

MEMORANDUM

TO: Director of Operations

FAO: North Team - Jill Lee

FROM: Mr Phil Tidridge

DATE: 14 November 2012

Planning Application No. 12/02013/HCS
Proposed Waste Management Site, Overton Road, Micheldever Station
Construction and operation of a 8 MWE pyrolysis advanced conversion technology
plant including a 2 MWE anaerobic digestion plant, associated office, visitor centre
with new access road and weighbridge facilities, solar panels, associated
landscaping and surface water attenuation features.

Thank you for your consultation regarding the above. I have examined the proposals in detail with specific reference to matters covered within Chapters 7, 8 and 10 of volume 2A of the Environmental Statement and the corresponding technical appendices in volume 2B. All paragraph references stated below relate to Volume 2A unless stated otherwise.

Air Quality/Odour Impacts

It is accepted that this process will be subject to the permitting regime under the Environmental Permitting (England and Wales) Regulations 2010. As would be expected modelling based upon the assumption of compliance with likely permit emission limits shows minimal air quality impacts. It is recommended that the Environment Agency (EA) is consulted regarding this application to confirm that they are satisfied with the emission limits used and that they will indeed be requiring such limits in any such permit issued. In addition it is recommended that specific clarification is sought from the EA regarding the End of Waste (EOW) determination referenced in paragraph 7.116 and the proposed further EOW referenced within paragraph 7.117. Such assessments determine whether the Waste Incineration Directive (WID) applies and therefore what controls will be placed over WID metals and dioxin emissions.

There are however wider potential amenity impacts and it is disappointing that this application presents no actual emission data from similar operational or trial plant. This would ensure the public concerns already expressed could be fully debated and considered at the planning stage.

The statement that the permit will include conditions aimed at controlling odour emissions is considered insufficient. Although the application contains a basic list of actions that will be taken to reduce odour emissions, there is no quantitative assessment of these potential impacts through either stack or fugitive sources. Although a permit can include a condition to require an odour management plan this can only require Best Available Techniques (BAT) to be employed. This is a different test to amenity impacts under the planning regime. It is therefore considered that this application has failed to demonstrate the conclusion that odour and dust emissions are “insignificant” (16.11). It is worth noting that such a permitted process is also exempt from formal action by the local authority under the statutory nuisance regime (Environmental Protection Act 1990, Part 3). There is reference to UV odour abatement plant regarding emissions from the steam sterilisation plant and also standby (emergency) odour control when ongoing plant is not operational (3.48 to 4.49). Odour abatement plant is also mentioned (3.86) with reference to the anaerobic digestion plant. However in all cases no technical details, specification or efficiencies are provided to assess residual odour emissions and their potential impacts.

Another potential issue is that the application shows a 20m high flue, although no chimney height calculations have been submitted to demonstrate how this has been established. Paragraph 7.113 refers to “Appendix 7/A” for design data provided by the technology designer which states stack height to be 20m but no further justification for this height is provided. Without such a calculation I am unable to ascertain that the final chimney height will be 20m as shown and if a different chimney height is required then this could have implications on the visual impacts assessed in Chapter 11.

Noise Impacts

The noise assessment using BS4142:1997 is considered unacceptable to support the conclusion of Chapter 16 (16.13 to 16.14) that there are no adverse noise impacts subject to mitigation measure proposed (i.e. doors at the facility remain closed at night). In detail this is for the following reasons:

- There are no calculations to show how the Predicted Noise Rating Levels presented in table 8-8 were derived. I would expect the sound power/pressure levels of the key plant/machinery to be identified in the supporting technical appendix together with detailed calculations to show their derivation to the predicted noise levels. Paragraph 8.712 refers to Appendix 8/5 I can find no such appendix and no such data is presented in any of Appendix 8 to volume 2B. There is only a brief discussion to the assumed sound reduction indexes presented in table 8-7 of volume 2A.

- Background noise levels at the identified target locations were monitored only for limited night/daytime periods. No justification has been presented to why these times are considered representative. (See requirements of paragraph 7.12 of BS4142).
- Background noise levels are from parts of two consecutive days (Sun/Mon) and no data has been presented to demonstrate that these days are representative. It is stated that the weather was dry with little or no wind with no consideration to background variation depending upon prevailing metrological conditions and in particular wind direction (paragraph 7.12 of BS4142).

Contaminated Land

Potential contaminated land issues have been identified. It is accepted that these can be resolved during the proposed redevelopment.

Light Nuisance

I am satisfied in general terms with the proposals for external lighting (3.127 to 3.128).

Conclusions

Overall I recommend that this application is refused until further clarification regarding potential odour and noise impacts are satisfactorily addressed.

Without prejudice to this recommendation, if permission is granted then it is recommended planning conditions are included to cover the following matters:

1. Hours of delivery and external vehicle movement restrictions.
2. Contaminated Land investigations/remediation.
3. External Lighting.
4. Implementation of proposed noise mitigation measures (e.g. all doors to be shut at night).
5. Submittal and approval of a construction management plan to include dust and noise mitigation measures.

If you require further clarification regarding this memorandum then please contact me on extension 2519.

Mr Phil Tidridge
Environmental Protection
Winchester City Council

