

To: Sally Smith, DC
From: Mike Smith. EH
Date: 10th December 2013
Reference: Application no: APP/13/01153

Site Address: Howards Car Spares, Mill Rythe Lane, Hayling Island, PO11 0QQ

Proposed Development: County Matters Application for change of use to civil engineering depot with office, materials recycling facility and extension of site into adjacent paddock for use for plant operator training.

I am writing in connection to the above application, which has been passed to Environmental Health for comment.

I have a number of concerns in relation to the application, and will separate these comments out for ease.

Noise

From vehicle movements to/from site

The proposed change of use from car spares to Civil Engineering depot raises concerns about the number of vehicle movements on site, but also the change in hours of vehicle movements on site. The applicant has listed 19 "heavy" type vehicles and trailers which would be stored on site in their supporting statement, however it is not clear how many movements these vehicles will make during the working day; and presumably in addition other vehicles, not stored on site, would visit the site throughout the working day in order to deposit material for recycling and to pick up materials.

In mitigation, the applicant has stated that the current use of the site results in a "constant stream" of vehicles delivering cars for scrap. It would not be appropriate to speculate what the applicant means by a "constant stream" of vehicles, and hence it is difficult to comment any potential disturbance, increased or otherwise, without having accurate figures between the two sites for comparison. I am fully aware that the sites current consent will allow for a number of heavy vehicle movements as a result of the business. I would suggest however, that as a worst case scenario, a civil engineering depot with 40 employees and construction vehicle training school would result in more heavy vehicle movements than delivery of cars for scrap.

I would also raise a concern at the hours at which heavy vehicles will be moving on site. The very nature of civil engineering works means working on the highway outside of peak times (at unsociable hours) such as early mornings and late at night, with the resultant vehicle movements to and from the depot at these times. Without knowing the hours of operation of the proposed application, as these have not been provided, I would again suggest a worst case scenario of heavy vehicle movements on site, turning out of Mill Rythe Lane onto the main Havant Road early in the morning and late at night. As there are a number of residential properties close to this junction, and

comparing this operation to the business hours of a scrap yard, there is likely to be potential for these residents to be disturbed.

From the construction vehicle training centre

The inclusion of a construction vehicle training centre will increase the number of vehicle movements on site and I am concerned about the noise generated from the use of heavy plant training vehicles, engine noise, impact noise, reversing alarms, horns etc on the paddock area proposed. The applicant has stated that the impact on the land will be no different to agricultural vehicles, however I disagree, as the training centre, accommodating 30 persons a day are likely to generate significantly more vehicle movements than an empty field with agricultural use.

From the materials recycling centre

The applicant has provided some acoustical information about a Red Rhino 7000 Series mini Crusher, and a diagram illustrating the theoretical noise dissipation over distance. The applicant has stated a Red Rhino 7005 mini Crusher will be used on site, and I would suggest that the applicant clarifies whether there is any difference in noise output between these machines.

This discrepancy aside, my main concern relates to the applicants acoustical calculations. In theory, the applicant is correct, in that for every doubling of distance (in meters) there will be a reductions of 6dB as noise dissipates over distance. This theory is correct, on the basis that the noise is originally measured in the free field. The acoustical report provided originally measures the noise from the crusher only 2 meters away, in the near field. On this basis there is no certainty that the desired sound reduction will be achieved using only distance as an acoustical mitigation measure. I would suggest that the applicant commissions an acoustical report from a reputable company in order to correctly demonstrate the impact of noise from the Crusher.

Dust

From the materials recycling centre

The use of the mini Crusher and storage of spoil materials, if not properly managed, will cause dust to spread, bearing in mind the sites location close to the shore with any associated wind. The applicant has stated that a system will be designed to suppress dust will be designed. The applicant states that the system will use harvested rain water. My concerns relate to dust suppression during the dry summer months when harvested rain water may not be readily available.

From the construction vehicle training centre

The use of the field for plant vehicle training is also likely to generate dust. The applicant has stated that any holes will be filled in, however there do not appear to be any control measures to suppress dust.

Lighting

Having examined the lighting specification included by the applicant, I am not concerned by the proposed lighting shining directly into residential properties. Bearing in mind however my concerns about the depot potentially operating at unsociable hours (late at night or very early in the morning) I am concerned about potential overspill of lighting.

Conclusion

Taking account of the number of above concerns this application raises in relation to disturbance, and the current lack of supporting information to mitigate these concerns, I am minded to object to this application until the applicant can provide information to mitigate these points.

Should you be minded to grant consent, I would request that there be the following conditions:

1. I would request a condition relating to hours of work on site, with ideally no vehicle movements before 7am or after 11pm when nearby residents are most likely to be disturbed. However not wishing to impose a condition which is too restrictive, or even a condition which the applicant cannot comply with, I would request the hours of operation and number/frequency of vehicle movements is clarified by the applicant.
2. The mobile crusher not to be brought into use until a scheme to mitigate the impact of noise is agreed in writing with the local planning authority.

BS4142 Requirement

Noise resulting from the use of any/all plant, machinery or equipment shall not exceed a level of 5dB(A) below the existing background level (or 10dB(A) below if there is a particular tonal quality) when measured according to British Standard BS4142-1997.

3. Prior to development, a scheme to mitigate dust arising from activities on site (mobile crusher, recycling facility, vehicle training centre and deliveries to and from site) be agreed in writing with the local planning authority. Thereafter the scheme, including all maintenance programmes, be introduced and applied at all times.
4. The proposed lighting scheme shall not deviate from the plan provided, including the hours of operation *** (after these have been provided by the applicant)***, unless otherwise agreed in writing with the local planning authority.