

I have reviewed all the application docs on the HCC web pages – screening opinion / assessment, traffic assessment, planning statement and dust & particulate management plan. I also note that previously, no adverse comments were put forward by Environmental Health, other than (as in formative) highlighting the possibility that the cement silo may require an environmental permit.

I have also checked our complaints history, and note a small number of complaints relating to dust, smoke & particulates emitted from the site, relating to the period 2001-2008 approx. I also note that the 50% increase in permitted throughput that was consented in 2010 has not resulted in any additional complaints with respect to noise, vibration or dust (etc.), which is regarded as representing an endorsement of the environmental management plan that is in operation at the site.

I have a slight reservation that without further modification of the process / storage arrangements, the (further) >85% increase in permitted throughput (as proposed) could result in an operational need to increase the stockpile heights (alongside a corresponding increase in the quantity of fines within the site that the wheel-washing & highway cleansing provisions will require adequate capacity to manage).

I appreciate that both stockpile heights & cleansing are controlled (so far successfully) by WML conditions. However, the proposed volume increase is expected to test the environmental management plan & site logistics, and periods of non-compliance are foreseeable. Wind whipping of stockpiled material has previously been the subject of complaints, and is a key area of concern – and in this regard I welcome the recent addition of ‘rain guns’ for control of this point source, though this may increase the risk of tracking fines out to the highway, again a source of previous complaints that unfortunately Environmental Health is not equipped to deal with.

In consideration of the quality of site management demonstrated by the apparently impact-free increase in handling capacity in 2010, the above concerns are not sufficient as to justify an objection or recommendation for temporary consent.

EIA Screening

I have reviewed the screening document, and agree both the rationale & conclusions.

Concrete Crushing Activities

I gather that Mark has already commented on this application from a noise perspective, highlighting in particular the possibility of elevated noise from the significant increase in construction & demolition wastes. I have consulted our records, and note that I have no deployment notifications (to the site) in respect of mobile crushing plant. Concrete Crushers generally require an environmental permit, and if mobile, the receiving authority must be notified of any deployment of permitted plant within its administrative area. As HBC does not permit any crushing plant at the site, and has not received any notifications of deployment of plant (and it is stated that crushing is regularly undertaken at the site); I would request an informative to the applicant as follows:

“The crushing, grinding or other size reduction, with machinery designed for the purpose, of bricks tiles or concrete’, and the screening of product resulting from crushing & grinding activities, require an environmental permit under the Environmental Permitting Regulations 2010 SI 675. Operators of mobile crushing & screening plant are required to notify the receiving authority, and this authority has not received any notifications of deployment to the Farlington Redoubt site. Whilst it is recognised that there has been little external dust or noise impact from the undertaking of crushing activities – the applicant is responsible for investigating the need for & if necessary obtaining a permit for crushing plant based at the site. It would also be good practice for the applicant to ensure that any operators of mobile equipment that are periodically contracted to the site a) are operating under a valid environmental permit, and b) are observing the conditions of that permit – including notifying the receiving authority of the deployment”.

Best Regards,

Jon

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