

Report of the Head of Planning, Transportation and Regeneration

Address LONDON BOROUGH OF HOUNSLOW OUTBOROUGH MIDDLESEX

Development: Out of borough consultation for the extraction of Sand and Gravel, Importation and Recycling of Secondary Aggregate including the installation and operation of an aggregate processing plant with ancillary buildings and associated parking, including the creation of new vehicular access, and progressive Restoration to Agricultural Land, at Land at South of WIM, Southall Lane, Southall.

LBH Ref Nos: 39705/APP/2020/3902

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Date Plans Received: 26/11/2020

Date(s) of Amendment(s):

Date Application Valid: 26/11/2020

1. **SUMMARY**

This application is being reported to the Major Applications Planning Committee so officers may issue an objection on behalf of the London Borough of Hillingdon (LBH) to the London Borough of Hounslow for the extraction of Sand and Gravel, Importation and Recycling of Secondary Aggregate including the installation and operation of an aggregate processing plant with ancillary buildings and associated parking, including the creation of new vehicular access, and progressive Restoration to Agricultural Land, on land.

In terms of the principle of development, the application site is located entirely within the Green Belt and is the only very narrow strip of remaining Green Belt land to the west of the A312, thus this application impacts the shared area of Green Belt that exists between the two local authorities. LBH have raised an objection to its release during previous consultations relating to the site allocation and this remains unresolved.

There is significant policy support for the use of sites within the Green Belt for the purposes of mineral extraction providing it does not result in significant harm to its openness. The application demonstrates that the proposed use and the provision of a mobile plant onsite would not result significant impacts to the openness of the Green Belt and any impact would be temporary therefore no objection to this is raised. Notwithstanding this point an objection is raised to the lack of compensatory enhancements which the London Borough of Hounslow allocation policy and Paragraph 002 of the National Planning Practice Guidance (NPPG) state are required.

The proposed development is located within two LBH catchment areas of two Air Quality Focus Areas: Hays Focus Area and M4 Focus Areas, bringing traffic emissions which will add to current exceedances. There is a lack of clarity between the proposed trip generation between the Air Quality reports and the Transport Statement which prevent an accurate assessment of the impact the proposed trips would have in regards to Air Quality. Furthermore the assessments fail to provide information relating to dust emissions and these could impact surrounding uses as well as the operations within the site itself. As such an Air Quality objection is raised and a Damage Cost contribution is requested.

Finally the Transport Statement does not include modelling information to demonstrate the vehicle trip routes and the congestion within these areas therefore it is not possible to accurately determine the impact the development would have upon the Hillingdon highway network.

For the reasons mentioned above, it is recommended that an objection to the development is raised.

2. RECOMMENDATION

Objection:

If the London Borough of Hounslow are minded to approve the application it is recommended that the following conditions/obligations be attached to the grant of consent:

(1) Air Quality damage cost of £109,858 towards Air Quality improvements within the Cranford Area.

(2) Revised Air Quality Assessment which provide accurate details relating to trip generation, the impact of dust emissions upon surrounding uses and inside of the site and appropriate mitigation measures.

(3) Submission of a transport assessment (or updated statement) which includes vehicle routing and modelling to demonstrate potential congestion impact

(4) Revised restoration plan which includes appropriate compensatory improvements.

(5) Accurate details of existing levels so the site is restored to existing levels.

3. CONSIDERATIONS

3.1 Site and Locality

The application site is and south of the Western International Market, Southall Lane within the boundary of the London Borough of Hounslow. To the west and south west of the site is Cranford Park which abuts the boundary between Hillingdon and Hounslow. It is also bounded by the M4 (running East to West), Southall Lane and 'The Parkway' which are all within Hounslow's borough boundary. 'The Parkway' merges and enters Hillingdon to the north of the site whilst the M4 within Hillingdon lies to the west of the address.

To the north and east are commercial and industrial developments. The Western International Market lies along the northern boundary, along with a waste transfer station operated by the local authority and a ready-mix concrete plant operated by Quattro UK Ltd. To the north of the waste transfers station and ready-mix plant is a mix of commercial and retail developments including a data centre and large Costco store.

The entire site is located within the Green Belt as well as a number of other designations which are as follows:

- Special Areas of Conservation (SAC);
- Special Protection Areas (SPA);
- Ramsar sites;
- Special Sites of Scientific Interest (SSSI);
- National Nature Reserves;
- Local Nature Reserves;
- Ancient Woodland
- Registered Parks and Gardens; and
- Historic Battlefields

3.2 Proposed Scheme

The application proposal is to extract approximately 700,000 tonnes of sand and gravel, which are to be won and worked over a period of 7 years at a maximum annual extraction rate of 100,000 tonnes (average 60,000 tonnes) with the infilling of the site due to take a further 7 years. The mineral excavations will be pumped dry for the duration of the works. The minerals operation will be worked in 3 phases each to represent approximately 2 years of mineral extraction each. The first phase is located in the south-west corner of the site and the phases progress in a clockwise progression around the site. The mineral will be processed on site using a low-level mobile processing plant. The products will be exported off-site for use in the applicant's adjacent ready mix concrete operations at Hayes and off-site to supply the Company's other ready-mix concrete plants and to the construction industry in general.

The void resulting from mineral extraction will be infilled in phases back to original ground level using suitable imported inert waste and quarry fines. All inert waste which contains recoverable aggregate will be processed through the mineral processing plant. This operation will process arisings from groundworks and construction and demolition waste to create secondary aggregates for supply to the general construction industry. Reject waste derived from this operation will be used in the restoration of the quarry void.

The development can be divided into several key stages, namely

- Site preparation - new site entrance, infrastructure development, soil stripping
- Mineral extraction
- Mineral processing and export
- Secondary aggregates import and production
- Restoration

It is anticipated that the duration of the development will be 15 years from commencement of mineral extraction to completion of restoration

3.3 Relevant Planning History

UDP / LDF Designation and London Plan

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

Part 1 Policies:

Part 2 Policies:

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- Not applicable

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

This is an out of borough application therefore the public consultation will be undertaken by London Borough of Hounslow and not the LBH.

1 comment was received by the Heathrow Villages Conservation Area Advisory Panel.

I am writing on behalf of the Heathrow Villages Conservation Area Advisory Panel. We note that the

land in question is owned by Hounslow Council and is an allocated site for mineral extraction within the adopted Hounslow Local Plan. We therefore do not object to the extraction of aggregate and subsequent restoration to agricultural land, though the site is very close to the Cranford Park Conservation Area which provides a 'green lung' for the southern part of Hayes where a large number of high-density housing developments have recently been approved and are under construction. However, we are opposed to the parallel use of the site for the importation and recycling of secondary aggregate which will entail the installation and operation of an aggregate processing plant. This will create additional noise and dust, and will increase the number of HGV movements in and out of the site which will add to the already considerable congestion on Hayes Road, at the roundabout where it crosses the A312 (Hayes Bypass), and on the stretch of the A312 running south to J3 on the M4. We hope permission will not be granted for the recycling of secondary aggregate

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The site lies within the Green Belt. The site was proposed for release in London Borough of Hounslow's recently submitted Local Plan Review. The London Borough of Hillingdon objected to the release of the site from the Green Belt and the matter remains unresolved. In line with Paragraph 48 of the NPPF (2019), limited weight should be attached to the new site allocation. This site allocation has also been subject to modifications since it was submitted to the Planning Inspectorate. The modifications have not yet been subject to consultation.

The London Borough of Hillingdon has already outlined the concerns regarding this Green Belt release. The release would remove a continuous extent of Green Belt from Heston to the north of Cranford Park, which currently provides a separation between built developments in the two boroughs. These concerns remain pertinent. Hillingdon Council does not agree that the site currently makes a less important contribution to the wider strategic Green Belt. Its release would result in only a very narrow strip of remaining Green Belt land to the west of the A312, thus impacting the purposes of this land and the shared area of Green Belt that exists between the two local authorities. The Green Belt Review also concludes that the site performs moderately when viewed in isolation.

It should be noted that as this is an out of borough consultation the main point of concern relating to the principle of development for the LBH, is whether the proposed development would result in an adverse impact upon the openness of the shared Green Belt land which separates the developments either side of the borough boundary.

Paragraph 146 of the National Planning Policy Framework (NPPF) states that mineral extraction is not inappropriate development 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 other uses 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. Taking this policy support into consideration there is no objection raised to the use of the site for this purpose.

Whilst the extraction of minerals is supported by both national and local policies the proposed onsite minerals processing plant 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 aggregate processing plant and ancillary buildings will be subject to Paragraph 145 of the NPPF (2019) or the very special circumstances test. It is noted that these have been located in the north eastern corner of the site, near to Southall Lane and the existing industrial uses. This approach is supported, in order to reduce the

temporary harm to the rest of the surrounding Green Belt. In this case the applicant has stated that the location of the plant equipment including its low level and the presence of soil bunds around the perimeter would result in a negligible impact upon the openness of the Green Belt. The LBH raises no objection to this.

Restoration

The site is proposed to be restored to agricultural land by infilling with inert waste to restore the original ground levels. The restoration to original levels only, is supported. The creation of new excessive artificial levels that would harm the openness of the site is not supported. It is recommended that details of the existing levels should be sought as part of the determination of this application.

The restoration to agricultural land is unexpected considering the site is not currently in agricultural use and the applicant has indicated that the site has not been in farming use for several decades. Whilst the use of the site for agricultural use itself does not conflict with the purposes of the Green Belt, the restoration plan would provide minimal public benefit overall.

It is noted that the modifications to the site allocation supporting mineral extraction on this site would require compensatory improvements to be made to the remaining Green Belt land. It also notes that development should strengthen the boundary of the site in order to provide a sufficient buffer with the adjacent Green Belt at the western edge of the site. Paragraph 002 of the National Planning Practice Guidance (NPPG) on Green Belt outlines what compensatory improvements are likely to consist of, including:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

It is not proposed that there would be any new or enhanced walking and cycle routes. There would also be no improved access to new, enhanced or existing recreational and playing field provision. There are no proposed landscape and visual enhancements secured beyond those necessary. The applicant has stated that there will be no change (neutral impact) in biodiversity after the new landscaping and a neutral impact on habitats and protected species. There is no new woodland planting or enhanced green infrastructure. The proposed tree and shrub planting belt would just replicate what already exists on the edge of the site.

The restoration plan should be revisited to allow for better compensatory improvements to be included. Due to the isolated nature of the site and its constrained access for members of the public, trying to improve access may not be the optimum solution. Officers would therefore advocate the restoration plan making improvements to biodiversity and the creation of additional woodland planting to the west of the site (where there is already existing woodland), in order to provide a sufficient buffer with the adjacent Green Belt.

Notwithstanding the objection to the release of this piece of Green Belt land or the lack of consultation following changes to the London Borough of Hounslow site allocation, there is support for the provision of sites for mineral extraction in principle therefore no objection is

raised to the proposed use of the land. Whilst the LBH does not consider the mobile plant as a requirement to serve the proposed use, its location to the north east of the site close to industrial uses which are located in this direction is the most appropriate within the site and its screening would assist in limiting the impact upon the openness of the Green Belt.

As stated above the proposed restoration plan should ensure that the land is returned back to its original state which includes the land levels. Concerns are raised with the lack of compensatory improvements which are required in accordance with the amended site allocations policy and Paragraph 002 of the National Planning Practice Guidance (NPPG). As such it is requested that the restoration plan be revised to reflect the above comments.

7.08 Impact on neighbours

The application relates to an out of borough consultation request for minerals extraction and processing on a site outside of the edge of the LBH boundary. The closest residential properties within Hillingdon are located 285 metres from the proposed site therefore the development is unlikely to give rise to significant impacts upon the residential amenities of Hillingdon residents.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The application for mineral extraction would result in between 70-100 additional two-way vehicle movements each day (predominantly HGV). Concerns are raised regarding the lack of a detailed transport assessment which provides modelling information that would demonstrate the likely vehicle routes. Due to this lack of detail the LBH cannot comment on whether the potential highway impacts would be significant. Whilst the applicant states that the likely impacts would be low it is understood that many of the surrounding roads including those leading up to the Bulls Bridge round about are heavily congested and although the statement refers to the commitment to avoiding peak times to reduce the potential for further congestion we don't have any substantial information to support this statement.

Given the absence of the aforementioned information, the Council is not in a position to provide an informed view on the acceptability (or otherwise) of the likely highway impacts of the proposal on Hillingdon's road network. On that basis, a highways refusal is recommended based on a lack of submitted 'traffic assignment/routing', or, further information should be provided by the Applicant on this matter.

7.18 Noise or Air Quality Issues

AIR QUALITY

The supporting information does not provide an accurate or consistent figure for the proposed traffic movements. There is a discrepancy between the Air Quality Assessment and the Transport Statement in terms of the HGVs servicing the application site (52 HGV movements in the AQ report versus 70 HGV movements (two-way) per day in the Transport Statement).

The total number of vehicle movements suggested within the Transport Statement is between 70-100 and this is spread across the HGV movements and other vehicle movements (presumably staff). The Transport Statement does not provide any detailed modelling which would provide details of congestion or vehicle routing which would be beneficial given the site is relatively close to the Bulls Bridge Roundabout which the LBH has identified as being congested already. As such the conclusion of how the additional vehicle movements would impact Air Quality are considered valid as congestion and queuing conditions at hot spot locations (e.g. within Focus Areas) were not taken into account in the assessment.

Moreover, the main potential impact is that of dust deposited on surfaces. The applicant has submitted two air quality reports in support of the application neither of which demonstrate that the possible impacts of dust emissions on surrounding uses and within the site itself satisfactorily. It is requested that further assessments of the impact upon Air Quality are undertaken which would include further information to address the points above as well as monitoring and appropriate forms of mitigation.

Whilst there is a request for additional information to be provided it is considered that appropriate levels of mitigation cannot be provided on site. The development cannot achieve air quality neutral status therefore a Damage Contribution should be secured by London Borough of Hounslow in order to off-set the potential impact. The level of mitigation required associated with the operation phase of the proposed development should be calculated using Defra's Damage Cost Approach. The calculations undertaken are deemed to be underestimated as they do not account for staff movements to and from the site, only accounting for the number of HGVs servicing the site operation. A contribution of £109,858 is required to mitigate against traffic emissions from the development. Should the damage cost be secured it is important that the air quality mitigation includes Air Quality improvements within the Cranford Area.

10. CONCLUSION

The London Borough of Hillingdon has strong concerns that use of the land for minerals extraction for up to 16 years could result in adverse impacts upon the openness of the Green Belt, Air Quality and the London Borough of Hillingdon's Highway Network. Additional information should be sought from the Applicant in respect of the concerns raised and that a further consultation should be undertaken with Hillingdon upon receipt of this information.

Contact Officer: Christopher Brady

Telephone No: 01895 250230