



Planning and Development
Environment Department
Elizabeth II Court West
The Castle
Winchester
SO23 8UD

My Ref: Hill/12/HCC

Date: 2nd May 2012

For the attention of Fay Eames

Dear Ms Eames

RE: Town and Country Planning Act 1990 – Variation of condition 5 of planning permission 10/96302 to increase permitted tonnage of composting material from 8,000 to 15,000 tonnes per annum, at Newbourne Farm, Rockbourne – 12/98401

Further to our meeting today with Mr and Mrs Hill at Newbourne Farm, I write to confirm the matters we discussed.

Firstly, I attach a copy of the amended location plan wherein the red line follows that which formed part of the original Certificate of Lawfulness application. As you saw on site, there are no plans (and no need) to increase either the storage or the operational areas of the site as a result of these proposals.

In terms of traffic generation, we discussed the best way of providing the LPA with the reassurances it seeks. As you know, we have explained in the application that overall traffic generation has actually decreased over the years, because the type of vehicle that is now visiting the site tends to be larger. In the early days of operation, the site was accessed by pickups, vans, cars with trailers, as well as some larger wagons. The details these traffic movements were set out in the original application for the Certificate of Lawfulness of Existing Use. Your records should confirm that, for example, between 1995 and 2004 the largest vehicle that accessed the site was 7.5 tonnes. This resulted in a total of 18,299 two way trips to the site in the ten year period between 1995 and 2004. This equates to 1830 per year (this is actually higher than the 1500 per year I had estimated in my original



submission), 152 per month, or 38 per week if averaged out. Over a 5.5 day working week, this translates to an average of 6.9 two way trips per day.

As you know, Mr Hill supplied you with copies of his most recent records, which represent the levels of activity that are contained in the application. He is, as already stated in the application, operating at a level that, if extrapolated over an entire year, would be at or around 12,000 tonnes per annum (but he has not exceeded his annual quota, as this period wraps around the year-end). The figures you have illustrate the Veolia trips, and these are by far the majority of trips to the site. These figures cover the period August 2011 to March 2012 inclusive – an 8 month period. In this time, 459 trips were generated, or 57 per month. This figure could be expected to rise if extrapolated across the remaining 4 months of the year, as this would cover the summer when growing is occurring at its fastest. But even allowing for 150 trips per month in the remaining 4 months (600 trips), the total for the year would only be 1059. There are other trips on top of those generated by Veolia, but these are approximately 10% of the Veolia total. This would take the total of intake trips to some 1200 per annum, which as you can see is still well below the levels of some 1830 per annum between 1995 and 2004.

I have not compared outtake trips (i.e. farmers collecting the compost product), but these are much smaller in number and nearly all of this is now collected by a single farmer that arrives and leaves without going through the village of Rockbourne, which is again an improvement in the sense that this previously went to a farm in Damerham (and hence through Rockbourne).

In summary, then, it is demonstrably the case that overall trip generation has fallen over the years, despite overall processing having increased. Since August 2011, the applicant has been operating in effect at 12,000 tonnes per annum level (over 7000 tonnes were processed in an eight month period, which would equate to around 12,000 tonnes per annum if the remaining four months of the year were factored in). Yet despite this trip generation is well below that which typified the early years of the operation. As I have already made clear, the 15,000 tonne limit applied for is unlikely to ever be reached but includes an element of built in flexibility.

In terms of setting a numerical limit on the overall number of trips generated, there are several difficulties with this. The applicant is more than willing, as you know, to co-operate in any way that he can but he must be allowed the flexibility to receive no green waste on some days and large amounts on others – that is how waste suppliers operate, and they themselves are dependent upon seasonal and weather issues. So a daily limit is impractical, as is any limit that sets to control trips on a weekly or even a monthly basis, as clearly during the non-growing times of the year or, as during the recent wet weather, little if any activity is generated.



In my view only an annual limit is reasonably workable, and indeed this would link to the annual limit of overall tonnage (which is, in itself, an upper ceiling and will provide an overall cap on trips generated in any event). As to the figure, and given that the overall trips generated are still well below the 1995-2004 period, then I would suggest that the average of 1830 per annum set during that period is imposed as an overall limit on intake. Any other figure would be somewhat random and would not relate to any historic activity at the site. The applicant does not consider that trip generation would reach these levels, but it would offer the LPA a reasonable and meaningful way of controlling intake in addition to that already offered by the proposed tonnage cap. I see no reason to set a limit on outtake, as these trips are far less frequent.

I think the most important point of all, however, is that the site has been operating at the levels now sought for at least the last six months and there have been no complaints about it. The application does not therefore actually propose any change to what is already occurring. It is only because an application has been made to accommodate the increased tonnage that anyone has become aware of it.

Finally, I think there is a need to bear in mind the context of the site and the village as a whole, and the traffic that uses it. Newbourne Farm is by no means the only business that generates traffic, articulated or otherwise, and there are several equine and stud operations that also generate large vehicles and a considerable number of trips. I believe the County Council surveyed this some time ago. It would be wrong to isolate Newbourne Farm simply because attention has been drawn to it through the application itself.

Hopefully, this additional information will enable you to favourably consider the application.

Yours Sincerely,

Jerry Davies