

# HARMONDSWORTH QUARRY RESTORATION ENVIRONMENTAL PERMIT APPLICATION

## **Non Technical Summary**

Prepared for: Ingrebourne Valley Limited

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- Drawing 001 Site Location Plan
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### APPENDICES

- Appendix A: Planning Permission
- Appendix B: Enhanced Pre-application advice

## 1.0 Introduction

Ingrebourne Valley Limited (IV) has instructed SLR Consulting Ltd (SLR) to prepare an application for an Environmental Permit for the proposed restoration of Harmondsworth Quarry ('the Site'), located off Holloway Close, Harmondsworth, Hillingdon, West London.

Planning permission has been granted to IV for the extraction of ca. 450,000 tonnes of sand and gravel from the quarry and for restoration of the Site to agriculture using in-situ materials and approximately 300,000m<sup>3</sup> imported inert waste reclamation materials.

The planning permission places an enforceable obligation on IV to restore the Site according to the approved restoration scheme and therefore the restoration satisfies the definition of 'recovery'. The Environment Agency (EA) have approved a Waste Recovery Plan for the Site and the application is for a bespoke Environmental permit for a waste recovery operation.

In accordance with the EA's application forms, this Non-Technical Summary (NTS) includes an explanation of what is being applied for, a summary of the regulated facility and a summary of the key technical standards and control measures.

In addition, the Environmental Permit application include the following documents:

- Application Forms Part A, Part B2, Part B3 and Part F1;
- Drawings;
- Waste Recovery Plan (WRP);
- Environmental Risk Assessment (ERA);
- Environmental Site Setting & Design (ESSD);
- Hydrogeological Risk Assessment (HRA);
- Stability Risk Assessment (SRA);
- Operating Techniques (OT); and
- Dust Management Plan (DMP).

### 1.1 Site Location and Setting

The Site is approximately 11 hectares in size and is located to the north of the village of Harmondsworth at National Grid Reference TQ06057823. The M4 motorway lies adjacent to the northern boundary of the Site, with the town of West Drayton beyond. To the east of the Site there is a wooded hedge beyond which lies Holloway Close, a petrol filling station, a small industrial estate and a disused nursery. An area of grassland used for grazing lies between the southern boundary and the village of Harmondsworth, with Heathrow Airport located 1km to the south. The western boundary of the Site is adjacent to Saxon Lake, a large water body formed within a former gravel pit.

The Site is located within the Metropolitan Green Belt. Two Nature Conservation sites are located nearby: Lower Colne which lies 400m to the west beyond Saxon Lake and St George's Meadow 700m to the north. The nearest residential properties are located approximately 145m to the north of the Site in West Drayton. A public footpath, from West Drayton to Harmondsworth, runs along the western boundary of the site.

The Site will be accessed at the south-eastern corner from the junction of Holloway Close with Holloway Lane.

The Site location is shown in Drawing 001 and the Environmental Setting of the site is illustrated on Drawing 003.

## 1.2 Planning Status

Planning Permission was granted to IV by the London Borough of Hillingdon on 10th October 2019 for the 'phased mineral extraction, including ancillary activities, with restoration to agriculture' at the site. The Planning Permission, reference 73289/APP/2017/3976, is provided in Appendix A.

## 1.3 Approved Waste Recovery Plan

A Waste Recovery Plan (WRP) was submitted to the Environment Agency (EA) in January 2021 and approved on 15<sup>th</sup> March 2021. The approved WRP and the RVD Pre-Application Advice letter are provided in Section 4 of this permit application.

## 1.4 Pre-application Advice

Enhanced pre-application advice was sought from the Environment Agency at a meeting which took place on 22<sup>nd</sup> October 2020.

Notes of the pre-application meeting were received from the EA on 29<sup>th</sup> March 2021 and are provided in Appendix B.

## 1.5 Application Fees

The application charges are £10,448 in total, consisting of:

- a deposit of waste for recovery activity (Table 1.17.9) £9,207; and
- assessment of the Dust Management Plan (Table 1.19.5) £1,241

## 2.0 Proposed Development

The site is approximately 11 hectares in size and prior to development, consists of two agricultural fields. Topsoil will be stripped and stored in temporary bunds on the site perimeter pending use in the subsequent restoration phase. Overburden will be removed and stored in temporary stockpiles within the site as extraction progresses. The quarry will be worked through the superficial Langley Silt deposits to the base of the Taplow Gravel to a depth of between 6m and 9m below ground level. The quarry will fully excavate the Taplow Gravels to the top of the London Clay bedrock, removing approximately 450,000m<sup>3</sup> of sand and gravel over a 10 to 12-year period. The mineral will be extracted in four phases and will be processed off-site.

Groundwater levels at the site are between 4 and 7m below ground level and dewatering is required for excavation of the lower deposits within the mineral seam. The site will be isolated from the aquifer by the installation of a low permeability 'picture frame' bund around the perimeter of the whole site. This will be constructed by digging a trench, extracting overburden and mineral down to the basal London Clay and backfilling it to the surface with in-situ clay comprising the Langley Silt overburden. The extraction and backfill will be carried out progressively in ca. 25m sections to minimise material handling. The construction of the perimeter barrier will facilitate local dewatering during extraction of mineral and allow mineral to be dug dry. No imported waste will be used for construction of the barrier.

The base of the void is underlain by 60m+ of low permeability London Clay deposits which will form an impermeable basal barrier upon which imported waste will be deposited for restoration. A side-wall barrier will be constructed using the in-situ clay deposits keyed into the basal clay. Groundwater will be managed within the site using temporary bunds as follows: Phase 1 will be dewatered and discharged to a recharge area in Phase 2; Phase 2 will be dewatered into Phase 3, etc. Discharge of water from the final phase will be made to the attenuation swale outside the barrier on the southern boundary of the site.

Infilling will take place within the void to restore the surface according to the restoration contours required by planning permission, using a combination of site derived materials and suitable imported inert waste. Imported inert restoration material will be screened to separate any oversize material before placement in the void. Oversize material will be crushed on a campaign-basis using mobile crushing plant and will be used as infill on-site. The plant area will be located 3-4m below ground level following excavation of the sand and gravel in the area.

## 2.1 Specified Waste Management Activities

The application is for deposit of waste for recovery. The waste management activities that will be carried out at the site, under the conditions of the permit, as specified in Annex I of the Waste Framework Directive are:

- R5: Recycling /reclamation of inorganic compounds – use of waste for the purpose of restoration of land.
- R13: Storage of waste pending any of the operations numbered R5 and R10.

## 3.0 Key Technical Standards and Control Measures

### 3.1 Technical Standards

Key technical standards laid out in the following documents will govern the operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016;
- Waste Recovery Plans and Permits; gov.uk, 18 October 2016;
- Risk Assessments for your environmental permit; gov.uk, updated 10 December 2020;
- Risk Assessments for specific activities: environmental permits; gov.uk, published 2 February 2016; and
- Develop a management system: environmental permits; gov.uk, updated 30 November 2020.

The key technical standards and control measures that are necessary to ensure that the site does not give rise to significant environmental impact have been determined through the risk assessment process and are summarised below:

- strict waste acceptance procedures will be implemented to prevent the acceptance of unauthorised waste;
- noise impacts will be minimised by speed limits and traffic calming, maintenance of road surfaces, selection and maintenance of plant to minimise noise and daily auditory inspections;
- operations will only be undertaken during the hours authorised by the planning consent;
- measures will be implemented to control fugitive emissions of dust through the implementation of the site specific Dust Management Plan;
- hard surfaces or paving will be used for haul routes. Speed limits of 20mph or less for surfaced roads and 5mph for unmade roads will be implemented;
- wet cleaning methods or mechanical road sweepers will be used on all roads during periods when blown dust arisings are visible;
- the proposed waste recovery operation will be engineered with a sidewall geological barrier/attenuation layer keyed into the London Clay natural basal barrier;

- a comprehensive programme of operational monitoring will be implemented to include noise, fugitive emissions, mud and litter;
- monitoring of groundwater and surface water will be undertaken throughout the operational and post closure period; and
- monitoring of in-waste gas boreholes will be undertaken following completion of each phase.

## 3.2 Management System & Operating Techniques

The site will be managed and operated in accordance with IV's Environmental Management System (EMS) which is accredited to ISO14001.

IV's management system will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system;
- performance against the management system is audited at regular intervals; and
- the environmental permit is complied with.

A summary of the management system and operating techniques is enclosed as Section 10 of this application.

## 3.3 Waste Acceptance

The site will only accept inert waste.

Strict waste acceptance procedures will be in place at the site to ensure that non inert waste is not accepted at the site. These procedures include the following:

- Pre-acceptance checks prior to accepting waste at the Site, including source checking of the waste characterisation data provided by the waste producer;
- Waste acceptance checks upon delivery to site to ensure that the wastes are as described, and as permitted within the Environmental Permit; and
- Actions to be taken if waste not permitted by the Environmental Permit is delivered to site.

## 3.4 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) has been undertaken to assess the potential impacts from the proposed operations and is enclosed as Section 5 of this EP application. A noise risk assessment has been undertaken and a Dust Management Plan has been prepared for the proposed Site which is enclosed as section 8 of the application.

The ERA, noise and dust assessments conclude that with the implementation of risk management measures potential impacts from the proposed development are not likely to be significant.

## 3.5 Environmental Setting & Site Design

An ESSD report has been prepared in support of this EP application. The ESSD defines the site's conceptual model including the potential source, pathway and receptor linkages. It provides details on the site's environmental setting, and the proposed design of the site.

A perimeter barrier will be constructed to isolate the site from the aquifer to facilitate local dewatering prior to extraction of mineral. The base of the extraction void below the mineral deposits is located on London Clay which will form an impermeable basal barrier. A sidewall barrier will be constructed as each phase proceeds and will be keyed into the basal London Clay to seal the void.

The ESSD report is enclosed as Section 7 of this EP application.

### 3.6 Stability Risk Assessment

A Stability Risk Assessment has been prepared in support of the application and is enclosed as section 9 of this application. This SRA incorporates analyses including side slope subgrade, attenuation /cut-off barrier stability and considers stability of the temporary waste slopes within the inert waste infill which will be generated as a consequence of the phased restoration.

The SRA demonstrates that the proposed temporary waste slopes maintain an adequate factor of safety in all modelled conditions and that the factor of safety is acceptable under both short (peak) and long term conditions.

### 3.7 Hydrogeological Risk Assessment

The modelling undertaken in the HRA has demonstrated that the proposed restoration will not result in the release of Hazardous Substances, and the release of Non-Hazardous Pollutants is sufficiently limited as to avoid pollution of the Taplow Gravels aquifer and Saxon Lake. This confirms that the proposed restoration of Harmondsworth Quarry would remain compliant with the Environmental Permitting Regulations 2016 subject to technical precautions including site specific waste acceptance criteria, engineered barriers and attenuation layers, and the monitoring of groundwater and surface water.

The Hydrogeological Risk Assessment is enclosed as Section 6 of this application.

### 3.8 Environmental Monitoring

A network of groundwater monitoring boreholes at the perimeter of the site will be monitored throughout the operational and post closure period to ensure that the site does not impact the surrounding environment.

Following completion of filling in each phase, in-waste monitoring boreholes will also be installed within the site to monitor the emissions of gas.

Daily monitoring will also be undertaken in accordance with operating procedures for amenity issues such as noise and dust in accordance with site management plans.

### 3.9 Site Closure

The IV accredited Environmental Management System (EMS) will continue to apply to the management of Harmondsworth Quarry following site closure.

The objective of the EMS procedures during the post closure period will be to ensure that when the site ceases to operate, it will be closed in accordance with regulatory guidance, that the approved restoration scheme will be implemented and that the site maintenance and environmental monitoring will be continued until no longer necessary.

## 4.0 Conclusion

The overall conclusion from the studies undertaken as part of the application is that there is unlikely to be a significant environmental impact as a result of the proposed waste recovery operations at Harmondsworth Quarry.



IV is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the company's environmental policy and management system.

It is therefore considered that the permit application should be issued as detailed above.

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## APPENDIX A

### Planning Permission



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Application Ref:  
73289/APP/2017/3976

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**  
**GRANT OF PLANNING PERMISSION**

The Council of the London Borough of Hillingdon as the Local Planning Authority within the meaning of the above Act and associated Orders **GRANTS** permission for the following:-

**Description of development:**

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

**Location of development:** Land At Harmondsworth Holloway Close  
Harmondsworth

**Date of application:** 03 November 2017

**Plan Numbers:** See attached Schedule of plans

**Permission is subject to the condition(s) listed on the attached schedule:-**

**Head of Planning, Transportation and Regeneration**

**Date: 10 October 2019**

- NOTES:
- (i) Please also see the informatives included in the Schedule of Conditions.
  - (ii) Should you wish to appeal against any of the conditions please read the attached sheet which explains the procedure.
  - (iii) This decision does not convey any approval or consent which may be required under any by-laws, building regulations or under any Act other than the Town and Country Planning Act 1990 (as amended).

# TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

## GRANT OF PLANNING PERMISSION

Application Ref: 73289/APP/2017/3976

### SCHEDULE OF CONDITIONS

- 1 · 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 · The development hereby permitted shall not be carried out except in complete accordance with the details submitted in the original Environmental Statement dated November 2017 and Update Statement submitted April 2019 as well as the submitted plans: 0835/A/1/v3, 0835/O/1/v4, 0835/O/2/v4 and 0835/PR/1/v6, 17388-02 Rev.a, 0835/CS/1.v4, Gen./03 v3, Gen./06 v3, Gen./02 v3, 0835/PP/1v3 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 · 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

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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).

## SCHEDULE OF CONDITIONS

- 4 · 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 · 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). .

## SCHEDULE OF CONDITIONS

- 6 · 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 · 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). .

## SCHEDULE OF CONDITIONS

- 8 · 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 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). .

- 9 · 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 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). .

## SCHEDULE OF CONDITIONS

- 10 · 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 · No excavation or development shall take place until a site survey and 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 · 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.



## SCHEDULE OF CONDITIONS

13 · 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.

## SCHEDULE OF CONDITIONS

- 14 · The development hereby approved, shall only operate 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. No works including deliveries and servicing shall take place on 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 · No contaminated soils or other excavated materials, (including road planings and/or hardcore), are to be imported to the site until information outlining: their source; the results of analyses; and assessment of their suitability for use, has been submitted to and agreed in writing by the Local Planning Authority. Prior to their import, and placement on site, a suitable methodology for sampling and testing the materials should be submitted to and agreed in writing by the Local Planning Authority. The methodology shall include (but not necessarily limited to):
- (i) The sampling frequency
  - (ii) Testing schedules
  - (iii) Method of sampling
  - (iv) Criteria against which the analytical results will be assessed (as determined by suitable risk assessment)
  - (v) Credentials of the testing facility

The agreed methodology shall then be carried out and verification evidence submitted to 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, 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 · Provision shall be made within the site to ensure that all vehicles associated with the development hereby approved are properly washed and cleaned before leaving the site 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.

## SCHEDULE OF CONDITIONS

- 17 · 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 · Within 6 months of the approval, a detailed scheme for the restoration of the land to Grade I agricultural use 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 · 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 · Prior to the commencement of development, details of noise mitigation and monitoring shall be provided to the Council and approved in writing by the Local Planning Authority. Thereafter, the approved noise mitigation measures and monitoring mechanism shall remain in place for the lifetime of the development.

### 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)

## SCHEDULE OF CONDITIONS

- 21 · The temporary buildings hereby approved on plans ref: Gen./03v3, Gen./06v3, Gen./02v3 and 0835/PP/1 v3 shall not exceed the dimensions shown on the listed plans for the lifetime of the development unless otherwise agreed in writing by the Local Planning Authority.

### 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).

- 22 · 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)

- 23 · 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.

- 24 · 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)

## SCHEDULE OF CONDITIONS

25 . An aftercare scheme for 5 years shall be submitted to the Local Planning Authority for approval in writing within 6 months of the completion of the mineral extraction. This scheme shall outline the works for the site to ensure the restoration scheme is implemented correctly. The scheme shall include maintenance procedures for ensuring the ditches are kept free from silt and any other materials which may prevent the site from draining adequately including:

- Substrate analysis;
- 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;
- Seeding rates and species mixtures;
- Control of invasive species
- A timetable for undertaking the approved aftercare scheme; and
- The keeping of records of the annual review of performance and proposed operations for the coming year which shall be submitted to the Local Planning Authority between 1st October and 31st December of each year.

### REASON

To ensure the appropriate environmental management in accordance with Policy EM7 and EM8 of the Local Plan Part 1 and the London Plan (2016).

### 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

## SCHEDULE OF CONDITIONS

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 . 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 . 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.

### 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

**SCHEDULE OF CONDITIONS**

	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

## **SCHEDULE OF CONDITIONS**

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

### **END OF SCHEDULE**

#### **Address:**

Residents Services  
London Borough of Hillingdon  
3 North Civic Centre, High Street, Uxbridge UB8 1UW  
Tel: 01895 250230  
[www.hillingdon.gov.uk](http://www.hillingdon.gov.uk)



## **GRANT OF PLANNING PERMISSION**

Application Ref.No.: 73289/APP/2017/3976

### **SCHEDULE OF PLANS**

0835/PR/1 - received 23 Jul 2018  
0835/CS/1 v4 - received 08 Apr 2019  
0835 O 1 v4 phasing plan 1 & 2 - received 08 Apr 2019  
0835 O 2 v4 phasing plan 2 & 3 - received 08 Apr 2019  
0835 PP 1 v3 - received 08 Apr 2019  
Appendix 1 - letter from planning agent - received 08 Apr 2019  
Appendix 2 (1)- SLR report 05.07.18 in full - received 08 Apr 2019  
Appendix 2 (2)- SLR report 05.07.18 in full - received 08 Apr 2019  
Appendix 3 Environment agency letter 10.08.18 - received 08 Apr 2019  
Appendix 4 Environment agency letter 14.02.19 - received 08 Apr 2019  
Appendix 5 Highways England response 30.05.19 - received 08 Apr 2019  
Appendix 6 Further information (officer report) - received 08 Apr 2019  
Appendix 8 Highways England response - received 08 Apr 2019  
Appendix 9 Highways England response 30.11.18 - received 08 Apr 2019  
Updated planning statement - received 08 Apr 2019  
422-01526-00014 - Flood risk assessment - received 09 Nov 2017  
422-01526-00014 - Hydrological impact assessment - received 09 Nov 2017  
1261-1r1 - Air quality assessment - received 09 Nov 2017  
Appendix 10 - SLR consulting letter/report - received 08 Apr 2019  
Appendix 11 - GLA planning report 19.03.18 - received 08 Apr 2019  
Appendix 12 - Appeal decision - received 08 Apr 2019  
Appendix 13 - GLA planning report 19.12.13 - received 08 Apr 2019  
SJT/NES/17388-02 0 Transport assessment - received 07 Nov 2017  
NTS. - Non technical summary - received 07 Nov 2017  
Environmental Statement - received 07 Nov 2017  
0835 A 1 v3(1) - received 01 Nov 2017  
0835 PR 1 v6 - Proposed Levels - received 01 Nov 2017  
0835 SC 1 v3 - Site context - received 01 Nov 2017  
0835 A 1 v3 - received 01 Nov 2017  
17388-02 Rev. a - received 01 Nov 2017

Gen. 02 v3 - received 01 Nov 2017

Gen. 03 v3. - received 01 Nov 2017

Gen. 06 Fuelling Area v3. - received 01 Nov 2017

0835 L v4. - received 01 Nov 2017

Environmental Statement November 2017 - received 01 Nov 2017

Non Technical Summary November 2019 - received 07 Nov 2017

0835 CS 2 v2 - Cross section of northern boundary - received 23 Jul 2018

HLH15/92 Archaeological desk based assessment - received 07 Nov 2017

HLH15/92 Archaeological evaluation - received 07 Nov 2017

3037/F0 Ecological assessment - received 07 Nov 2017

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the office of the First Secretary of State under Section 78 of the Town and Country Planning Act 1990.

If you want to appeal, then you must do so within six months of the date of this notice, using a form which you can get from the Planning Inspectorate at Customer Support Unit, Room 3/15 Eagle Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN (Tel 0117 372 8424). Appeal forms can be downloaded from the Planning Inspectorate's website at [www.Planning-inspectorate.gov.uk](http://www.Planning-inspectorate.gov.uk)

If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate ([inquiryappeals@planninginspectorate.gov.uk](mailto:inquiryappeals@planninginspectorate.gov.uk)) at least 10 days before submitting the appeal.

Further details are available at [www.gov.uk/government/collections/casework-dealt-with-by-inquiries](http://www.gov.uk/government/collections/casework-dealt-with-by-inquiries)

The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances, which excuse the delay in giving notice of an appeal.

The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

**Purchase Notices.**

If either the local planning authority or the officer of the First Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use by carrying out of any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

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## APPENDIX B

### Enhanced Pre-application Advice

Mrs Maggie Dutton  
 Ingrebourne Valley Limited  
 Harmondsworth Quarry  
 Harmondsowth,  
 Hillingdon  
 UB7 0AE

Our reference: EA/EPR/JB3503HT/A001  
 Date: 29/03/2021

Dear Mrs Dutton

**Pre application advice – Enhanced service**

I am pleased to provide you with your enhanced level of pre-application advice for Harmondsworth Quarry as requested on 23/06/2020.

Our advice is based on the information provided on your pre application advice form and conversations/emails recorded on the following dates:

- Telephone conversation on 22/10/2020

**What enhanced pre application covers**

Further information on the enhanced pre-application service is detailed on section 2 of the [Environmental permitting charges guidance on GOV.UK](https://www.gov.uk/guidance/environmental-permitting-charges).

As part of this service we have provided you with the following information:

Applicat ion referenc e number	
Applicat ion charge require d	<p>The baseline fee of £9,207 1.17.9 of the charging scheme. Deposit of waste for recovery is required.</p> <p>The following plans and assessments should also be added to the baseline fee(s):            £620.00 (Dust and bio-aerosol management plan) – please see table 1.19 of the charging guide, row 1.19.9.</p>

**customer service line 03706 506 506**

**floodline 03459 88 11 88**

**incident hotline 0800 80 70 60**

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Application reference number	
<b>Forms required to be submitted</b>	<p>Forms</p> <p>You can apply for this permit online at: <a href="https://apply-for-environmental-permit.service.gov.uk/start/start-or-open-saved">https://apply-for-environmental-permit.service.gov.uk/start/start-or-open-saved</a></p> <p>If you apply online, you must attach all the required documents.</p> <p>Alternatively, you can submit the following forms – Part A, Part B2, Part B4 and Part F1. Please ensure you download the latest version of the forms, as your application will be returned if an old version of the forms is used: Part A - <a href="https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you">https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you</a> Part B2 <a href="https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b2-new-bespoke">https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b2-new-bespoke</a></p> <p><a href="https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b4-new-bespoke-waste-operation">https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b4-new-bespoke-waste-operation</a></p> <p><a href="https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f1-opra-charges-declarations">https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f1-opra-charges-declarations</a></p> <p>You must read all accompanying guidance (whether applying online or using forms) to ensure you do not miss anything out.</p> <p>You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A, and Appendix 2 in form B2. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.</p> <p>Declaration (Form F1)</p> <p>Please ensure the Declaration section is completed by each “relevant person”.</p> <ul style="list-style-type: none"> <li>· For an application from an individual, a relevant person is the person to be named on the permit.</li> </ul>

<b>Application reference number</b>	
	<ul style="list-style-type: none"> <li>· For an application from more than one individual, each person who is applying for their name to be on the permit must complete the declaration – you will have to print a separate copy of the declaration page for each additional individual to complete.</li> <li>· In the case of a company, a relevant person must be an active director/company secretary as listed on Companies House – <a href="https://beta.companieshouse.gov.uk/">https://beta.companieshouse.gov.uk/</a></li> <li>· For a charity, a relevant person is a key post holder, i.e., chair, chief executive, director or trustee.</li> </ul>
<b>Additional documents required</b>	<p><b>Site Plan</b></p> <p>The site location drawing should clearly outline the site boundary in a green, unbroken line. The site plan should not be an aerial photograph. The site plan should include a date and a reference, and must be drawn accurately to a defined scale. It is helpful if local features are shown on the plan to help us clearly identify the exact location of the site.</p> <p>If you are sending us a paper copy of your site plan it must be either A3 or A4 size. Alternatively you can send us an electronic copy on CD or via email.</p> <p>You should also provide plans showing the site’s infrastructure, storage and drainage arrangements.</p> <p><b>Evidence of appropriate technical competence</b></p> <p>If you already have an appropriate qualification, you must provide a copy of the original technical competence certificate, along with the most recent continuing competency certificates, if required.</p> <p>If you do not yet have the appropriate award but have registered for it, you must provide written confirmation from the course provider of your registration.</p> <p>If you are relying on the EPOC qualification for a medium or high risk activity, you must provide a copy of the original EPOC certificate and any continuing competencies, along with confirmation from the course provider that you are registered on the appropriate full award.</p>

Application reference number	
	<p>For further information, including who to contact for advice on the appropriate level of qualification and alternative routes, please refer to the B2 guidance which can be found at: <a href="https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b2-new-bespoke">https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b2-new-bespoke</a></p> <p>Environment Management System</p> <p>We require you to submit a summary of your Environment Management System. Your summary should cover all the points in ‘Develop a management system: environmental permits’ at <a href="https://www.gov.uk/guidance/develop-a-management-system-environmental-permits">https://www.gov.uk/guidance/develop-a-management-system-environmental-permits</a></p> <p>Non-Technical Summary</p> <p>You need to send us a non-technical summary which should explain your proposal using non-technical language. This should summarise your operations (including how waste is handled, treated and stored), key technical standards you will adhere to and the main control measures arising from your risk assessment.</p> <p>Site-specific risk assessment produced in line with our guidance or equivalent</p> <p>You should describe the environmental risk posed by your proposals. This must take the form of an environmental risk assessment which should follow the methodology set out in ‘Risk assessments for your environmental permit’ at <a href="https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#risks-from-your-site">https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#risks-from-your-site</a> .</p> <p>Site condition report</p> <p>We require a site condition report in line with the H5 Site Condition Report Guidance. This guidance includes a template you can use</p> <p><a href="https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report">https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report</a></p> <p>Emissions (Dust) Management Plan (DMP) Note: include the DMP section where dust is an issue (see guidance on GOV).</p>



Application reference number	
	<p>We consider that this application will require the submission of a DMP because of the nature of the activity and the site's proximity to receptors. To see which sites commonly require a DMP and for information about how to write a DMP, please see:</p> <p><a href="https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits">https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits</a></p> <p>Further guidance</p> <p>I would highly recommend that you read our Core Guidance document which will tell you about the permitting process and provide information about your responsibility as a waste operator. Here is the link:</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/211852/pb13897-ep-core-guidance-130220.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/211852/pb13897-ep-core-guidance-130220.pdf</a></p> <p>You should use the Technical Guidance WM3 to help you classify your wastes which is found at: <a href="https://www.gov.uk/government/publications/waste-classification-technical-guidance">https://www.gov.uk/government/publications/waste-classification-technical-guidance</a></p>
<b>Additional information</b>	<p>Pre-Application Discussions/Review</p> <p><b>Meeting attendees</b>            David Rushton – Environment Agency Area Technical Officer            Helen Culshaw - Environment Agency GOT Technical Specialist            Theresa Cory - Environment Agency Area GWCL Technical Specialist            Rob Devonshire - Environment Agency Installation officer            Maggie Dutton – SLR Project Manager            Stephen Muggeridge – SLR Hydrogeologist            Maria Francis – SLR permitting team            James Sutton – Ingrebourne            Maria Anton-Garcia - Ingrebourne</p> <p>The meeting ran through the agenda as provided in the pre-application briefing document.</p> <p><b>2. A brief introduction to the site</b> as detailed in the briefing document. Restoration is to high quality agricultural land (Grade 1 and 2). Dewatering will take place. HRA has been presented</p>

Application reference number	
	<p>as part of planning application, with the landfill inert WAC assumed. Dewatering to discharge to south of site. This included confirmation that mineral is to be taken off-site for processing on other sites, they site will still require plant for screening and crushing incoming waste on site. Any hardcore created through this process, will be for use on site, the site will not produce secondary aggregate and no waste will leave the site.</p> <p><b>Question:</b> Does the EA foresee any concerns with justification of restoration as recovery? A Waste Recovery Plan (WRP) will need to be submitted for approval and would need to meet the recovery test as outlined in the guidance: <a href="https://www.gov.uk/guidance/waste-recovery-plans-and-permits">https://www.gov.uk/guidance/waste-recovery-plans-and-permits</a></p> <p>This would be assessed through the separate WRP process, with approvals given in principle by the NPS waste recovery assessors team. The team may ask further questions through that process to make a decision. An approved WRP should be gained before submitting a deposit for recovery permit application. If this is not deemed a recovery activity, the development must comply with the Landfill Directive.</p> <p>An Environmental Permit boundary will need to include all the locations where associated activities will be undertaken, e.g. waste treatment areas, water abstraction and discharge areas, and groundwater monitoring borehole locations. The composite operations plan may not currently include all of the water discharge area to the south, this was difficult to see from the screen.</p> <p><b>3. Site construction</b> An Artificially Established Attenuation Layer (AEAL) would be constructed around the perimeter of the site using a vertical trench backfilled with low permeability site derived clay to allow dewatering and placement of waste in dry conditions.</p> <p><b>Question:</b> Does the Environment Agency foresee any issues regarding this proposal? The permit application will need to include the source characterisation for the Clay material to be used in the cutoff trench. Consideration will need to be given to the ability of the overburden to meet the engineering requirements to create the AEAL, and the stability of this barrier while dewatering to prevent failures both from the groundwater pressure behind the barrier. It was mentioned that another site – Cockhide Farm has recently been permitted using a similar method but in a lower sensitivity setting.</p> <p>In terms of construction, the clay placed into the trench will need to achieve the agreed specification referenced above. No imported waste will be used for the AEAL. Suitability of this methodology and demonstration that the specification has been achieved will be through the CQA Process so are not to be included as part of the Environmental Permit determination. The applicant identified the placement of clay may also be into water as well as unsaturated conditions. The impact of this, on the pore pressure, density and compaction would need to be considered through the construction method statement in the CQA Plan.</p> <p>Site Investigation data to show the thickness of the overburden clay, gravels aquifer, and the thickness of the London Clay will need to be presented within the application.</p> <p>Concerns were raised around the presence of unidentified Highways Agency drainage to the north, as well as standoff distance from the noted underground gas pipeline which could act as both a receptor and pathway for any contamination.</p>

Application reference number	
	<p>It is likely that the Hydrogeological Risk Assessment (HRA) will show an attenuation layer is required (given below groundwater setting of the site), therefore CQA requirements will be included in the Environmental Permit. Guidance on information required is provided at: <a href="https://www.gov.uk/guidance/waste-recovery-engineering-create-a-construction-quality-plan">https://www.gov.uk/guidance/waste-recovery-engineering-create-a-construction-quality-plan</a></p> <p>The procedures adopted must make sure that any material used in the attenuation layer is physically and chemically stable.</p> <p>The stability risk assessment for the application will need to assess the risk to the AEAL from water pressures from the gravels groundwater and the potential for basal heave. This needs to consider during construction and during backfill of void, as well as long term performance, The stability risk assessment template for landfills is available and is suitable for the appropriate elements that need to be covered for a recovery application: <a href="https://www.gov.uk/government/publications/stability-risk-assessment-report-template">https://www.gov.uk/government/publications/stability-risk-assessment-report-template</a></p> <p><b>4. HRA and water management</b></p> <p><b>Question:</b> Scope and approach for HRA:</p> <p>An HRA has been produced for planning around 2018 that will need to be updated with additional groundwater data collected since.</p> <p>The important aspect for a deposit for recovery application is that the waste acceptance procedures and waste acceptance criteria are shown through risk assessment that they are acceptable and will not cause pollution. This means that you must prevent hazardous substances (<i>currently the hazardous substances in the landfill inert waste criteria are mercury, arsenic, lead, BTEX and PAH</i>) from entering groundwater, and non-hazardous pollutants (<i>such as selenium and sulphate identified as likely to need site specific waste criteria</i>) must not cause pollution.</p> <p>This is the informative we have been giving to applicants who want to rely on the landfill directive inert waste acceptance criteria for similar recovery sites:</p> <p><b>“Informative for applicant.</b></p> <p>Guidance on the tiers of risk assessment that are appropriate are given at <a href="https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit#generic-quantitative-risk-assessment">https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit#generic-quantitative-risk-assessment</a>). We expect you to have screened your waste acceptance criteria against appropriate water quality standards for the receptors identified (for example minimum reporting values, Drinking Water Standards or Environmental Quality Standards from the Water Framework Directive) or background concentrations if these are significantly lower, to identify which substances may pose a risk to the water environment. <a href="https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit#qualitative-risk-screening">https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit#qualitative-risk-screening</a>. We would then expect you to provide suitable assessment of those substances that exceed the water quality standards using calculations to show that the criteria proposed will not cause pollution. The risk assessment produced may indicate that either a) an attenuation layer is required or b) the waste</p>

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	<p>acceptance criteria need to be reduced. For b) we would expect you to derive the reduced waste acceptance criteria. “</p> <p>The risk assessment should also consider a rogue load risk assessment for accepting waste that is not inert (non-inert) for example, contaminated soil, or non-inert waste concealed within a load of waste that appears to be inert.</p> <p>In terms of setting any site specific waste acceptance criteria an understanding of the background groundwater quality will be important. This will also be important if you consider setting any compliance criteria for down hydraulic gradient groundwater. We would anticipate these being provided given the long term below water table setting of the site within a Principal aquifer.</p> <p><b>Question:</b> Dewatering requirements</p> <p>Dewatering of the final phase will be discharged to a swale along the southern boundary of the site. The construction of the perimeter barrier will facilitate local dewatering during extraction of mineral and allow mineral to be dug dry.</p> <p>There will be a need to apply for a groundwater activity for the dewatering abstraction and discharge.</p> <p>Discussion with permitting colleagues has confirmed that discharge to natural ground within the cut-off trench would require impact the on stability to be assessed, and also should show sufficient storage capacity within the natural ground that is cut off such that it will not enter the placed waste. Discharge to groundwater would not need risk assessing at this point if the cut-off trench is to have a specification that will isolate the water within an impermeable barrier. If the specification is such that there is interaction with the surrounding groundwater then an assessment of discharge may be required.</p> <p>The discharge of water in the final stage to the south of the site will need to be risk assessed, and will need to cover the quantity, rate and quality of the water to be discharged at this time. It should be noted this groundwater may be impacted from up gradient sources, and could be affected by discharge previously within the site area. It may require treatment prior to final discharge.</p> <p>Restoration is to create impermeable lined drains for to collect surface water runoff. This will be attenuated by ponds to meet greenfield runoff rates and provide additional ecological benefit.</p> <p>It is highlighted that the discharge of any abstracted water that is proposed would need to be covered under a Groundwater activity (discharge onto land) within the permit application (see question 2b on Part B2 – General – new bespoke permit application form, and Part B6 – apply for a bespoke water discharge activity and groundwater(point source) environmental permit). The risks of this will need to be assessed, particularly as the abstracted water could be contaminated from up hydraulic gradient sources (landfill, and petrol station and potentially fly tipping). The use of the H1 annex J5: infiltration worksheet and user manual (<a href="https://www.gov.uk/government/publications/h1-annex-j5-infiltration-worksheet">https://www.gov.uk/government/publications/h1-annex-j5-infiltration-worksheet</a>) is recommended for the assessment of risks to groundwater and identification of any treatment requirements.</p> <p><b>5. Other risk assessments</b></p>

Application reference number	
	<p><b>Question:</b> Nearest residential property is 200m distant. Confirm if dust or noise management plans are required. Planning didn't require noise management plan because of distance to Heathrow and M4, is one needed at permitting?</p> <p>After internal consultation, it is determined that a BS4142 report should be undertaken, as it is precisely the situation the British Standard was designed for; i.e. will a new industrial process cause noise pollution to existing neighbours? Whether a Noise and Vibration Management Plan is required or not would be determined by the result of the BS4142 report.</p> <p>A Dust and Emissions Management Plan (DEMP) is required, and would require that non road going mobile machinery is to the highest tier of the latest standards, given that the site is in an Air Quality Management Area for NO<sub>x</sub>. The latest dust management plan template is attached and the applicant/ operator can follow the guidance at this <a href="#">link</a> for guidance on appropriate measures in accordance with the template.</p> <p><b>AOB</b> – The site to south has been flytipped in past. Petrol station to northeast. Underground gas pipe to north. RD raised has there been any engagement with Heathrow? JS confirmed that had contact in 2018/2019 last. May contact again following Appeal.</p>

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

A complete application must contain the following information below:

<b>Declaration</b>	<b>Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.</b>
<b>Site Plan</b>	Site plan must be clearly marked with the full site boundary
<b>Payment</b>	Please note your application will not be processed until we receive the full payment.

**customer service line 03706 506 506**

**floodline 03459 88 11 88**

**incident hotline 0800 80 70 60**

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### What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: EA/EPR/JB3503HT/A001

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to:

[psc-waterquality@environment-agency.gov.uk](mailto:psc-waterquality@environment-agency.gov.uk) or [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

We are not currently processing paper applications as our offices are closed. Any applications submitted via post will be stored at the Permitting Support Centre until we are able to re-open the office. For further information, please check our latest operational update on the [Environment Agency website](#).

Or by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

### Dealing with the impact of COVID-19

We are following Government advice to manage the risks of Coronavirus to our organisation, to protect the health, safety and wellbeing of our staff and sustain our critical operations.

We are doing all we can to maintain our service, however it may take us longer than usual to respond to you. It is important that you inform us of any applications that are critical to maintain national resilience, national infrastructure and critical environmental protection.

Our current queues are large and we are taking longer than usual to allocate work for duly made checks. Please see the table below for current average queue times.

Application type	Average time on queue
New standard rules	7-9 weeks
New Bespoke	10-12 weeks
Admin variation	2-4 weeks
Minor variation	6-8 weeks
Normal variation	9-11 weeks
Substantial variation	9-11 weeks
Transfer	6-8 weeks
Surrender	6-8 weeks

### Disclaimer

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The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers waste only. Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

### **Enhanced pre application cost estimate**

At this stage the pre-application advice is expected to cost up to £1133.00 plus VAT. An invoice will be sent separately at a later date.

### **This pre-application request is now closed.**

We consider this pre application request is now closed however if you have any questions regarding this letter please contact Malcolm Wood. If you require additional enhanced pre-application advice please complete our [online form](#).

We look forward to working with you on this project.

If you have any questions please call 03708 506 506.

Yours sincerely

Malcolm Wood

Permitting Officer, National Permitting Service

**Malcolm.wood@environment-agency.gov.uk**

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LIT 55346

20/8/2020

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