

Report of the Head of Planning & Enforcement Services

Address HOLLOWAY LANE QUARRY HOLLOWAY LANE HARMONDSWORTH

Development: Temporary wood recycling operation (Part retrospective application).

LBH Ref Nos: 43155/APP/2010/1417

Drawing Nos: Noise Impact Assessment
Hsp-COMSEC-0510-02
Hsp-Pln-1109-01
Hsp-COMSEC-0510-01
Hsp-WSLOC-0110-01
Design and Access Statement
Alternative Site Assessment
Supporting Statement

Date Plans Received: 16/06/2010 **Date(s) of Amendment(s):**

Date Application Valid: 24/06/2010

DEFERRED ON 19th April 2011 FOR FURTHER INFORMATION .

The application was deferred for further clarification in respect of the following issues:

ISSUE 1:

The contaminated status of the wood, whether treated by chemicals.

RESPONSE 1:

The wood is to be sourced from Municipal collections from Civic amenity sites, Industrial and commercial and construction waste. The wood is non-hazardous as classified by the European Waste Codes, in general terms simply pallets, construction timber (2by4 etc.) and chipboard and plywood. The wood mostly comes from furniture, doors and house building.

ISSUE 2:

Whether the shredded wood would be incinerated or used in landfill.

RESPONSE 2: No wood from the current operations will be sent or disposed in the landfill. When it is time to restore the sites any shredding requirements as per the approved restoration can utilise the on-site operations therefore reducing the carbon footprint for the transport of material. Any shredded wood used for the restoration of the site will be used as per the approved restoration plan for the sites.

ISSUE 3:

What quantities of shredded wood would be used on site and those taken off site and used in other processes and what proportion of the wood shredding is for commercial use.

RESPONSE 3: All wood currently processed is taken off site for use in chipboard manufacture and energy production. As restoration progresses incoming wood will be modified to meet the approved restoration requirements for the sites. The applicant is currently recovering and processing approximately 3,800 tonnes/month of wood waste at Holloway Lane.

The wood waste comprises of mixed wood i.e.: chipboard (up to 70-80% or approx 2400

tonnes/month), clean wood i.e.: pallets (up to 20-30% of inputs) and reject <1% of which are plastic and metals.

The waste wood is recovered from the existing landfill operations at Harmondsworth and Ivor recycling and skip hire operations, both of which are relocated at the Holloway Lane / Harmondsworth site. The applicant currently recovers up to 300 tonnes/month from both the landfill and recycling operations at the site which would otherwise have been landfilled. Each tonne of wood waste diverted from landfill and reprocessed into a useable resource or product represents a 0.54 tonne saving of CO2 emissions. The remaining 3,200 tonnes/month of wood waste is sourced from commercial and industrial customers in the surrounding area. The shredded product can be re-used for example as a biofuel or animal bedding product.

Harmondsworth is in the final phase of landfilling and the applicant has recently submitted scoping for a 5 year time extension to enable completion in line with the approved restoration contours for the site. Once operations are complete the landfill will be restored to an arable land comprising of 700mm of subsoil and 300mm of topsoil. There is currently a remaining requirement of 41,500 m3 of topsoil for restoration of Harmondsworth. As part of this requirement and material balance for site operations, the applicant is assessing the availability of site derived topsoil to blend with the 0-10mm fines produced from the clean wood product to enable bulking of the available stockpiled soil on site so as to limit vehicle movements for the additional soil importation which would be required during the restoration phase if wood operation was not located or available for site use.

In addition to the restoration of Harmondsworth there will also be a need to restore the site entrance area at Holloway Lane which has an approximate area of 3 ha. There would also be a soil blending/bulking requirement, as described above, to restore this area which will need to be accounted for as part of the material balance for Holloway Lane.

As part of the restoration for the site there is a requirement for the reinstatement of hedgerows. This reinstatement will require mulch for weed and moisture control as the hedgerows become established. The use of the shredder and screener on site will enable a suitable sourced material to be processed to achieve the required end product which will deliver the approved after-care plan for the site.

ISSUE 4:

Clarify the routes, numbers and times for HGV vehicles.

RESPONSE 4: There will be 25 vehicles bringing wood to the site (25 arrivals and 25 departures, 50 movements total) and 10 vehicles taking wood away from the site (10 arrivals and 10 departures, 20 movements total) thus there would be a total of 70 vehicle movements for the operation.

The 25 vehicles for inputs comprise of 17 roll on/ roll off and 8 articulated lorries. The outputs would be 10 articulated lorries. The articulated vehicles come late morning/ early afternoon. The vehicles coming into the site are coming from in and around the London, Surrey and surrounding boroughs.

ISSUE 5:

Whether working on the site is wood shredding or chipping.

RESPONSE 5: In practice both, but these are almost one of the same. Breaking wood into smaller pieces for use in energy or chipboard manufacture depending on the demand for the

output product.

1. SUMMARY

This application seeks planning permission for a temporary wood recycling operation on the above site.

The site is located within the Green Belt.

Based on further information supplied by the applicant on the nature of the operation, which clearly involves imporation of a substantive proportion of the wood waste, the development is considered to be inappropriate development in the Green Belt. Accordingly it is recommended that planning permission be refused for this reason.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Inappropriate development in the Green Belt

The proposal represents inappropriate development within the Green Belt and no very special circumstances to justify the development have been demonstrated which would outweigh the harm that would be caused to the Green Belt as a result of the development. The proposal is therefore contrary to policy OL1 of the adopted Hillingdon Unitary Development Plan (Saved Policies, September 2007), Policy 7.16 of the London Plan (2011) and PPG2 Green Belts.

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (July 2011) and national guidance.

OL1	Green Belt - acceptable open land uses and restrictions on new development
OE1	Protection of the character and amenities of surrounding properties and the local area
MIN16	Waste recycling and disposal - encouragement of efficient and environmentally acceptable facilities
MIN17	Proposals for concrete crushing/soil screening plants

3. CONSIDERATIONS

3.1 Site and Locality

The application site has an area of approximately 0.74 ha and forms part of Holloway Lane Quarry and Landfill site located to the north of Heathrow Airport and south of the M4. The site is accessed off Holloway Lane (A3044).

The wider site comprises a partially restored quarry, landfill and materials recycling facility. Approximately 19 ha of the site has been restored to agriculture. The site contains a plant area and access road which also serves the adjoining landfill site to the south of Harmondsworth Lane. There are a number of operations carried out on the site including a material recovery facility and landfill operations. A concrete batching plant has recently ceased and the facility removed from the site. The application site comprises an existing hardstanding area within the confines of the plant area and entrance area of the site.

3.2 Proposed Scheme

Planning permission is sought for a temporary wood recycling operation on the site. It is proposed that operations would take place daily from 0700 to 1800 Monday to Friday and 0700 to 1600 Saturday. It is anticipated that the wood shredding operation would result in up to 25 vehicles per day for inputs and 10 vehicles for outputs. This would translate into up to 8 articulated vehicles and 17 roll-on roll-off vehicles for inputs and 10 articulated vehicles for outputs. The proposed operation would enable waste wood to be processed into products which can be utilised by industry. It would also supply restoration material which would expedite restoration of the existing landfill sites.

No more than 1,000 tonnes of waste wood would be stored within the application site at any one time, and this would be shredded using mobile pre-shedding and shredding plant on an ongoing basis. The waste wood would be deposited in a reception area and then placed into the pre-shedder by a back acting excavator equipped with a hydraulic grab. Any material identified as unsuitable for shredding would be placed in a scrap area along with that ejected from the shredding process, expected to be largely ferrous metal removed by the plant's on-board magnetic separator. The shredder would produce one product, shredded timber, which would be stored on site. It would also produce a fines material (a by-product which does not meet minimum size specification) which would be stored in a fines area. Product and fines would be carried to storage areas by wheeled front end loader. The shredded wood would then be loaded into bulk transporters for export off site or off-road dumper if the material is to be used within the wider landfill site. Fines would be hauled in the same manner either for further use or on or off site disposal. The mobile shredding plant would not exceed 6 metres in height, whilst raw and shredded wood stockpiles would vary in height, but not exceed 10 metres.

3.3 Relevant Planning History

43155/89/0520

South Side Of Harmondsworth Lane Harmondsworth

Extraction of sand and gravel and refilling with inert material and restoration to agriculture

Decision: 16-09-1991 Approved

43155/H/99/0326 South Side Of Harmondsworth Lane Harmondsworth

Variation of conditions 7,12 and 13 (to vary the waste types and amendments to phasing and restoration plans) of planning permission ref.43155/89/520 dated 16/09/91; Extraction of sand and gravel and refilling with inert material and restoration to agriculture

Decision: 20-10-1999 Approved

Comment on Relevant Planning History

Planning permission was granted on 3 September 1979 by the Department of Environment following a High Court appeal for the extraction of sand and gravel and refilling with waste materials on the Holloway Lane site (Ref. 1354/A/73/316). Mineral workings commenced shortly after and continued until the early 1990's. The minerals processing plant with associated silt ponds were located within the centre of the site. Permission was subsequently granted for additional related development within this area. By the mid 1990's mineral extraction, landfilling and restoration had been completed at the site except for the plant area and access road. These areas were retained because waste materials for infilling the adjoining landfill site to the south of Harmondsworth Lane have to cross the Holloway Lane site using the existing access and weighbridge facilities.

Planning permission was granted on 16 September 1991 for the extraction of sand and gravel and refilling with inert material and restoration to agriculture on land on the south side of Harmondsworth Lane (Ref. 43155/89/520). A further planning permission was granted on 20 October 1999 for the variation of conditions 7, 12 and 13 of the permission to vary the waste types and amendments to phasing and restoration plans (Ref. 43155/H/99/0326). Workings on this site are currently permitted until 2011.

Planning permission was granted on 13 October 2001 for the extraction of sand and gravel beneath the plant area and access road on the Holloway Lane site and completion of the restoration by infilling with inert waste (ref. 1354/APP/2001/1583). This permission requires the extraction of minerals, landfilling and restoration of the site to be undertaken in a four year period following completion and restoration of the landfill site on the south side of Harmondsworth Lane (Ref. 1354/APP/2001/1583).

4. Planning Policies and Standards

Planning Policy Statement 1 (Delivering Sustainable Development) (January 2005)
Planning Policy Guidance Note 2 (Green Belts) (January 1995)
Planning Policy Statement 10 (Planning for Sustainable Waste Management) (July 2005)
Planning Policy Statement 23 (Planning and Pollution Control) (November 2004)
The London Plan (February 2008)
Hillingdon Unitary Development Plan Saved Policies (September 2007)

The relevant policies of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and London Plan (February 2008) are referenced in the relevant section below.

UDP / LDF Designation and London Plan

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- | | |
|--------|--|
| PT1.1 | To maintain the Green Belt for uses which preserve or enhance the open nature of the area. |
| PT1.10 | To seek to ensure that development does not adversely affect the amenity and the character of the area. |
| PT1.29 | To seek, in conjunction with other London boroughs, to contribute a proportion of the regional sand and gravel requirement and London-wide landbank, and to protect the amenities of those living, working and recreating in and travelling through that part of the Borough south of the M4 motorway from an over-concentration of aggregate working. |

Part 2 Policies:

- | | |
|----------|---|
| OL1 | Green Belt - acceptable open land uses and restrictions on new development |
| OE1 | Protection of the character and amenities of surrounding properties and the local area |
| MIN16 | Waste recycling and disposal - encouragement of efficient and environmentally acceptable facilities |
| MIN17 | Proposals for concrete crushing/soil screening plants |
| AM7 | Consideration of traffic generated by proposed developments. |
| LPP 7.16 | (2011) Green Belt |

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **4th October 2010**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

100 neighbouring occupiers including the Harmondsworth and Sipson Residents Association were notified of the application and 2 notices were posted on site. 1 reply has been received from the Harmondsworth and Sipson Residents Association expressing concern that it was a requirement that when the extraction of gravel had been completed all plant should be removed from the site and this has already been reneged upon to allow gravel to be processed south of Harmondsworth Lane. The Association asks when the recommendations on the original plans are going to be adhered to. The connection between a wood recycling operation and the extraction and processing of gravel is also questioned. Finally it notes that the wood recycling plant is already partly in place and has recently caused a fire.

ENVIRONMENT AGENCY

Planning permission should only be granted for the proposed development if the following planning condition is imposed as set out below. Without this condition, the proposed development poses an unacceptable risk to the environment and the Environment Agency would wish to object to the application.

Condition

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason

To ensure protection of controlled waters.

BAA AIRPORTS

No objection to the proposal from an aerodrome safeguarding perspective. However advises that the proposed development is likely to be within the future airport boundary required to facilitate the development of a future runway as outlined in the Government White Paper 'The Future of Air Transport' and hence is likely to be subject to a Compulsory Purchase Order prior to the runway becoming operational.

Internal Consultees

TREES AND LANDSCAPE OFFICER

I refer to the above application, Suez/SITA's Supporting Statement, the Design and Access Statement, drawing Nos. Hsp-WSLOC-0110-01, 0510-01, 02, 1109-01

THE SITE

The site is a former mineral working within the Green Belt, which currently accommodates a waste transfer and ancillary buildings. The site is remote from residential properties and is accessed from Holloway Lane to the north and Harmondsworth Lane to the south. The operational yard, which services ongoing quarrying / landfill operations is situated at a lower level than the surrounding fields and is not visible from these public places. Furthermore, the site is partly screened by trees and hedgerows, notably from the Holloway Lane.

THE PROPOSAL

The proposal is part-retrospective to carry out temporary wood re-cycling operations, linked to the extant landfill and land restoration programme. The wood-shredding facility will be sited upon the existing hardstanding within the Holloway Lane operational area. The Design & Access Statement confirms (2.10) that the mobile shredding plant 'will not exceed 6 metres in height, whilst raw and shredded wood stockpiles will vary in height, but not exceed 10 metres'.

In the course of the recent site inspection, it was estimated that both piles are currently at, or close to, 10 metres in height. Due to the lower ground level on which the piles are based, and assisted by the road side vegetation, the stockpiles were not visible from Holloway Lane. However, there are distant views of the stockpiles from Harmondsworth Lane to the south - which does not benefit from road-side screening.

LANDSCAPE CONSIDERATIONS

In view of the temporary nature of the stockpiles and the context of the quarrying operations, the visual impact of the peaks of the stockpiles on the landscape is not considered to be significant or permanent. The closure of the wood re-cycling operation should be linked to the completion of the quarrying and landscape restoration programme.

Attempts to visually screen the stockpiles, for example with planting, would be unlikely to achieve sufficient height or visual screening within the life of the project.

RECOMMENDATION

No objection subject to the above comments.

ENVIRONMENTAL PROTECTION UNIT

The details submitted in respect of this application have been considered in relation to noise and dust generation. The Environmental Protection Unit sees no reason to raise any objection in this instance.

HIGHWAY ENGINEER

No objection on traffic generation grounds subject to a condition restricting the maximum number of traffic movements in and out of the site per day in connection with the proposed use to no more than 35.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The main policy issue is the suitability of the proposed development within the Metropolitan Green Belt. Policies OL1 and OL2 of the Hillingdon Unitary Development Plan Saved Policies aim to ensure that the Green Belt is protected and is primarily retained and used for agriculture, horticulture, forestry, nature conservation, open air recreational facilities and cemeteries.

The proposed development constitutes a commercial wood recycling operation and is considered to be inappropriate development in the Green Belt. In support of the application the applicant has commented as follows:

'...As you are aware we undertook an Alternative Site Assessment as part of our application of which concluded there is no reasonably suitable or available alternative sites for the wood recycling operation in the service area. A review of available sources as detailed in the report provided numerous sites, however many were considered unsuitable based on either one or more of the following criteria:

- There was insufficient space available at the site.
- The proposed land use was considered incompatible with other facilities already present on adjacent land.
- Use of the site would result of HGV's passing through residential areas.
- Sites were located within areas of flooding.
- Sites were not available.

The Assessment identified that there are no suitable alternative sites for the wood recovery and recycling operation other than the site at Holloway Lane. The wood recovery and recycling operation also would not be sustainable as a stand alone operation if it were not for shared resources (offices, security, welfare facilities etc) that exist for the permitted landfill and associated auxiliary operations carried out at Holloway Lane...'

Whilst the development would be located on and adjacent to existing landfill sites which have been worked for minerals and are now in the process of being restored, the applicant has advised that no wood will be used for landfill restoration at this time. Whilst Planning Policy Guidance Note 2 (Green Belts) states that mineral extraction need not be inappropriate development in the Green Belt as it need not conflict with the purposes of including land in the Green Belt provided that high environmental standards are maintained and the that the site is well restored, the current application for a wood recycling operation has no direct link to the existing mineral extraction operation. Accordingly the development is considered to be inappropriate development in The Green Belt and it is recommended that planning permission be refused for this reason.

7.02 Density of the proposed development

Not applicable to the application.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

No Archaeological Priority Areas, Conservation Areas, Listed Buildings or Areas of Special Character are affected by this development.

7.04 Airport safeguarding

BAA Airports raises no objection to the proposal from an airport safeguarding perspective.

7.05 Impact on the green belt

Policy OL2 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) states that within the Green Belt, where development proposals are acceptable in principle in accordance with Policy OL1, the Local Planning Authority will where appropriate seek comprehensive landscaping improvements to achieve enhanced visual amenity and other open land objectives.

The site is situated at a lower level than the surrounding fields and is partially screened by trees and hedgerows, particularly from Holloway Lane. Consequently, the proposed plant and stockpiles would not be easily visible from Holloway Lane. Whilst there would be distant views of the stockpiles from Harmondsworth Lane to the south, which does not benefit from road-side screening, in view of their temporary nature and in the context of the quarrying operations, the visual impact of the peaks of the stockpiles on the Green Belt is not considered to be significant or permanent.

The Trees and Landscape Officer is of the view that attempts to visually screen the stockpiles, for example with planting, would be unlikely to achieve sufficient height or visual screening within the life of the project. However, in the event of planning permission being granted it is considered necessary to impose a condition limiting the overall height of the stockpiles to no more than 10 metres from ground level in the interests of the visual amenity of the Green Belt. As such, it is not considered that the scheme would have a harmful visual impact, however this does not override the fact that the scheme represents inappropriate development and is unacceptable in principle.

7.07 Impact on the character & appearance of the area

Dealt with in Section 7.05 of the report.

7.08 Impact on neighbours

The nearest residential property to the site is approximately 220 metres away in Harmondsworth Lane. This is sufficient distance to avoid any loss of amenity to the occupiers as a result of visual intrusion, dust or noise.

7.09 Living conditions for future occupiers

Not applicable to the application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The Highway Engineer raises no objection to the proposed operation on traffic generation grounds subject to a condition restricting the maximum number of traffic movements in and out of the site per day in connection with the proposed use to no more than 35.

7.11 Urban design, access and security

No further issues identified.

7.12 Disabled access

Not applicable to the application.

7.13 Provision of affordable & special needs housing

Not applicable to the application.

7.14 Trees, landscaping and Ecology

Trees and landscaping issues are dealt with in Section 7.05 of the report. The site is not of any particular ecological interest.

7.15 Sustainable waste management

The proposed woodshredding facility would be a sustainable operation enabling wood waste to be diverted from landfill whilst providing a product which can be utilised both on the landfill as part of restoration and for use in the wider community.

7.16 Renewable energy / Sustainability

Not applicable to the application.

7.17 Flooding or Drainage Issues

The Environment Agency has raised no objection on flooding or drainage grounds subject to a condition prohibiting any infiltration of surface water drainage into the ground without the express written consent of the Local Planning Authority in the event of planning permission being granted.

7.18 Noise or Air Quality Issues

The Environmental Protection Unit raises no objection to the proposal on noise and dust generation grounds.

7.19 Comments on Public Consultations

With regard to the concerns raised by the Harmondsworth and Sipson Residents Association, the concern regarding the lack of a link between the proposed wood recycling operation and the existing gravel extraction operation is supported. With respect to the issue of fire risk the nearest residential curtilage is a distance of 220m away. The proposals are also covered by Environment Agency Waste Management Regulations.

7.20 Planning obligations

Not applicable to the application.

7.21 Expediency of enforcement action

Not applicable.

7.22 Other Issues

None.

8. Observations of the Borough Solicitor

When making their decision, Members must have regard to all relevant planning legislation, regulations, guidance, circulars and Council policies. This will enable them to make an informed decision in respect of an application.

In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights (the Convention) directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

Article 6 deals with procedural fairness. If normal committee procedures are followed, it is unlikely that this article will be breached.

Article 1 of the First Protocol and Article 8 are not absolute rights and infringements of these rights protected under these are allowed in certain defined circumstances, for example where required by law. However any infringement must be proportionate, which means it must achieve a fair balance between the public interest and the private interest infringed and must not go beyond what is needed to achieve its objective.

Article 14 states that the rights under the Convention shall be secured without discrimination on grounds of 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status'.

9. Observations of the Director of Finance

10. CONCLUSION

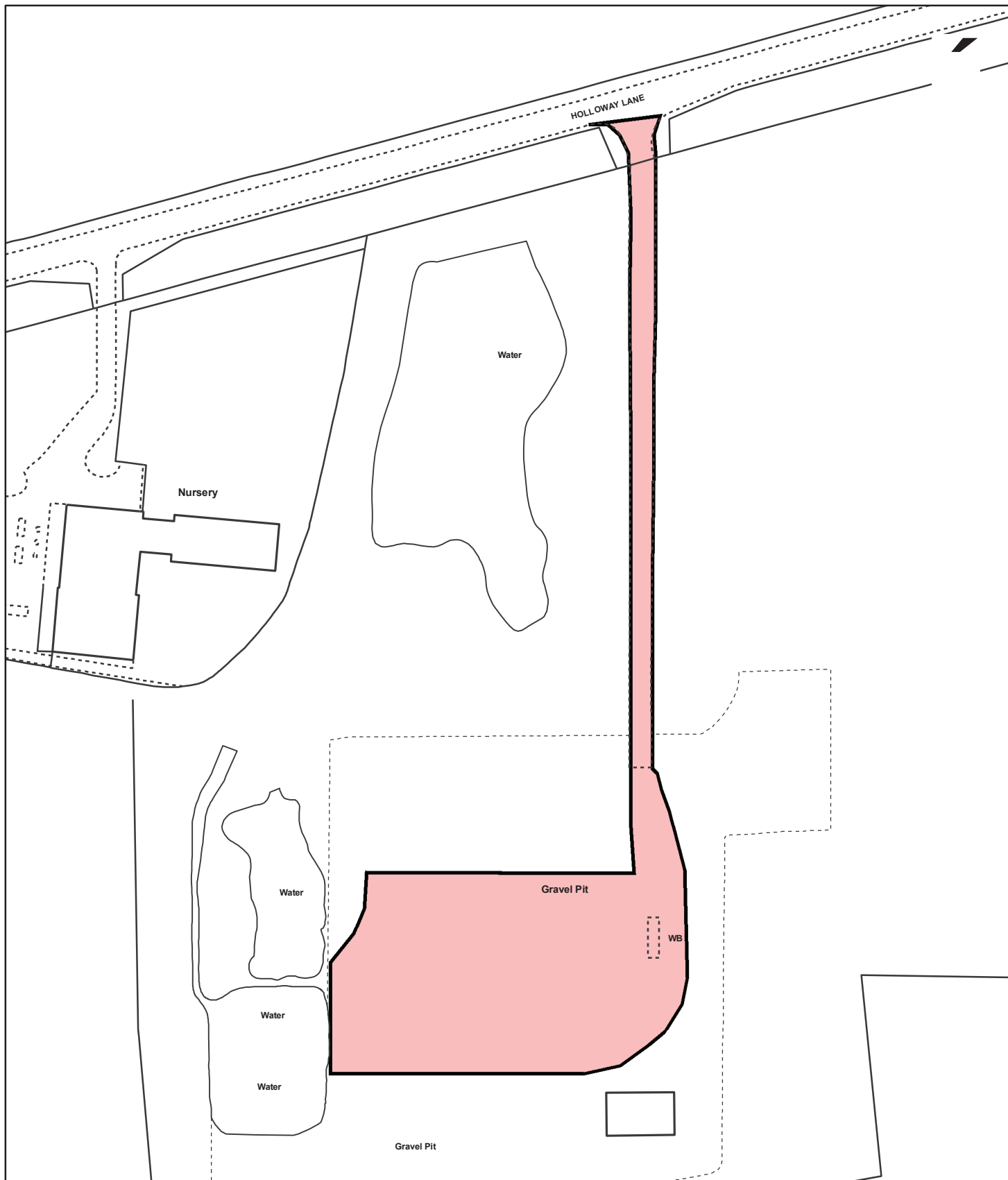
This application seeks planning permission for a temporary wood recycling operation on the above site. The site is located within the Green Belt. Based on further information supplied by the applicant on the nature of the operation, the development is considered to be inappropriate development in the Green Belt. Accordingly it is recommended that planning permission be refused for this reason.

11. Reference Documents

Planning Policy Statement 1 (Delivering Sustainable Development) (January 2005)
Planning Policy Guidance Note 2 (Green Belts) (January 1995)
Planning Policy Statement 10 (Planning for Sustainable Waste Management) (July 2005)
Planning Policy Statement 23 (Planning and Pollution Control) (November 2004)
The London Plan (July 2011)
Hillingdon Unitary Development Plan Saved Policies (September 2007)

Contact Officer: Mark Smith

Telephone No: 01895 250230



Notes



Site boundary

For identification purposes only.

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London Borough of Hillingdon
100019283 2011

Site Address

**Holloway Lane Quarry,
Holloway Lane, Harmondsworth**

Planning Application Ref:

43155/APP/2010/1417

Planning Committee

Central & South

Scale

1:1,500

Date

April 2011

**LONDON BOROUGH
OF HILLINGDON**

**Planning,
Environment, Education
& Community Services**

Civic Centre, Uxbridge, Middx. UB8 1UW
Telephone No.: Uxbridge 250111



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