



GILL PAWSON PLANNING

Rural Planning, Minerals and Waste

PLANNING APPLICATION for

VARIATIONS TO PLANNING PERMISSION 8/2004 RELATING TO
THE COMPOSTING FACILITY OFF

OLD MAIN ROAD
HAYNES CHURCH END
BEDFORDSHIRE

BY MATERIAL CHANGE LTD

SUPPORTING STATEMENT

December 2005

Mill House
East Haddon
Northamptonshire
NN6 8DU

1.0 Introduction

- 1.1 Material Change has established a facility to compost green waste to provide a compost product suitable for use as a soil conditioner and for spreading on farmland at a site off Old Main Road, at Haynes Church End. The site is shown edged red on Drawing No B.7599. Planning permission was granted for this facility on 13 April 2004, reference 1/2004. This permission was subsequently varied by permission 8/2004 to allow essential plant to be delivered to and removed from the site by articulated HGVs.
- 1.2 The site became operational in November 2004. During 2005 there have been occasional odour problems, which resulted in the Environment Agency closing the site temporarily in August and requiring the removal of all waste off site. This work was completed to the Agency's satisfaction and the site is again operational. As a result of these problems and of the experience of operating the site, it has become apparent that a number of changes need to be made to ensure that the site can be operated efficiently, effectively and economically.

2.0 The Proposal

- 2.1 Planning permission 8/2004 currently imposes 16 conditions that limit the operations at the site. This application seeks to vary the wording of some and remove the restrictions imposed by others as set out in detail below.
- 2.2 The conditions of planning permission 8/2004 for which changes are sought are:
- Condition 1, which states that 'Planning permission shall extend to the area edged with a thick black line on the attached plan BC/CM/2003/28-1. The development shall be carried out in accordance with the planning permission number 1/2004 and supporting information as amended and supplemented by 2 letters dated 20 October 2003 and 21 November 2003 with plan number B 7230b, except for minor amendments which may be agreed in writing by the County Planning Authority'.
 - Condition 3, which states that 'Unless otherwise approved in writing by the County Planning Authority, no operations authorised or required under this permission shall take place on site except between the hours of 10.00 to 17.00 on Monday to Friday, 10.00 to 16.00 on Saturday and 11.00 to 16.00 on Sunday and Public Holidays'.
 - Condition 8, which states that "No more than a maximum of 10 deliveries of green waste shall be imported to the site per working day".
 - Condition 15 "No articulated HGV's shall enter or leave the site, except for the purposes of delivery and removal of the screen, shredder and loader".
 - Condition 16 ' There shall be nor more than 6 articulated HGV movements per week associated with the development.
- 2.3 The proposed changes are shown in bold or strikethrough as follows:

- Condition 1, which states that ‘Planning permission shall extend to the area edged with a thick black line on the attached plan BC/CM/2003/28-1. The development shall be carried out in accordance with the planning permission number 1/2004 and supporting information as amended and supplemented by 2 letters dated 20 October 2003 and 21 November 2003 with plan number B 7230b and **in accordance with the Working Plan of the Waste Management Licence**, except for minor amendments which may be agreed in writing by the County Planning Authority’.
- Condition 3, which states that ‘Unless otherwise approved in writing by the County Planning Authority, no operations authorised or required under this permission shall take place on site except between the hours of ~~10.00~~ **08.00** to 17.00 on Monday to Friday, 10.00 to 16.00 on Saturday and 11.00 to 16.00 on Sunday and Public Holidays’.
- ~~Condition 8, which states that “No more than a maximum of 10 deliveries of green waste shall be imported to the site per working day”.~~
- ~~Condition 15 “No articulated HGV’s shall enter or leave the site, except for the purposes of delivery and removal of the screen, shredder and loader”.~~
- ~~Condition 16 ‘There shall be not more than 6 articulated HGV movements per week associated with the development.~~

3.0 The Site and The Operations

- 3.1 No changes to the site or equipment are proposed.
- 3.2 It is proposed that the composting operations will be carried out in accordance with the details set out in the Working Plan that forms part of the Waste Management Licence, recently issued by the Environment Agency. A copy of the Working Plan is included in Appendix 1. The Working Plan provides a comprehensive statement on how the site will be managed and operated and complies with all current Environment Agency guidance on open windrow composting operations. The details in the Working Plan therefore supercede those submitted with the original planning application. Thus for the avoidance of doubt Condition 1 of the planning permission should refer to the Working Plan.

4.0 Planning considerations

4.1 Traffic and access

A Transport Statement has been prepared by DT Transport Planning and a copy of the full report is included in Appendix 2. The report has considered the background to the imposition of the conditions, the validity of the conditions and the implications of their removal. This report demonstrates the following:-

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- The requirement for the conditions seems to stem from the concerns regarding HGV's associated with the site using the weight restricted section of Old Main Road to the north of the site access. There was no technical requirement for their imposition raised by the Council's professional highways advisors.
 - The weight restrictions in place on Old Main Road to the north of the site access prevent vehicles in excess of 7.5 tonnes from using the road. The restrictions are enforceable by the police and as such conditions on the basis of concerns about prohibited vehicles using the road, would be ultra vires and fail the tests of Circular 11/95 regarding the use of conditions in planning permission.
 - The site enjoys an excellent relationship with the County's Strategic Route Network which includes the A6. This route is one where Structure Plan Policy seeks to contain HGV movements. The site enjoys an almost direct access to this route via a short section of Old Main Road.
 - The junction of Old Main Road with the A6 is laid out as a ghost island right turn lane and is compliant with national design standards set out in the Department for Transport's Design Manual for Roads and Bridges. The layout of the junction is suitable and appropriate to the level of traffic that uses it.
 - There is a limited collision record at the A6 junction with Old Main Road, which has recorded three collisions in a five year period. The collision record is considered to be below the average that could be expected for the junction.
 - The removal of conditions 8, 15 and 16 will allow the site operators the flexibility to use larger vehicles, which in turn will reduce the number of deliveries and vehicle movements to the site. This complies with the aims of PPG13 to reduce the number of vehicle miles travelled. The site operators are not applying to change the maximum input tonnage to the site which is restricted to 10,000 tonnes per annum.

It is therefore considered that there are no technical highway or traffic reasons why Conditions 8, 15 and 16 should not be removed.

The original concerns that lead to the imposition of the vehicle restrictions related to ensuring that the site could not handle more waste than the 10,000 tonnes to which the planning permission related. This issue is controlled by Condition 9 of the planning permission, which requires the operator to keep weekly records of the waste received at the site, records to be available to the County Planning Authority on request. In addition, now that the Waste Management Licence has been issued, the operator is required to make quarterly returns of waste inputs to the Environment Agency. Also, the Agency's regular inspections will include checking the quantities of material being composted and the records of the intake.

4.2 Odours

Experience at this site has found that the following measures need to be taken to control odour from the composting operations:

- Maintenance of correct Carbon:Nitrogen balance.
When high concentrations of grass are received at the site in the kerbside collected material, which has a high Nitrogen content, this will be blended with reserved woody oversize, HWRC green waste, landscape contractors' green waste or straw to add Carbon to achieve the correct balance. These four components will be stored separately following delivery, so that they can be blended effectively.
- Shredding of green waste will ideally only take place when there is a wind blowing in the directions between 080° and 150° or between 220° and 310°, as shown on the attached plan. Kerbside collected waste will not be shredded if it contains a high proportion of leafy waste, but will be added directly to the woody waste after the latter has been shredded. Wind direction monitoring equipment, weather vanes and windsocks have been installed.
- Careful choice of composting process.
When there is a good supply of woody waste to mix with leafy waste, the material will be composted through windrows. However, if there is an insufficient supply of woody waste to achieve the optimum balance of C:N, then the material will be placed into a static pile, which will be capped with chipped woody material or straw to provide a biofilter for the air to pass through.
- Windrows will be turned as necessary to ensure aerobic conditions. Turning will ideally only take place when the wind is blowing in the directions between 080° and 150° or between 220° and 310°, as shown on the attached plan. If there is a long period when the wind is in these directions, thus preventing windrow turning, the windrow will be added to a static pile and covered with chipped woody material.
- Odour treatment equipment will be deployed as necessary. A Cobra system and an APPS system are being trialled at the site. They will be deployed when handling waste, windrows or compost that could cause odours beyond the site boundary.

By allowing additional time for work on site, the operator will have more opportunity to avoid carrying out operations when they may cause an odour nuisance; see 4.5.

4.3 Noise

No change is proposed to the use of plant and equipment, therefore there will be no change to the noise environment as a result of this proposal.

4.4 Protection of water

A bunded, impermeable pad, laid to drain to a lagoon is already at the site, compliant with the Environment Agency's specification. This prevents any water draining either to surface or ground water sources.

4.5 Hours of operation

It is proposed to change the hours for the acceptance of deliveries and operation of the shredder and screen from the permitted 10.00am start on Monday to Friday to 08.00 start. No changes are proposed to the permitted hours for Saturdays, Sundays and Bank Holidays. The additional time during the working week will provide greater flexibility to receive waste and to process and handle it, thus facilitating better control over operations and thus better management of those aspects which have the potential to cause a nuisance.

It is usual for any business operation to commence work at 08.00 and there are no environmental impacts resulting from operations carried out between 08.00 and 10.00 that are not already being generated between 10.00 and 17.00. There is no uniquely sensitive receptor that could be adversely affected by an 08.00 start.

4.6 Bioaerosols

The proposals will not lead to any increase in the production of bioaerosols from the changed operations.

5.0 Conclusions

- 5.1 The proposed changes to the conditions of the planning permission will enable the site to be run more efficiently and thus help to reduce the risks of adverse odour impacts.
- 5.2 Removal of the restrictions on vehicle movements could result in less vehicle movements and therefore benefit the users of the strategic highway network.

Appendix 1

Working Plan

Appendix 2

Transport Statement