

Report of the Head of Planning, Transportation and Regeneration

Address LAND AT HARMONDSWORTH HOLLOWAY CLOSE HARMONDSWORTH

Development: Phased mineral extraction, including ancillary activities, with restoration to agriculture (AMENDED JAN 2019)

LBH Ref Nos: 73289/APP/2017/3976

Drawing Nos:

- 0835/PR/1
- 0835/CS/1 v4
- 0835 O 1 v4 phasing plan 1 & 2
- 0835 O 2 v4 phasing plan 2 & 3
- 0835 PP 1 v3
- Appendix 1 - letter from planning agen
- Appendix 2 (1)- SLR report 05.07.18 in ful
- Appendix 2 (2)- SLR report 05.07.18 in ful
- Appendix 3 Environment agency letter 10.08.18
- Appendix 4 Environment agency letter 14.02.19
- Appendix 5 Highways England response 30.05.19
- Appendix 6 Further information (officer report)
- Appendix 8 Highways England response
- Appendix 9 Highways England response 30.11.18
- Updated planning statement
- 422-01526-00014 - Flood risk assessment
- 422-01526-00014 - Hydrological impact assessment
- 1261-1r1 - Air quality assessment
- Appendix 10 - SLR consulting letter/report
- Appendix 11 - GLA planning report 19.03.18
- Appendix 12 - Appeal decisior
- Appendix 13 - GLA planning report 19.12.18
- SJT/NES/17388-02 0 Transport assessment
- NTS. - Non technical summary
- Enviornmental Statement
- 0835 A 1 v3(1)
- 0835 PR 1 v6 - Proposed Levels
- 0835 SC 1 v3 - Site context
- 0835 A 1 v3
- 17388-02 Rev. a
- Gen. 02 v3
- Gen. 03 v3.
- Gen. 06 Fuelling Area v3
- 0835 L v4.
- Environmental Statement November 2017
- Non Technical Summary November 2019
- 0835 CS 2 v2 - Cross section of northern boundary
- HLH15/92 Archaeological desk based assessment
- HLH15/92 Archaeological evaluatior
- 3037/F0 Ecological assessment

Date Plans Received: 01/11/2017

Date(s) of Amendment(s):

09/11/2017
07/11/2017

**Major Applications Planning Committee -
PART 1 - MEMBERS, PUBLIC & PRESS**

Date Application Valid: 03/11/2017

23/07/2018

08/04/2019

01/11/2017

1. SUMMARY

Planning permission is sought for the phased mineral extraction on agricultural Green Belt land, with an estimated lifespan of 10 to 12 years, together with a minerals processing , with subsequent restoration works involving importation of inert material, back to agricultural use.

The initial submission including the construction of a concrete plant which was viewed as unacceptable given the sites location within the green belt. Subsequently the applicant has now removed to concrete batching element from the scheme. However, the mineral processing and material treatment plant remain part of the amended proposals

Whilst the extraction of minerals from within the Green Belt is acceptable in principle, the minerals processing plants constitute inappropriate development for which the applicant is required to demonstrate the proposal meets the very special circumstances set out in the NPPF. The revised statement provides a list of very special circumstances which support the proposal which include limiting the impact to the highway network by the inclusion of a processing plant on site, the plant machinery itself will be low level thus minimising the impact to the openness of the Green Belt and the storing of soil bunds around the perimeter provides both a visual and noise barrier to the proposed plant.

The combination of the above points and the temporary nature of the operation demonstrate very special circumstances which outweigh the potential harm to the openness of the Green Belt

2. RECOMMENDATION

1. That the application be referred back to the Greater London Authority.

2. That should the Mayor not direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application, that the application be deferred for the determination by the Head of Planning Transportation and Regeneration under delegated powers, to approve the application

3. That if the application is approved, the following conditions be attached:

1 RES3 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 RES4 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:

0835/PR/1
Gen. 06 Fuelling Area v3.
Gen. 03 v3.
Gen. 02 v3
0835 CS 1 v3
0835 CS 2 v2 - Cross section of northern boundary
0835 PR 1 v6 - Proposed Levels
17388-02 Rev. a
0835 PP 1 v3
0835 O 2 v4 phasing plan 2 & 3
0835 O 1 v4 phasing plan 1 & 2
0835/CS/1 v4
Environmental Statement November 2017

and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), Hillingdon Local Plan: Part Two - Development Management policies (March 2019) and the London Plan (2016).

3 COM5 General compliance with supporting documentation

The development hereby permitted shall be completed in accordance with the specified supporting plans and/or documents:

Updated statement submitted April 2019
LVA Appendix A - Figure 1
LVA Appendix A - Figure 2
LVA APPENDIX A - Figure 4
422-01526-00014 - Flood risk assessment
HLH15/92 - Archaeological Desk Based Assessment
HLH15/92 - Archaeological Evaluation
SJT/NES/17388-02 - Transport Statement
Non Technical Summary November 2017
1261-1r1 - Air Quality Assessment

Thereafter the development shall be retained/maintained in accordance with these details for as long as the development remains in existence

REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part

Two Saved UDP Policies (November 2012), Hillingdon Local Plan: Part Two - Development Management policies (March 2019) and the London Plan (2016).

4 NONSC Archaeology

No excavation or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

REASON

To ensure the proposal is in accordance with Policy BE1 and BE3 of the Local Plan Part 2 - Saved UDP Policies (2012), Policy DMHB7 of the Hillingdon Local Plan Part 2: Development Management policies (March 2019) .

5 NONSC Contamination

No excavation or development shall take place until a remediation strategy to deal with the risks associated with contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:

- all previous uses;
- proposed activities
- potential contaminants associated with those uses;
- a conceptual model of the site indicating sources, pathways and receptors; and
- potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site from the proposed activities.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

REASON

To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution in line with paragraph 170 of the National Planning Policy Framework. To prevent further deterioration of groundwater quality and prevent the recovery of a drinking water protected area in the Lower Thames Gravels groundwater body.

To ensure the proposal is in accordance with policy DME112 of the Hillingdon Local Plan Part 2: Development Management policies (March 2019) and with policy OE11 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012). .

6 NONSC Contamination

No infiltration of surface water drainage into the ground at this site is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

REASON

To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution in line with paragraph 170 of the National Planning Policy Framework. To prevent further deterioration of groundwater quality and prevent the recovery of a drinking water protected area in the Lower Thames Gravels groundwater body. Ingerbourne Valley 17 SLR Ref: 427-01526-00014 Harmondsworth Quarry - HIA October 2017 section 4.3.3 Abstraction Licenses and Discharge Permits states. The proposed development will not require an abstraction license as abstraction will take place for the purpose of dewatering only with the water returned to ground via a proposed infiltration trench. It is not envisaged that a discharge consent will be required as all groundwater or surface water abstracted from the site will preferentially be discharged to groundwater via an infiltration pond or recharge trench.(The soakaway trench will be installed along the southern boundary of the site between boreholes GWD2 and GWD4.) The proposed discharge to ground on the southern boundary of the site of untreated "dewatering" or proposed limits detailed in Section 3 of the letter dated 05 July 2018 (ref: 422-01526-00034) are unacceptable during the operational phase of the quarry.

To ensure the proposal is in accordance with policy DME112 of the Hillingdon Local Plan Part 2: Development Management policies (March 2019) and with policy OE11 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012). .

7 NONSC Contamination

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.

REASON

To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and The Environment Agency's approach to groundwater protection March 2017 Version 1.0.

To ensure the proposal is in accordance with policy DME112 of the Hillingdon Local Plan Part 2: Development Management policies (March 2019) and with policy OE11 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012). .

8 NONSC Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the

Local Planning Authority. The remediation strategy shall be implemented as approved.

REASON

No investigation can completely characterise a site. The condition may be appropriate where some parts of the site are less well characterised than others, or in areas where contamination was not expected and therefore not included in the original remediation proposals.

To ensure the proposal is in accordance with policy DME12 of the Hillingdon Local Plan Part 2: Development Management policies (March 2019) and with policy OE11 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012). .

9 NONSC Contamination

The development hereby permitted may not commence until such time as a scheme for the following has been submitted to, and approved in writing by, the local planning authority:

1. The storage of oil;
2. Disposal of foul and surface water.

The scheme shall, where necessary, be supported by detailed calculations and include a programme for future maintenance. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme, or any details as may subsequently be agreed, in writing, by the local planning authority.

REASON

To ensure that the proposed development, including mineral extraction, does not harm the water environment in line with paragraph 170 of the National Planning Policy Framework and the Environment Agency's Approach to Groundwater Protection and to ensure that the proposed non-mains drainage system does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework.

The response given in question 11 of the application form for the foul sewage states "Self-contained chemical unit" further details are required to ensure that there are no discharges to ground that may cause pollution from sewage discharge and/or site drainage.

To ensure the proposal is in accordance with policy DME12 of the Hillingdon Local Plan Part 2: Development Management policies (March 2019) and with policy OE11 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012). .

10 NONSC Aviation Safety

No permanent or mobile structure including plant and cranes required for the erection and dismantling of any facility shall exceed a height of 41m amsl, unless written permission has been obtained from the LPA in consultation with NATS En Route LTD;

REASON

To ensure that operation and operating equipment on the site does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems in accordance with Policies 6.6 and 7.7 of the London plan (2016) and Policy A6 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and policy DMHB Hillingdon Local Plan Part 2: Development Management policies (March 2019) .

11 NONSC Ecology

No excavation or development shall take place until an ecological protection and enhancement scheme has been submitted and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate (1) how the higher quality vegetation will be protected or incorporated into the proposed development; (2) how the restoration of the site will accommodate specific areas for wildlife enhancement (in addition to the swale strips) along the boundary of the site, with a at least a 5m deep strip of species rich wildlife planting along the length of the western border with public right of way; (3) that the restored scheme shall accommodate a new standing water body, linked to the swales, that is constructed and planted to be of ecological value. The development should proceed in accordance with the approved scheme.

REASON

To ensure the ecological value of the site is protected and enhanced in accordance with EM7 of the Local Plan Part 1, policy DME17 of the Hillingdon Local Plan Part 2: Development Management Policies (March 2019) the London Plan and the NPPF.

12 NONSC Monitoring Report

Within 3 months of the commencement of development, a scheme for the monitoring, recording and reporting to the Local Planning Authority of mineral extraction (type and quantity) shall be submitted to and approved in writing by the Local Planning Authority. The development must proceed in accordance with the approved scheme.

REASON

To ensure the appropriate recording and reporting of the type and quantum of minerals extracted in accordance with Policy EM9 and EM10 of the Local Plan Part 1.

13 NONSC Operation Management Plan

No excavation or development shall take place until an operational management plan shall be submitted to and approved by the Local Planning Authority. The plan shall specify the following:

- (a) details of the order of construction and associated works including the sequence and phasing of minerals extraction and reclamation/backfilling and restoration.
 - (b) The estimate of the amount of material to be extracted, stockpiled and imported across the life of the project.
 - (c) The provision of information to be made available to the Local Planning Authority on a quarterly basis relating to the estimated amount of material to be imported to the site for the subsequent quarter.
 - (d) The provision of information to be made available to the Local Planning Authority on a quarterly basis relating to the estimated amount of HGV (3.5t or more) movements for the subsequent quarter.
 - (e) the provision of monthly progress reports to be submitted to the Local Planning Authority covering:
 - i. the amount and type of material being excavated and transported off site
 - ii. the amount of heavy goods vehicles (3.5tonnes or more) movements to and from site
 - iii. the amount and type of material being imported for the reclamation/backfilling operations
- The amount of HGV movements and imported material shall not exceed the estimates unless with the prior written approval of the Local Planning Authority.
- (f) the information to be disseminated to all site operators and contractors showing the preferred traffic routes.
 - (g) details for the provision of fencing to protect retained trees and hedgerows.

(h) details (height and location) of the stockpiling with maximum heights to be agreed with the Local Planning Authority. These heights should not be exceeded without prior written consent of the Local Planning Authority.

(i) the provision of information relating to:

i. the infill and the land restoration programme with a scheme for the agreement of land levels to be established on a quarterly basis in advance of the works taking place.

ii. The recording (including survey information) and the reporting of land levels to the Local Planning Authority on a quarterly basis with levels not exceeding those agreed in advance unless without the prior written consent of the Local Planning Authority.

(j) the provision of information (including survey data, type of material and timing of submission) to be made available to the Local Planning Authority to demonstrate each phase of the restoration scheme is free from contamination.

REASON

To ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of the Local Plan Part 1 and the London Plan.

14 NONSC Noise

All earthworks activities, shall only take place between the hours of 07.30 - 18.30 on Monday-Friday and there shall be no arrival or departure of delivery vehicles outside the hours of 07.30 - 16.30 on Monday to Friday. There shall be no earthworks activity and no delivery vehicles at the site on Saturdays, Sundays or Bank and Public Holidays.

REASON

To safeguard the amenity of the surrounding area in accordance with policy OE1 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and policy DMIN 1A of the Hillingdon Local Plan Part 2: Development Management Policies (March 2019)

15 NONSC Contamination

No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. All imported soils shall be inspected and tested for chemical contamination and the results of this testing shall be submitted to and approved by the Local Planning Authority.

Reason

To ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of the Local Plan Part 1, policy DME12 of the Hillingdon Local Plan Part 2: Development Management policies (March 2019), policy OE11 of the Hillingdon Local Plan Part Two: Saved UDP policies (November 2012) and the London Plan.

16 NONSC Vehicle Washing

Provision shall be made within the site to ensure that all vehicles associated with the construction of the development hereby approved are properly washed and cleaned to prevent the passage of mud and dirt onto the adjoining highway.

REASON

To ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of the Local Plan Part 1 and the London Plan.

17 NONSC Parking Layout

No excavation or development shall take place until details of the parking arrangements for employees and visitors have been submitted to and approved in writing by the Local Planning Authority and such details as are approved shall be implemented and retained for

the duration of the development.

REASON

To ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of the Local Plan Part 1, policy AM14 of the Hillingdon Local Plan Part Two: Saved UDP policies (November 2012), policy DMT6 of the Hillingdon Local Plan Part 2: Development Management Policies (March 2019) and the London Plan.

18 NONSC Restoration Plan

Within 6 months of the approval, a detailed scheme for the restoration of the land shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall identify the final site contours, the landscaping arrangements, the material to be used for restoration (including depths and types of top soil and substrate), the detailed drainage regime including phased implementation and the type of boundary treatment including details of the dimensions of the perimeter ditch as well as the long-term maintenance of the infiltration trench and other drainage infrastructure. The development must proceed in accordance with the approved plans.

REASON

To ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of the Local Plan Part 1 and the London Plan.

19 NONSC Non Standard Condition

If the proposed operation requires a structure to be constructed to provide access over the perimeter ditch, details of this structure/s shall be submitted and approved in writing by the local planning authority.

REASON

To ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of the Local Plan Part 1 and the London Plan.

20 NONSC Lighting Details

If lighting is required on the site, a lighting plan shall be submitted to the Planning Authority to show the location of any lighting to be placed on the site together with written evidence to demonstrate that lighting will not have an adverse effect on the motorists using the M4. Any lighting that is to be installed shall not thereafter be altered without the prior consent of the LPA other than for routing maintenance which does not change its details.

REASON

To ensure the safety for all users on the M4 and that the M4 continues to be an effective part of the national system of routes for thorough traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety. To ensure the proposal is in compliance with policy OE1 of the Hillingdon Local Plan Part Two: Saved UDP policies (November 2012)

21 NONSC Dewatering and Settlement Assessment

No excavation or development shall take place until a dewatering and settlement assessment is carried out by the Environment Agency and to agree that this document can be shared with Highways England for review.

REASON

To ensure that the integrity of the M4 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act

1980 and to satisfy the reasonable requirements of road safety.

22 NONSC Permitted Time Frame

Extraction of minerals shall cease by 1st September 2027; restoration of the land to agriculture shall be completed by 1st September 2029; and all temporary buildings and structures within the site shall be removed by 1st September 2027; unless otherwise agreed in writing by the Mineral Planning Authority."

REASON

In order to comply with the terms of the application and to safeguard the visual amenity of the Green Belt in compliance with Policy OL1 of the Hillingdon Unitary Development Plan and policy DMEI4 of the Hillingdon Local Plan Part 2 : Development Management Policies (March 2019)

23 NONSC Aftercare

The restored landform will be subject to a 'Aftercare Scheme' for 5 years. This scheme will outline the works for the site to ensure the restoration scheme is implemented correctly. The scheme will include maintenance procedures for ensuring the ditches are kept free from silt and any other materials which may prevent the site from draining adequately and these are listed below;

- regularly remove any silt (if any) by careful excavation without altering the shape of the ditch,
- regularly strimming of vegetation but only just above the water level (leaving the fringe of the bank uncut in order to maintain some habitat)
- all cuttings to be removed from the area to avoid blockages further downstream,
- all organic waste should be completely, removed off site and disposed of correctly

REASON

To ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of the Local Plan Part 1 and the London Plan

INFORMATIVES

1

The written scheme of investigation (condition 4) will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

2

The dewatering and discharge to ground, restoration and landfill activities associated with this development will require an Environmental Permit under the Environmental Permitting Regulations 2010, from the Environment Agency, unless an exemption applies.

The applicant is advised to contact the Environment Agency on 08708 506506 for further advice and to discuss the issues likely to be raised. You should be aware that the permit may not be granted. Additional 'Environmental Permitting Guidance' can be accessed via our main website. From 1 January 2018 most exempt water abstractions will need a licence. E.g. Dewatering mines, quarries and engineering works, where the water is mostly groundwater rather than rainwater. For more information please see here. We would like to refer the applicant/enquirer to our position statements in our Approach to

Groundwater Protection (February 2018), available from our website. This sets out our position for a wide range of activities and developments including and not limited to:

- Waste management
- Discharge of liquid effluents
- Land contamination
- Drainage

Model Procedures and good practice

We recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Consider using the National Quality Mark Scheme

3 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).

4 I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements
OL4	Green Belt - replacement or extension of buildings
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
MIN1	Safeguarding of sand and gravel reserves
MIN3	Restriction on area of land south of the M4 motorway subject to planning consent for sand and gravel extraction and/or waste disposal
MIN4	Restriction on the release of good agricultural land for mineral working and requirement for restoration
AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
BE13	New development must harmonise with the existing street scene.

BE21	Siting, bulk and proximity of new buildings/extensions.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
DMIN 1	Preferred Areas of Mineral Extraction and Aggregates Railheads
DMIN 3	Extraction, Landfilling and Restoration
DMIN 4	Re-use and Recycling of Aggregates
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 7.2	(2016) An inclusive environment
LPP 7.4	(2016) Local character
LPP 7.16	(2016) Green Belt
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.21	(2016) Trees and woodlands
LPP 8.3	(2016) Community infrastructure levy
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment

3. CONSIDERATIONS

3.1 Site and Locality

The site is located on the outskirts of the village of Harmondsworth, near Heathrow Airport. The site is allocated as Green Belt and falls within the Heathrow Opportunity Area. The site extends to approximately 11ha of agricultural grassland, comprising two agricultural fields, surveys identified excellent and very good quality agricultural land of Grades 1 and 2. At a local level the application site is a safeguarded mineral site.

It is bound by the M4 to the north, employment units and Holloway Close to the east, the

A3044 Holloway Lane and other agricultural land to the south and Saxon Lake to the west.

3.2 Proposed Scheme

The site proposals entail the installation of a washing plant in which the entire mineral reserve will be processed. Following the extraction of minerals, the site will be restored via the importation of inert materials on a phased basis, returning the site to agricultural use.

The application as originally submitted was for the extraction of circa 450,000 tonnes of sand and gravel, together with a concrete batching plant and associated development, including a minerals processing plant and a soil treatment plant for the incoming reclamation material, (which also includes a crusher to reduce the size of larger pieces of material to be screened out). Any unsuitable material would be removed from site or stockpiled to be crushed.

The applicant has now removed to concrete batching element from the scheme. However, the mineral processing and material treatment plant remain part of the amended proposals.

In summary, the Proposed Development would involve stripping soil and overburden to full depth across the site, placement of this material into bunds, establishment of a mobile processing plant and associated infrastructure such as silt ponds, office, mess room and weighbridge, extraction of mineral by 360 degree excavator, importation of inert material to backfill the worked void, replacement of overburden and soils in order to restore the Site back to agriculture at original ground levels and statutory aftercare over a 5 year period.

The proposed site has an overall mineral reserve of 450,000 tonnes. The overall period for mineral extraction is estimated at 8 years. Mineral extraction will take around 4 years in phases 1 and 2, with reclamation commencing by the end of Year 2 or early Year 3, with reclamation of these phases taking 3-4 years. In total extraction and restoration will take place for approximately 10 years.

The following reports have been submitted in support of the application:

Agricultural Land Quality Appraisal October 2016

Assessment of the agricultural land quality of a site proposed for mineral extraction and restoration

Air Quality Assessment

Based on the assessment results, air quality issues are not considered a constraint to planning consent for the proposed development.

Hydrogeological Impact Appraisal

Archaeological Desk-based Assessment

The site lies within an Archaeological Priority Zone as defined in the local plan. There are no known heritage assets on the site but archaeological deposits of Bronze Age and Saxon date were recorded immediately to the north during M4 motorway road widening. It will be necessary to provide further information about the potential of the site from field observations in order to draw up a scheme to mitigate the impact of development on any below-ground archaeological deposits if necessary.

Archaeological Evaluation

The evaluation revealed a spread of archaeological deposits in several locations across the site with seemingly blank areas in between, but with a dense concentration of deposits in the west. All of the features, the majority of which contained some dating evidence, were of later Bronze Age date. Just single sherds of pottery of Roman and post-medieval date were also recovered. Test pits revealed a thick deposit of brickearth above the gravel, but no Palaeolithic finds were recovered.

UPDATING ECOLOGICAL ASSESSMENT

The site provides a range of common, species-poor habitats supporting low numbers of foraging and commuting bats, breeding birds and a very low population of reptiles. Recommendations have been made to protect these species groups within the proposals and to enhance the site post-completion to cause a net gain in biodiversity. It is considered that the site proposals will accord with the requirements of NPPF and with Policies EM7 and 7.19 (refer to Section 2.0) in respect of ecology, subject to the implementation of suitable mitigation and enhancement measures.

Updating Site Survey

Given the mobility of animals and the potential for colonisation of the site, it is recommended that an updating walkover of the site is undertaken prior to the development commencing should this not occur within 12 months of the date of the survey (i.e. by July 2018).

Flood Risk Assessment

There are no proposals for discharge of either surface water or groundwater from the site during the active quarrying. Both surface water and groundwater will be routed to an internal sump within the site boundary where it will either be allowed to soakaway to groundwater or be pumped to another area of the site to soakaway.

Transport Statement

This Transport Statement has demonstrated that the development is fully in accordance with both national and local policy and in particular confirms that the impact of the development is not severe. On this basis it concludes that there are no grounds for refusal on highway grounds.

Landscape and Visual Appraisal

3.3 Relevant Planning History

Comment on Relevant Planning History

The application site does not benefit from any relevant planning history

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 - Saved UDP Policies (2012)

The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2018) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Local Plan: Part 2

The Local Plan Part 2 Draft Proposed Submission Version (2015) was submitted to the Secretary of State on 18 May 2018. This comprises a Development Management Policies document, a Site Allocations and Designations document and associated policies maps. This will replace the current Local Plan: Part 2 - Saved UDP Policies (2012), once adopted. The document was submitted alongside Statements of Proposed Main and Minor Modifications (SOPMs) which outline the proposed changes to submission version (2015) that are being considered as part of the examination process.

Submission to the Secretary of State on 18th May 2018 represented the start of the Examination in Public (EiP). The public examination hearings concluded on the 9 August 2018 and the Inspector is currently assessing the findings of these hearings. The EiP will conclude when a final Inspector's Report is published.

Paragraph 48 of the NPPF (2018) outlines that local planning authorities may give weight to relevant policies in emerging plans according to:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

On the basis that the Council is awaiting the final Inspector's Report on the emerging Local Plan: Part 2, the document is considered to be in the latter stages of the preparation process. The degree to which weight is attached to each policy is therefore based on the extent to which there is an unresolved objection being determined through the public examination process and the degree of consistency to the relevant policies in the NPPF (2018).

Relevant emerging policies include those listed below:

DMHB 11, Design of New Development
DMHB 14, Trees and Landscaping
DMEI 2, Reducing Carbon Emissions
DMEI 6, Development in Green Edge Locations
DMEI 7, Biodiversity Protection and Enhancement
DMEI 14, Air Quality
DMT 1, Managing Transport Impacts
DMT 2, Highways Impacts
DMCI 7, Planning Obligations and Community Infrastructure Levy
DMIN 1, Preferred Areas of Mineral Extraction and Aggregates Railheads
DMIN 3, Extraction, Landfilling and Restoration
DMIN 4, Re-use and Recycling of Aggregates

UDP / LDF Designation and London Plan

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

Part 1 Policies:

PT1.BE1 (2012) Built Environment

PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains

PT1.EM3	(2012) Blue Ribbon Network
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise

Part 2 Policies:

OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements
OL4	Green Belt - replacement or extension of buildings
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
MIN1	Safeguarding of sand and gravel reserves
MIN3	Restriction on area of land south of the M4 motorway subject to planning consent for sand and gravel extraction and/or waste disposal
MIN4	Restriction on the release of good agricultural land for mineral working and requirement for restoration
AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
BE13	New development must harmonise with the existing street scene.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
DMIN 1	Preferred Areas of Mineral Extraction and Aggregates Railheads
DMIN 3	Extraction, Landfilling and Restoration
DMIN 4	Re-use and Recycling of Aggregates
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development

DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 7.2	(2016) An inclusive environment
LPP 7.4	(2016) Local character
LPP 7.16	(2016) Green Belt
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.21	(2016) Trees and woodlands
LPP 8.3	(2016) Community infrastructure levy
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **15th December 2017**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

The application has been subject to 3 methods of consultation which include 321 letters sent to neighbouring properties within reasonable proximity to the site, site notices erected outside of the site and also a press advert. All methods of consultation expired 08-02-19 and 33 number of responses were received raising the following concerns;

- Threat of damage to the village due to the constructions of a third runway
- Highway network impacts (traffic congestion, increase in vehicle movements etc)
- Objection to the applied time frame for the works to be undertaken and the secondary works proposed
- Hours of operation
- Noise
- Road safety towards the slip road onto the M4

PETITION FEB. 2019

A petition bearing 21 signatures has been received objection to the proposals on the following grounds:

- (i) The proposal will impact the the grade 1 agricultural land and subsequent reduction in farming land which will effect the viability of the farming community and their employees
- (ii) The area between Holloway Lane and the M4, was used to dump the spoil from the building of the M4. The spoil from these and other nearby sites gathers in the gutters and causes flooding in Holloway Lane when it rains.
- (iii) The pathways are covered by fine particulates which add to the pollution in the area. We demand that these areas are fully restored, before another application for mineral extraction is approved.
- (iv) This parcel of land is included in the local and London plan. This means residents have no option, but to accept the extraction of minerals.
- (v) We strongly object to the importation of material for recycling. The concrete crushing will bring more pollution to the area, noise in excess of 65 db (according to the manufacturer of this equipment) which will be in operation from 7am. To 6pm everyday and 7am to 1pm on Saturdays. This plant will be dependant on diesel fuel for its operation. As an example the Terex Pegson machines, are built with a heavy duty fabricated chassis with a high efficiency caterpillar 224 kw 6 cylinder diesel power pack. The height of the plant will impose on the view of this area.
- (vi) The 3m bund proposed will do nothing to improve the site. This activity can be easily relocated to one of the existing sites especially one just 500 meters away in Holloway Lane. A strict time limit with punitive fines must be imposed to ensure any over run of this activity is discouraged.
- (vii) Holloway Lane / Hatch Lane is already subject to traffic congestion and to put more lorries onto this road will increase the pollution in the area.
- (viii) Harmondsworth Road is the site of a coach park that has built on the green belt without permission. It is subject to a planning inspectors decision, but this has also reduced the agricultural land in the area by some 5.5 acres.
- (ix) The intake of children from West Drayton going to Harmondsworth Primary School is 60%. These children are encouraged to walk. They will need to cross the entrance to this site. During busy times they will be held, while the lorries sit idling waiting to join the traffic stream. They cannot cross to the other side of Holloway Lane as there is no pavement.
- (x) Lorry movements in Hatch Lane will disturb residents for a significant part of the day and evening. No assurances can be given by the applicant that this route will not be taken. The residents on these roads already experience lorry noise due to the speed humps. Speed checks carried out by the police with the help local residents confirm the speed limit is not adhered to.
- (xx) There is a concern regarding the contaminated land in-front of this parcel, locally known as Thackra Land. This was used for a long period for illegal dumping. There has been no sampling of the any kind from seepage from this land.

CASE OFFICER COMMENT:

For clarity the petitioners points are answered below;

- (i) The London Plan identifies Hillingdon as one of four boroughs that are collectively required to maintain a seven year landbank of sites with the capacity to deliver at least 5 million tones of land won aggregates. The council needs to ensure it has permitted reserves amounting to a total of at least 1.75 million tones for seven years. Local Plan Part 1: Strategic Policies sets out to safeguard and promote areas of geological importance and to proportionate contribution to West London's target for mineral extraction. The Hillingdon Local Plan Part 2 - Site Specific Allocations LDD identifies the application site as an area which could contribute to these targets. As such there is significant policy support for the extraction of minerals in this location.
- (ii) The proposal is subject to a number of flood protection conditions
- (iii) Issues relating to the current state of the pathways which surround the site are not considered part of the assessment of this application as they fall outside of the red line site boundary.
- (iv) The local is subject to consultation throughout its examination. Once adopted Officers are

required to assess application in line with national, regional and local plan policies.

(v) The concrete batching plant has been removed the proposal and a condition to control hours of operation has been included to insure noise impacts are kept to a minimum. The hours of operation are restrict earthworks to weekdays only and no weekend or bank holiday work. With regards to the height of the machinery, the proposed plans indicate the processing plant is to be sited within a ditch 3-4 metres below ground level and minimal views will be offered above the 3 metre bunds

(vi) This has been addressed in the response to point (i)

(vii) The transport statement provides data relating to vehicle movements which has been tested by the councils highways engineer and found to have an acceptable level of impact upon the highway network. Furthermore the removal of the concrete batching plant from the scheme will result in a reduction in volume of vehicle movements which were deemed acceptable by the LPA

(viii) Unauthorised coach parking is an issues which cannot be included with the assessment of this application as it falls outside of the red line site boundary

(ix) The proposed site access remains unaltered from the existing arrangement. The entrance to the site lays some 825 metres from the aforementioned school and whilst the application proposes an increase in vehicle movements to and from the site the TS includes the provision of visibility splays to adequate levels of road safety are achieved.

(x) A condition has been included to restrict operating hours with deliveries to be restricted to 07.30 - 16.30. It should also be noted that the development proposes a 1% increase to vehicle trips upon the highway network

(xx) Illegal flytipping is matter which cannot be considered as part of the assessment of this application as it is not a material consideration and also falls outside of the red line site boundary.

The Greater London Archaeological Advisory Service (GLAAS)

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: Harmondsworth; Heathrow Area. The Heathrow plateau and Harmondsworth in particular are areas of well-known archaeological interest. The archaeology of the plateau has been recognised since at least the Second World War when an Iron Age settlement and shrine set inside an earthwork enclosure was excavated in advance of runway construction - the shrine is considered an exemplar of a nationally rare monument type. In recent decades very extensive investigations have been undertaken in advance of both airport and mineral extraction related development. Cumulatively this amounts to one of the most extensive programmes of landscape-scale archaeological investigations in England. Heritage assets so far discovered at Heathrow include a major Neolithic ceremonial monument complex, one of the earliest extensive organised field systems in England (Bronze Age), the early Iron Age shrine noted above followed by later Iron Age, Roman and early medieval settlements and fields. The latter are the precursors of the villages which still exist alongside the modern airport and include many important historic buildings such as their medieval parish churches and the Great Barn at Harmondsworth. Immediately to the west of the application site, at Prospect Park, multi-period archaeology was recorded prior to mineral

extraction in the 1990s -most notably discoveries included an early-middle Bronze Age cremation cemetery, late Bronze Age settlement and field boundaries and scattered sunken-floored and timber hall Anglo-Saxon buildings.

The application is accompanied by helpful archaeological desk-based assessment and field evaluation (trial trenching) reports. The latter has identified a later Bronze Age settlement in the western part of the application site comprising a dense concentration of burial archaeological features: ditches, gullies, pits and postholes. The southern part of the site has a lower density of similar features whilst the northern part has only sparse features with many blank trenches. This indicates that the late Bronze Age settlement and fields recorded at Prospect Place extend into the application site, indeed the density of features suggests that the settlement core may lie in the western part of this site. No significant evidence for other periods was found in the evaluation but that was also the case with the extensive but sparsely distributed Anglo-Saxon buildings found at Prospect Place so the possibility of further discoveries should not be discounted. The evaluations both here and at Prospect Place also found deep brickearth deposits over the gravel. Elsewhere in West London Palaeolithic implements and Ice Age fauna have been found within the brickearth which in places seals a buried land surface on which in-situ pre-modern human occupation sites can be found. Such sites are very rare and hard to locate but of national importance if discovered.

The excavation of mineral from this site would remove all archaeological interest, most significantly the remaining part of the late Bronze Age settlement in the western part of the site. Harm to heritage assets should be minimised and for non-designated assets of less than national significance a balanced judgement reached (NPPF 129 and 134). In this case harm could be reduced by excluding the main late Bronze Age settlement from mineral extraction. I acknowledge that this is an area with a history of archaeological investigations in advance of mineral extraction and note that the Hillingdon Local Plan recognises this as an area where mineral extraction might be permitted so if preservation in-situ were to be sought a balanced judgment would need to be taken by the LPA in relation to the 'sterilisation' of a small part of the mineral reserve. Preservation in-situ would require revision of the extraction plans as an amendment to the application and/or the imposition of a condition to protect the area of interest.

Archaeological remains which are not preserved in-situ should be investigated prior to or during mineral extraction secured by the condition outlined below. Finally with respect to restoration plans, there appears to be no intention to restore either the landform or the historic hedge which runs across the site. An historic hedge can reasonably be considered a heritage asset which contributes to local historic landscape character so restoration should be considered. It is also worth noting that the site lies within the historic landscape setting of Harmondsworth; an area currently being considered for green infrastructure improvements related to the proposed expansion of Heathrow Airport. Whilst I appreciate that the new runway does not have a development consent might it be worth considering securing an option to incorporate its restoration into such future plans should they proceed.

Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates that the development would cause harm to archaeological interest a condition applied to require an investigation to be undertaken to advance understanding.

The archaeological interest should be conserved by attaching a condition as follows:

No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. The programme and methodology of site investigation and recording and the nomination of a

competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative

The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

I envisage that the archaeological fieldwork would comprise the following:

Excavation

If not preserved in-situ, the main area of Bronze Age settlement will need to be archaeologically excavated in advance of mineral extraction. Over the remainder of the site a 'strip, map and sample' approach would be appropriate with a contingency to investigate further any unexpected discoveries of greater significance (e.g. Anglo-Saxon buildings). In addition a specialist strategy will be needed for geo-archaeological investigation of the brickearth/gravel. Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

Refer to Science Advisor In preparing a written scheme for this site, the applicant's archaeologist should consult Historic England's Regional Science Advisor.

Preservation in-situ

If the Bronze Age settlement is to be excluded from mineral extraction then it should be protected from harm during extraction operations by a condition requiring the area to be fenced off and not disturbed or tracked across by heavy machinery.

Further information on archaeology and planning in Greater London including Archaeological Priority Areas is available on the Historic England website.

Harmondsworth Conservation Area Advisory Panel.

Over a year ago we commented on the original application, and we see very little change in the new plans, other than the apparent removal of the concrete batching plant. This is certainly an improvement as its absence will mean that noise and air pollution will not increase as much, but the majority of our concerns have not been addressed so we still feel the village of Harmondsworth and its Conservation Area will be adversely affected for the whole of the time the site is being extracted and then backfilled - which will be for a minimum of ten years. I reiterate most of our earlier comments: 'While accepting the inevitability of gravel extraction from this site at some point because of its designation in the local and London plans, there are details in the application which we do not consider appropriate, given the long history of problematic gravel extraction in the areas surrounding Harmondsworth village and its Conservation Area. There is and already has been much gravel extraction in the surrounding area, and experience has shown that the lack of suitable inert material for landfill has slowed the return of these areas back to their original state. We are therefore sceptical about the about the proposed 10 year timescale and fear the loss of this open area of the

green belt will be for a far longer period. It should be made clear to the applicant that if permission is granted and full restoration of the site has not been completed in the agreed time period, there would be financial penalties as the Council would have to pay another company to complete the site restoration. We also have concerns about lorry movements - although the proposal states that the majority will be to and from the direction of the M4, the rest will surely be going through Harmondsworth village creating further noise, air pollution from diesel vehicles, and mud on the roads.'

Harmondsworth & Sipson Residents Association

Since December 2017, when we first submitted objections to this development, HASRA has continued to receive concerns regarding another gravel extraction company within the locality of the Heathrow Villages. As a designated area for such forms of industry the villages have had to suffer the consequences of companies failing to comply with regulations and time limits set by the Council. Therefore it's understandable that residents do not want yet another site to be approved and the management of said site abused. Noise and air pollution produced by user vehicles to this site is the fundamental problem as once in operation there will be no control of the roads used by the large diesel lorries transporting the gravel and concrete from the site. It is proposed for the site to be operational Monday to Saturday which gives virtually no respite. The constant noise generated by the extraction machinery is considered unacceptable by those living in close proximity to the proposed site. More and more vehicles are travelling through the villages, hurtling through narrow roads and ignoring both the Highway Code and traffic calming measures means we definitely do not want to see more heavy duty vehicles damaging our very precious environment.

ENVIRONMENT AGENCY

The proposed development will be acceptable if the following planning conditions are included with planning permission. Without these conditions we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

The proposed development site as sand and gravel quarry and inert landfill presents a high risk of contamination that could be mobilised during the proposed activities to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon Principal aquifer and Drinking Water Protected Area waste in the Lower Thames Gravels groundwater body. In addition, the Thames river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. Without these conditions, the impact of contamination from the proposed development could cause further deterioration of groundwater quality and prevent the recovery of a drinking water protected area in the Lower Thames Gravels groundwater body.

The documents referenced above submitted in support of this planning application provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the Local Planning Authority.

Parts of these conditions require the submission of a remediation strategy, carried out by a competent person in line with paragraph 178 of the National Planning Policy Framework. The Planning Practice Guidance defines a "Competent Person (to prepare site investigation information): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional

organisation."(<http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/>)"

EA Condition 1

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:

- all previous uses;
- proposed activities
- potential contaminants associated with those uses;
- a conceptual model of the site indicating sources, pathways and receptors; and
- potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site from the proposed activities.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason

To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution in line with paragraph 170 of the National Planning Policy Framework. To prevent further deterioration of groundwater quality and prevent the recovery of a drinking water protected area in the Lower Thames Gravels groundwater body.

The submitted reports discuss a groundwater plume potentially from the upgradient historical landfills migrating across the current site; however the proposed inert landfill includes the installation of a geological boundary (in order to comply with the Landfill Directive) will modify the current hydrogeological conditions and therefore additional hydrogeological risk assessment needs to be undertaken with consideration of mounding effects from the geological barrier and results from further characterisation of the contaminated plume to ensure no further deterioration of groundwater quality nor increase the plume off-site to affect new receptors not currently downgradient.

The letter 05 July 2018 (ref: 422-01526-00034) includes a summary groundwater monitoring results for hazardous substances and not the laboratory certificates; further clarification is required to establish which hydrocarbon ranges and methods were used to generate the results for mineral oils and TPHs/ Oil & Greases and the justification for the elevated method detection limits.

EA Condition 2

Prior to any part of the permitted development brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reasons

To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution in line with paragraph 170 of the National Planning Policy Framework and to prevent further deterioration of groundwater quality and prevent the recovery of a

drinking water protected area in the Lower Thames Gravels groundwater body.

EA Condition 3

The development hereby permitted may not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority.

Reasons

To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution in line with paragraph 170 of the National Planning Policy Framework and to prevent further deterioration of groundwater quality and prevent the recovery of a drinking water protected area in the Lower Thames Gravels groundwater body.

EA Condition 4

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons

No investigation can completely characterise a site. The condition may be appropriate where some parts of the site are less well characterised than others, or in areas where contamination was not expected and therefore not included in the original remediation proposals.

EA Condition 5

No infiltration of surface water drainage into the ground at this site is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reasons

To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution in line with paragraph 170 of the National Planning Policy Framework. To prevent further deterioration of groundwater quality and prevent the recovery of a drinking water protected area in the Lower Thames Gravels groundwater body. Ingerbourne Valley 17 SLR Ref: 427-01526-00014 Harmondsworth Quarry - HIA October 2017 section 4.3.3 Abstraction Licenses and Discharge Permits states. The proposed development will not require an abstraction license as abstraction will take place for the purpose of dewatering only with the water returned to ground via a proposed infiltration trench. It is not envisaged that a discharge consent will be required as all groundwater or surface water abstracted from the site will preferentially be discharged to groundwater via an infiltration pond or recharge trench. (The soakaway trench will be installed along the southern boundary of the site between boreholes GWD2 and GWD4.) The proposed discharge to ground on the southern boundary of the site of untreated "dewatering" or proposed limits detailed in Section 3 of the letter dated 05 July 2018 (ref: 422-01526-00034) are unacceptable during the operational phase of the quarry.

This activity is likely to require an Environmental Permit. The proposed soakaway and infiltration trench dimensions outlined in the submitted plans may invalidate the groundwater results for the groundwater monitoring boreholes GWD2 to GWD4 on the southern boundary due to mounding effects. The indicative refuelling area drawing states the concrete refuelling area is serviced by a silt/oil trap before going to site drainage; whilst the silt/oil trap may deal with free product, the

concentrations in the dissolved phase may cause pollution to groundwater if the site drainage is via infiltration of surface water drainage into the ground.

EA Condition 6

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.

Reason

To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and The Environment Agency's approach to groundwater protection March 2017 Version 1.0.

EA Condition 7

The development hereby permitted may not commence until such time as a scheme for the following has been submitted to, and approved in writing by, the local planning authority:

1. The storage of oil;
2. Disposal of foul and surface water.

The scheme shall, where necessary, be supported by detailed calculations and include a programme for future maintenance. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme, or any details as may subsequently be agreed, in writing, by the local planning authority.

Reasons

To ensure that the proposed development, including mineral extraction, does not harm the water environment in line with paragraph 170 of the National Planning Policy Framework and the Environment Agency's Approach to Groundwater Protection and to ensure that the proposed non-mains drainage system does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework.

The response given in question 11 of the application form for the foul sewage states "Self-contained chemical unit" further details are required to ensure that there are no discharges to ground that may cause pollution from sewage discharge and/or site drainage.

Advice to Applicant

The dewatering and discharge to ground, restoration and landfill activities associated with this development will require an Environmental Permit under the Environmental Permitting Regulations 2010, from the Environment Agency, unless an exemption applies.

The applicant is advised to contact the Environment Agency on 08708 506506 for further advice and to discuss the issues likely to be raised. You should be aware that the permit may not be granted. Additional 'Environmental Permitting Guidance' can be accessed via our main website. From 1 January 2018 most exempt water abstractions will need a licence. E.g. Dewatering mines, quarries and engineering works, where the water is mostly groundwater rather than rainwater. For more information please see here. We would like to refer the applicant/enquirer to our position statements in our Approach to Groundwater Protection (February 2018), available from our website. This sets out our position for a wide range of activities and developments including and not limited to:

- Waste management
- Discharge of liquid effluents
- Land contamination
- Drainage

Model Procedures and good practice

We recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Consider using the National Quality Mark Scheme

NAATS 06-12-17

Dear Sir/Madam, Further to our previous representation, NATS has received the elevation diagrams attached. As the maximum height is anticipated to conflict with our safeguarding criteria, we respectfully request that the planning condition detailed below is imposed. Should the applicant be able to supply accurate coordinates for the installation site and surveyed AOD/ground levels, it should be possible to dismiss any concerns. At this time, due to the limited information available, and the uncertain distance from our navigation aid sited a few hundred metres SW it is anticipated that the application has the potential to degrade this navigation aid (LON DVOR/DME). For the avoidance of any doubt, NATS respectfully requests that the following planning condition is imposed: Aviation Condition 1 No permanent, temporary, fixed or mobile structure, including that required for the erection and dismantling of any facility shall exceed a height of 40m AOD, unless written permission has been obtained from the LPA in consultation with NATS En Route LTD. Reason: In the interests of Aviation Safety. The planning condition will also apply to cranes and other structures, however NATS will assess these on a case-by-case basis when airport Crane Permits are sought. I trust this clarifies our position and is acceptable to the LPA. Should you have any further queries, do not hesitate to contact us. Regards S. Rossi NATS Safeguarding Office

NATS 15-02-19

NATS has assessed the proposal referenced above. While this is not anticipated to affect its infrastructure and NATS has no objection to the proposal, it wishes to ensure its infrastructure and operations are not compromised by associated structures and activities. Accordingly, NATS respectfully requests that the planning condition quoted below is imposed on any consent.

Condition 1

No permanent or mobile structure including plant and cranes required for the erection and dismantling of any facility shall exceed a height of 41m amsl, unless written permission has been obtained from the LPA in consultation with NATS En Route LTD;

Reason: In the interests of aviation safety.

HIGHWAYS ENGLAND 13-12-17:

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. In this case, the M4 in particular Junction 4 and 4b and M25 Junction 15. I would like to advise you that, having assessed this application, Highways England need additional time to work with the

developers to understand what, if any, impact this development may have on the SRN. We require a Key Stage 1 Statement of Intent in accordance with the Design Manual for Roads and Bridges Standard HD22/08 Managing Geotechnical Risk, and to allow the applicant time to provide calculations demonstrating the stability of the proposed bund and to provide calculations demonstrating that water draining on to the M25 from the adjacent land will be no greater in volume or intensity than current levels. Furthermore, we require information on the proposed distribution of vehicles accessing and egressing the sites to establish the potential number of vehicles utilising the SRN to access the site. We are also concerned that the proposed bund in this development encroaches on the planting on the M25 embankment adjacent to this site. Please could the extent of the bund be presented on a clear plan. Highways England are happy to meet with the applicant to discuss the above issues further to ensure we fully understand the impact this development could have on the SRN. Please could you put this forward to the developer, or are happy for us to contact the developer directly? Please use the following email address if you need to contact me. planningse@highwaysengland.co.uk Accordingly, we formally request that your authority refrains from determining this application, (other than a refusal) until such time as we have received and considered this and any subsequent requested information. Once we are able to adequately assess what, if any, mitigation may be required for the SRN we will provide you with our final formal response. If, in the meantime, your authority wishes to determine the application, please let us know and we will provide you with a formal response based on the then available evidence

HIGHWAYS ENGLAND 06/06/18

Below are the comments we have received from Connect Plus concerning the planning application

The bund should not be so close to our boundary fence that it has an impact on our fence of the gravity drains in the verge, please see attached plan. Another concern will be the 3m bund proposed to run parallel with the M4, historically along the length of the M4 from J3 towards J4b we have a history of flooding (water run off from the adjoining lands) so we would not want to encourage erection of a bund which could add to the issue. The 15m+ deep excavation next the M4 would probably be the biggest concern at the moment (stability and dewatering), along with the bund. Connect Plus would like to see how these have been considered as there is no obvious Technical Report in the list of supporting documents. Another concern, is the runoff from the land onto our network. Point 2.10 in the Nontechnical summary states that runoff will be collected by perimeter ditches and drains but couldn't see any details of these in the plans. This drainage collection is vital for the protection of our network and must be included in the proposal. Could the applicant please supply the information as requested below. Could the offset of the toe of the bund to the DBFO boundary please be provided, along with the dimensions of the bund, and any engineering assessment of its composition and stability. Could the offset of the quarry face to the DBFO boundary please be confirmed. We appreciate that drawings have been submitted, however confirmation of the offset would be welcome, along with any engineering assessment of its stability. Has any assessment of the settlement of the surrounding area been carried out due to the proposed dewatering, how will this be measured and controlled during operations.

This is the most significant unknown at the moment and due to the potential impact on the DBFO, such assessments will need to be carried out and provided for review, along with all other available information relating to the hydrology of the proposal. There is need for some specialist Hydrology input to assess the effects of the groundwater lowering. We would like to see this before works commences. The bund should not be so close to our boundary fence that it has an impact on our fence of the gravity drains in the verge. The runoff from the land onto our network. Point 2.10 in the Nontechnical summary states that runoff will be collected by perimeter ditches and drains but couldn't see any details of these in the plans. This drainage collection is vital for the protection of our network and must be included in the proposal. Could you please ask the applicant to supply the additional information as Connect Plus need to see the information to ensure that the bund will not have an impact on the M4. Also has the applicant sent you a copy of the travel plan?

Council's Reference: 73289/APP/2017/3976

Location: Land at Harmondsworth, Holloway Close, Harmondsworth.

Proposal: Phased mineral extraction, erection of a low profile processing and concrete plant, importation and treatment of reclamation material including ancillary activities, with restoration to agriculture. (amended plans).

Referring to the planning application that is referenced above, dated 23 July 2018, in the vicinity of the M4, that forms part of the Strategic Road Network, notice is hereby given that Highways England's formal recommendation is that we:

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A - Highways England recommended Planning Conditions);

Highways England Planning Response (HEPR 16-01) January 2016

Highways Act Section 175B that requires consent to be obtained from the strategic highways company for the construction, formation or laying out of any access to or from a trunk road in England is / is not relevant to this application. This response represents our formal recommendations and has been prepared by the Area 5 Spatial Planning Team. It is copied to the Department for Transport as per the terms of our Licence. Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting

Condition 1

If the applicant should decide to place lighting on the site then they need to submit a lighting plan to the Planning Authority to show the location of any lighting to be placed on the site together with written evidence to demonstrate that lighting will not have an adverse effect on the motorists using the M4. Reason: To ensure the safety for all users on the M4 and that the M4 continues to be an effective part of the national system of routes for thorough traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Condition 2

Prior to the commencement of work on site the applicant should submit the dewatering and settlement assessment carried out by the Environment Agency and to agree that this document can be shared with Highways England for review. Reason To ensure that the integrity of the M4 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

GLA - SUMMARY OF COMMENTS:

London and draft London Plan Policies on Green Belt, mineral extraction, loss of agricultural land, opportunity areas, urban design and transport are relevant to this application. Whilst the principle of mineral extraction at the site is acceptable in strategic planning terms, the application does not comply with the London Plan. The following changes might, however, lead to the application being compliant with the London Plan:

- Principle of development: Whilst the extraction of minerals from within the Green Belt is acceptable in principle the proposed mineral processing and concrete batching plants constitute inappropriate development for which very special circumstances have not been demonstrated. According the application does not comply with London Plan Policy 7.16 and draft London Plan Policy G2. The application must demonstrate very special circumstances, or, remove the proposed inappropriate development.

- Urban design: The design of the concrete batching and mineral processing plants is not supported by virtue of their undue prominence and impact on Green Belt openness contrary to London Plan Policy 7.16 and draft London Plan Policy G2. The applicant must demonstrate very special circumstance, or, remove the proposed inappropriate development.

- Transport: The proposed transport strategy is acceptable in accordance with London Plan Policy 6.1 and draft London Plan Policy T1

CASE OFFICER COMMENT:

A revised statement has been submitted with a number of appendices which demonstrates the concrete batching plant which was subject to strong objection from the GLA, has been removed from the proposal. Subsequently this creates a much smaller processing plant which would be constructed of low level machinery and would be obscured by vegetation and the use of perimeter bunds.

The revised statement provides evidence of very special circumstance which are presented below and in policy terms are considered an acceptable response to the objection raised by the GLA.

- Processing on site avoids the need to double transport the material to an external processing plant and then to the market.
- All plant will be established and maintained at a lower level to reduce the impact on the openness of the Green Belt.
- The storing on soil as perimeter bunds will provide visual and noise protection for the proposed processing plant.
- The development is temporary so there will be no permanent impact on openness.

Internal Consultees

PEP

Phased mineral extraction, including ancillary activities, with restoration to agriculture

Development Plan

Principle of Development

The Local Plan: Part 1 - Strategic Policies includes Policy EM9: Safeguarding Mineral Resources and refers to three sites available to meet the requirement for land-won aggregate extraction within Hillingdon as follows:

1. Land west of Harmondsworth Quarry
2. Land north of Harmondsworth
3. Land at Sipson Lane east of the M4 Spur

The emerging Local Plan: Part 2 - Site Allocations and Designations document defines the site boundaries for these three safeguarded areas for minerals. These three sites amount to a total of 4.75 million tonnes of identified and safeguarded aggregates within Hillingdon. These should be regarded as the preferred areas for land-won aggregates. This application relates to Site 2 - Land North of Harmondsworth. Given the site's designation as a safeguarded area for minerals, the principle of mineral extraction on this site is acceptable.

Extracting Aggregates in the Green Belt

Policy EM2 of the Local Plan: Part 1 - Strategic Policies outlines that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special

circumstances test. Paragraph 8.20 of the Local Plan: Part 1 - Strategic Policies highlights that the most important attribute of Green Belt is its openness. The main purpose of Hillingdon's Green Belt is to keep land open and free from development, to maintain the character and identity of individual settlements and to make a clear distinction between rural and urban environments, in support of strategic objective SO3.

The NPPF 2018 paragraph 146 outlines that mineral extraction is not to be considered inappropriate in the Green Belt, provided that it preserves the openness of the Green Belt and does not conflict with the five purposes of including land within it. These are:

- 1) to check the unrestricted sprawl of large built-up areas;
- 2) to prevent neighbouring towns merging into one another;
- 3) to assist in safeguarding the countryside from encroachment;
- 4) to preserve the setting and special character of historic towns; and
- 5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Detail consideration must therefore also be given to whether the proposed remediation of the site would restore the openness of this existing green belt site.

Assessment of Proposals

The NPPF 2018 para. 205 states that when determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. Paragraphs 205 a) to g) also set out issue mineral planning authorities should consider in assessing minerals proposals. At the local level, development management policies for assessing the unacceptable adverse impact on the environment or human health from mineral extraction are located within the current Local Plan: Part 2 - UDP Saved Policies (2012). Reference in particular, but not exclusively, should be paid to the following:

- AM2
- AM7
- BE19
- BE38
- MIN3
- MIN14
- OE1
- OE3
- LPP 7.4
- LPP 7.14
- LPP 7.15
- LPP 7.16

Designations

Green Belt

Mineral Safeguarded Site 2 in revised proposed submission version of LPP2

PEP APRIL 2019

Principle of Development

Given the site's designation as a safeguarded area for minerals, the principle of mineral extraction on this site is acceptable. Both national planning guidance (Paragraph: 013 Reference ID: 27-013-20140306) and draft Local Plan Part 2 (with Main Modifications) (DMIN 1A) set out criteria for assessing proposals for new minerals development to ensure that there will be no significant adverse impacts arising from the development.

Extracting Aggregates in the Green Belt

Taking into account the temporary nature of mineral extraction and associated development, the

NPPF deems mineral extraction 'not inappropriate' within the Green Belt, provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt. Minerals working can therefore be accommodated within the Green Belt provided that the associated developments are designed and positioned appropriately to prevent conflict with the purposes of the Green Belt. It is noted that an onsite minerals processing facility remains part of the proposed development. Given that the processing plant is not integral to the extractive operations, very special circumstances will need to be demonstrated to justify its location within the Green Belt. The revised statement from the applicant provides a list of very special circumstances to support their proposals. The ones specific to the inclusion of a processing plant on site are as follows:

- Processing on site avoids the need to double transport the material to an external processing plant and then to the market.
- All plant will be established and maintained at a lower level to reduce the impact on the openness of the Green Belt.
- The storing on soil as perimeter bunds with provide visual and noise protection for the proposed processing plant.
- The development is temporary so there will be no permanent impact on openness.

It is recognised that primary processing is likely to reduce the number of lorry movements on the road network provided only indigenous material is processed making this a more sustainable option than off-site processing. The proposals to limit the impact on the openness of the Green Belt through the provision of lower level machinery and perimeter bunds is also welcome. Finally the temporary nature of the proposed plant is key consideration. Any proposed processed facility must be removed at the completion of the mineral workings to ensure that an industrial use is not development on a permanent basis which would be considered inappropriate development in the Green Belt. The combination of the factors outlined above could, in combination, demonstrate very special circumstances which outweigh the potential harm to the Green Belt. However, the impact of the proposed facility will need to be appraised on a site- and technology specific basis to ensure that any impacts on the Green Belt are minimised. All associated development must also be tied to the life of the extraction with plant and machinery removed expediently following the completion of the mineral extraction. In addition to the need to protect the Green Belt, there is also an opportunity to enhance its beneficial use following the restoration of the site as set out in Draft Local Plan Part 2 Policy DMIN 3. This is particularly significant given the current use of the land for agricultural purposes. The proposed restoration of the site should where practicable seek to restore the land to its previous quality or better.

WASTE MANAGER

Any general waste and recycling generated on site should be removed by a licensed operator with a focus on recycling waste over disposal. No access concerns for the site.

FLOODING - Initial objection (an initial objection was raised however the revised statement was assessed and objection removed)

We note that the Environment Agency has raised an objection to the proposals. We support this objection and would not wish to comment on matters raised by the Environment Agency regarding groundwater quality. These comments relate only to the management of surface water on the site and the risk of groundwater flooding. The applicant has provided a Flood Risk Assessment (SLR Consulting report revision 1 dated October 2017) to accompany the application. The FRA acknowledges the risk of flooding from both groundwater flooding and infrastructure failure since this will be a mineral extraction site that will involve dewatering. In addition, there are parts of the site that are shown to currently be at risk of surface water ponding in the low points in the south-east and south-west corners of the site boundary.

The FRA includes a proposal for the management of surface water on the site. A perimeter drain and an infiltration trench are proposed to manage collected surface water once the excavation has

been restored. The reported management of surface water during excavation is unclear as a perimeter earth bund is shown to be located there the infiltration trench is proposed. The hydrogeological study (ref) states that pumped groundwater collected during dewatering activities will be discharged to the infiltration trench. Other than the water quality concerns raised by the Environment Agency, we would have additional concerns over the long-term performance of the infiltration trench should have been used for the disposal of groundwater due to the potential for excessive siltation.

Calculations have been provided for the infiltration trench using Micro Drainage; however, the calculations show that the size of the infiltration trench is insufficient to manage the expected volume of water for the 1 in 100 year without the need for an additional swale. Due to the expected fall on the land towards the south-east corner, it is expected that the swale will require check dams to maximise the storage. The current proposals have not included check dams and has not considered the potential fall at the base of the swale.

We note from the hydrogeological study that there has been groundwater monitoring since 2015 at the perimeter of the site. To ensure that there is no increase in the risk of groundwater flooding we require the results of the groundwater monitoring over the period of excavation. This could be in the form of a monitoring report that is likely to be produced for the Environment Agency, or a regular extract of raw monitoring results.

The submitted information does not consider the maintenance of the drainage infrastructure, particular given the proposed dual use of the infiltration trench for groundwater disposal and rainwater storage.

FLOODING MAY 2019 - No objection comments.

Based on the additional information provided in Appendix 10 I am able to remove my objection to the proposals. Evidence has been provided to support the assumption that groundwater levels will be below the base of the infiltration trench for the restored site. I note that the Environment Agency has concerns regarding the potential for contaminants to enter controlled waters and has recommended a condition on the development, alongside the potential for an Environmental Permit to be required. The Flood and Water Management team will not be able to comment on the discharge of this condition from the perspective of the impact on controlled waters and this will require additional consultation with the Environment Agency. There are aspects of the drainage strategy for the restored site for which more detailed information is required that should be secured by way of condition. This includes the details of any structures for access across the perimeter ditch, the dimensions of the perimeter ditch, as well as information about the long-term maintenance of the infiltration trench and other drainage infrastructure.

SUSTAINABILITY JUNE 2019

I have no objections to the proposed development subject to a number of conditions relating to:

1. Minerals Extraction Monitoring
2. Restoration
3. Importation of Material
4. Ecological Enhancements
5. EIA

The applicant has voluntarily undertaken an environmental statement to comply with the Environmental Impact Assessment (EIA) Regulations.

EIA is required where a development is likely to have a significant environmental effect. The Council

does not consider that the proposals would have a likely significant effect in the context of EIA, but the Applicant has voluntarily entered into the EIA process.

No EIA Screening or Scoping opinions have been issued by the Council.

The EIA as submitted contains sufficient information for the Council to determine the effects of the development. Compliance with the regulations is open to considerable interpretation and it is the view of the Council that the submitted statement is commensurate with the scale, nature and impact of the development. It is considered that the submitted information and supporting reports meets the minimum requirements of Schedule 4 of the EIA Regulations.

3 Ecology

The site has been subjected to agricultural uses for a number of years before becoming fallow and maintained as species poor improved grassland. The baseline position allows for active agricultural management such as ploughing which would remove the majority of the ecological value from the site. The higher value ecological buffer (trees and hedges) around the perimeter of the site is said to be retained.

Consequently, the ecological impacts of the development need to be considered in the context of what could happen regardless of the proposals. Notwithstanding, the information on ecology provided with the application demonstrates the site to be of some ecological importance which will be impacted by the development.

The majority of the improved grassland will be lost and the subsequent restoration to agricultural land will result in a net environmental loss from the position of the site as now. Furthermore, there are serious questions what appears to be a contradiction in the submission:

At 4.8.2 of the Environmental Statement it states:

The site preparation stage is to strip the topsoil from the majority of the site to form the 3 metre high perimeter bunds.

The ecological assessment states:

As the majority of boundary habitats will be retained within the proposals, there will be no significant loss of bat foraging and commuting habitat at the site.

It is not clear how the applicant intends to retain the boundary vegetation whilst simultaneously putting a 3m high bund on it.

In general the ecological information is sufficient for the Council to understand the impacts of the proposals. However, there is insufficient information as to how the applicant intends to accommodate, protect, or enhance ecology features as part of the proposals. The following condition is therefore needed:

Condition

Prior to the commencement of development, an ecological protection and enhancement scheme shall be submitted and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate (1) how the higher quality vegetation will be protected or incorporated into the proposed development; (2) how the restoration of the site will accommodate specific areas for wildlife enhancement (in addition to the swale strips) along the boundary of the site, with a at least a 5m deep strip of species rich wildlife planting along the length of the western border with public right of way; (3) that the restored scheme shall accommodate a new standing water body, linked to the swales, that is constructed and planted to be of ecological value. The development should proceed in accordance with the approved scheme.

Reason

To ensure the ecological value of the site is protected and enhanced in accordance with EM7 of the Local Plan Part 1, the London Plan and the NPPF.

4 Minerals Reporting

The applicant has indicated an amount of minerals available and that this conforms to policy criteria to secure minerals in Hillingdon for the Greater London area. The actual quantum of minerals extracted is therefore important to understanding the impacts on minerals resource in the borough and across London. The following condition is therefore necessary:

Condition

Within 3 months of the commencement of development, a scheme for the monitoring, recording and reporting to the Local Planning Authority of mineral extraction (type and quantity) shall be submitted to and approved in writing by the Local Planning Authority. The development must proceed in accordance with the approved scheme.

Reason

To ensure the appropriate recording and reporting of the type and quantum of minerals extracted in accordance with Policy EM9 and EM10 of the Local Plan Part 1.

5 Construction Management

The submission identifies the possible material to be used for the reclamation of the site. It indicates that this would be predominantly 'excavation' waste as opposed to 'construction' waste material. Excavation waste can be a significant cause for concern stemming from contaminative land uses or it can be entirely inert and relatively trouble free. If inert, then the Environment Agency waste management protocols are generally quite lax resulting in limited tracking and monitoring; however, this can open the door to nefarious waste activity, i.e. the disposal of polluting material.

It is therefore essential that a clear and robust operational management plan is drawn up and implemented. The following condition is therefore necessary:

Condition

Prior to the commencement of development an operational management plan shall be submitted to and approved by the Local Planning Authority. The plan shall specify the following:

- (a) details of the order of construction and associated works including the sequence and phasing of minerals extraction and reclamation/backfilling and restoration.
- (b) The estimate of the amount of material to be extracted, stockpiled and imported across the life of the project.
- (c) The provision of information to be made available to the Local Planning Authority on a quarterly basis relating to the estimated amount of material to be imported to the site for the subsequent quarter.
- (d) The provision of information to be made available to the Local Planning Authority on a quarterly basis relating to the estimated amount of HGV (3.5t or more) movements for the subsequent quarter.
- (e) the provision of monthly progress reports to be submitted to the Local Planning Authority covering:
 - i. the amount and type of material being excavated and transported off site
 - ii. the amount of heavy goods vehicles (3.5tonnes or more) movements to and from site
 - iii. the amount and type of material being imported for the reclamation/backfilling operationsThe amount of HGV movements and imported material shall not exceed the estimates unless with the prior written approval of the Local Planning Authority.
- (f) the information to be disseminated to all site operators and contractors showing the preferred traffic routes.
- (g) details for the provision of fencing to protect retained trees and hedgerows.

(h) details (height and location) of the stockpiling with maximum heights to be agreed with the Local Planning Authority. These heights should not be exceeded without prior written consent of the Local Planning Authority.

(i) the provision of information relating to:

i. the infill and the land restoration programme with a scheme for the agreement of land levels to be established on a quarterly basis in advance of the works taking place.

ii. The recording (including survey information) and the reporting of land levels to the Local Planning Authority on a quarterly basis with levels not exceeding those agreed in advance unless without the prior written consent of the Local Planning Authority.

(j) the provision of information (including survey data, type of material and timing of submission) to be made available to the Local Planning Authority to demonstrate each phase of the restoration scheme is free from contamination.

The development must proceed in accordance with the operational plan.

Condition

All earthworks activities, shall only take place between the hours of 07.30 - 18.30 on Monday-Friday and there shall be no arrival or departure of delivery vehicles outside the hours of 07.30 - 16.30 on Monday to Friday. There shall be no earthworks activity and no delivery vehicles at the site on Saturdays, Sundays or Bank and Public Holidays.

Condition

No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. All imported soils shall be inspected and tested for chemical contamination and the results of this testing shall be submitted to and approved by the Local Planning Authority.

Condition

Provision shall be made within the site to ensure that all vehicles associated with the construction of the development hereby approved are properly washed and cleaned to prevent the passage of mud and dirt onto the adjoining highway.

Condition

The development hereby approved shall not be commenced until details of the parking arrangements for employees and visitors have been submitted to and approved in writing by the Local Planning Authority and such details as are approved shall be implemented and retained for the duration of the development.

Reasons

All the above conditions are necessary to ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of the Local Plan Part 1 and the London Plan.

5 Restoration

Condition

Within 6 months of the approval, a detailed scheme for the restoration of the land shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall identify the final site contours, the landscaping arrangements, the material to be used for restoration (including depths and types of top soil and substrate), the detailed drainage regime including phased implementation and the type of boundary treatment. The development must proceed in accordance with the approved plans.

Reason

To ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of

the Local Plan Part 1 and the London Plan.

HIGHWAYS

This application relates to the use of a site in Holloway Lane Harmondsworth for use of mineral extraction and subsequent restoration. There is an additional use of a concrete plant on the site using mined aggregates. Holloway Lane (A3044) is a classified road on the Council road network. The applicant supplied a Transport Statement (TS) by David Tucker Associates in support of the application. The site has estimated reserves of 450,000t and the extraction period is over 8 years with an early excavation phase and reclamation phases taking place later. The TS cited traffic counts in October 2015 that showed peak hour counts of approximately 1000 vph in the AM peak and 1300 vph in the PM peak on Holloway Lane. The 85%tile speeds outside the property were in the range 36-38 mph. The TS suggests that there will be a maximum of 100 two-way HGV movements per day as a result of the extraction, reclamation, cement delivery, concrete dispatch and other activities on the site. In addition there will be trips generated by the 10 employees and visitors which have been estimated at 30 two way movements per day which equates to a total of 130 two-way movements per day. The TS suggests that these trips will be less than 1% of the existing traffic levels which is not seen as significant. The TS contains details of the visibility splays and HGV tracking which is seen as adequate. There are details shown of a wheel wash and concrete road into the site which will go some way into reducing mud on Holloway Lane. I would suggest you limit the annual excavation through condition to no more than 80000 tonnes excavation per annum from the site in order to keep the traffic activity to a reasonable level. On the basis of the above comments I do not have any significant highway concerns over this application.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The London Plan identifies Hillingdon as one of four boroughs that are collectively required to maintain a seven year landbank of sites with the capacity to deliver at least 5 million tonnes of land won aggregates. The LBHillingdon's apportionment is a rolling permitted landbank of at least 1.75 million tonnes, which is the equivalent to 0.25 million tonnes per annum (mtpa). Therefore the Council needs to ensure it has permitted reserves amounting to a total of at least 1.75 million tonnes for seven years.

A key objective of the Local Plan Part 1: Strategic Policies is to safeguard and promote areas of geological importance and make a proportionate contribution to West London's target to extract 0.5 million tonnes of minerals. 8.2 It is clear that Hillingdon could not make a significant contribution to meeting future aggregates demand without using sites in the Green Belt. 8.3 The NPPF states that mineral extraction need not be inappropriate in the Green Belt provided that the openness of the Green Belt is preserved and that it does not conflict with the purposes of including land in Green Belt. Judgements about the acceptability of extraction in the vicinity of houses have to be taken on a case-by-case basis, based on taking account of the likely specific impacts of individual schemes. 8.4 The Minerals Technical Background Report (2008) concludes there are three sites able to provide the defined aggregates requirement for the Borough over the Plan period. The following sites will be safeguarded for these purposes:

- Land west of the present Harmondsworth Quarry;
- Land north of the village of Harmondsworth; and
- Land at Sipson Lane, east of the M4 spur.

The above three sites are defined as 'Preferred Mineral Safeguarding Area in Local Plan Part 1.

Policy EM10: Mineral Extraction of the Hillingdon Local Plan: Part 1 - Strategic Policies (Adopted November 2012) The Council will make an appropriate contribution towards the West London apportionment figure in the London Plan in the form of mineral working at the principal Broad Locations and will aim to maintain a minimum land bank equivalent to seven years production for the West London area at a rate of 0.25 million tonnes per annum. The principal Broad Locations for mineral development are land west of the present Harmondsworth Quarry, land north of the village of Harmondsworth, and land at Sipson Lane, east of the M4 spur .

Aggregates come from a variety of sources, including recycling of construction waste. However, an important source of supply will remain from mineral deposits. Provision for the production and supply of recycled and secondary aggregates will be made through the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD whereby permanent and long term temporary recycling facilities across the borough which will make a significant contribution to the production of recycled and secondary aggregates will be identified.

Policies MIN 1, MIN 2 and MIN 3 are included within the Local Plan Part 2 : Saved UDP policies and form the basis of the emerging Local Plan Part 2 - Development Management policies DMIN 1, DMIN 2 and DMIN 3. As such the below text is relevant to this application

Policy DMIN 1: Preferred Areas of Mineral Extraction and Aggregates Railheads

A) The following specific site, preferred areas and areas of search will be protected for the extraction of sand and gravel reserves:

1. Land west of Harmondsworth Quarry (Preferred Area)
2. Land north of Harmondsworth (Preferred Area)
3. Land at Sipson Lane east of the M4 Spur (Specific Site) 4. Bedfont Court Estate (Area of Search)

B) Where sand and gravel reserves are identified, the Council will, in addition to the above, safeguard those resources from sterilisation by surface development. The identification of such reserves will, in itself, create no presumption that proposals for mineral extraction will be acceptable.

C) The Council will safeguard the existing railheads at Hayes, West Drayton, West Drayton Tavistock Road and West Ruislip from alternative use. Applications for alternative uses will need to demonstrate that there is no real prospect of a transport use continuing or being reintroduced on the site. Proposals for new railhead capacity will be supported.

Policy DMIN 3: Extraction, Landfilling and Restoration

A) The Council will expect any planning application for minerals extraction to include a comprehensive Environmental Impact Assessment (EIA) and adopt an Environmental Management System to outline measures to address environmental impacts and mitigation during all phases of the extraction and restoration process.

B) Mineral working on the best and most versatile farmland will only be permitted if working, restoration and aftercare schemes are adopted which enable the land to be restored, as far as it is practicable, to its previous quality or better.

C) Applicants will be required to show how excavation is to be arranged and to provide for beneficial after use(s) consistent with providing a balanced range of leisure activities and/or creation of natural habitats before any planning permission is granted.

D) To reduce the environmental impact of aggregates, the Council will make appropriate use of planning conditions dealing with restoration, aftercare and re-use of mineral sites including the use of suitable construction, demolition and excavation waste to restore original ground levels.

Policy DMIN 4: Re-use and Recycling of Aggregates

A) The Council will promote the recycling of construction, demolition and excavation waste.

B) All developments will be encouraged to:

- i) recycle and re-use construction, demolition and excavation waste as aggregates;
- ii) process and re-use the recyclable material on-site, and where this is not possible, the material should be re-used at another site or for land restoration; and
- iii) use substitute or recycled materials in new development in place of primary minerals.

B) Planning permission for aggregates recycling on active minerals extraction and landfill sites will be supported, subject to local amenity and other policies within the Local Plan. Applications for aggregates recycling sites in other areas such as Strategic Industrial Locations will be required to satisfy other relevant policies in the Local Plan including the West London Waste Plan.

GREEN BELT

Paragraph 146 of the National Planning Policy Framework (NPPF) states that mineral extraction need not be inappropriate in the Green Belt provided that the openness of the Green Belt is preserved and that it does not conflict with the purposes of including land in Green Belt. Judgements about the acceptability of extraction in the vicinity of houses have to be taken case-by-case, based on the likely specific impacts of individual schemes. Furthermore it states that the Local Planning Authority should be supportive of mineral extraction applications within designated zones. Given the NPPF support for minerals applications and that the site is located within a dedicated area for the extraction of minerals as identified within the Hillingdon Local Plan Part 1 (Adopted November 2012) the extraction of minerals within this greenbelt location is considered acceptable.

Whilst the extraction of minerals is supported by both national and local policies the proposed onsite minerals processing facility is not considered to be integral to the extractive operations thus very special circumstances needs to be demonstrated to justify its location within the Green Belt. The revised statement from the applicant provides a list of very special circumstances to support their proposals. The ones specific to the inclusion of a processing plant on site are as follows:

- Processing on site avoids the need to double transport the material to an external processing plant and then to the market.
- All plant will be established and maintained at a lower level to reduce the impact on the openness of the Green Belt.
- The storing on soil as perimeter bunds will provide visual and noise protection for the proposed processing plant.
- The development is temporary so there will be no permanent impact on openness.

It is recognised that primary processing is likely to reduce the number of lorry movements on the road network which is particularly important given the sites location within an area of air quality management, provided only indigenous material is processed making this a more sustainable option than off-site processing. The proposals to limit the impact on the openness of the Green Belt through proposal to house the processing plant 3-4 metres

below the existing ground level, the provision of lower level machinery and perimeter bunds and finally the temporary nature of the proposed plant is key consideration. The applicant has provided an updated Given the above the policy position on the proposal is that very special circumstances have been demonstrated and therefore the processing of the extracted minerals is considered to outweigh the potential harm to the openness green belt.

7.02 Density of the proposed development

This section is not relevant to this application.

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

Policy BE1 of the Hillingdon Local Plan Part 2 - Saved UDP (2012) states only in exceptional circumstances will the planning authority allow development to take place if it would disturb remains of importance within the archaeological priority areas. Furthermore policy BE3 states that the local planning authority will ensure wherever practicable that sites of archaeological interest are investigated and recorded either before any new buildings, development, site works, golf course or gravel extraction are stated, or during excavation and construction. Development which would destroy important archaeological remains will not be permitted.

Policy MIN14 states where mineral extraction is proposed in a location where the minerals planning authority is advised that there is a strong probability of significant archaeological discoveries requiring time for examination and recording, the minerals planning authority will not grant planning permission until satisfied that the working programme has been designed to reasonably accommodate this in accordance with the PPG16 and that adequate safeguards are available to ensure that the confederation of British industry's current code of conduct is fully satisfied.

Similarly emerging policies DMHB7 sets out a specific position the local planning authority should take to ensure that development within priority areas does not unsettle the reasons for why they are identified as priority areas within the Local Plan.

The site lies within an Archaeological Priority Zone as defined in the local plan. There are no known heritage assets on the site but archaeological deposits of Bronze Age and Saxon date were recorded immediately to the north during M4 motorway road widening. It will be necessary to provide further information about the potential of the site from field observations in order to draw up a scheme to mitigate the impact of development on any below-ground archaeological deposits if necessary.

An archaeology evaluation was undertaken which revealed a spread of archaeological deposits in several locations across the site with seemingly blank areas in between, but with a dense concentration of deposits in the west. All of the features, the majority of which contained some dating evidence, were of later Bronze Age date. Just single sherds of pottery of Roman and post-medieval date were also recovered. Test pits revealed a thick deposit of brickearth above the gravel, but no Palaeolithic finds were recovered. As such the application for mineral extraction is considered to be acceptable.

7.04 Airport safeguarding

NATS and Heathrow Airport Safeguarding have been consulted on this planning application. Neither have raised objection to the proposal.

7.05 Impact on the green belt

The London Plan strongly supports the protection, promotion and enhancement of London's open spaces and natural environments. Policy 7.16: Green Belt states that in terms of planning decisions:

"The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance"

Local policy, Policy EM2 'Green Belt, Metropolitan Open Land and Green Chains' of Hillingdon's Local Plan: Part 1 - Strategic Policies (Nov 2012) explains that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains and that development in the Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

Policy OL1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (Nov 2012) restricts development of Green Belt land to predominantly open uses, however it specifically states that limited infilling or redevelopment of major existing development sites is considered appropriate.

Policy OL2 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (Nov 2012) states that within the Green Belt, where development proposals are acceptable in principle in accordance with the above policy, comprehensive landscaping improvements to achieve enhanced visual amenity and other open land objectives will be sought.

Policy OL4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (Nov 2012) states that the Council will only permit the replacement or extension of buildings within the green belt if the development would not result in any disproportionate change in bulk and character of the original building; the development would not significantly increase the built up appearance of the site; and the development would not injure the visual amenities of the Green Belt by reason of siting, materials, design, traffic or activities generated.

The Proposed Development would cause temporary adverse visual effects to a limited number of residents and PRow users, with footpath users to the immediate west of the site receiving visual disturbance of highest significance, although this would only be for a short duration and the inclusion of low level machinery is welcomed. Effects on residents would be reduced due to distance and intervening elements curtailing most views, although some would remain throughout the works. The relative lack of visual receptors within the local area together with good screening elements surrounding the site effectively combine to limit the overall visual effects of the proposed development.

The initial submission including the construction of a concrete plant which was viewed as unacceptable given the sites location within the green belt. Subsequently the applicant has now removed to concrete batching element from the scheme. However, the mineral processing and material treatment plant remain part of the amended proposals. Whilst the removal of the the concrete plant from the development proposal is viewed as beneficial the processing plant is also viewed as inappropriate development within the Green Belt thus is required to meet the very special circumstances set out within the NPPF. This being said the view that the processing plant is inappropriate development is countered by established case law as the courts in the Europa Oil case stated that structures, engineering works and associated buildings...generally encountered in mineral extraction or the common structural paraphernalia for mineral extractions cannot cause the development to be inappropriate.

Despite the established position on the scope of mineral extraction and the ancillary

machinery required to process the minerals on site, as not being inappropriate development in the Green Belt, there remains the need to ensure that the associated plant for mineral extraction does not harm the openness of the Green Belt. In order to address this impact the area occupied by the plant will be partially excavated to a depth of 3-4 metres below the existing ground level as demonstrated in the submitted section plans. This will effectively hide below ground a substantial part of the processing plant. To further screen the plant and reduce the impact to the openness of the Green Belt grassed perimeter soil bunds will be erected. The bunds will also serve as a soil resource to be stored so that it is available for the restoration of the site. The bunds are recognised as a widespread element of mineral extraction and are not deemed inappropriate if the height (3 metres) does not exceed that which is normally required for soil storage.

The above approach to the design of mineral extraction sites is recognised as good practice as it reduces any impacts on the openness of the Green Belt. Further more this approach is supported by a recent planning appeal decision (May2017) for a new sand and gravel quarry at Wennington which included a processing plant. The inspector when considering the question of openness, as well as the need for minerals in London, concluded "whilst the upper sections of the conveyors would be above ground level, they would be temporary in nature, and I am satisfied that their location, on the base of the excavated area, would preserve the openness of the Green Belt". The inspector goes on to state "I have found that the proposal would benefit the supply of mineral to London and benefit the economy generally. I have also found that the recycling element of the proposal would provide high benefits in terms of reducing the need for mineral extraction importation into London and reducing the need for mineral transportation. All of these are benefits which have a wide ranging positive impacts to which attach great weight".

The Wennington Quarry proposals are very similar to the amended application proposals. Both the Wennington site and the application site are both within the GLA area and the Green Belt. The GLA response to the Wennington Quarry proposals came to a different conclusion where it was accepted that 'mineral extraction' including the processing plant was not itself 'inappropriate development' as evidenced within GLA report ref D&P/3313 19-12-2013 (appendix 13) which was submitted in support of this proposal.

The updated planning statement submitted by the applicant provides details as to why the proposal meets the requirements of 'very special circumstances'. The first being that a key element of Green Belt policy relates to preserving the permanence of the openness and as 'mineral extraction and its common structural paraphernalia are temporary there would be no permanent impact on the openness once mineral extraction is completed and the site is fully restored which in this case would involve the land being returned back to its original level and use.

Furthermore the proposal to process the minerals on site not only makes the best use for the materials but also avoids the need to double the transportation of the material. If processed off site the excavated materials would need to be transported to an external processing facility and then to further transported to the market. By processing the materials on site it reduces the number of vehicle movements required to serve the site which is important given the site's location within an air quality management area.

The Environmental Statement concludes that the proposal would not have a detrimental effect on the highway network for which concerns have been raised by the petitioner and form the basis of many of the objections received. In terms of traffic generation, distribution and impact the ES provides conclusive traffic data which has been tested by

both the councils Highways Officer and Highways England both of which raise no objection to the proposed volume of HGV movements. This view is further compounded by the foreseeable reduction in vehicle movements as a result of removing the concrete batching plant from the proposal.

Following restoration and aftercare, the site at the 10 years post restoration stage would appear similar to existing from most of the viewpoints, although the hedgerow along the western boundary would have matured and would be partially or fully curtailing views across the site from the PRoW along the western boundary, depending on its height. If views are maintained across the site, over a well-managed hedgerow approximately 1.5m in height, this is considered to be an enhancement to the landscape and an improvement to views from the PRoW. It is therefore considered that significance of visual effects on all visual receptors at this stage would either be neutral or possibly minor beneficial for PRoW users in close proximity to the western boundary and residents along Meadowlea Close with views towards the north.7.29 Restoration back to agriculture at original ground levels with a western boundary hedgerow would positively accord with Policy 7.4 Local Character of the London Plan (Ref.5) as it would "improve an area's visual connection with natural features."

In summary the proposed extraction of minerals within the location is considered acceptable given the policy support at both national and regional level as well as the sites designation with the Local Plan. The applicant has provided substantial evidence in the form of a relative site appeal decision and case law, to question whether or not the processing plant is to be considered inappropriate development. This being said the applicant has made an attempt to reduce the visual impact to the Green Belt through the submission of a proposed sections which demonstrates the plant would be sited in an excavated area approximately 3-4 metres below ground level would be screened from all areas outside of the site by the presence of bunds and vegetation around the sites perimeter. Furthermore the Air Quality Assessment stated that there is the potential for air quality impacts as a result of road vehicle exhaust emissions associated with traffic travelling to and from the site. These were assessed at sensitive locations using dispersion modelling. Impacts on annual mean NO2 and PM10 concentrations were predicted to be negligible at all receptors. Following consideration of the relevant issues, air quality impacts as a result of traffic emissions were predicted to be not significant, in accordance with the IAQM guidance. This would be further reduced by the reduction in HGV movements following the removal of the concrete batching plant from the proposal which should be afforded weight when assessing the proposal.

Taking the above into consideration the proposal is considered to be acceptable subject to a number of conditions which would assist with controlling the temporary impact to the Green Belt.

7.07 Impact on the character & appearance of the area

Policy BE13 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to ensure that the layout and appearance of new development harmonises with features of the area which are considered desirable to retain or enhance. The application site is visible from public vantage points, including Harmondsworth Lane although vegetation along the boundaries will help to screen immediate views to some extent, particularly from the north and south.

The site itself is fundamentally open in character and is surrounding by fields which are also located within the Green Belt boundary. Whilst not of significant landscape value, the site contributes towards the setting of the adjoining conservation area and fulfils its Green

Belt function of keeping land open and free from development, of maintaining the character and identity of individual settlements and making a clear distinction between rural and urban environments. Whilst the surrounding area support various types of development, this is generally low key.

As noted elsewhere in this report, the site is located in the Green Belt. The proposed concrete plant has been removed from the scheme leaving only mineral processing plant to be constructed in order to serve the extraction process. The National Planning Policy Framework advises that the essential characteristics of Green Belts is their openness. Thus the loss of openness, however limited, would harm the essential character of the Green Belt. Whilst the construction of the processing plant is not considered to be essential to the extraction operation the low level machinery proposed and presence of the perimeter bunds which will provide sufficient screening are viewed as acceptable and would ensure the temporary operation does not significantly impact the character and appearance of the area.

It is therefore considered that the proposed development would result in a temporary, acceptable visual impact and provide spatial characteristics which relate to the surrounding area and, as such, is in accordance with Policy BE13 and London Plan Policies 7.4 and 7.6.

7.08 Impact on neighbours

It is clear that Hillingdon could not make a significant contribution to meeting future aggregates demand without using sites in the Green Belt and sites in relative close proximity to housing. Extraction in such locations has already taken place in the borough in the past, and continues to do so. The proposal has given rise to a number of objections from local resident who raise concerns relating to the impact the development will have on the highway network. These concerns are answered in the Highways section of this report. The application site is located north of the village of Harmondsworth and 1 km north of Heathrow Airport. The norther boundary of the site is bounded by the busy M4 motorway and the eastern boundary is marked by a wooded hedge adjacent to Holloway Close which is home to Holloway Farm which features a number of small to medium sized buildings formally used for agricultural purposes but now appear to be used for vehicle parking and a petrol filling station. The nearest residential house are located in excess of 230 metres south of the site on Harmondsworth Lane.

7.09 Living conditions for future occupiers

This section is not relevant to this type of application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policies AM2 and AM7 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) advise respectively that proposals for development will be assessed against their contribution to traffic generation and impact on congestion, having regard to the present and potential capacity of public transport and that the traffic generated by proposed developments would need to be accommodated on principal roads without increasing demand along roads or at junctions already used to capacity, not prejudice the free flow of traffic, nor diminish environmental benefits brought about by other road improvement schemes or infiltrate local roads. Policy AM9 supports cycle provision, including the need for cycle storage provision within development schemes and Policy AM14 advises that development should accord with adopted car parking standards.

The initial submission related to the use of a site in Holloway Lane Harmondsworth for use of mineral extraction and subsequent restoration with the addition of an onsite concrete plant. Following objection by the Local Planning Authority and the GLA the concrete

batching plant has been removed from the proposal. The submitted Transport Statement states the site has an estimated reserve of 450,000t and the extraction period of over 8 years with an early excavation phase and reclamation phases taking place later. The TS cited traffic counts in October 2015 that showed peak hour counts of approximately 1000 vph in the AM peak and 1300 vph in the PM peak on Holloway Lane.

The removal of the concrete batching presents a reduction in vehicle movements however the concrete production will essentially be replaced by aggregates, the saving being there is no requirement to import cement or specialist aggregates. Therefore essentially there is a slight reduction, with the concrete mixer trucks replaced with 8 wheeler HGV lorries exporting aggregates instead of ready-mix concrete. The aggregate lorries have a larger capacity than the concrete mixer trucks and so this aids the reduction of vehicle movements. The maximum is now 82 (previously was 88) although on average it will be lower, but in order to remain robust this maximum level is increased to 100 movements (50 in, 50 out) per day to ensure the traffic assessment is very robust and fit for purpose.

To summarise the traffic assessment was based on 100 movements and this was deemed acceptable by the councils Highways Officer however as stated above the daily movements are likely to be much lower.

During the consultation process Highways England raised various concerns, mainly regarding possible flooding impacts the proposed development would have on the M4 motorway which runs adjacent to site. The applicant has successfully resolved these concerns as demonstrated in the external consults section of this report and Highways England have agreed the revised scheme is acceptable subject to 4 conditions relating to aftercare of the site. These conditions have been condensed as the conditions requested coincided with conditions requested other internal and external consultees.

7.11 Urban design, access and security

This section is not relevant to this type of application.

7.12 Disabled access

This section is not relevant to this type of application.

7.13 Provision of affordable & special needs housing

This section is not relevant to this type of application.

7.14 Trees, landscaping and Ecology

ECOLOGY

An updating ecological assessment was undertaken in June and July 2017 consisting of an extended Phase 1 habitat survey, desktop study and a bat transect survey. The site is situated in a semi-urban location just north of the village of Harmondsworth within the London Borough of Hillingdon. It consists of two improved grassland fields with speciespoor hedgerows and broadleaved plantation woodland. ECOSA have conducted a suite of ecological survey work comprising an extended Phase 1 habitat survey in April 2015, a great crested newt environmental DNA (eDNA) survey during June 2015 and a bat and reptile assessment of the site during August and September 2015.

The main findings of these surveys and the updating assessment are:

- There are two non-statutory designated sites within one kilometre of the site. The nearest of these is the Lower Colne Site of Importance for Nature Conservation which lies immediately adjacent to the western site boundary;
- The site is used at a low level by mainly common foraging and commuting bat species and is unlikely to represent an important resource for bat species in the area. As

the majority of boundary habitats will be retained within the proposals, there will be no significant loss of bat foraging and commuting habitat at the site. Any new lighting will be directed away from the boundaries to minimise disturbance to bats;

- The site offers suitability for nesting birds. Vegetation clearance will be undertaken outside the breeding bird season of March to August, inclusive, or if not possible, an ecologist will be present immediately prior to clearance to check vegetation. Active nests will be left with suitable buffer until nesting ends naturally;

- The site supports a low population of grass snake, with a single adult recorded. While a reptile translocation is considered unnecessary, an ecologist will carefully trim the eastern field boundary just prior to the commencement of works to encourage reptiles away from the works area; and

- Given the mobility of animals and the potential for colonisation of the site, it is recommended that an updating walkover of the site is undertaken prior to the development commencing should this not occur within 12 months of the date of the survey (i.e. by July 2018).

The councils sustainability officer has been consulted and has raised no objection subject to a number of conditions which have been included. As such the proposal is viewed as acceptable.

7.15 Sustainable waste management

The Councils Waste Strategy Officer has raised no objection to the scheme stating that any waste or recycling generated by the operation should be removed by a licensed operator and that the access to the site is suitable for waste vehicles. As such a suitably worded condition has been added to ensure the operators adhere to the above.

7.16 Renewable energy / Sustainability

Not relevant to this type of application.

7.17 Flooding or Drainage Issues

This report has been commissioned to assess the flood risk to the proposed development of a sand and gravel quarry near Harmondsworth, Middlesex. With reference to the Environment Agency Flood Mapping the proposed development is located entirely within Flood Zone 1, low probability. The assessment has demonstrated that there is limited flood risk from fluvial, surface water or artificial sources. The only significant risk identified is from groundwater flooding during working of the quarry. It is however noted that the client has significant experience of working below the water table and dewatering will be undertaken to allow for dry working of the site. The risk from groundwater flooding is therefore suitably managed.

There are no proposals for discharge of either surface water or groundwater from the site during the active quarrying. Both surface water and groundwater will be routed to an internal sump within the site boundary where it will either be allowed to soakaway to groundwater or be pumped to another area of the site to soakaway. There are no proposals for any discharge to surface water; there will therefore be no potential for increased flood risk downstream of the site during quarrying.

The site will be restored using inert waste to create a slightly domed restoration level. The site will be restored to agricultural land use. Surface water run-off will be controlled by a perimeter drain which will collect any surface water run-off shed from the restored site and route it to a soakaway trench installed along the southern boundary. The soakaway trench will be constructed through the Langley Silts to allow infiltration into the Taplow Gravels. In addition a shallow swale feature will be created along the southern boundary of the site which will provide temporary storage in the event that surface water run-off exceeds

the infiltration capacity of the trench. There is no proposed discharge from the site.

A Hydrogeological Impact Appraisal (HIA) has been undertaken to assess the potential impact of the proposed sand and gravel quarry at Harmondsworth on the local hydrogeological and hydrological regime. A review of the current baseline hydrogeology and hydrology of the site indicates that the local geology comprises of superficial Langley Silts overlying the Taplow Gravels (the mineral resource) with bedrock London Clay present at a depth of between 5m and 9m below ground level. The Langley Silts and London Clay are both classified as unproductive strata and are considered to have minimal groundwater potential; the Taplow Gravel are however classified as a principal aquifer and are considered locally important for both abstractions and providing baseflow for local watercourses and water features. The assessment has identified several potential receptors which could be impacted by the proposed development, including Saxon lake to the west and licensed and private groundwater abstractions to the south and east. It is proposed that the site is worked dry through the initial installation of a perimeter bund which will act as a barrier to groundwater flow and allow for the mineral to be worked dry through the use of sump pumps to dewater the saturated mineral and any direct rainfall to the site. An initial assessment of the dewatering and infiltration capacity of the Taplow gravels indicates that the site should be able to be worked without the requirement for a discharge to nearby watercourse.

7.18 Noise or Air Quality Issues

NOISE

A suitable noise condition has been added which restricts earthworks to between the hours of 07.30 - 18.30 on Monday-Friday and there shall be no arrival or departure of delivery vehicles outside the hours of 07.30 - 16.30 on Monday to Friday. There shall be no earthworks activity and no delivery vehicles at the site on Saturdays, Sundays or Bank and Public Holidays. This condition is proposed in order to minimise noise impacts for nearby residential properties.

AIR QUALITY

Hillingdon was declared an Air Quality Management Area in September 2003 which covers the Borough from the Chiltern-Marylebone railway line southwards. Following on from this, an Air Quality Action Plan was approved by the Council in 2004. In conjunction with other bodies, this aims to put in place measures to reduce air pollutant emissions and improve local air quality.

The application site falls within an Air Quality Management Area as for which Local Plan Part 2 policy DME1 14 states that developments should contribute towards the reduction in air pollutant emissions in order to improve local air quality.

The proposals have the potential to cause air quality impacts at sensitive locations in the vicinity of the site as a result of fugitive dust and vehicle exhaust emissions. As such, an Air Quality Assessment was required in order to determine baseline conditions and assess potential effects as a result of the scheme. The AQA states there is the potential for air quality impacts as a result of road vehicle exhaust emissions associated with traffic travelling to and from the site. These were assessed at sensitive locations using dispersion modelling. Impacts on annual mean NO₂ and PM₁₀ concentrations were predicted to be negligible at all receptors. Following consideration of the relevant issues, air quality impacts as a result of traffic emissions were predicted to be not significant, in accordance with the

IAQM guidance. Furthermore the updated statement submitted by the applicant demonstrates the removal of concrete batching plant from the proposal which in turn results in a reduction of vehicle movements. Whilst the processing of the materials on site may be a cause for concern regarding the impact to the openness of the Green Belt, if processed off site the excavated materials would need to be transported to an external processing facility and then to further transported to the market. By processing the materials on site it reduces the number of vehicle movements required to serve the site which is important given the sites location within an air quality management area.

The AQA states there is the potential for fugitive dust emissions from the development to cause disamenity dust impacts and increases to PM10 concentrations at human receptors. These were assessed in accordance with the IAQM methodology and considered receptor location and sensitivity, the proposed extraction phases, the activities to be undertaken on site, proposed mitigation measures and prevailing meteorological conditions. Furthermore the disamenity dust assessment predicted slight effects at six receptors and negligible effects at one location. As such, the overall disamenity dust effect was predicted to be slight as a result of the development.

The human health assessment predicted a PEC below the annual mean PM10 AQO at all receptors in the vicinity of the site. As such, the overall effect of PM10 emissions on human health was predicted to be negligible as a result of the development. Following consideration of the relevant issues, the overall significance of fugitive dust effects as a result of the development was predicted to be not significant in accordance with the IAQM guidance. As such the proposed development is considered to be acceptable.

7.19 Comments on Public Consultations

Discussed in the external consultation section of this report

7.20 Planning obligations

Not relevant to this type of application.

7.21 Expediency of enforcement action

Not relevant

7.22 Other Issues

Not relevant

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

10. CONCLUSION

The application proposes the phased mineral extraction on agricultural Green Belt land for a period of 10-12 years together with a minerals processing plant and subsequent restoration works involving importation of inger material, back to agricultural use.

The extraction of minerals from within the Green Belt is acceptable in principle and the proposed minerals processing plants meets the very special circumstances set out in the NPPF as stated within the principle of development section of this report. The applicant has submitted evidence in the form an appeal statement for a similar development within area covered by the GLA, as well case law examples which both support the approval of the application.

The presence of a minerals processing plant on site aids to limit the impact to the highway network through halving the vehicle movements to and from the site. A reduction in HGV movements subsequently reduces the impact to air quality within an Air Quality Management Area. The plant machinery would be sited within a ditch dug 3-4 metres below the existing ground level and the machinery itself will be low level thus minimising the impact to the openness of the Green Belt. The storing of soil bunds around the perimeter provides both a visual and noise barrier to the proposed plant.

A condition has been included to restrict the longevity of extraction operation in order to ensure the operation ceases within an acceptable time frame.

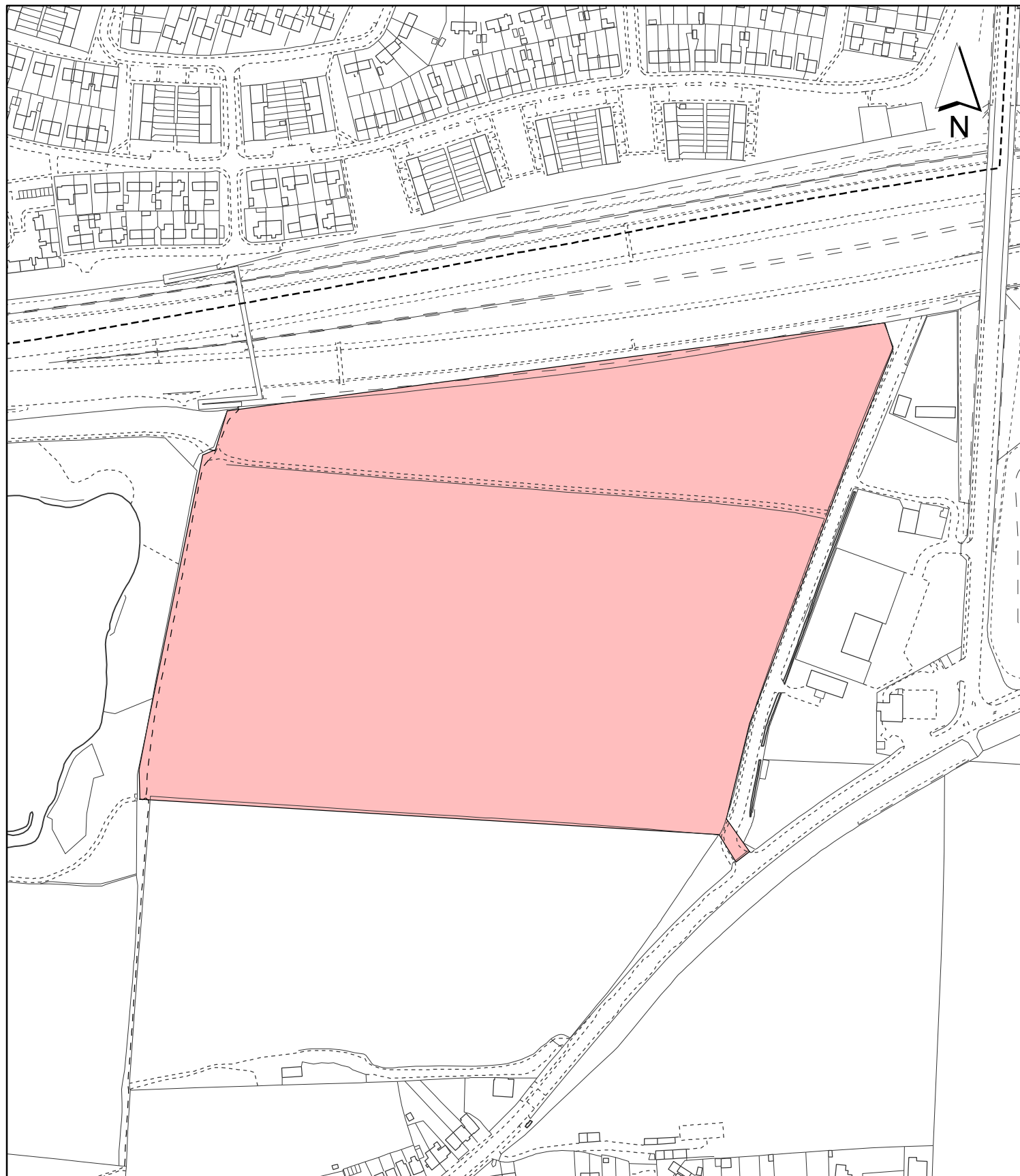
Taking into consideration the policy support for this type of application and the evidence submitted to confirm the proposal meets very special circumstances the application is recommended for approval.

11. Reference Documents

HiHillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012)
Hillingdon Local Plan: Part Two - Development management policies (March 2019)
The London Plan (March 2016)
National Planning Policy Framework (January 2019)

Contact Officer: Christopher Brady

Telephone No: 01895 250230



Notes:

 Site boundary

For identification purposes only.

This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act).

Unless the Act provides a relevant exception to copyright.

© Crown copyright and database rights 2018 Ordnance Survey 100019283

Site Address:

**Land at Harmondsworth
Holloway Close
Harmondsworth**

Planning Application Ref:

73289/APP/2017/3976

Planning Committee:

Major

Scale:

1:3,250

Date:

August 2019

**LONDON BOROUGH
OF HILLINGDON**

**Residents Services
Planning Section**

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



HILLINGDON
LONDON