

Report of the Head of Planning, Transportation and Regeneration

Address: HARMONDSWORTH LANDFILL SITE HARMONDSWORTH LANE
HARMONDSWORTH

Development: The installation of a leachate pre-treatment plant and piped connection to sewer at Harmondsworth closed landfill site

LBH Ref Nos: 43155/APP/2020/4267

Drawing Nos: Hsp-PLN-1020-01 Rev. A
Hsp-PLN-1020-03
Hsp-PLN-1020-02
Hsp-SC-0320-01a
Supporting Planning Statement

Date Plans Received: 18/12/2020

Date(s) of Amendment(s):

Date Application Valid: 23/12/2020

1. SUMMARY

Planning permission is sought for the installation of a leachate pre-treatment plant and piped connection to the Thames Water sewer at Harmondsworth closed landfill site. This application seeks to improve the existing leachate disposal system at Harmondsworth Landfill by removing dissolved methane from the leachate on site, to enable discharge of the leachate into the nearby mains sewer system under an appropriate discharge consent.

The closed landfill site currently produces leachate which needs to be treated to remove dissolved methane before it can be safely discharged into the main sewer. It is therefore a process which supports the wider landfill operation, and is not considered to be inappropriate development in the Green Belt.

The development will create fewer vehicular trips than the existing situation and there will be no changes to the access. There are therefore no highway objections to this proposal. In terms of air quality, design of the structure will prevent any odour releases, whilst it is not anticipated that the proposed plant will have any impact upon noise levels at sensitive receptors.

The plant would be a visible feature when viewed locally within the wider landfill site, but is modest in size at less than 1.5m tall, especially when compared to the existing leachate holding tank. It is considered that any harm which may arise to the openness of the Green Belt is clearly outweighed by the greater sustainability benefits.

Both Thames Water and the Environment Agency raise no objections to the proposed development, subject to a Trade Effluent Consent and a variation to the Landfill Environmental Permit under the Environmental Permitting (England and Wales) Regulations 2016.

Approval is recommended accordingly, subject to conditions.

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2. RECOMMENDATION

APPROVAL subject to the following:

1 COM3 Time Limit

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

2 B17 Temporary Permissions

The development shall be removed as soon as reasonably practicable after the plant is no longer required under the Environmental Permit for the landfill site, as regulated by the Environment Agency and land on which the development was mounted or into which the development was set is restored, as soon as reasonably practicable to its condition before the development took place, or restored to such condition as may have been agreed in writing with the Local Planning Authority.

REASON

To safeguard the visual amenity of the Green Belt, in compliance with policy EM2 of the Local Plan Part 1 (2012), policies DME1 4 and DME1 6 of the Hillingdon Local Plan Part 2- Development Management Policies (2020), Policy G2 of the London Plan (2021) and the NPPF.

3 COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers, Hsp-PLN-1020-01 Rev. A, Hsp-SC-0320-01a, Hsp-PLN-1020-02 and Hsp-PLN-1020-03 and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to GRANT 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 GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations,

including The London Plan (2921).

DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 7	Biodiversity Protection and Enhancement
DMHB 14	Trees and Landscaping
DMIN 3	Extraction, Landfilling and Restoration
DMT 2	Highways Impacts
LPP G9	(2021) Geodiversity
LPP G2	(2021) London's Green Belt
LPP G7	(2021) Trees and woodlands
LPP SI1	(2021) Improving air quality
LPP SI10	(2021) Aggregates
LPP SI7	(2021) Reducing waste and supporting the circular economy
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land

3 I14 Installation of Plant and Machinery

The Council's Commercial Premises Section and Building Control Services should be consulted regarding any of the following:-

The installation of a boiler with a rating of 55,000 - million Btu/hr and/or the construction of a chimney serving a furnace with a minimum rating of million Btu/hr;

The siting of any external machinery (eg air conditioning);

The installation of additional plant/machinery or replacement of existing machinery.

Contact:- Commercial Premises Section, 4W/04, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250190). Building Control Services, 3N/01, Civic Centre, High Street, Uxbridge, UB8 1UW (tel. 01895 250804 / 805 / 808).

4 I15 Control of Environmental Nuisance from Construction Work

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance' The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit (www.hillingdon.gov.uk/noise Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

5 I19

Sewerage Connections, Water Pollution etc.

You should contact Thames Water Utilities and the Council's Building Control Service regarding any proposed connection to a public sewer or any other possible impact that the development could have on local foul or surface water sewers, including building over a public sewer. Contact: - The Waste Water Business Manager, Thames Water Utilities plc, Kew Business Centre, Kew Bridge Road, Brentford, Middlesex, TW8 0EE. Building Control Service - 3N/01, Civic Centre, High Street, Uxbridge, UB8 1UW (tel. 01895 250804 / 805 / 808).

6 I24

Works affecting the Public Highway - General

A licence must be obtained from the Highway Authority before any works are carried out on any footway, carriageway, verge or other land forming part of the public highway. This includes the erection of temporary scaffolding, hoarding or other apparatus in connection with the development for which planning permission is hereby granted. For further information and advice contact: - Highways Maintenance Operations, 4W/07, Civic Centre, Uxbridge, UB8 1UW

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This development will require a variation to Landfill environmental permit under the Environmental Permitting (England and Wales) Regulations 2016, Regulation 12. In circumstances where an activity/operation meets certain criteria, an exemption from permitting may apply, more information on exempt activities can be found here: <https://www.gov.uk/guidance/register-your-waste-exemptions-environmental-permits> The applicant is advised to contact National Permitting Service via our website to discuss the issues arising from the permit application process?

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A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent. Applications should be made at <https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwholesale.thameswater.co.uk%2FWholesale-services%2FBusiness-customers%2FTrade-effluent&data=04%7C01%7C%7Cad615925db9d46565a9a08d8be16c745%7Caaacb679e38148fbb320f9d581ee948f%7C0%7C0%7C637468352324445648%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJB Til6Ik1haWwiLCJXVCI6Mn03D%7C1000&sdata=0Ra5ihNWeT01sgrwCrcCwPdqrNn2rwfJosaKaiLojwg%3D&reserved=0> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

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This development will require a variation to Landfill environmental permit under the Environmental Permitting (England and Wales) Regulations 2016, Regulation 12. In circumstances where an activity/operation meets certain criteria, an exemption from permitting may apply, more information on exempt activities can be found here:

<https://www.gov.uk/guidance/register-your-waste-exemptions-environmental-permits> The applicant is advised to contact National Permitting Service via our website to discuss the issues arising from the permit application process?

3. CONSIDERATIONS

3.1 Site and Locality

Harmondsworth Landfill is a closed and capped landfill site located to the north of Heathrow Airport. The site is bounded by Harmondsworth Lane to the north and Holloway Lane closed landfill site to the north of that. Sipson Village lies to the east and an agricultural field to the west. To the south of the site, there exist a mix of different uses including agricultural fields, residential areas, general industrial units and offices, with Heathrow Airport located further to the south.

The landfill site has largely been restored to agriculture and is currently grazed, with landfill gas and leachate management infrastructure located in the margins of the restored fields where possible, for ease of access and to minimise obstruction to the agricultural use.

The application site is within the Green Belt and does not have any other statutory landscape or ecological designations.

3.2 Proposed Scheme

Planning permission is sought for the installation of leachate pre-treatment plant and piped connection to the Thames Water sewer at Harmondsworth closed landfill site.

This application seeks to improve the existing leachate disposal system at Harmondsworth Landfill by removing dissolved methane from the leachate on site to enable discharge of the leachate into the nearby mains sewer system under an appropriate discharge consent. As previously outlined, the closed landfill site currently produces leachate which needs to be treated to remove dissolved methane before it can be safely discharged into the main sewer.

The connection point to sewer is approximately 350 metres outside the existing landfill planning

permission boundary and consequently not covered by existing planning permissions. The applicant is therefore applying for planning permission to install a buried pipeline connection to sewer together with an associated methane stripping plant unit (MSP) to pre-treat the leachate prior to discharge.

It is proposed to locate the MSP alongside similar existing leachate management infrastructure in the north-west corner of the landfill, at the former site entrance, where an area of hardstanding remains in place. The MSP is a bunded movable unit which will be installed adjacent to an existing leachate storage tank and retained on site as part of the leachate management infrastructure for as long as required to enable safe disposal to sewer of the landfill leachate. A 2.4-metre-high paladin fence, coloured green, will also be erected around the proposed MSP and existing leachate storage tank for safety and security.

The landfill leachate will be pumped from the landfill to the MSP via the existing leachate storage tank and, once stripped of methane, will be transferred to sewer via the new buried

pipeline and connection point to the west

Methane Stripping Plant

The MSP consists of a series of cylindrical tanks housed within a steel banded unit of external dimensions 7.70 metres in length, 2.50 metres in width and 2.58 metres in height. The MSP will be coloured dark green to match the existing leachate tank and will be located adjacent to it.

There is a very low potential for odour release from the MSP however to further minimise any potential release a carbon filter will be installed on one side of the MSP. The carbon filter will strip potentially odorous compounds as they pass through a 220-litre drum containing either active carbon or woodchip.

In addition, a 1.40 metre diameter hydrogen peroxide system will be installed alongside the MSP in order to reduce the levels of hydrogen sulphide to meet the consented level in the issued effluent discharge consent.

A gantry platform and small ladder are also required to provide access to the MSP for maintenance.

Pipeline and Mains Sewer Connection

Pipework infrastructure, which will provide the connection from the MSP to the foul sewer, will be routed below ground. The applicant currently has existing pipelines running through a conduit beneath Harmondsworth Lane taking landfill gas from Harmondsworth landfill to the gas management compound within Holloway Lane landfill to the north. The proposed pipeline will run with the existing landfill gas pipework beneath Harmondsworth Lane, and then run west approximately 350m to connect with the mains sewer. The pipeline will not affect the field boundary hedge nor cause damage to tree or hedge roots.

The pipeline itself will be high-performance polyethylene and will be buried at approximately 1m depth below ground (as required by the Highways Authority). The pipeline will have an outside diameter of approximately 63mm which provides adequate clearance for jetting. All sections of pipeline will be pressure tested to ensure no leakage.

3.3 Relevant Planning History

43155/APP/2020/1075 Harmondsworth Landfill Site Harmondsworth Lane Harmondsworth

The installation of a leachate pre-treatment plant and piped connection to sewer at Harmondsworth closed landfill site.

Decision: 15-12-2020 Withdrawn

Comment on Relevant Planning History

The original planning permission for the site (43155/89/0520) was granted on 16/09/1991 for "the extraction of sand and gravel and refilling with inert material and restoration to agriculture". Restoration designs were agreed on 05/01/1995, reference number 43155/D/93/0932.

An application for a variation to the phasing and restoration plans was approved on 20/10/1999

(43155/D/93/0932). Details pursuant to the aftercare scheme for the restoration of the site were approved on 10/08/2005 (43155/APP/2000/2595). A further variation to enable the site to be fully restored by no later than 30 September 2017 was granted planning permission on 22/02/2013, reference number 43155/APP/2012/1903. A Landscape and Ecology Management Plan (LEMP) was approved in 2013 under the conditions of this permission and any works on site remain covered by methodologies within this approved plan.

Landfill gas and leachate management and monitoring infrastructure necessarily remains in place until such time as no longer required under the Environmental Permit for the landfill site, as regulated by the Environment Agency.

On 15-12-20 planning application ref. 43155/APP/2020/1075 for a leachate pre-treatment plant and pipeline to sewer at Harmondsworth landfill was withdrawn, in order for the applicant to make minor revisions to the plant layout and design.

The differences between the withdrawn and current application can be summarised as follows:

- > The location of the pipeline crossing beneath the road has been moved approximately 10m to the west in order to coincide with the surveyed location of the existing conduit through which the landfill gas pipework currently runs;
- > The red line application boundary has been extended to encompass both the proposed methane stripping plant and the existing leachate tank in order to include a proposed new security fence around both;
- > The detailed design of the methane stripping plant differs from that previously submitted.

4. Planning Policies and Standards

The Development Plan for the London Borough of Hillingdon currently 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)

UDP / LDF Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.EM10 (2012) Mineral Extraction
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM8 (2012) Land, Water, Air and Noise

Part 2 Policies:

- DMEI 11 Protection of Ground Water Resources
- DMEI 12 Development of Land Affected by Contamination

DMEI 14	Air Quality
DMEI 7	Biodiversity Protection and Enhancement
DMHB 14	Trees and Landscaping
DMIN 3	Extraction, Landfilling and Restoration
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LPP SI1	(2021) Improving air quality
LPP SI10	(2021) Aggregates
LPP SI7	(2021) Reducing waste and supporting the circular economy
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **10th February 2021**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

The application has been advertised under Article 15 of the Town and Country Planning General Development Management Order 2015.

THAMES WATER

Waste Comments

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent.

Applications should be made at
<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwholesale.thameswater.co.uk%2FWholesale-services%2FBusiness-customers%2FTrade-effluent&data=04%7C01%7C%7Cad615925db9d46565a9a08d8be16c745%7Caaacb679c38148fbb320f9d581ee948f%7C0%7C0%7C637468352324445648%7CUnknown%7CTWFpbGZsb3d8eyJWIoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJB Til6Ik1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=0Ra5ihWeT01sgrwCrcCwPdqrNn2rwfJosaKaiLojwg%3D&reserved=0> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For

your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

ENVIRONMENT AGENCY

We have no objections to the proposed development.

Advice to LPA/applicant This development will require a variation to Landfill environmental permit under the Environmental Permitting (England and Wales) Regulations 2016, Regulation 12. In circumstances where an activity/operation meets certain criteria, an exemption from permitting may apply, more information on exempt activities can be found here: <https://www.gov.uk/guidance/register-your-waste-exemptions-environmental-permits> The applicant is advised to contact National Permitting Service via our website to discuss the issues arising from the permit application process.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Harmondsworth Conservation Area Advisory Panel:

We appreciate the desire of the applicants to reduce the number of HGV trips to deal with the leachate from this site but feel more thought should have been given to the siting and screening of the proposed methane stripping plant (MSP). The proposed plant, and the existing storage tank, are on Green Belt land that is supposed to have been returned to agricultural use. The tank is clearly visible to all the many pedestrians who walk along Harmondsworth Lane as it is close to the gateway to the southern part of the Harmondsworth Landfill site. If the Council is minded to approve this application, we suggest that the MSP should be sited to the west of the storage tank, rather than to the east as is proposed. This move would make it far less visually intrusive to passers-by. We would also like to see a condition imposed that the existing fence on both sides of the gateway should have a hedge planted behind it to better screen both the tank and the proposed MSP from the road; the boundary would then more closely match that along the rest of Harmondsworth Lane.

CADENT

Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified.

Can you please inform Plant Protection, as soon as possible, the decision your authority is likely to make regarding this application.

If the application is refused for any other reason than the presence of apparatus, we will not take any further action.

Please let us know whether Plant Protection can provide you with technical or other information that may be of assistance to you in the determination of the application.

Internal Consultees

CONTAMINATION OFFICER

The EA have responded with information that confirms my consideration that the site is currently

regulated by the Environmental Permitting Regulations, in which case the proposed development of a methane stripping plant will require a variation to the current landfill environmental permit.

The permit should include reference to a site condition report (SCR) for any area of the site that is not subject to waste disposal. The SCR details are required to identify:

the environmental setting and pollution history of the site
any possible sources of historical contamination
substances in, on or under the land, from materials currently used or produced by the activities under the permit that may be a pollution risk
relevant plans for the site

The permit holder is required to collect and record information throughout the lifetime of the environmental permit, and they must update the SCR and submit it to the EA when the holder wishes to surrender the permit.

Therefore, in terms of land contamination matters, the Permitting Regulations should ensure relevant land conditions at the site are identified/addressed/managed accordingly.

Hence, I have no objection or further comments to the application.

FLOOD AND WATER MANAGEMENT

Flood Zone 1. No comments.

AIR QUALITY OFFICER

We have no air quality observations as the proposal will have no air pollution emissions to the atmosphere.

Odour would be the only concern. However, reading the planning statement which presents a very succinct description of odour impacts, it seems that the design of the structure will prevent any releases, with no further details provided.

HIGHWAY ENGINEER

On the basis that the development will create fewer trips than the existing situation and there will be no changes to the access there are no highway objections to this proposal

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The proposed MSP and pipeline to sewer is required to more effectively deal with leachate arising as a by-product of the landfilling operation. The plant would process the leachate, stripping it of methane, which would allow it to be safely disposed of to the main sewer. It is therefore a process which supports the wider landfill operation, so is not considered in itself to be inappropriate development in the Green Belt.

It is considered that the development does not conflict with paragraph 133 of the NPPF, policy DMEI 4 and DMEI 6 of the Hillingdon Local Plan Part 2- Development Management Policies (2020), policy EM2 of the Local Plan Part 1 (2012) and Policy G2 of the London Plan (2021).

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7.02 Density of the proposed development

Not applicable to this application.

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

Not applicable to this application.

7.04 Airport safeguarding

Not applicable to this application.

7.05 Impact on the green belt

Paragraph 133 of the NPPF says that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.

Policy G2 of the London Plan 2021 says that the strongest protection should be given to London's Green Belt,

Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) of Local Plan: Part 1- Strategic Policies (2012) says that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.

Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open Land) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) says that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

The proposed plant would be a visible feature when viewed locally within the wider landfill site but is modest in size, at less than 1.5m tall, especially when compared to the existing leachate holding tank. The area in which the MSP is to be located is screened from the road to the north and land to the west by the established field edge hedgerow vegetation. The landform of the restored landfill itself screens the area from other directions. It could be argued that it would be seen as an industrial element impacting upon the openness of the green belt, but when weighed against its discreet siting and small size, together with the context of the greater gain arising from the wider benefit of a safe, restored landfill site and reduced road miles, it is considered that any harm which may arise to the openness of the Green Belt is clearly outweighed by the greater sustainability benefits.

The MSP is to be retained until no longer required for the management of leachate produced within the landfill site. This is most likely to be the point at which the Environmental Permit is surrendered, for which there is no fixed timescale, as the permit will remain in place until the site operator can demonstrate that the landfill site presents no further environmental risk. The timescale to remove the MSP once no longer required for leachate management could be controlled by a planning condition. It would not be appropriate to impose a fixed timescale, there being no fixed timescale for Environmental Permit surrender, but a condition requiring removal once no longer required for safe discharge of leachate to sewer would be appropriate.

It is considered that the development does not conflict with paragraph 133 of the NPPF, policy DMEI 4 and DMEI 6 of the Hillingdon Local Plan Part 2- Development Management Policies (2020), policy EM2 of the Local Plan Part 1 (2012) and Policy G2 of the London Plan (2021).

7.06 Environmental Impact

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

Policy DMEI 12 (Development of Land Affected by Contamination) of the Local Plan: Part 2 - Development Management Policies (2020) says that the Council will support planning permission for development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely used through remediation.

The site is known to have a history of contaminative uses including mineral extraction and subsequent landfilling operations which, as outlined in the Council's Contaminated Land Strategy and aligned site prioritisations, are ranked as high priority activities. However, it is understood that, despite early operations being controlled by less onerous regulatory regimes, the more recent waste management processes (for the landfilling operations and subsequent monitoring of the closed site) were and continue to be managed by prescribed modern controls and procedures that are regulated by the Environment Agency (EA), all in accordance with European Waste Management Regulations, including the Landfill Directive, as enacted by the Environmental Permitting (England and Wales Regulations) (2010).

Odour

Odour from leachate may be released through leachate breakouts, damaged monitoring and extraction points, emptying of leachate holding tanks or uncovered storage tanks. Leachate is currently routinely removed from site for off-site disposal via tankers and the leachate transfer process (as well as the associated transport from site) has the potential to give rise to odour.

The applicant states that it does not normally experience odour issues relating to MSPs and associated leachate management, as the systems are sealed and contained. The proposed system of pre-treatment and discharge direct to sewer will have less potential for odour escape than the current method of removal by road tanker, where the most likely source of odour is the air evacuated from the tanker body as it fills up on site.

The process air exhausted from the MSP at Harmondsworth closed landfill will pass through an odour filter unit as a precautionary measure.

The Environment Agency has raised no objection to the proposed development as submitted, on the basis that the ground improvement trial will be located within an engineered landfill currently regulated under environmental permit NP3139PK; the existing environmental permit will need to be varied, to control risks to the environment posed by the proposed plant and relevant pollution control measures will be applied and enforced under the permit.

On this basis, it is considered that the impact of the development on contamination and air quality will be controlled, in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMEI 12 (Development of Land Affected by Contamination) of the Local Plan Part 2: Development Management Policies (2020) and Policy SI 1 of the London Plan (2021).

7.07 Impact on the character & appearance of the area

Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. Policy DMHB 11 Local Plan: Part Two - Development Management Policies (2020) advises that all development will be required to be designed to the highest standards and incorporate principles of good design. Policies D1 and D4 of the London Plan (Publication version 2020) states that development design should respond to local context

The proposed development is not considered to have any significant landscape or visual impact as the pipeline will be buried below ground and the MSP unit is relatively small, moveable, and located in the former landfill site entrance area, alongside other necessary environmental management infrastructure. The former site entrance area is at a lower level than the road to the north and screened from it by existing established hedgerow vegetation. The proposed MSP unit will be coloured dark green to match the existing leachate storage tank.

On this basis, the development proposal is considered to be acceptable in terms of its impact on the character and appearance of the area, in accordance with the Hillingdon Local Plan, the adopted London Plan (2021) and the NPPF.

7.08 Impact on neighbours

Policy DMHB 11 Local Plan: Part Two - Development Management Policies (2020) advises that proposals should not have an adversary impact on the amenity, daylight and sunlight of adjacent properties and open space. Policy DMHD 1 also requires that there is no unacceptable loss of outlook to neighbouring occupiers.

There are no immediate neighbours within the vicinity of the proposed development. The works would be sufficiently remote from surrounding residents so that their amenities would not be adversely affected. As the development would be sited a sufficient distance away from adjoining properties, it is not considered that there would be any loss of amenity to surrounding occupiers, in compliance with relevant Local Plan Policies and standards.

7.09 Living conditions for future occupiers

Not applicable to this application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

ACCESS

The existing site entrance to Harmondsworth landfill site is located off Harmondsworth Lane in a 20 mph speed zone. The road is a single carriageway with a pedestrian footpath on the northern carriageway only. Dense vegetation borders both sides of the road. Overhead street lighting appears absent. At the location of the entrance existing pelican crossing lights are present, associated with the landfill operation. The entrance of the site is currently gated with a level access from Harmondsworth Lane. The existing access will be utilised with no modifications envisaged.

Transport and Sustainability

Currently heavy goods vehicles transport the collected leachate to a waste-water treatment works.

Implementing this proposal would result in a significant reduction in traffic generation and constitutes a more sustainable operation, saving around 630 road miles by HGVs every

week:

The Highway Engineer considers that on the basis that the development will create fewer trips than the existing situation and there will be no changes to the access there are no highway objections to this proposal.

In conclusion, it is considered that the proposal is unlikely to result in material harm to the local and strategic highway network and accords with Local Plan Part 2 (2020) Policies DMT 1 and DMT 2 and Policy xx of the London Plan (2021).

7.11 Urban design, access and security

Urban design issues have been addressed elsewhere in this report

7.12 Disabled access

Not applicable to this application.

7.13 Provision of affordable & special needs housing

Not applicable to this application.

7.14 Trees, landscaping and Ecology

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure. Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

- A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure

The MSP unit will be located on an existing area of hardstanding at the former site entrance, alongside similar infrastructure relating to environmental controls for the landfill site. The installation of a pipeline link to sewer will involve some disturbance to vegetation at the field edge but will be located outside of and to the north of the existing established field edge hedge and its associated root zone.

The existing Landscape and Ecology Management Plan (LEMP) for Harmondsworth landfill site, as approved under conditions 7, 9 & 10 of landfill permission 43155/APP/2012/1903, will cover all operations within the Harmondsworth landfill site boundary and the minor works involved in installing the piped connection to sewer will follow the same principles of reasonable avoidance measures as enshrined in Appendix D to the approved LEMP.

The proposed development is not anticipated to have any significant impact on ecology. It is considered that the proposed development would not have significant adverse impacts on statutorily or locally protected nature conservation sites or landscapes, in compliance with Local Plan Part 1 Policy EM7 (Biodiversity and Geological Conservation), Policy DMEI 7 Biodiversity (Protection and Enhancement) Development Management Policies - Local Plan Part 2 (2020), The London Plan Policy G6 and National Planning Policy Framework (NPPF).

7.15 Sustainable waste management

Not applicable to this application.

7.16 Renewable energy / Sustainability

Not applicable to this application.

7.17 Flooding or Drainage Issues

Policy EM6 (Flood Risk Management) of the Local Plan Part 1 Strategic Policies (Adopted Nov. 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. London Plan policies xxx require development proposals to use sustainable urban drainage systems (SUDS) unless there are good reasons for not doing so.

The site is located within Flood Zone 1 according to the Environment Agency's online Flood Zone Map. As a result of this and given that the site area is under one hectare, a flood risk assessment is not required to support the planning application.

The MSP unit will be located on an existing area of hardstanding at the former site entrance and the proposed development will therefore not result in increased rates of surface water run off or increase the potential for flooding.

Thames Water advise that a Trade Effluent Consent will be required for any effluent discharge other than a 'Domestic Discharge'.

it is considered that the scheme satisfactorily addresses drainage and flood related issues, in compliance with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part Two - Development Management Policies , Policy SI 12 of the London Plan and the aspirations of the NPPF.

7.18 Noise or Air Quality Issues

Noise

The NPPF requires new development to 'mitigate and reduce to a minimum' potential adverse impacts resulting from noise - and avoid noise giving rise to significant adverse impacts on health and the quality of life. The NPPF also seeks to create places with a high standard of amenity for existing and future users.

London Plan Policy D14 requires that proposals meet the minimum standards in the Mayor's supplementary planning guidance, which includes minimising noise pollution.

Local Plan Part 1 Policy EM8 promotes the maximum possible reduction in noise levels and seeks to ensure that noise impacts can be adequately controlled and mitigated.

It is not anticipated that the proposed MSP will have any impact upon noise levels at sensitive receptors. The proposed MSP will be mains powered and is located close to existing landfill gas management infrastructure. Noise generated by the MSP will be barely audible and at a significantly lower level than the nearby gas generation unit and flare.

Air quality issues have been addressed elsewhere in this report.

7.19 Comments on Public Consultations

The issues raised have been addressed in the main report.

7.20 Planning obligations

Not applicable to this application.

7.21 Expediency of enforcement action

Not applicable to this application.

7.22 Other Issues

None.

8. Observations of the Borough Solicitor

General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in *Probity in Planning, 2009*.

Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

9. Observations of the Director of Finance

Not applicable to this application.

10. CONCLUSION

The proposal is not considered to be inappropriate development in the Green Belt, as the plant is associated and essential for the ongoing management of this former landfill site.

The development will create fewer vehicular trips than the existing situation and there will be no changes to the access. There are therefore no highway objections to this proposal. In terms of air quality, design of the structure will prevent any odour releases, whilst it is not anticipated that the proposed plant will have any impact upon noise levels at sensitive receptors. It is considered that any harm which may arise to the openness of the Green Belt is clearly outweighed by the greater sustainability benefits.

The plant will be subject to a variation to the Landfill Environmental Permit Both and a Trade Effluent Consent.

Approval is recommended accordingly.

11. Reference Documents

The Hillingdon Local Plan: Part 1- Strategic Policies (8th November 2012)

The Hillingdon Local Plan: Part Two - Development Management Policies (2020)

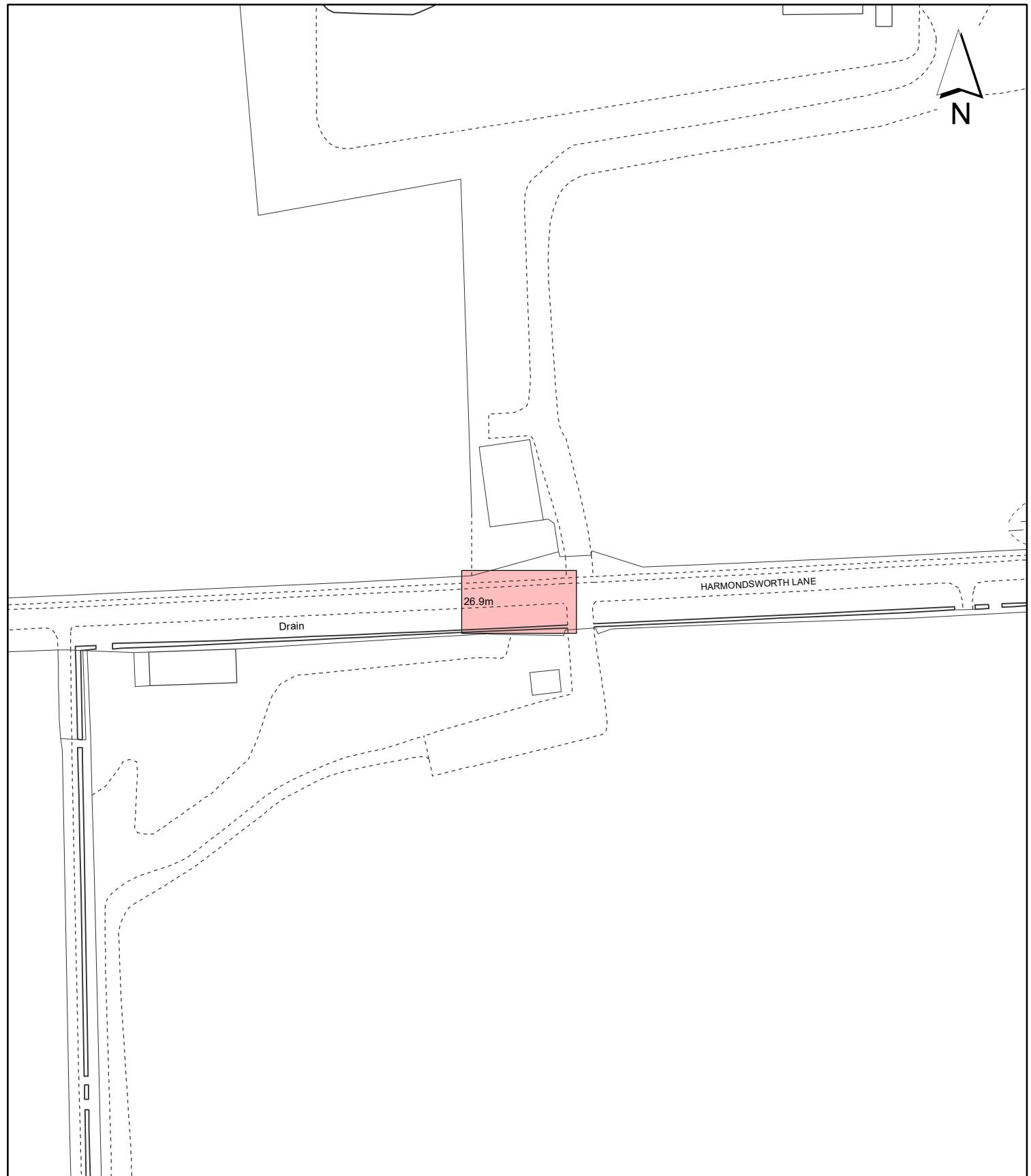
London Plan 2021National Planning Policy Framework (NPPF)

West London Waste Plan (2015)

Council's Supplementary Planning Document - Air Quality

Contact Officer: Karl Dafe

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**Notes:**

 Site boundary

For identification purposes only.

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Site Address:

**Harmondsworth Landfill Site
Harmondsworth Lane**

**LONDON BOROUGH
OF HILLINGDON**
Residents Services
Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW
Telephone No.: Uxbridge 01895 250111

Planning Application Ref:

43155/APP/2020/4267

Scale:

1:1,250

Planning Committee:

Central & South

Date:

May 2021



HILLINGDON
LONDON