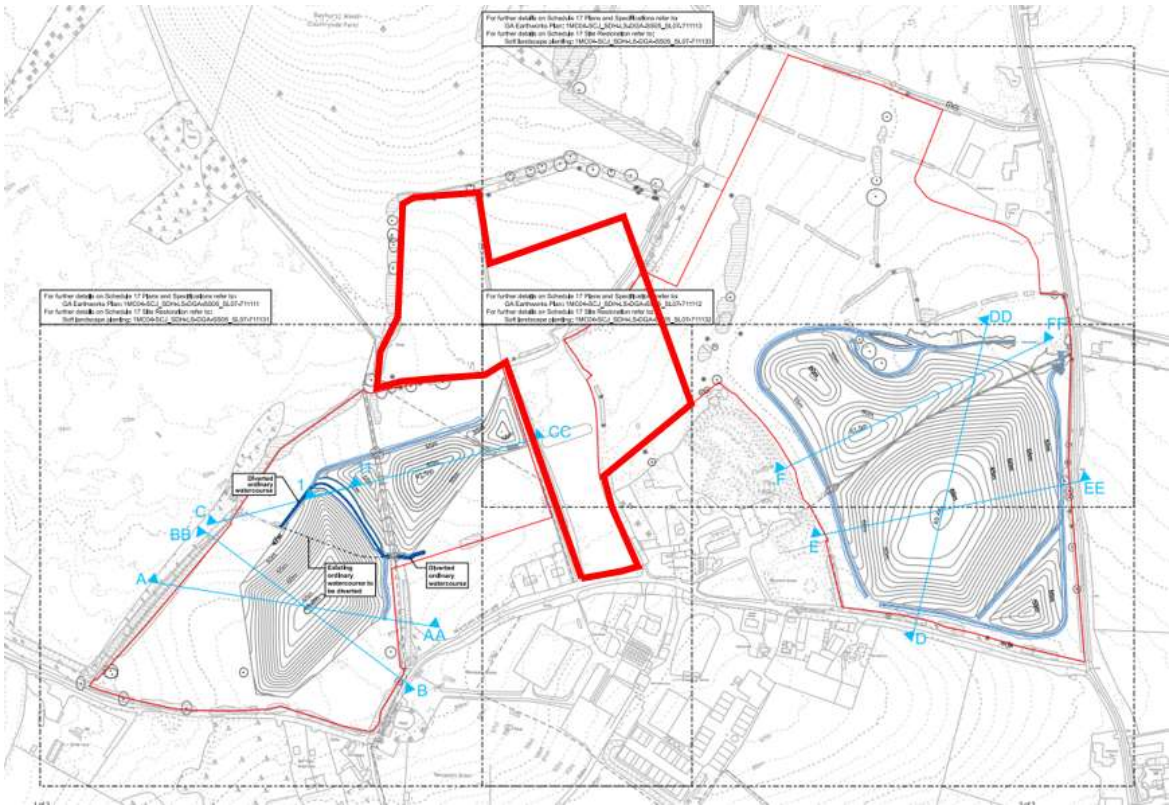
2.13 High Speed Rail (HS2) & Biodiversity Off-Setting

2.13.1 The proposal will be located close to (and partly covering) an approved HS2 development boundary which involves the placement of excavated HS2 material arising from HS2 works to form 2 no. mounds (i.e. western and eastern mound), fencing (location only), the diversion of an ordinary watercourse to facilitate the western mound, creation and associated drainage in the form of swales, culverts, and a pond.

2.13.2 The proposed development overlaps with part of the restoration scheme of the approved HS2 development (see the enclosed drawing GPP/W/WLC/EX/22/03 v2 – Site Location Plan and HS2 Development Boundary) on the eastern part of the proposed extension area. The area of the approved HS2 development, which is approximately 1.43 hectares in size, involves the land being restored to a mix of grassland, scrub, and woodland/woodland edge. In principle agreement has been reached with the HS2

development team to provide a larger area (approximately 1.69 hectares) to the northeast to off-set the impact of the proposed development and create areas of landscaping and ecological enhancement.

2.13.3 The Application Site is shown shaded orange on the approved HS2 drawing extract below. The approved HS2 earth mounds are shown southwest and southeast of the Application Site.



2.14 Landscaping and Biodiversity Net Gain

2.14.1 The Planning Application includes the submission of a Landscape Planting scheme and areas of Ecological Enhancement. The area to the north west of the proposed extension area is shown on drawing GPP/W/WLC/EX/23/09 v1 - Site Layout Plan including BNG area. The philosophy behind the Landscape planting scheme is to:

- minimise negative impact to existing ecological assets during the construction phase and post-development;
- enhance the value post-development to provide an overall net gain in biodiversity both in terms of habitats and species; and
- diversify the range of habitats post-development to support species populations greater than currently occur on site where appropriate.

2.14.2 Habitat creation within the Site proposals include:

- An area of new proposed broadleaved woodland to sit adjacent to the ancient woodland and strengthen the corridor in the area;
- New native thicket planting is proposed along the Site boundaries, in order to widen the existing hedgerows here and to form a firm boundary to the development. This habitat will provide complimentary structural diversity to the adjacent ancient woodland;
- Landscape planting associated with peripheries of the developed area, and
- New species-rich native hedgerow planting.

3 ENVIRONMENTAL IMPACT REGULATIONS 2017

3.1 Introduction

3.1.1 The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (the EIA Regulations) set out a list of descriptions of Schedule 1 developments for which an Environmental Impact Assessment (EIA) is mandatory and a list of Schedule 2 developments for which an EIA may be required. An Environmental Statement (ES), which sets out the EIA findings, and associated technical documents are a mandatory accompaniment to a planning application for which an EIA is required.

3.2 Schedule 1

3.2.1 Schedule 1 identifies twenty different categories of development in which EIA is mandatory. The proposal is not listed as Schedule 1 development and therefore no mandatory EIA is required.

3.3 Schedule 2

3.3.1 Paragraph: 017 (Reference ID: 4-017-20170728) of the Planning Practice Guide states that:

> *If a proposed project is listed in the first column in Schedule 2 of the 2017 Regulations and exceeds the relevant thresholds or criteria set out in the second column (sometimes referred to as 'exclusion thresholds and criteria') the proposal needs to be screened by the local planning authority to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required.*

3.3.2 Within Schedule 2, the proposed development is identifiable in Part 11 (b) where it exceeds Part b (ii) of being larger than the 0.5 hectare threshold (the Application Site is 7.2 hectares in size).

(b) Installations for the disposal of waste (unless included in Schedule 1);	(i) The disposal is by incineration; or (ii) the area of the development exceeds 0.5 hectare; or (iii) the installation is to be sited within 100 metres of any controlled waters.

3.3.3 The proposal could also be considered identifiable under Part 13 b (Changing and Extensions) as follows.

(b) Any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed.	Either— (i) The development as changed or extended may have significant adverse effects on the environment; or (ii) in relation to development of a description mentioned in column 1 of this table, the thresholds and criteria in the corresponding part of column 2 of this table applied to the change or extension are met or exceeded.

3.3.4 The proposal is Schedule 2 for the purposes of the EIA Regulations. The main test in respect of screening is whether the proposed development is likely to have significant effects on the environment. That matter is assessed at section 4 of this report.

3.3.5 The EIA Regulations provide definitions of those areas that are regarded as 'sensitive', and these include Sites of Special Scientific Interest (SSSI), National Parks, Areas of Outstanding Natural Beauty (AONB), World Heritage Sites, Conservation Areas, scheduled monuments, and internationally designated sites.

3.3.6 The Application site is located approximately 70 metres from Ruislip Woods which is a Site of Special Scientific Interest (SSSI) and therefore the location of the Application Site could be considered "sensitive" for the purposes of the EIA Regulations.

3.4 Screening Opinion

3.4.1 The WPA has provided a formal Screening Opinion on 13th January 2023 (under reference 39755/APP/2022/3726). Although the Council's response refers to a site area of 3.41 hectares, the additional areas now included within this Planning Application are either part of the existing permitted waste management development area or are areas set aside for ecological enhancement and are not therefore considered to affect the overall conclusions reached by the Council, which are as follows:.

> *"It is considered in the light of available information that the proposal would not have likely significant environmental effects with impacts of local importance only. The neighbouring sensitive site (SSSI) would be subject to only negligible to very local impacts and not alter the conservation value of the site.*
>
> *Consequently, the Local Planning Authority considers that a subsequent application that conforms to the proposal screened is not required to be accompanied by an Environmental Statement. No further application of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) is required."*

4 PLANNING POLICY CONTEXT

4.1 Introduction

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of a Planning Application must be made in accordance with the Development Plan unless material considerations indicate otherwise.

4.1.2 In this instance, the Development Plan for the London Borough of Hillingdon consists of the following documents:

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020)
- The Local Plan: Part 2 - Site Allocations and Designations (2020)
- The West London Waste Plan (2015)
- The London Plan (2021)

4.2 The Development Plan

Hillingdon Borough Local Plan – Part 1 (2012)

4.2.1 The Local Plan Part 1 sets out the overall level and broad locations of growth up to 2026. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2.

- EM2 - Green Belt, Metropolitan Open Land and Green Chains
- EM6 - Flood Risk Management
- EM7 - Biodiversity and Geological Conservation
- EM8 - Land, Water, Air and Noise

Hillingdon Borough Local Plan – Part 2 (2020)

4.2.2 The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map. Once adopted, it will deliver the detail of the strategic policies set out in the Local Plan Part 1.

- DMEI 4 Development on the Green Belt or Metropolitan Open Land

- DMEI 7 Biodiversity Protection and Enhancement
- DMHB 14 Trees and Landscaping
- DMT 1 Managing Transport Impacts
- DMT 2 Highways Impacts
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 11 Protection of Ground Water Resources
- DMEI 12 Development of Land Affected by Contamination
- DMEI 13 Importation of Material
- DMEI 14 Air Quality
- DMEI 9 Management of Flood Risk

West London Waste Local Plan 2015

4.2.3 The 6 West London Waste Authority boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) and the Old Oak and Park Royal Development Corporation have formally adopted the West London Waste Plan as part of the Local Plan for their areas.

4.2.4 The Plan sets out a strategy and policies for the sustainable management of all waste produced within the Plan area for the period up to 2031.

4.2.5 The following main policies of the West London Waste Local Plan are relevant to proposal:

- Policy WLWP 2 – Safeguarding and Protection of Existing and Allocated Waste Sites

London Plan 2021

4.2.6 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.

4.2.7 The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.

4.2.8 The following main policies of the London Plan are relevant to proposal:

- LPP D12 Fire safety

- LPP D13 Agent of change
- LPP HC1 Heritage conservation and growth
- LPP D14 Noise
- LPP DF1 Delivery of the Plan and Planning Obligations
- LPP G2 London's Green Belt
- LPP G6 Biodiversity and access to nature
- LPP G7 Trees and woodlands
- LPP G9 Geodiversity
- LPP GG2 Making the best use of land
- LPP SI1 Improving air quality
- LPP SI12 Flood risk management
- LPP SI13 Sustainable drainage
- LPP SI7 Reducing waste and supporting the circular economy
- LPP SI8 Waste capacity and net waste self-sufficiency
- LPP SI9 Safeguarded waste sites
- LPP SI2 Minimizing greenhouse gas emissions
- LPP T4 Assessing and mitigating transport impacts

4.3 Other Relevant Documents

4.3.1 The National Planning Practice Guide (NPPG) confirms that the National Planning Policy Framework (NPPF) represents up-to-date government planning policy and must be taken into account where it is relevant to a Planning Application.

4.3.2 The following documents are therefore considered to represent a material consideration in the determination of this Planning Application:

- Environment Agency's Appropriate Measures Guidance;
- National Planning Policy Framework;
- National Planning Practice Guidance, and
- National Planning Policy for Waste (2014).

5 ASSESSMENT OF THE PROPOSED DEVELOPMENT

5.1 Introduction

5.1.1 From an assessment of the Development Plan and other relevant documents, the main issues in the assessment of the proposed development are as follows:

- Principle of Development
- Green Belt
- Environmental and Amenity Considerations.

5.1.2 The main planning and environmental matters are addressed in turn below.

5.2 Principle of Development

Safeguarding & Protecting Existing Waste Sites

5.2.1 Policy WLWP 2 (Safeguarding and Protection of Existing and Allocated Waste Sites) of the West London Waste Local Plan states that:

> *"Land accommodating existing waste management uses in West London will be protected for continued use for waste management.*
> *Existing sites which have been allocated as having the potential for capacity expansion by redevelopment (Table 5-1) and new sites with potential for development for waste management facilities (Table 5-2) are also be safeguarded.*
> *To ensure no loss in existing capacity, re-development of any existing waste management sites must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste for which the site is currently permitted to manage, or that the management of the waste is being moved up the waste hierarchy.*
> *Development for non-waste uses will only be considered on land in existing waste management use, or land allocated in Table 5-2 if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs".*

5.2.2 Policy SI9 (Safeguarded Waste Sites) of the West London Plan 2015 has similar policy requirements as follows:

- *"A Existing waste sites should be safeguarded and retained in waste management use.*

- *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.*
- *C Waste plans should be adopted before considering the loss of waste sites. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.*
- *D Development proposals that would result in the loss of existing sites for the treatment and/or disposal of hazardous waste should not be permitted unless compensatory hazardous waste site provision has been secured in accordance with this policy.*
- *E Development proposals for the relocation of waste sites within London are supported where strategic waste management outcomes are achieved."*

5.2.3 The Applicant's existing green/food waste management site is therefore identified an essential facility for dealing with the specific waste streams within the Plan area. The Plan notes that the protection of the safeguarded sites is required to ensure the West London Boroughs' pooled apportionment targets are met and thereby demonstrate general conformity with the requirement of the London Plan (2021). The existing waste management site therefore makes an important contribution to assisting the West London area move green and food waste up the Waste Hierarchy and contribute to the Government's aspirations of a circular economy.

Maximising Waste Management Capacity

5.2.4 Policy SI 8 of the London Plan (2021) deals with 'Waste capacity and net waste self-sufficiency'. It states that in order to manage London's waste sustainably (3) the waste management capacity of existing sites should be optimised**.** The proposed extension to the maturation yard is required to enable the Applicant to ensure capacity for green waste composting on the site in compliance with the aspirations of Policy SI 8 of the London Plan, and also the wider Government guidance and (BAT & Appropriate Measures).

Conclusions

5.2.5 The Applicant's existing site plays a vital role in moving green waste collected in the West London area up the waste hierarchy. There is clear support in the Development Plan for maintaining waste management capacity at existing sites and ensuring that the amount of waste that is recycled is optimised. The proposed

extension to the site will broadly comply with policy aspirations of the Development Plan in terms of optimising the recycling capacity of existing sites.

5.3 Green Belt

5.3.1 The Application Site lies wholly within land designated as Green Belt as defined by Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) of the Hillingdon Borough Council Local Plan (Part 1). Policy EM2 requires any proposals for development in Green Belt to be assessed against national and London Plan policies, including the very special circumstances test.

5.3.2 The London Plan at Policy G2 also seeks to protect Green Belt from inappropriate development in accordance with the National Planning Policy Framework (NPPF July 2021). Development proposals that would harm Green Belt should be refused except where very special circumstances exist.

5.3.3 The proposal is likely to be considered inappropriate development for the purposes of interpreting national and local green belt planning policy and very special circumstances are required to be demonstrated to clearly outweigh the harm to the Green Belt by reason of inappropriateness.

Very Special Circumstances – Inappropriate Development

5.3.4 Paragraph 144 of the NPPF states:

> *"…when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".*

5.3.5 Paragraph 147 goes on to state that:

> *When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.*

5.3.6 There is therefore a requirement for 'very special circumstances' to be demonstrated where inappropriate development, 'by definition', is harmful to the Green Belt. The Applicant's very special circumstances case is based on the following main matters:

- Operational Need to Extend the Compost Maturation Yard
- Waste management capacity and need;
- Environmental benefits including the need for Sustainable Waste Management/Landfill Diversion and Maintaining Recycling/Recovery Rates;
- Waste Hierarchy and Climate Change, and
- Economic and Employment Benefits.

Operational Need to Extend the Compost Maturation Yard

Introduction

5.3.7 The Applicant needs to extend the current compost maturation pad for the following main reasons:

- Compliance with Environment Agency's 'Appropriate Measures Guidance' requiring a reduction in Fire Risk and minimise Odour generation
- Cessation of the IVC facility/food waste recycling and an increase in green waste recycling

Appropriate Measures Guidance

5.3.8 The Environment Agency published guidance on 21st September 2021 relating to 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.

5.3.9 Section 8.5 of the document relates to 'Open Air Composting' operations and contains a number of specific requirements (1 to 6 inclusive below).

1. To minimise dust, odour and bioaerosol fugitive emissions to air from open air composting processes, you must:

- *actively manage material to prevent anaerobic conditions developing and to prevent overheating*
- *prevent dry and dusty conditions occurring*

2. You must work out the appropriate dimensions of your windrows taking account of:

- *waste type*
- *heat generation and loss*
- *space availability*
- *effective retention time*
- *aeration requirements*

- *monitoring capability*
- *seasonal variation*

3. You must provide enough space between composting windrows so that:

- *there is sufficient passive aeration*
- *plant and equipment can access the windrows without compacting the waste or causing cross-contamination*

4. You must adapt your operations to the meteorological conditions. For example, by:

- *avoiding turning waste, screening or shredding during adverse weather conditions*
- *orientating windrows so that the smallest possible area of composting mass is exposed to the prevailing wind*
- *locating windrows and piles at the lowest elevation within the overall site layout*

5. You must:

- *maintain adequate moisture and control high temperatures to prevent anaerobic conditions, bioaerosols and odour plume dispersal*
- *dampen roadways and working areas*

6. You must also consider using one or a combination of the following techniques where bioaerosols, dust or odour are a problem:

- *cover actively composting windrows using semi-permeable membranes (particularly if there is an increased risk to receptors) – using alternative targeted containment may be acceptable*
- *use purpose made windrow turners*
- *use dust and bioaerosols suppressants during turning, shredding and screening, for example, back actor water sprayers or aprons on plant*
- *install static aeration with an aeration system that is the correct size to deliver enough air to the waste to prevent anaerobic conditions developing*

5.3.10 The requirements of the Environment Agency's guidance give rise to a number of operational changes that are required to the open windrow composting operations, which are set out below.

Seasonality, Windrow Size and Spacing

5.3.11 The current open windrow maturation pad is cramped, particularly during the peak season. The lack of current space means the Applicant must create windrows which are up to 5-6 metres in height and position them adjacent to each other making it difficult to turn the windrows. This in turn can give rise to increased fire risk from spontaneous combustion and can create problems associated with odour.

5.3.12 The existing planning permission requires windrows to be no more than 2 metres in height. This also accords with the Environment Agency's recent Appropriate Measures guidance. The aerial photograph below of the existing operations shows the lack of space on the site which gives rise to the problems identified above.

5.3.13 The Applicant experiences high demand during the Spring/Summer months, particularly during, for example, Bank Holiday weekends. As the composting producing process usually takes greater than two months to complete, there is a need for flexibility to be able to manage and store green waste and construct windrows during the peak periods and beyond. The Applicant is also required to manage size graded leftovers, which involves cleaning up contaminating plastics all of which requires additional space.

5.3.14 The Applicant therefore requires more space within which to process the green waste by open windrow methods into a compost product and to comply with the Appropriate Measures guidance.

Compliance with Fire Prevention Plan Guidance

5.3.15 The prevention of fire is a significant undertaking in waste and in particular composting. Composting piles heat up through the creation of biological heat through aerobic respiration of the microbes which break down the materials into a stable product. This heat must be allowed to dissipate in order to prevent exponential rises in temperature and the start of slow chemical pyrolysis. If not managed carefully, the material can self-combust.

5.3.16 The Environment Agency has released guidance on fire prevention plans to which each site is required to produce a detailed operating plan setting out how they will minimise the risk of combustion and fire

occurring. This includes many features and processes. In brief, the operator of a composting operation is required to manage pile size to ensure they are within the guidance volumes or, if during the actively managed phase, the material is turned, and pile sizes are small enough to allow heat dissipation through maximisation of the surface area to volume ratio.

5.3.17 In addition, the operator must also ensure adequate stocks of firefighting equipment together with adequate firefighting water supplies and then the ability to contain the water on site providing total containment to prevent pollution risk. The proposed tanks ensure there is firefighting water supplies available.

Management of Windrows & Windrow Turner

5.3.18 As recommended by the Environment Agency in their 'Appropriate Measures' guidance, the Applicant proposes to introduce a purpose-built mechanical windrow turner which will enable the windrows to be more turned more easily, uniform in size and scale and restricted in height (2 metres) to conform with the requirements of the main planning permission. An example of the type of equipment the Applicant intends to use is set out below.

Recent Legislative Changes Affecting Food and Green Waste Streams

5.3.19 The Government has introduced a landmark Environment Bill which included that Local Authorities should provide separate weekly kerbside collected food waste from households by 2024/5 (Green waste is yet to be confirmed if this will be mandated). For those Local Authorities that currently collect co-mingled food and green waste, they will need to transition "as soon as contracts allow". The exact details of how this change will be rolled out have been subject to consultation by Defra with the organic waste industry and the outcome of this is now overdue from Defra. It is expected that the consultation outcome and guidance will cover the timing of this transition, compensation from Government to assist with the cost of transition (changes to fleet, transfer stations, staff and so on) and the circumstances whereby some Local Authorities may be exempt from the changes if they can evidence that the separate waste collections are not economically viable.

5.3.20 Recent data from WRAP (part of Defra) forecasts that the proposed separate collections will increase food waste capture from £3.2million tonnes per annum to £5.1million tonnes per annum. It is likely that most of this food waste will go to Anaerobic Digestion plants that can generate green gas from this waste as well as liquid digestate for fertilising agricultural land. As Anaerobic Digestion operators benefit from financial incentives, such as the Feed in Tarif (FIT's)/ Renewable Heat Incentive and Green Gas Support Scheme, they currently offer more competitive gate fees (typically £15/t to £30/t) compared to £35-50/t for IVC facilities.

5.3.21 The impact of this move to separate food waste collection means that IVC (which has traditionally offered an Animal By-Product compliant, highest recycling option at best value) will no longer be able to be competitive with Anaerobic Digestion Plants. This will mean that IVC will only be viable for the period of time that Local Authorities can continue with existing co-mingled contracts and/or the remaining asset life of the IVC plant and equipment. The Applicant estimates that the timeframe for the demise of co-mingled waste and IVC will be 3-5 years.

5.3.22 IVC's for many years have avoided accepting source segregated food waste due to the odour issues associated with the inability to mix the two streams (Food and Green waste) efficiently on site rather than being mixed by the householder. It would not be feasible to assume that an IVC can take a percentage of food waste source segregated for this reason notwithstanding the commercial pressures mentioned above.

5.3.23 In terms of green waste, the awaited consultation response and guidance will hopefully provide details of whether the required collections will be free of charge or charged for (or a combination of both). It is

anticipated that the capture of green waste will increase as a result. Organic waste processors such as West London Composting Ltd will be able to continue to process this waste through open windrow only (IVC is only required for food waste, but not for green only).

Impacts upon the West London Site

5.3.24 The majority of waste coming into West London is green waste from the West London Waste Authority. There is a smaller component of co-mingled food and green waste that comes from Medway Council (22,000t) but this will cease next year. Due to changes in contracted tonnages, the Applicant anticipates that its Cambridge site will have capacity to continue to take existing co-mingled food and green waste next year (where the Applicant has other co-mingled contracts to run their course at this site).

5.3.25 There is no reasonable likelihood of the West London site receiving any further food waste or co-mingled green and food waste going forward for the main reasons detailed below:

- All of West London Waste Authority 's food waste goes to bio-collectors South London Anaerobic Digestion Plant sites
- Hillingdon were the last Authority to collect co-mingled food and free waste within the WLWA area and this ceased in July 2021
- Surrey, Kent and Buckinghamshire already separately collect food and green waste
- Berkshire sends its co-mingled waste to Veolia (Padworth)
- Oxford have a PFI arrangement with Agrivert

5.3.26 The Applicant's existing site is restricted to 75,000 tonnes per annum made up of 30% food waste and 70% green waste. The anticipated cessation of food waste collections will enable the Applicant to increase green waste recycling from the West London area by approximately 22,500 tonnes per annum. This will require additional compost windrow maturation space.

Conclusions – Operational Need

5.3.27 In order to minimise odour generation and fire risk, additional operational space is required to improve the management of the open windrowing of green waste into a compost product. A purpose-built windrow turner is proposed to be used to improve the efficiency and management of windrows.

5.3.28 The forthcoming cessation of food waste collections will enable the Applicant to maximise the recycling of green waste from the West London area in compliance with the cumulative permitted total of 75,000 tonnes per annum (condition 2 of the extant planning permission refers).

5.3.29 The requirements for additional compost management and windrowing area are matters which represent a very special circumstance which should be afforded significant weight against any harm to the Green Belt.

Waste Management Capacity & Need

5.3.30 The London Plan (2021) identifies that at present 32% of London's waste that is biodegradable is sent to landfill. The Mayor is committed to sending no biodegradable waste to landfill by 2026. The Applicant's existing composting site has been operating for a number of years and is the primary facility for managing organic waste across West London. It is an allocated site within the West London Waste Local Plan and therefore plays a crucial role in managing green waste in the West London area and moving waste up the Waste Hierarchy.

5.3.31 Policy SI 8 of the London Plan (2021) deals with 'Waste capacity and net waste self-sufficiency'. It states that in order to manage London's waste sustainably:

> *1) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026*
> *2) existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)*
> ***3) the waste management capacity of existing sites should be optimised***
> *4) new waste management sites should be provided where required*
> *5) environmental, social and economic benefits from waste and secondary materials management should be created.*

5.3.32 Policy SI 8 (part 3 identified in bold above) seeks to optimise the waste management capacity of existing sites. Whilst this proposal does not seek to increase capacity, it does seek approval to extend the maturation yard to enable the Applicant to improve the way in which green waste is managed and matured into a compost product minimising odour and fire risk and optimising the length of time of the maturation process. These are matters which represent a very special circumstance which should be afforded significant weight against any harm to the Green Belt.

Waste Hierarchy & Climate Change

5.3.33 Strategic Objective 2 of the 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).

5.3.34 The proposal will make an important contribution to green waste recycling, reducing emissions and helping to meet the Government's climate change. In addition, the proposal will also contribute to towards the Mayor of London's aspirations of creating a circular economy.

5.3.35 The proposal's contribution to recycling targets, carbon savings and moving waste up the waste hierarchy are environmental benefits which are considered to constitute a very special circumstance which should be afforded significant weight against any harm to the Green Belt.

Economic & Employment Benefits

5.3.36 The Government is committed to securing economic growth in order to create jobs and prosperity and meeting the twin challenges of global competition and of a low carbon future.

5.3.37 Paragraph 81 of the NPPF states that:

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

5.3.38 Paragraph 84 of the NPPF also provides that

Planning policies and decisions should enable:
a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
b) the development and diversification of agricultural and other land-based rural businesses;

5.3.39 With a successful outcome of this planning application, the proposal will sustain 10 existing jobs, create 3 full-time positions, and assist to maintaining a prosperous rural based business. Maintaining and

increasing employment in the Applicant's business and sustaining an existing rural based business is considered to represent a very special circumstance which should be afforded moderate weight.

Conclusions – Green Belt & Very Special Circumstances

5.3.40 The proposal has been assessed in accordance with Policy 9 of the WLP and the requirements of the NPPF. The Applicant's green waste management facility is required to adapt from older, more traditional composting techniques to modern operating procedures required by the requirements set out by the Environment Agency's Appropriate Measures guidance. The anticipated cessation of food waste collections will enable the Applicant to increase green waste recycling/composting by approximately 22,500 tonnes per annum. These factors require additional space to be utilised to improve green waste/compost management, minimise odour generation and fire risk.

5.3.41 The Applicant's waste management facility plays a vital functional role in the West London area for moving green waste up the waste hierarchy and contributing to the Mayor of London's aspirations of a circular economy. Accordingly, the Applicant's existing site is allocated in the Waste Local Plan and safeguarded for future green waste management. The proposal will also comply with the aspirations of Policy SI 8 of the London Plan by maximising waste management capacity at existing sites.

5.3.42 The proposals contribution to increasing and improving the recycling of green waste, helping to meet the Government's climate change agenda, and contributing to a circular economy are matters which attract significant weight as part of the Applicant's very special circumstances case.

5.3.43 In overall conclusion, it is considered that any harm by reason of inappropriateness is clearly outweighed by the considerations set out above, which amount to a robust very special circumstances case. The Applicant's proposal therefore complies with Green Belt policy set out in the NPPF and the Development Plan.

6 ENVIRONMENTAL ASSESSMENT

6.1 Introduction

6.1.1 The following environmental and local amenity topics are covered in appropriate detail as follows:

- Landscape & Visual Impact
- Ecology & Biodiversity Net Gain
- Air Quality/Odour/Bioaerosols
- Noise
- Flood Risk and the Water Environment

6.2 Landscape & Visual Impacts

6.2.1 Policy WLWP 4 (Ensuring High Quality Development) provides that all waste development proposals will be required to demonstrate, for both the construction and operational phases of the development, that

> *c. The development is of a scale, form and character appropriate to its location and incorporates a high quality of design, to be demonstrated through the submission of a Design and Access statement as appropriate;*

6.2.2 Supporting text at paragraph 6.4.4. to Policy WLWP 4 states that:

> *Developers are expected to have actively considered innovative and sustainable design approaches to ensure that the development is in accordance with best practice and complements the local area in terms of* ***topography, landscape and setting****.*

6.2.3 Policy G7 (Trees and woodlands) of the London Plan states that:

> *London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.*

6.2.4 A Landscape and Visual Assessment (LVA) report has been prepared by a qualified landscape consultant and is enclosed at Appendix 2 to this report. A summary of the findings of the LVA are set out below.

6.2.5 The format of LVA report follows the methodology employed in accordance with the 'Guidelines for Landscape and Visual Impact Assessments' by The Landscape Institute and the Institute of Environmental Management and Assessment, 3rd Edition published April 2013, The Landscape Institutes Technical

Guidance Note 06/19 Visual Representation of Development Proposals Published 17th September 2019 and Natural England (NE) with Department for Environment, Food and Rural Affairs (DEFRA). Landscape and Sea Scape Character Assessments (October 2014).

6.2.6 The LVA report comprises:

- A desktop review of current statutory and non-statutory documents;
- A landscape assessment of the wider context of the site including an analysis of character, quality and sensitivity, and the identification of key viewpoints;
- An assessment of the site and its immediate landscape setting, in particular level changes, and
- An understanding of views affected by the proposed development.

6.2.7 In terms of Landscape Character, the LVA report notes that the site is situated with the West London Green Belt, with a Site of Special Scientific Interest, Ancient Woodland and Country Park all found in close proximity to the north of the site boundary. The 3km study area does contain several further designations another of which come close to the eastern boundary (Listed Building) and northern boundary (Ancient Woodland / Country Park / Site of Special Scientific Interest) of the proposed application site.

6.2.8 The field work for the assessment was carried out on the 22nd November 2022 during the daytime, when leaf loss was well underway. The weather condition for the visit was sunny with occasional cloud cover and light winds. The weather conditions were considered suitable for undertaking the landscape and visual appraisal assessment.

6.2.9 A total of 8 viewpoints were recorded on the site visit in November 2022, which illustrate the general range of visibility within 1km of the study area, as well as viewpoints with the highest sensitivity. The wider 3km study area was visited at the time of the site visit, but no views were found beyond 1km, as Bayhurst Wood, the topography, HS2 works, well treed country lanes and other pockets of vegetation severely restricted these views.

6.2.10 At the time of the visit in November 2022, the HS2 works had changed the landscape, as noted in chapter one above, and it had also changed the route of Footpath U37 and U38, both these footpaths were under permanent diversion.

6.2.11 Table 1 within the LVA report sets out a summary of the potential visual impact of the proposed development from each viewpoint location. In summary, the visual harm on the neighbouring landscape and landscape character generated by the expansion of the Maturation Site to accommodate new and updated process and procedures are limited due. The works associated with High Speed 2, are currently

and will change the landscape surrounding the site, and impact on the landscape character, evident in many of the viewpoints. Generally, the topography of land, HS2 works, wooded areas, tall hedgerows and buildings form visual barriers which restrict views towards the site. The proposed development, by virtue of its form and nature, will blend well into the current landscape and will therefore exert minimal visual harm.

Landscape Planting

6.2.12 Landscape Planting Scheme accompanying the Landscape and Visual Appraisal (see drawing ALD938_PL401_RevP01 – Appendix 3 to this statement). The philosophy behind the Landscape planting scheme is to:

- minimise negative impact to existing ecological assets during the construction phase and post-development;
- enhance the value post-development to provide an overall net gain in biodiversity both in terms of habitats and species; and
- diversify the range of habitats post-development to support species populations greater than currently occur on site where appropriate.

6.2.13 The strategy has been developed to positively contribute to local, regional and national environmental policy, following the 'Avoid, Mitigate, Compensate' hierarchy protocol and to achieve net gain.

6.2.14 The strategy has built upon the baseline data gathered to inform the Planning Application. The key objectives and aims should be implemented within detailed landscape and management proposals during future phases of development.

6.2.15 The key aims of the strategy are:

i. Avoid and minimise harm to existing ecological features on site during construction and operational phases; and

ii. Enhance, through creation and management of habitats appropriate to the area, to promote biodiversity while supporting green infrastructure and landscape concepts.

Conclusions

6.2.16 It is concluded that the proposed development will give not rise to unacceptable landscape and visual impacts and the implementation of the proposed landscape planting will minimise any negative effects. It is therefore concluded that the proposal is compliant with Policy WLWP 4, Policy G7 and the NPPF.

6.3 Ecology & Biodiversity Net Gain

6.3.1 Policy G6 (Biodiversity and access to nature) of the London Plan states that Sites of Importance for Nature Conservation (SINCs) should be protected. It also requires development proposals to manage impacts on nature conservation and aim to secure net biodiversity gain as part of development proposals. This should be informed by the best available ecological information and addressed from the start of the development process. Proposals which reduce deficiencies in access to nature should be considered positively.

6.3.2 Policy DMEI 7 (Biodiversity Protection and Enhancement) of the of the Hillingdon Borough Local Plan (Development Management Policies) states that:

> *The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site… If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.*

6.3.3 Chapter 14 of the NPPF also deal with 'Conserving and enhancing the natural environment' and seeks to protect and enhance the natural environment.

6.3.4 A Preliminary Ecological Appraisal (PEA) report and Biodiversity Net Gain (BNG) Assessment report accompanies this Planning Application and are enclosed at Appendix 3 to this statement. The PEA has been prepared with reference to current guidelines for ecological assessments (e.g. CIEEM, 2017 and 2017a) although adapted to be appropriate for the conditions on Site. Reference was also made to BS42020:2013: Biodiversity – Code of Practice for Planning and Development. The assessment comprised the following:

- Desk study; and
- Extended Phase 1 Habitat Survey.

6.3.5 The PEA notes that the Site is an area of semi-natural habitat comprising ruderal, scrub and poor semi-improved grassland. In the north of the Site, the HS2 development is currently active, and some areas of the Site were restricted and worked ground. There is also an area of hardstanding and limited habitat areas within the existing composting site.

6.3.6 In terms of the desk study, it is noted that the Site itself does not lie within any statutory designated sites of nature conservation importance. There are five statutory designated sites of nature conservation importance within 2 km of the Site as set out in table 3.1 to the PEA report. The Site lies within the Impact Risk Zone (IRZ) of two statutory designated sites of nature conservation importance: Ruislip Woods SSSI, NNR & LNR and the Mid Colne Valley SSSI.

6.3.7 There are a number of non-statutory designated sites of nature conservation importance within 1 km of the Site as located using open-source data chiefly HS2 London - West Midlands Environmental Statement (2013). These sites are summarised in Table 3 of the PEA report.

6.3.8 In terms of protected species, there are no records of GCN within the Site boundary and one licence that was returned within 1 km of the Site. There were no statutory designated sites within 5 km of the Site that are designated for bats.

6.3.9 Due to the nature of the proposals, there will be some habitat loss, however, it is considered no areas of the Site are of elevated ecological value which are due to be impacted. The main area of the Site impacted by the proposed development are confined to areas of bareground, hardstanding, ruderal, scrub and grassland.

6.3.10 No habitats on Site meet the appropriate criteria to be considered as UK Priority Habitats or Local BAP Habitats. Based on the habitats recorded, the Site is considered unlikely to support significant populations of other protected or notable species. The habitats were low in species diversity, are generally common and widespread.

6.3.11 The proposal is not likely to have an adverse impact upon protected species, such as amphibians, bats, nesting birds, hedgehog or reptiles.

Biodiversity Net Gain

6.3.12 A Biodiversity Net Gain Assessment (BNG) report (and accompanying drawings/documents) is enclosed at Appendix 3 to this statement. The BNG report presents the results of the biodiversity impact calculation

undertaken at the Site to demonstrate that a net gain of biodiversity can be achieved as on the basis that this proposal is successful.

6.3.13 The quantitative assessment uses the Biodiversity Metric 3.1 metric, to provide a transparent and replicable numeric value of biodiversity before and after development. The metric only considers habitats and does not take protected and notable species into account.

6.3.14 The pre-development baseline habitat value is compared with the predicted post-development habitat value to assess gain or loss using biodiversity units, giving a numeric value of biodiversity net gain likely to be achieved by the development. The metric only considers habitats and does not take protected and notable species into account.

6.3.15 Habitat creation within the Site is proposed to include:

- An area of new proposed broadleaved woodland to sit adjacent to the ancient woodland and strengthen the corridor in the area;
- New native thicket planting is proposed along the Site boundaries, in order to widen the existing hedgerows here and to form a firm boundary to the development. This habitat will provide complimentary structural diversity to the adjacent ancient woodland;
- Landscape planting associated with peripheries of the developed area, and
- New species-rich native hedgerow planting.

6.3.16 Due to the nature of the proposals, there would be areas of clearance associated with the grassland, ruderal and areas of scrub. Where feasible the boundary areas and habitats should be retained.

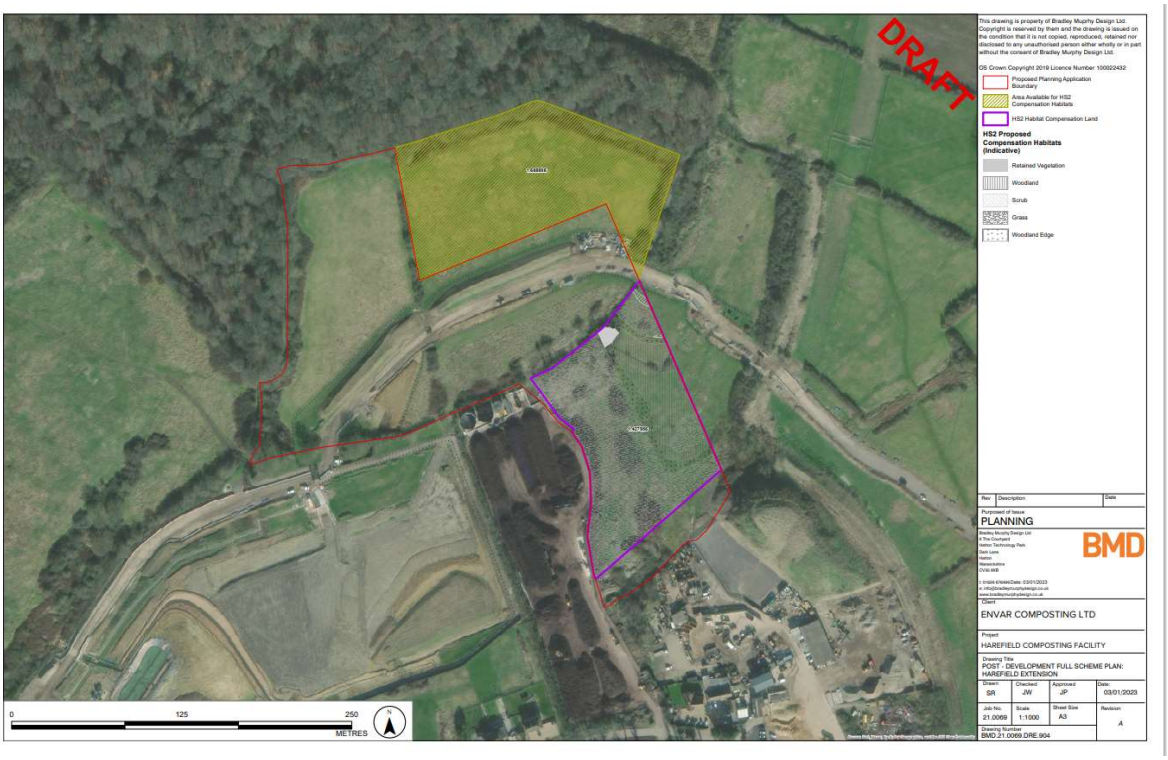
6.3.17 The outcome of the biodiversity and linear impact assessments is provided in Figure 6.1 to the BNG report and detailed in the supporting 3.1 Metric. The results of the BNG assessment demonstrate that a positive habitat biodiversity unit change of 19.3% and a positive hedgerow unit change of 40.99% is anticipated based on the proposed development scheme. A River Unit assessment does not apply to the Site in this case.

HS2 Development – Biodiversity Off-Setting

6.3.18 The proposed development overlaps with part of the restoration scheme of the approved HS2 development on the eastern part of the proposed extension to the maturation yard. The area of the approved HS2 development, which is approximately 1.43 hectares in size, involves the land being restored to a mix of grassland, scrub, and woodland/woodland edge. In principle agreement has been reached with

the HS2 development team to provide a larger area (approximately 1.69 hectares) to the northeast to off-set the impact of the proposed development and create areas of landscaping and ecological enhancement.

6.3.19 The area available to the HS2 development to develop and increase the areas of ecological enhancement, to off-set the areas lost as a result of the proposed development, is shown shaded yellow on the draft drawing below. This area of land is in the ownership of the Applicant and therefore can be delivered on the basis that this Planning Application is successful. In overall terms, the proposal has the potential to provide HS2 with a healthy increase in biodiversity enhancement, over and above that which is already permitted. It is therefore concluded that the proposal will not have an adverse ecological impact upon the approved HS2 development.



Conclusions

6.3.20 Based on the findings of the PEA and BNG reports, it is concluded that:

- No further surveys are considered necessary in order for the LPA to validate this activity.
- No statutory Nature Conservation Sites will be negatively impacted by the proposed works.
- The Site lies within the Impact Risk Zone (IRZ) of two statutory designated sites of nature conservation importance: Ruislip Woods SSSI, NNR & LNR and the Mid Colne Valley SSSI. The proposed application is

included on the list of developments that are considered likely to cause a risk to the corresponding SSSI's, therefore, Natural England should be consulted during the application.

- No Non-statutory Nature Conservation Sites will be negatively impacted by the proposed works.
- No S41/Priority Habitats will be negatively impacted by the proposed works.
- No protected or notable species will be negatively impacted if appropriate mitigation and precautions are followed
- With the implementation of the proposed ecological enhancement measures, biodiversity net gain will be achieved.

6.3.21 It is therefore concluded that the proposal will not have an adverse impact on features of nature conservation interest. A suite of mitigation measures that can be secured by the imposition of planning conditions will ensure that the overall impact is minimised. The proposed ecological enhancement measures will provide a biodiversity net gain which exceeds the Government's target of 10%.

6.3.22 In principle agreement has been reached with the HS2 development team to provide an area of ecological enhancement north east of the proposed development. The HS2 development team will seek to secure this via amendment to their approved restoration scheme. This will ensure that the proposal provides a net benefit to nature conservation.

6.3.23 In overall terms, the proposal is fully compliant with the policy aspirations of Policy G6 on the London Plan, Policy DMEI 7 of the of the Hillingdon Borough Local Plan (Development Management Policies) and the NPPF in terms of protecting and enhancing nature conservation.

6.4 Air Quality, Odour & Bioaerosols

6.4.1 Poor air quality is a major issue for London which is failing to meet requirements under legislation. Poor air quality has direct impacts on the health, quality of life and life expectancy of Londoners. In response, Policy SI 1 of the London Plan relates to "improving air quality" and states:

To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:

1) Development proposals should not:

a) lead to further deterioration of existing poor air quality

b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits

c) create unacceptable risk of high levels of exposure to poor air quality

2) In order to meet the requirements in Part 1, as a minimum: a) development proposals must be at least Air Quality Neutral b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures

6.4.2 Hillingdon Local Plan Part 2 sets out strategic objectives and policies for development in the Borough. Policy DMEI 14 relates specifically to air quality and states that:

'Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Development proposals should, as a minimum:
i. be at least "air quality neutral";
ii. include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
iii. actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area

6.4.3 A technical Air Quality Assessment (AQA) report accompanies this Planning Application and is enclosed at Appendix 4 to this statement. The AQA report presents the findings of the assessment of the potential impact of dust, odour and bioaerosol and vehicle emissions associated with the proposed development on local air quality. The significance of potential impacts is identified and the measures that should be employed to minimise these impacts are described.

6.4.4 The AQA report has had regard to the suite of legislation, planning policy and guidance relating to assessing air quality impacts from development proposals. It notes that there are residential properties within 100m of the boundary of the proposed development and to the north is the Ruislip Woods Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR). An assessment of construction related impacts, in relation to both human and ecological receptors is also covered in the assessment work.

6.4.5 The precise behaviour of the dust, its residence time in the atmosphere, and the distance it may travel before being deposited would depend upon a number of factors. These include wind direction and strength, local topography and the presence of intervening structures (buildings, etc.) that may intercept dust before it reaches sensitive locations. Furthermore, dust would be naturally suppressed by rainfall.

6.4.6 The wind roses presented in Figures 4.1 to 4.3 of the AQA report show that the prevailing wind direction is from the south and west and therefore receptors located to the north and east are most likely to experience impacts as a result of dust generated during the construction process.

Receptors

6.4.7 The AQA report identifies a number of receptor locations in the proximity of the proposed development. These are shown on the aerial image below.

6.4.8 A review of registered odour complaints relating to the existing site received between July 2015 and December 2021 indicate that the vast majority of complaints arose from the residential area on the outskirts of Ruislip, over 600m east of the site. Over this period, there were a total of 44 complaints were received, however only two were determined to be related to operations at the WLC site. No complaints were received from receptors in Newyears Green, which due to their close proximity to the site, would be most likely to be adversely affected by odour emissions from the facility.

Construction Phase - Dust

6.4.9 The dust emission magnitude is based on the scale of anticipated works at the Site and has been defined as small, medium or large for each of the three activities; earthworks, construction and trackout.

6.4.10 There are a number of factors that can affect the magnitude of the dust emission during construction activities including the size of any buildings, materials used for construction, the method of construction and the duration of the build.

6.4.11 During the earthwork activities it is anticipated that 35 there would be less than 10 earth moving vehicles on Site at any given time, however bunds in excess of 8m in height may be created. A dust emission magnitude of 'large' is anticipated with regards to earthwork activities.

6.4.12 The proposed development will create a large impermeable concrete base, which will house the open windrows and compost storage areas. Based on the scale of the works and the expectation that concrete batching may be undertaken on site, the magnitude of the dust emission during construction activities is considered to be 'medium'.

6.4.13 The proposed works will be cut and fill and therefore very few additional HGV vehicle trips will be generated during the construction phase. Furthermore, any construction traffic will travel through the existing site prior to joining the local road network where dust control measures are already implemented through the Site's Dust Management Plan to limit trackout of material from the Site. The magnitude of the dust emission from trackout is therefore considered to be negligible.

6.4.14 Based on the IAQM guidance, residential dwellings are considered as high sensitivity receptors in relation to both dust soiling and health effects of PM^{10}. There are less than 5 properties within 20 m of the site boundary and less than 10 within 50 m, the overall sensitivity of the surrounding area is therefore considered to be 'low' in relation to dust soiling.

6.4.15 Monitoring of rural airborne particulate (PM^{10}) concentrations is not carried out in the vicinity of the proposed development, however Defra mapped background data indicates that existing concentrations are less than 50% of the air quality objective of 40 µg/m3. Based on the proximity of the residential receptors to the site boundary and the local concentrations of PM^{10}, the sensitivity of the surrounding area is considered to be 'low' with regards human health impacts.

6.4.16 Ruislip Woods SSSI / NNR is a nationally designated site comprising ancient woodland, acidic grassland and wetlands which support a range of rare plan and insect species. The boundary of the SSSI / NNR is approximately 50m from the proposed development and therefore, in accordance with the IAQM guidance, its sensitivity to dust impacts is therefore considered to be 'low.

Odour

6.4.17 Odours from composting activities may be detected at receptor locations if they are released in sufficiently high concentrations, are carried towards sensitive receptors and there is insufficient dispersion to dilute the odours to a concentration that cannot be detected by the human nose. Therefore, the significance and resultant impact of odour emissions to air from odorous processes are dependent upon the significance of the emissions, the proximity of sensitive locations to the emission sources, and the prevailing meteorological conditions for that location.

6.4.18 The proposed development will employ BAT to minimise odours from the windrows. The waste will be regularly turned to introduce oxygen and prevent anaerobic conditions occurring, thereby reducing the potential for odour. The H4 guidance considers well aerated green waste composting to be a moderately offensive odour. Based on the magnitude and unpleasantness of the odour, the source odour potential of the proposed development is considered to be 'medium'.

6.4.19 Odour annoyance is often exacerbated during light wind conditions that result in poor dispersion. The meteorological data from Heathrow indicates that, on average, calm winds occur for 3.7% of the time.

6.4.20 The wind blows towards the nearest sensitive receptors less than 5% of the time, however there are a number of buildings between the proposed development and the receptors that have the potential to affect dispersion. The odour flux to receptor pathway at these receptors is therefore considered to be 'moderately effective'. The sensitive receptors to the east that will be most affected by the prevailing wind (12.9% of the year) are over 390m from the proposed development.

6.4.21 The odour effect at sensitive receptor locations is predicted to be 'negligible' to 'slight adverse'. However, it should be noted that the quantity of waste processed at the site will not change from the current levels and the new windrows will be further from the nearest sensitive receptors than the existing windrows. The overall odour effect is therefore considered to be 'not significant'.

6.4.22 The proposed development will not change the amount of waste that is received at the facility and therefore no additional traffic will be generated during the operational phase. On this basis, there will be no traffic-related impact on air quality.

Operational Dust and Bioaerosols

6.4.23 The existing facility includes the following dust and bioaerosol mitigation measures:

- All delivery vehicles are sheeted when loaded.

- Composting materials as well as wastes in the stockpiles will be kept at a suitable moisture content, using water sprays when necessary, and windrows are positioned and built in such a way so as to minimise the potential for wind-whipping.
- The screening operations will be monitored (as per shredding) and if found necessary, water sprays will be provided on the screening equipment.
- Bioaerosol and dust generation attributable to vehicle movements will be controlled by the maintenance and sweeping of the site access road. All site areas include comprehensive hardstanding of either tarmac or concrete, thereby minimising the potential for vehicle movements to create dust and a strict site speed limit is enforced. During dry weather, action will be taken to spray the roads using a water bowser.
- The Site Manager will carry out a daily visual assessment of dust emission within the site and at the downwind site boundaries. In the event of a potential or actual dust nuisance being identified, then appropriate remedial actions will be implemented such as spraying the source of the dust emission with additional water or stop the waste handling operations giving rise to the emission and suppress the aerial emission from the waste.
- Trees and hedgerows around the site provide a dust break / barrier to minimise the potential escape of any dust which is created and any gaps or die-back would be replaced.
- The results of the daily inspections and any remedial work will be recorded in the Site Diary. Any complaint, which is received, will be reported to the Environment Agency.
- The moisture content within all stages of the composting process should be monitored to avoid the waste and materials drying out and potentially forming dusts.
- The shredding and formation or turning of windrows is avoided if possible on windy days. Screening is also undertaken when wind speeds are calm or wind direction is away from sensitive receptors.
- The composting of waste at the sanitisation phase is carried out within the dedicated area.
- An onsite weather station collects the required data every day (for wind direction and wind speed) to identify conditions of high winds blowing towards the receptor(s).

6.4.24 These measures are considered sufficient to mitigate dust and bioaerosols associated with the proposed development and potential impacts have therefore been scoped out of the assessment.

6.5 Noise

6.5.1 Policy D14 (Noise) of the London Plan 2021 states that "*A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by*:

1) avoiding significant adverse noise impacts on health and quality of life

2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change

3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses

4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity

5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation

6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles

7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receive

6.5.1 Reference is made within the NPPF to the Noise Policy Statement for England (NPSE), which sets out the long-term vision of the Government noise policy. Further information has been provided on the assessment of noise within recent Planning Practice Guidance, updated in July 2019 and available on the Government planning web site. Whilst this guidance does not provide any objective criteria upon which to base noise assessments, the guidance provides a description of the relevant Effects Levels identified within the NPPF and NPSE.

6.5.2 This Planning Application is supported by a Noise Assessment Report, full details of which can be found at Appendix 5 to this statement. The Noise Assessment Report notes, there are a small number of residential properties along Newyears Green Lane, which have the potential to be affected by noise from the proposed operation, located to the west, east and south of the current and proposed operational area.

6.5.3 Green waste will continue to be brought into the site by HGV, with compost transported out by HGV. The material is processed through a shredder and subsequently through a screening plant. It is proposed to relocate the shredding and screening operations to a dedicated area at the northern end of the site, furthest from the neighbouring properties. The plant is serviced using an excavator and loading shovels.

6.5.4 The windrows are currently turned regularly using an excavator, which operates on top of the material. The method of turning the windrows will also change. Rather than use an excavator as at present, it is

proposed to use a specific self-propelled straddle windrow turner, to more efficiently turn the material as it composts.

6.5.5 In addition, there are two silenced generators, located adjacent to the tanks at the northern end of the site, which operate during the working hours. Overnight, one generator may automatically start periodically (less than 10% of the time), to run a sump pump, which operates when the sump fills with water.

6.5.6 Overnight, the occasional operation of the one of the generator sets to operate the sump pump, would result in very low noise levels at the neighbouring properties. The level of noise associated with this operation would remain substantially below the prevailing background noise levels and thus would not result in adverse noise impacts. Given that this presently operates without any disturbance to the occupants of neighbouring properties provides further reassurance that the noise levels are very low. Consequently, this operation is not considered further within the Noise Assessment report.

6.5.7 The typical background noise levels have been derived by an analysis of the noise measurement results during the early morning period before the plant started operating (typically between 07:00 – 07:30) and during the evening periods, typically between 18:00 – 19:00 hours. In addition, the results obtained during Saturday afternoon and Sunday have also been considered. Utilising these times is likely to result in marginally lower noise levels than during the operating periods, as traffic on surrounding roads may be lighter at these times. This therefore provides a worst-case approach.

6.5.8 The noise monitoring indicated that operation of the plant is not tonal or impulsive in nature, however the operation of the plant has other sound characteristics and thus a penalty of 3 dB(A) has been applied to determine the rating noise level, when considering the noise levels whilst the site is operational.

6.5.9 Based upon an evaluation of these periods by the Applicant's noise consultant, the typical background noise levels were as follows:

- Friday evening – 42 dB L_{A90};
- Saturday morning 44-46 dB L_{A90} and afternoon 42-43 dB L_{A90};
- Sunday 43-44 dB L_{A90};
- Monday morning 44-46 dB L_{A90} and evening 43 dB L_{A90};
- Tuesday morning 46-47 dB L_{A90}.

6.5.10 The above data indicates that the typical background noise levels during the daytime period are between 42 - 47 dB L_{A90} and upon this basis it is reasonable to assume a typical level of 44 – 45 dB L_{A90} for the main daytime periods.

6.5.11 The main changes in relation to noise, would be to relocate the current shredding and screening operations, which are undertaken within the central area of the current site, to a new area, located at the northern end of the site.

6.5.12 Calculations of the noise levels at the surrounding properties to the south and east have been made using the SoundPlan computer modelling package, which implements the calculation methodology from ISO 9613-2. The calculations have taken account of the land formation around the site and surrounding area, based upon LiDAR mapping data. To provide an indication of the present noise levels at the surrounding properties, an initial model was prepared, based upon the plant presently operating on the site.

6.5.13 A second model has been prepared, based upon the proposed layout of the site. Whilst there would be only one staddle turner, the calculations have been based upon one working within both windrow areas to provide worst case conditions.

6.5.14 Both models have assumed 10 vehicle movements per hour using the access to the screening plant for loading / unloading purposes.

6.5.15 The calculated daytime noise levels at the following properties are summarised in the table below.

Location	Calculated Noise Levels [dB $L_{Aeq,T}$]	
	Present Operations	Proposed Operations
1-2 Newyears Green Lane	54	42
St Leonards Farm	53	49
Pylon Farm	51	47

6.5.16 The assessment indicates that the proposals would result in a noticeable reduction in noise levels at the properties, compared to the presently permitted operations. An assessment of the proposed operations made in accordance with the requirements of BS 4142, taking the context of the surrounding area into account, indicates that the operational noise levels would result in the potential for a low impact, with no adverse impacts identified.

6.5.17 Having regard to the Noise Assessment report, it is concluded that no significant noise impacts will arise as a result of the proposed development in compliance with Policy D14 (Noise) of the London Plan 2021 and supporting national planning policy guidance.

6.6 Flood Risk & the Water Environment

6.6.1 Policy DMEI 9 (Management of Flood Risk) of the Hillingdon Borough Local Plan (Development Management Policies) seeks to steer new development away from Flood Zones 2 and 3 unless there is no suitable alternative.

6.6.2 Policy SI 12 (Flood risk management) of the London Plan 2021 requires development proposals to minimise and mitigate flood risk and ensure that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

6.6.3 Chapter 14 of the NPPF (Meeting the challenge of climate change, flooding and coastal change) seeks to locate development in low flood risk areas and avoid unacceptable impacts upon the water environment.

6.6.4 In this case, the Application Site is located within Flood Zone 1 of the Environment Agency's Flood Zone Maps.

6.6.5 The NPPF confirms that '*A site-specific flood risk assessment is required for proposals of 1 hectare or greater in Flood Zone 1*. The Application Site is situated within Flood Zone 1 and is 7.2 hectares in size. A Flood Risk Assessment (FRA) therefore accompanies the submission of the Planning Application and is enclosed at Appendix 6 to this statement.

6.6.6 The enclosed FRA report at Appendix 6 to the statement has been undertaken with due regard to the statutory requirements of the NPPF and with reference to the Planning Practice Guidance (PPG) in relation to development and flood risk. This ensures that flood risk is taken into account at all stages of the planning process and to avoid inappropriate development in areas potentially at risk of flooding.

6.6.7 The National Planning Guidance Note provides guidance on development and flood and states (Paragraph: 031 Reference ID: 7-031-20140306) that:

> *A flood risk assessment should also be appropriate to the scale, nature and location of the development. For example, where the development is an extension to an existing house (for which planning permission is required) which would not significantly increase the number of people present in an area at risk of flooding, the local planning authority would generally need a less detailed assessment to be able to reach an informed decision on the planning application.*

6.6.8 As the development is located within Flood Zone 1 a Sequential test is not required. The development compatibility table shows that the development does not require the Exception test applying.

6.6.9 The NPPF requires an assessment of flood risk to consider all forms of flooding and lists six forms of flooding that should be considered as part of a flood risk assessment. These are:

- Flooding From Rivers (Fluvial Flooding)
- Flooding From the Sea (Tidal Flooding)
- Flooding from Groundwater
- Flooding from Sewers and Drains
- Flooding from Other Artificial Sources

Fluvial & Tidal Flooding

6.6.10 Appendix D indicates that the site is not susceptible to fluvial and/or tidal flooding. As the development site is in Flood Zone 1, the risk is considered low and acceptable.

Pluvial Flooding

6.6.11 In terms of pluvial flood risk the proposed development site is generally at no risk of flooding from overland sources. However, there is a patch of high risk flooding located at the southern boundary of the development which has been investigated further in ScalGo's pluvial modelling package. ScalGo maps from the modelling exercise (see Appendix F to the FRA report) show that the area of flooding in the southern section of the site is generated by the onsite catchment falling towards the boundary. A 150mm pluvial deluge has been added to the model and this results in a maximum flooded depth of 38mm. Therefore, the flooding can be considered low risk and with a formal drainage strategy, the flooding can be mitigated and eliminated.

6.6.12 ScalGo modelling also picks up flooding within the spoil heap in the centre of the proposed development. The flooding is localised and with a 150mm rainfall deluge, the maximum depth is noted to be 82mm. The area of spoil will be removed as part of the construction for the composing pad. The area will be formally drained as part of the works, removing the risk of flooding.

Groundwater Flooding

6.6.13 Due to the presence of clays, it is likely that there is a perched water table. Boreholes to establish the level of groundwater on site will be commissioned prior to the detailed design stage. The West London Strategic Flood Risk Assessment (SFRA) shows that there are no recorded ground water flooding incidents within

the close vicinity of the development. The SFRA mapping (see Appendix G to the FRA report) shows that the site sits within a low-risk area groundwater flooding. Therefore, the risk of groundwater flooding is considered low and acceptable based on historic events and risk mapping.

Flooding from Reservoirs, Canals, and other artificial sources

6.6.14 The Environment Agency Reservoir flood map shows that the Application Site is outside the zone of influence should a reservoir fail. Desktop study shows that there are no other artificial sources close to the development which could present a flood risk. Flood risk from reservoirs, canals and other artificial sources is therefore deemed low and acceptable.

Sewer and Drain Flooding

6.6.15 The SFRA mapping shows that the site is not within an area at risk of sewer flooding and no local incidents had been confirmed at the time of the report. No further information on sewer and drain flooding within the area could be found during the desktop review, the risk is considered low and acceptable.

Flooding from the Development

6.6.16 Incorporating a Sustainable Urban Drainage System (SUDS) will control runoff associated with the proposed redevelopment. The proposed system should allow interception of overland flow via a series of appropriate SuDS components. An allowance of 40% additional flow for Climate Change should be added to any design calculations. The existing strategy at the adjacent site shall be applied to the proposed site, the strategy incorporates re-use of all water on site due to the year-round demand for water in the composting process. The Applicant is a net importer of water with their current water reuse system at the adjacent site. The additional area for composting will create more of a water demand and therefore, all water on falling on site will be collected, stored and reused in processing. The flooding risk as a result of the proposed development is low and therefore acceptable.

Sustainable Drainage Strategy

6.6.17 The existing strategy at the adjacent site will be applied to the proposed development in that the strategy incorporates the re-use of all water on site due to the year-round demand for water in the composting process. West London Composting Limited are net importers of water with their current water reuse system at the adjacent site. The additional area for composting will create more of a water demand and therefore, all water on falling on site will be collected, stored and reused in processing. The site will be bunded to prevent any offsite discharge of runoff and or spills.

6.6.18 All compost treatment areas on the existing Site are isolated from the main drainage network using a combination of barrier walls, bunding and isolated and sealed drainage systems. Attenuation storage is provided to ensure that all water can be contained within site. Water is stored in the surface water storage tanks or on the pad itself in the case of the credible worst-case event.

6.6.19 When the surface water storage tanks reach 80% capacity, the water is collected and transported offsite by tanker to a suitably licenced facility for treatment and reuse at another facility or discharged under permit.

6.6.20 The NPFF requires that surface water arising from a developed site should as far as practicable be managed in a sustainable manner to mimic the surface water flows arising from the site prior to redevelopment. Opportunities to reduce the surface water run-off and the associated flood risk should be identified and climate change should be considered. Building Regulations (Part H), the NPPF and Environment Agency advice notes require the consideration of sustainable drainage techniques for new developments. Surface water drainage should be considered in accordance with a prescribed hierarchy aimed at minimizing the impact of the development.

6.6.21 Surface water flows will be designed to discharge to:

- 1. Infiltration based systems e.g., soakaways / porous pavements etc.
- 2. Watercourses
- 3. Surface water sewers
- 4. Combined water sewers

6.6.22 The proposal incorporates a Sustainable Urban Drainage System (SUDS), which will control runoff associated with the proposed scheme. The proposed system will allow interception of overland flow via a series of appropriate SuDS components. An allowance of 40% additional flow for Climate Change will be added to any design calculations.

6.6.23 The biodiversity net gain area to the northeast will contain new planting and ecological enhancements. Therefore, no drainage system is suggested for the area. The existing drainage system, bunded areas and storage tanks for the existing site contain the 1 in 100 +40% climate change storm event. Further details can be found in Appendix J to the FRA report, where EPGJ000079-DS-01 Report discusses the existing drainage system and onsite pluvial runoff analysis and in Appendix K which contains the CQA Spill Mapping Assessment for the existing site.

6.6.24 The CQA Spill Mapping Assessment notes that 1397m^3 of water can be retained on site within the bunds and 1000m3 further within the storage tanks. Environment Agency regulations do not permit untreated runoff leaving the development site. The proposed new extension area will be linked to the existing site. The proposed new hardstanding areas will be bunded and runoff shall be collected and reused on site with storage in the new water tanks for operational use. The containment bund will contain the 1 in 100 +40% storm event runoff volume.

Maintaining Flow Paths

6.6.25 No surface water flow path exists on site. The low-risk pluvial flooding is encapsulated on site and is inherent to the site catchment area.

Conclusions

6.6.26 The FRA report has considered all potential sources of flooding to the site, including sea, rivers, groundwater, land, existing sewers, artificial sources and the proposed development.

6.6.27 With reference to the NPPF and the Environment Agency (EA) standing advice on development and flood risk, the proposed site is located within Flood Zone 1 and is considered to be a 'more vulnerable' development. The sequential and exception test can be considered to be passed.

6.6.28 The proposed new hardstanding areas will be bunded and runoff will be collected and reused on site with storage in the new water tanks for operational use. The containment bund will contain the 1 in 100 +40% storm event runoff volume. No adverse surface water or groundwater impacts will therefore arise.

6.6.29 In overall terms, the Application Site is not susceptible to groundwater flooding, however, groundwater is likely to be perched due to the presence of clays. Overall, it is therefore concluded that the proposed development is capable of being controlled by planning conditions to prevent unacceptable impacts upon the water environment in compliance with Policy DMEI 9 (Management of Flood Risk) of the Hillingdon Borough Local Plan (Development Management Policies) and the NPPF.

7 ENERGY EFFICIENCY

7.1.1 The Applicant is required under the existing Environmental Permit, issued and controlled by the Environment Agency, to improve energy efficiency on site. On the basis that this Planning Application is successful, the Applicant will seek a variation of the Permit to include the new maturation area. This also extends to resource procurement, sourcing and usage. In brief, the Applicant's existing Environmental Permit requires under sections 1.2, 1.3 and 1.4:

- take appropriate measures to ensure that energy is used efficiently in the activities and that raw materials are used efficiently including water
- review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and minimise the use of raw materials
- take any further appropriate measures identified by a review.
- Avoid and if not, possible recover wastes produced as part of the site operations and associated activities

7.1.2 The Environmental Permitting Regulations also require the Applicant to show compliance to various Best Available Techniques (BAT) conclusions. This includes BAT 29 – Energy Efficiency. To show compliance with BAT requirements, the Applicant's Energy Efficiency Plan is enclosed at Appendix 7 to this statement.

7.1.3 Energy efficiency has a strong financial as well as environmental footing and is widely adopted across many businesses with the primary motivator being the reduction in costs rather than any environmental credential. The IMS (integrated Management System) already includes functions to assess and justify energy efficiency within the system.

7.1.4 In addition, the Applicant undertakes energy reviews as part of ISO 14001 accreditation to continually improve its performance in efficiency as is required by the standard. The only site energy input is the use of diesel in heavy plant machinery of which there is no alternative at this moment in time. The Applicant does though intend seek to improve energy efficiency through the following methods:

- Analysing new machinery purchases and maintaining a modern fleet of machines which have been assessed against environmental suitability/efficiency
- Engaging employees on training which aids in efficient driving of machinery
- Monitoring and recording usage
- Ensuring machines are maintained in the most efficient order as per the manufacturer's schedules

- Where possible replacing the more polluting with the less polluting or replacing COSHH substances which are more harmful with those that are less harmful.

8 CIRCULAR ECONOMY

8.1 Introduction

8.1.1 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.

8.1.2 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. Therefore, the applicant is required to submit a Circular Economy Statement in accordance with GLA guidance.

8.2 Circular Economy Statement

8.2.1 Given that the Application Site is an extension to an existing waste management facility, with permanent planning permission, most of the policy requirements of Policy SI 17 of the London Plan are not applicable or relevant to this proposal. Notwithstanding this, a Circular Economy Statement is enclosed at Appendix 8 to this statement.

8.2.2 The Circular Economy Statement confirms that the proposal is highly sustainable form of development by recycling green waste into a compost product thereby complying with the Government's aspirations of creating a circular economy.

8.3 Conclusion

8.3.1 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.

9 CONCLUSIONS

9.1 The Planning Balance

9.1.1 This Planning Statement accompanies a Planning Application on behalf of West London 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 proposal also includes landscaping planting and areas of ecological enhancement designed to achieve Biodiversity Net Gain.

9.1.2 The Applicant's green waste management facility is required to adapt from older, more traditional composting techniques to modern operating procedures required by the requirements set out by the Environment Agency's Appropriate Measures guidance. In addition, the Applicant's IVC facility will soon become obsolete as co-mingled kerbside food/green waste collections services are due to cease. This provides the opportunity for the Applicant to increase the amount of green waste recycling on the Site responding to the waste management needs of the West London area.

9.1.3 The following sets out the conclusions of the assessment of the proposal against the Development Plan and other material considerations in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Principle of Development

9.1.4 The Applicant's existing site plays a vital role in moving green waste collected in the West London area up the waste hierarchy. The Plan notes that the protection of the safeguarded sites is required to ensure the West London Boroughs' pooled apportionment targets are met and thereby demonstrate general conformity with the requirement of the London Plan (2021). The existing site therefore makes an important contribution to assisting the West London area move green (and currently food waste) up the Waste Hierarchy and help meet the Government's aspirations of a circular economy.

9.1.5 There is clear support in the Development Plan (Policy SI 8 of the London Plan) for maintaining waste management capacity at existing sites and ensuring that the amount of waste that is recycled is optimised. The proposed extension to the maturation yard responds to the Environment Agency's guidance on the 'Biological waste treatment: appropriate measures for permitted facilities', which requires improvements in waste management efficiency, minimising odour generation and fire risk. A purpose-built windrow turner is proposed to be used to improve the efficiency and management of windrows.

9.1.6 The objectives of maintaining and increasing green waste recycling capacity, contributing to a circular economy, reducing climate change and moving waste up the hierarchy is therefore compliant with the policy aspirations of Development Plan and the NPPF. The principle of the proposal is therefore considered acceptable.

Green Belt

9.1.7 In terms of the Green Belt test, the proposal has been assessed in accordance with Policy 9 of the WLP and the requirements of the NPPF. The proposal is defined as inappropriate development for the purposes of the Green Test. There is therefore a requirement for 'very special circumstances' to be demonstrated where inappropriate development, 'by definition', is harmful to the Green Belt.

9.1.8 In this case, the Applicant's advanced Very Special Circumstances case clearly outweighs harm to the Green Belt, which is based on the following main matters:

- Operational Need to Extend the Compost Maturation Yard
- Waste management capacity and need;
- Environmental benefits including the need for Sustainable Waste Management/Landfill Diversion and Maintaining Recycling/Recovery Rates;
- Waste Hierarchy and Climate Change, and
- Economic and Employment Benefits.

9.1.9 On the basis of the Applicant's Very Special Circumstances case, the proposal therefore complies with the Green Belt test set out in the NPPF and Policy 9 of the WLP.

Environmental Impact

9.1.10 The assessment of environmental impacts concludes that, taken into account the proposed mitigation measures, the potential effects of the proposed development are not considered to be significant. The proposed development will give not rise to unacceptable landscape and visual impacts and the implementation of the proposed landscape planting will minimise any negative effects.

9.1.11 The proposal will not have an adverse impact on features of nature conservation interest. A suite of mitigation measures that can be secured by the imposition of planning conditions will ensure that the overall impact is minimised. The proposed ecological enhancement measures will provide a healthy biodiversity net gain of 19.3%.

9.1.12 In principle agreement has been reached with the HS2 development team to provide an area of ecological enhancement north east of the proposed development. The HS2 development team will seek to secure this via amendment to their approved restoration scheme. This will ensure that the proposal provides a net benefit to nature conservation.

9.1.13 In overall terms, the proposal is fully compliant with the policy aspirations of Policy G6 on the London Plan, Policy DMEI 7 of the of the Hillingdon Borough Local Plan (Development Management Policies) and the NPPF in terms of protecting and enhancing nature conservation.

9.1.14 The proposal will not give rise to unacceptable adverse effects on local receptors in terms air quality, odour, bioaerosols and noise impacts. These matters are capable of being controlled by the imposition of planning conditions and the controls imposed by the Applicant's Environmental Permit, which will be required to be varied on the basis that this Planning Application is successful.

9.1.15 The proposal is located in flood zone 1 and will not give rise to an increased flood risk in the locality. The design of the Site will provide total containment of surface water which will ensure there is no adverse impact upon groundwater beneath site. There will therefore be no adverse impacts upon the water environment.

Overall Conclusion

9.1.16 Having regard to the assessment above, it concluded that the benefits of the proposal significantly outweigh any limited negative impacts. The proposal is therefore fully compliant with the Development Plan and the NPPF by being a sustainable form of waste management development which should be supported by the Waste Planning Authority.

APPENDIX 1: SCREENING OPINION

APPENDIX 2: LANDSCAPE & VISUAL APPRAISAL

APPENDIX 3: ECOLOGICAL APPRAISAL & BIODIVERSITY NET GAIN

APPENDIX 4: AIR QUALITY, ODOUR, BIOAEROSOLS

APPENDIX 5: NOISE ASSESSMENT

APPENDIX 6: FLOOD RISK & SURFACE WATER DRAINAGE

APPENDIX 7: ENERGY EFFICIENCY PLAN

APPENDIX 8: CIRCULAR ECONOMY STATEMENT