MEMORANDUM

TO: Director of Operations

FAO: Katherine Snell

FROM: Mr David Ingram

DATE: 3 May 2013

Planning Application No. 13/00793/HCS
TJ Waste And Recycling Ltd, Barfield Close, Winchester
The construction and operation of a waste transfer station to handle construction and demolition/skip waste (10,000tpa) and continued use of the site for recycling metal, paper, cardboard and plastic (15,000tpa)

Thank you for your consultation regarding the above. I have examined the proposals in detail and I wish to offer the following comments.

The application is to construct a waste transfer facility to process, in addition to 15000 tonnes per annum, metal card, paper, cardboard, and plastic, a further 10000 tonnes of demolition and skip waste.

This additional demolition and skip waste will likely include a range of materials such as inert soils, concrete/brick work, wood, plasterboard, tyres, paper/cardboard and glass. The handling of such waste, by virtue of it mass and composition, presents additional concerns from dust, noise and potential vibration.

In the Planning Supporting Document SLR Ref: 416.0492.00013, there is a broad statement in section 4.5 'Proposed Operations', which simply explains that a waste transfer building will be constructed to process the additional waste. There are no details in this document as to how the waste will be handled or processed i.e. methods and any specified plant proposed. Such information is required to inform this department as to whether there are adequate controls to mitigate potential nuisance.

Dust

Section 7.0 'Potential Environmental Effects' of the same report, only offers in scant detail how potential on site sources of dust will be effectively controlled. When handling soils, concrete/brick work and plasterboard there will inevitably be the

potential for considerable emissions of dust. The statement only makes a passing reference to a hose down facility to ensure lorries leaving the site do not spread mud onto the highway. Mud is not dust, the latter of which is usually airborne and created from fine dry particulates generated through the handling of soils and mineral waste. There is nothing in the supporting statement to address how the on site dust created through materials handling, will be mitigated. This is particularly pertinent when you consider one side of the waste transfer station building is open.

On Site Noise

The Noise Assessment SLR Ref: 416-00492-00013 seeks to assess the potential impacts from the static on site noise sources, from the handling of the waste and the additional vehicles accessing and leaving the site.

In assessing the noise impacts from the on site noise, the predicted noise from the combined use of the static plant, is compared with the existing background noise environment at noise sensitive receptors, as outlined in BS 4142:1997.

Section 5.0 'Assessment' of this report has identified five on site plant and activities which SLR believes present significant noise impacts, and it has combined them and using certain assumptions fed the data into a proprietary noise prediction software package called Cadna/A.

Using the predicted noise levels at three pre identified noise sensitive locations and comparing them with the existing background noise levels, the report concludes that complaints will be likely in two of the three locations.

The report therefore proposes the mitigation measure of reducing the building height from 12.5m to 7m. This, it purports, will reduce the height of the noise source, and with therefore render the existing barriers more effective. This position assumes that there will be a reverberant field inside the WTS making it a single noise source and reducing the height of the source if will render existing barriers and buildings more effective at 'containing' the noise on site. According to the report, this single measure will drop the predicted noise impacts to Prinstead Close by 15.6 dB $_{LAr, 1hr,}$ and at New Bridge Cottages by 5.2 dB $L_{Ar, 1hr}$. This presents a significant reduction.

I am not confident that the proposal will derive the suggested mitigation because:

- There is no information provided as to the height or performance of the existing barriers or buildings;
- The height of the fixed plant inside the waste transfer station will remain the same, regardless of building height:
- Unless the building is of such a structure that can guarantee that a uniform sound reduction performance throughout, then there will inevitably be acoustically 'weak spots' which may present a disproportionate and directional

impact. Notwithstanding, one of the facades is open and will certainly present significant break out of noise.

- The above performance has been derived from the findings of noise prediction software package called Cadna/A, and the report contains little information as to how this has informed the final position.

For a mineral processing operation such as this, set in close proximity to residential receptors I would consider that a single skin prefabricated steel construction offers insufficient performance to mitigate noise impacts.

Road Traffic Noise

The increased road haulage needs have also been assessed in accordance with BS5228:2009. This takes the noise levels created by each vehicle pass by event and presents them as an equivalent continuous sound level.

The suggested worst case is for 14 access and egress movements per hour, each with a sound power level of 105 dB(A). Again using the proprietary noise modeling software Cadna/A, it predicts noise levels that are only slightly higher than existing ambient noise levels at the chosen noise sensitive properties of between 0.1 dB $L_{Aeq, 1hr}$ and 1.1 dB $L_{Aeq, 1hr.}$ The human ear can only perceive noise differences of 3 dB(A) or more and as such the report concludes that the impact is minor.

However, this method in effect averages the true impact of each vehicular 'event' over an hourly period. Assuming a worst case for the full operational day between 07.30 and 18.30 i.e. 11 hours, this equates to a total of 154 vehicle movements, each of which with the potential to present a single yet significant noise impact to the rear facades to residents of Bar End Road. Taking these events and averaging them over a requisite period in effect underplays the potential noise impacts.

An appropriate response would be to determine the L(A)max peak noise environment using short term measurement periods e.g. 5 minutes and compare these levels and their frequency of occurrence with the same parameters from predicted noise peak noise environment. Using these comparators one can make an informed decision as whether the source noise presents an unacceptable detriment to amenity.

Vibration

The Noise Assessment is the only report that makes reference to the plant and machinery that is proposed but does not prescribe any indication of size, capacity or performance. The nature of the implied activities are such that the waste will be tipped onto the site, a tele-handler will grab stock piled waste, drop it into a feed hopper serving a trommel screen which rotates and sorts the waste, before being

deposited onto a picking line. These activities not only present noise concerns as discussed, but they also have the potential to create significant vibration.

Although it is not expected to have a measurable impact to those addresses identified in the noise report, Wharf House located on the other side of the chalk bank to the north west of the site, has planning permission to develop a property into the side of the same chalk bank. I would expect some consideration as to whether the proposed minerals processing activity, using the heavy plant identified in processing bulking and heavy waste, is likely to present a material impact from vibration.

Given my considerations as outlined above, I am recommending refusal of this planning application.

Should you require further information please contact me on 01962 848 479

Mr David Ingram
Environmental Protection