

Holloway Lane AD Facility

784-B049182

Site Condition Report

Environmental Permit Application

SUEZ Recycling and Recovery UK Ltd

February 2024

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Appendix A – Preliminary Ground Investigations Report

Appendix B – Preliminary Land Quality Risk Assessment

EA Site Condition Report Template

1.0 SITE DETAILS	
Name of the applicant	SUEZ Recycling and Recovery UK Ltd (SUEZ)
Activity address	Holloway Lane Sipson, Middlesex, UB7 0AE
National grid reference	TQ 06719 78035
Document reference and dates for Site Condition Report at permit application and surrender	Application Site Condition Report (February 2024)
Document references for site plans (including location and boundaries)	SUEZ/B049182/PER/01- Boundary Plan 1451_PL100- Proposed Site Layout

Note:

In Part A of the application form you must give us details of the site's location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part A of the application form then you should submit the additional plan or plans with this site condition report.

2.0 CONDITION OF THE LAND AT PERMIT ISSUE	
Environmental setting including: <ul style="list-style-type: none">• geology• hydrogeology• surface waters	<u>Site Setting</u> <p>The site is located approximately 1.2km south of the West Drayton town centre. The site location is shown on Drawing Number SUEZ/B049182/PER/01.</p> <p>The site forms part of a historic landfill which extends to areas further offsite to the south, east and west, and to the north of Holloway Lane.</p> <p>The site is occupied by two tenants to operate separate waste facilities. The first facility comprises a soil recycling facility in the western section of the site. The operation of this facility will cease before operations commence for the proposed AD facility.</p>

The second facility comprises a Material Recycling Facility (MRF) to the east of the site. The proposed AD facility will overlap some of the permit areas for the MRF facility including the internal haul road and an area to the north of the MRF which is currently used as a car park. Despite this, the operation of the MRF is expected to continue.

The immediate surroundings of the site comprise agricultural land to the east and south, Holloway Lane to the north, stormwater retention ponds, commercial stores and a garden centre to the west. In addition, there is a landfill located to the south of the site off Harmondsworth Lane. The nearest residential properties are located approximately 145m to the south of the site.

Access to the site is achieved by an access road to the north of the site off Holloway Lane.

Geology

According to the British Geological Survey (BGS) 'Geology of Britain Viewer' the permitted area consists of London Clay Formation - Clay, silt and sand (Bedrock Geology). The London Clay Formation is a sedimentary bedrock formed between 56 and 47.8 million years ago during the Palaeogene period.

The superficial deposit of the permitted area comprises of Taplow Gravel Member which is a sedimentary superficial deposit formed between 362 and 126 thousand years ago during the Quaternary period. Due to the site being a former mineral extraction and processing works, it is anticipated a large proportion of these superficial deposits have been removed from beneath the site.

Hydrogeology

According to the Multi-Agency Geographic Information for the Countryside's (MAGIC) website, the London Clay underlying the site comprises an Unproductive Aquifer whilst the Taplow Gravel Formation is reported as a Principal Aquifer.

The MAGIC website indicates that the proposed permit area is not situated within a Groundwater Source Protection Zone (GSPZ).

Hydrology

There are multiple surface water features within 1km in the site, these are listed below: -

- Two ponds adjacent to the site (north and west);
- Saxon Lake (900m west);
- Two ponds Sipson Road (175m northeast);
- Hardcrete Pond (905m east);

	<ul style="list-style-type: none"> • Harmondsworth Lane Brook (135m south); • Bath Road Brook (355m south); and, • Pond (1,000m southeast). <p>With reference to the Flood Map for Planning Service (FMPS) website, the permit area is situated in a Flood Zone 1 area. As defined on the FMPS website, land within Flood Zone 1 has a low probability of flooding from rivers and the sea.</p> <p><u>Ecology</u></p> <p>A nature and heritage screen was requested from the Environment Agency to determine the presence of any sites of nature and heritage conservation, protected species and habitats that may be impacted by the proposal. A copy of the screen is provided as part of the Environmental Risk Assessment (Appendix D of the Environmental Permit Application). The results of the screen identified the following:-</p> <ul style="list-style-type: none"> • Field Close Open Space Roughs (1,036m southeast). • Carp Ponds and Broads Dock (900m west). • Iron Bridge Road Railsides (2,017m northeast). • Londons Canals (1,095m north). • Lower Colne (1,058m west). • St Georges Meadows Southlands Arts Centre (1,032m northwest). • Stockley Road Rough (1,049m northeast). • Wall Garden Farm Sand Heaps (3,016m southwest). • Southwest London Water Bodies (4,011m southwest). • Windsor Forest and Great Park (9,035m southwest) • Atlantic Salmon Migratory Route (1,022m west) • European Eel Migratory Route (1,022m west)
<p>Pollution history including:</p> <ul style="list-style-type: none"> • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination • evidence of damage to pollution prevention measures 	<p>The Preliminary Land Quality Risk Assessment (PLQRA) provided within Appendix A details in the history of the site. Please refer to Section 3.1 of the PLQRA (Appendix B) for a review of historical maps.</p> <p>A Preliminary Ground Investigation was undertaken by SLR, including intrusive works that took place in October 2023 (provided as Appendix A of the Site Condition Report). The report identified that there was no visual evidence of significant contamination, staining and/or olfactory indications of hydrocarbons within any of the exploratory trial pit locations. Appendix 1 can be referred to for further detail on contamination levels.</p>
<p>Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)</p>	<p>Please refer to Appendix A – Preliminary Ground Investigation Report.</p>
<p>Baseline soil and groundwater reference data</p>	<p>Please refer to Appendix A – Preliminary Ground Investigation Report</p>

Supporting information	Please refer to Appendix A – Preliminary Ground Investigation Report
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3.0 PERMITTED ACTIVITIES

Permitted activities	<p><u>Current Permitted Activities</u></p> <p>At present, there are three active permits at the site. The first permit (reference EPR/JB3209LR) is registered to Foley Haulage Limited and allows the operation of a soil recycling facility.</p> <p>The second permit (reference EPR/JB3400HB) is registered to Powerday PLC (Powerday) and allows the operation of a Material Recycling Facility (MRF). The permit for the MRF was originally issued to SUEZ in September 2002 however, the permit was transferred to Iver Recycling (UK) Limited in October 2012 and has now been transferred to Powerday.</p> <p>The third permit (reference EPR/NP3139PK) is registered to SUEZ and relates to the Harmondsworth Landfill site. The main landfill site is located to the south of Harmondsworth Lane however, the permit allows the operation of a gas management compound which is centred at approximate National Grid Reference (NGR) TQ 06686 77859. In addition, the permit boundary for Harmondsworth Landfill includes the access road off Holloway Lane which overlaps the application area.</p> <p>SUEZ is the landowner of the site and the permit areas for the soil recycling facility and the MRF are subject to a lease agreement from SUEZ.</p> <p><u>Proposed Permitted Activities</u></p> <p>SUEZ are seeking to operate a new Anaerobic Digestion (AD) Facility at the site. The AD facility would provide the treatment of organic food waste (initially from municipal waste streams only, although this is likely to be expanded to include some commercial food wastes as further facilities are developed). The process will generate biogas which will be processed by a CHP engine to generate heat and electricity that would be used by the AD plant. Once the parasitic load has been met, any excess biogas will be processed by a gas upgrading plant to National Gas Grid criteria and injected into the gas grid. Alternatively, excess biogas will be processed by the CHP engines to generate electricity that will be exported to the National Grid.</p> <p>It is considered that the AD facility will fall under following Schedule 1 activity of the Environmental Permitting (England and Wales) Regulations 2016 (as amended): -</p>
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	<ul style="list-style-type: none"> Section 5.4 A(1)(b)(i) - Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment. <p>In addition, the site will operate a wastewater treatment plant which will fall under the following Schedule 1 Activity:</p> <ul style="list-style-type: none"> Section 5.4 A(1) (a)(ii) – Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving physico-chemical treatment. <p>In addition to the above, the AD facility will have the following Directly Associated Activities (DAAs): -</p> <ul style="list-style-type: none"> Storage of waste pending recovery or disposal; Physical treatment for the purpose of recovery; Heat and electricity power supply (i.e. CHP) Emergency flare operation; Gas upgrading; Carbon Capture Raw material storage; Gas storage; Digestate storage. <p>The proposed AD facility will overlap the permit area for the soil recycling facility. However, if SUEZ gain the relevant permissions to operate the AD plant, Foley will be required to vacate the site and surrender their permit. Once Foley have vacated the land, they will have no rights of access back to the site.</p> <p>In addition, the AD facility will overlap some of the permit areas for the MRF facility including the internal haul road and an area to the north of the MRF which is currently used as a car park. Despite this, the layout of the AD plant is based on the assumption that the MRF will continue to operate.</p>
<p>Non-permitted activities undertaken</p>	<p>There will be no non-permitted activities undertaken on-site.</p>
<p>Document references for:</p> <ul style="list-style-type: none"> plan showing activity layout; and environmental risk assessment. 	<p>The environmental permit boundary is provided as Drawing Number: SUEZ/ B049182/PER/01.</p> <p>The layout of the site is provided on Drawing Number: 1451_PL100.</p> <p>An Environmental Risk Assessment is provided as Appendix D to the Environmental Permit Application.</p>

It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail. These include substances that would be classified as ‘dangerous’ under the Control of Major Accident Hazards (COMAH) regulations and also raw

materials, fuels, intermediates, products, wastes and effluents. If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater we may need to request further information from you or even refuse your permit application.

4.0 CHANGES TO EXISTING ACTIVITIES	
Have there been any changes to the activity boundary?	If yes, provide a plan showing the changes to the activity boundary.
Have there been any changes to the permitted activities?	If yes, provide a plan showing the changes to the activity boundary.
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	If yes, list of them.
Checklist of supporting information	<ul style="list-style-type: none"> • Plan showing any changes to the boundary (where relevant) • Description of the changes to the permitted activities (where relevant) • List of 'dangerous substances' used/produced by the permitted activities that were not identified in the Application Site Condition Report (where relevant)

5.0 MEASURES TAKEN TO PROTECT THE LAND	
Use records that you collected during the life of the permit to summarise whether pollution prevention measures worked. If you can't, you need to collect land and/or groundwater data to assess whether the land has deteriorated.	
Checklist of supporting information	<ul style="list-style-type: none"> • Inspection records and summary of findings of inspections for all pollution prevention measures • Records of maintenance, repair and replacement of pollution prevention measures

6.0 POLLUTION INCIDENTS THAT MAY HAVE HAD AN IMPACT ON LAND, AND THEIR REMEDIATION	
Summarise any pollution incidents that may have damaged the land. Describe how you investigated and remedied each one. If you can't, you need to collect land and /or groundwater reference data to assess whether the land has deteriorated while you've been there.	
	<ul style="list-style-type: none"> • Records of pollution incidents that may have impacted on land • Records of their investigation and remediation

7.0 SOIL GAS AND WATER QUALITY MONITORING (WHERE UNDERTAKEN)	
Provide details of any soil gas and/or water monitoring you did. Include a summary of the findings. Say whether it shows that the land deteriorated as a result of the permitted activities. If it did, outline how you investigated and remedied this.	

Checklist of supporting information	<ul style="list-style-type: none"> Description of soil gas and/or water monitoring undertaken Monitoring results (including graphs)
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8.0 DECOMMISSIONING AND REMOVAL OF POLLUTION RISK

Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.

Checklist of supporting information	<ul style="list-style-type: none"> Site closure plan List of potential sources of pollution risk Investigation and remediation reports (where relevant)
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9.0 REFERENCE DATA AND REMEDIATION (WHERE RELEVANT)

Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.

If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.

Checklist of supporting information	<ul style="list-style-type: none"> Land and/or groundwater data collected at application (if collected) Land and/or groundwater data collected at surrender (where needed) Assessment of satisfactory state Remediation and verification reports (where undertaken)
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10.0 STATEMENT OF CONDITION

Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that:

- the permitted activities have stopped
- decommissioning is complete, and the pollution risk has been removed

DRAWINGS

Permit Boundary Plan - SUEZ/ B049182/PER/01

Receptor Plan - SUEZ/B049182/REC/01

APPENDICES

APPENDIX A – PRELIMINARY GROUND INVESTIGATIONS REPORT

APPENDIX B – PRELIMINARY LAND QUALITY RISK ASSESSMENT