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DESIGN & METHOD STATEMENT

18 January 2019

PROJECT – Planning Application to establish Change of Use to mixed use of B2 Industrial Processing and B8 Storage and Distribution from general open storage.

Havant Borough Council Ref: 18/00102/CPM dated 27.11.2018 – request submission of retrospective FUL planning application to regularise situation.

CLIENT – Premier Pallet Supplies Ltd, Palk Road, Havant. Hants PO9 1NL

Associated Matters

- (i) Client letter to Amy Zelazik dated 30.11.2018 re current situation and proposals
- (ii) Site location and surroundings
- (iii) Business operating time revisions
- (iv) Delivery vehicle movements
- (v) Fork truck use
- (vi) Sound levels from hand held cutting and nailing equipment (all related to pallet repair work).
- (vii) BS4142:2014 – context of sound levels
- (viii) Sound reduction within workshop facilities.

Item (i) – Basic details of the current pallet refurbishment works are set out by the client in the attached “work” confirmation letter dated 30.11.2018. This relates to the site visit and “Planning requirement” letter from Amy Zelazik at Havant District Council dated 27.11.2018. This response should also be read in conjunction with the respective itemised paragraphs (i) to (viii). Premier Pallets would seek to ensure that any work / noise issues that have also been raised are suitably addressed within this application to clarify all works carried out on this site.

Item (ii) – The current overall site is set between a vehicle storage facility on north eastern boundary and with JD Pipe Solutions distribution depot on south western boundary. To the north west across Palk Road and unused rough field area is the Portsmouth to Brighton main railway line with Bedhampton Station (about 50metres away) and Level Crossing over West Street adjacent to it. Trains stop and start constantly all day at this station. On the south eastern boundary is a small river with meadows beyond before reaching Meyrick Road. There are also two electricity sub stations in the adjacent meadow / riverside that lie between Premier Pallets and residents in Meyrick Road (area of the only noise complaint referred to in client's letter). There are residential properties on both sides of Palk Road including a block of flats immediately adjacent to the vehicle storage facility. The client has spoken some of the nearest Palk Road residents and has not had any questions raised.

Item (iii) Client quite understands that any weekend work must be restricted to reasonable working times Monday to Friday and half day Saturday with no Sunday or Bank Holiday working without prior permission. Construction industry working which relates to this semi outdoor working operation type activity permits 08.00 to 18.30 Monday to Friday and 0800 - 13.30 on Saturday. Final maximum hours to be agreed between client and Council, but client has also advised his proposed working hours as 07.30 -16.00 Monday to Thursday and 07.30 – 15.30 on Fridays with 08.00 to 14.00 on Saturdays (or 13.30). The client advises that although the premises open at 07.30, no operational work commences till 08.00.

It should also be noted that assembly of pallets runs between 08.00 and 14.00 (with statutory breaks) for nail gun use and between 14.00 – 16.00 dismantling of damaged pallets and saw cutting etc, with similar proportion on Saturday mornings, therefore the gun use noise is for a maximum of 6 hours during a standard day. Fork trucks would operate as required over the overall working day.

Item (iv) – Vehicle movements to and from the site are almost entirely made up of "Transit" 3.5T and occasional 7.5T (mainly flat bed units), plus very occasional artic units. The client has a 18T flatbed unit for delivery and collections. Obviously a fork truck will operate to load and unload as required plus for yard pallet stacking.

JD Pipe Solutions next door can have up to around 10 artic and trailer movements on any one day plus general van and truck traffic. They also have the larger Tele-handler fork truck units in operation in their adjacent yard.

Item (v) Fork truck use – the client's fork trucks did have reversing beepers on them originally but these have recently been replaced with flashing warning lights to lower their overall noise levels to the engine only. Health and Safety directives / observations / requirements by operatives is very essential to achieve safe working operations, plus general staff awareness of the dangers surrounding such activities.

(vi)Sound from pallet manufacturing operations. As stated earlier, the actual nail gun operation which when all five workshop bays are active can produce short and sometimes longer bursts of "machine gun" staccato notes which can echo / reverberate above the general yard noise. It is this basic area which will require mitigation. (All employees working in and around this environment are supplied with ear defenders and constantly reminded to

keep wearing them. The afternoon work of dismantling of damaged pallets for assembly work the following day requires use of mechanical reciprocating saws etc but the sound levels are not as high and give a more constant note than the nail guns. [These saws are not loud like the chain saws sounds of tree felling operations.]

Item (vii) BS4142:2014 – Method for Rating and Assessing Industrial and Commercial Sound.

This edition of BS4142 recognises the importance of the context in which the sound occurs including the differentiation between sound (measured by sound level meters) and noise as related to human response as unwanted, undesirable or disruptive and by such margins as sound exceeding the background sound level.

The scope of this standard includes manufacturing process, loading and unloading of goods and from forklifts etc that are an intrinsic part of the overall sound emanating from the premises, using outdoor sound levels to assess the likely effects of sound on people, whether inside or outside of a dwelling upon which sound is incident. The scope also includes rating levels for sound source plus residual, background and ambient sound levels, especially where a complaint has been registered.

Noise as a nuisance in this standard does not include sound of an industrial / commercial nature or vehicles on public roads or railway systems. The clients work is only carried out during the day when the general background noise is at its highest levels and that the complaint was raised by a member of the public who worked at night and slept in the day and whose property is more than 200M from the site. Notwithstanding this, consideration should still apply if noise unreasonable. Other considerations included that specific residential property being somewhat in the line of the prevailing wind direction from the site. However, in context, adjacent neighbours have not raised objections and this business has been operating on this site in excess of 5 years.

Item (viii) To provide some acceptable form of noise reduction to the existing open sided workshop unit in proportion to the work application and surroundings.

The workshop backs directly on to the vehicle storage premises on its 60'-0" rear elevation (in 4No 15'-0" steel framework bays) and is enclosed on that elevation and the two return 20'-0" ends. The remaining long side is totally open to the yard (building approx. 15'-0" high).

The proposal is to create 5No internal 12'-0" wide "work stations" approx. 10'-0" high and 10'-0" returns (approx. half depth of building) in timber framework and to line these with sound absorbent sheeting to (a) reduce / absorb the original nail gun sound (b) reduce the resultant echo / reverberation. [Cost implications would rule out proprietary manufactured work station cubicles relative to the application requirements and needs.]

Question was raised to re-site the position of the workshop on the current site, but it was deemed more valuable to have the needed open side facing towards the open fields than towards local residents in order to minimise 'direct' workshop sound and to concentrate on internal sound reduction / absorption applications.

Consideration too should include the actual value of the business concerned and its practical support to the needs of the local and surrounding community in its current location.

It provides employment for about 14 local residents, it is a vital cog in the recycle chain for the supply of rebuilt timber pallets – critical for the today's transportation system of goods handling. Provides work for collectors of surplus / non return pallets. Any surplus timber offcuts then also continue in the recycle chain for conversion to biomass fuel or Contiboard manufacture – nothing wasted.

The current and ongoing demand for pallets exceeds supply provision so that the recycle of them is vital to the industry. This guarantees local employment in uncertain times and fully supports all 'green' projects. Having this in mind, the client will be upgrading his workshops to suitably reduce noise / sound levels to an acceptable level and coupled with his 'contained' working hours should more than adequately meet any objections without involving any extensive and expensive sound testing procedures whilst still working as close as possible within the bounds of the above recommendations and standards.

This application is therefore to allow the regularising of the provision for Premier Pallets to be able to continue working from this site (having been there over 5 ½ years) and for the site / Premier Pallets to have full planning permission re B2 and B8 for as long as their business is situated there including meeting the environmental, general working times and employment needs as detailed above.

Premier Pallet Supplies Ltd Palk Road Havant Hants

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