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TAMAR RENEWABLE POWER BASINGSTOKE LTD

BASINGSTOKE A.D. FACILITY

KENNEL FARM

DUMMER

RG23 7LW

**SECTION 73 APPLICATION FOR THE AMENDMENT OF
PLANNING CONDITION 4 (VEHICLE MOVEMENTS) AND
AMENDMENT OF APPROVED DETAILS FOR CONDITION 14
(LANDSCAPE) AND CONDITION 15 (SITE LAYOUT) ATTACHED
TO PLANNING APPROVAL BDB/75034 DATED 12TH MARCH
2012**

RESPONSE TO CONSULTATIONS

1518/PS03 rev 01

Mark	Revision	By	Checked	Date
01	Issued for Comments	gc		20.04.16

Tamar Renewable Power Basingstoke Ltd. Basingstoke A.D. Facility, Kennel Farm, Dummer, Hampshire. RG23 7LW.

Section 73 Planning Application for the Amendment of Planning Condition 4 (vehicle movements) and Amendment of Approved Details for Condition 14 (landscape) and Condition 15 (site layout) attached to Planning Approval BDB/75034 Dated 12th March 2012

Response to Consultations

Introduction

Tamar Renewable Power Basingstoke Ltd (TRPB) is a subsidiary of Tamar Energy Ltd (TEL), a developer of Anaerobic Digestion Plants for the conversion of Agricultural Waste and Commercial Food Waste into Green Energy for export into the local power network.

In January 2016 TRPB applied to amend various planning conditions of the current approval.

The additional clarification points set out below are in response to queries raised in during application process.

Proposed Vehicle Movements

The proposal to amend the permitted HCV vehicle movements to 38 movements per day (19 in and 19 out) is based on the following data.

FARLEIGH													
Notes													
Peak			Client 1	Client 2	Client 3	Client 4	Client 5	Client 6	Client 7	Digesate	skips	Vehicles	Movements
	Tonnes by load		27	27	20	6	3	3	3	25	8		
Mon			2	1	1	2	1	2	1	4	1	15	30
Tue			2	1		1	1	1	1	4	1	12	24
Wed			2	1	1	2	1	2	1	4	1	15	30
Thu			2	1		1	1	1	1	4	1	12	24
Fri			2	1	1	2	1	2	1	4	1	15	30
Sat						1						2	4
Actuals												71	142

FARLEIGH													
Notes													
Typical Week			Client 1	Client 2	Client 3	Client 4	Client 5	Client 6	Client 7	Digesate	skips	Vehicles	Movements
	Tonnes by load		27	27	20	6	3	3	3	25	8		
Mon			2	1	1		1	1	1	2	2	11	22
Tue			1			1	1	1	1		1	6	12
Wed			2	1	1		1	1	1	3		10	20
Thu			1			1	1	1	1	2	1	8	16
Fri			2	1	1	1	1	1	1	2	1	11	22
Sat						1	1					2	4
Actuals												48	96

These vehicle movements show Typical Week (around 9 months per year) and Peak (around 3 months per year) vehicle movements. The numbers are based on the plant operating up to the 40,000 tonne waste capacity permitted under the Environment Agency licensing.

It is proposed the Condition is written to make suitable allowance for potential unplanned fluctuations, delivery delays, delays due to driver hours reaching maximum, etc. The Condition should also be written to allow the tightest possible planning enforcement control, without unduly restricting the business. It is understood the preference, from a Planning Enforcement perspective, is to restrict vehicle movements on a daily basis, rather than being averaged over a weekly or monthly timeframe. Hence the proposal to limit vehicular movements on a DAILY basis to up to 38 movements (19 in and 19 out).

A further condition limiting the site to a maximum throughput of 40,000 tonnes per year (in line with the Environment Agency license for the site) will be acceptable. This will ensure, from a Planning perspective, that the plant cannot move to a situation where it is operating entirely at the maximum permitted vehicle movements and this is entirely made up of only the largest types of vehicle.

Overall the figures demonstrate that the plant will typically be operating at a much lower vehicular movement level than the headline figure identified in the conditions.

Vehicle Routes and Times To/From Site

Vehicle routes will be subject to control by conditional approval of a Traffic Management Plan. A draft plan is attached to demonstrate the intended content. This includes a 'Contract Pack' which details instructions for drivers on the allowed route to the A30 and allowed times. This also details where drivers should wait on the A30 if their arrival time will conflict with the school drop-off / pick-up times. Vehicles due to exit the site during the school drop-off / pick-up times will be retained on site for that period.

Generally drivers will be instructed to use the Woodbury Road route. Where HCV vehicles are taking digestate to the local farm estate they will be permitted to turn right when exiting the site. This will be limited to a maximum 4 vehicles per day.

Historic Excessive Vehicle Movements

We understand the exceedance of the previously set level of vehicular movements is mainly due to delays in removal of digestate in the previous season which was allowed to build-up to maximum storage levels and was then removed over a short period which led to vehicle numbers exceeding the condition. This incident is unlikely to be repeated and furthermore the proposed amendment to the permitted vehicular movements allow a more reasonable 'buffer' for any future fluctuations in planned movements that may occur.

Responses to Comments Raised

The comments noted below are summarised and have been grouped into broadly the same subject for each response.

Comment

- *The applicant has flouted existing restrictions of hours, days, routing given*
- *There have been frequent breaches of both traffic route (no traffic in Long Cross Lane) and numbers and no enforcement by HCC.*
- *HGVs can move along Woodbury Road during school times which is not acceptable as it is dangerous due to the proximity of the school (Danebury Road)*

Response

- Tamar Energy are committed to working within any planning restrictions applicable to the plant. This new application is part of an overall management review to be able to regularise and provide better control of such issues going forward. The new application does not seek to amend the agreed working hours or restrictions on traffic entering/leaving the site during strategic school hours, or outside of normal working hours. Further driver briefing will be included to ensure the timing restriction related to school drop-off / pick-up is applied to Woodbury Road in addition to the site entrance.

Comment

- *Deliveries of waste are coming from over large distances already (Kent, East Anglia and Midlands), increasing greenhouse gases and not making it a sustainable proposal.*
- *Basingstoke & Deane Borough Council does not use the site for waste disposal*
- *Application should have a weight limit on the HGVs used*

Response

- The commercial nature of the food waste industry will dictate an economical distance for transportation of food waste, whether it is a commercial operator or a local council. In addition, the commercial haulier contracts will mean that any 'vehicle branding' suggesting a particular region that the vehicle operates from, does not necessarily relate to the particular load being delivered to the site. The majority of food waste processed at the facility will be 'local' but it is possible for some deliveries to be from a distance (for example if a particular product is removed from supermarkets due to a food safety issue this may be of such a volume that it needs to be distributed to many food waste recycling facilities over a wide area to avoid disposal to landfill). Therefore, it is not necessary, practical or viable to use the planning system to restrict sources of food waste.
- Any restriction on maximum vehicle size would have a negative impact. Whilst it is expected more smaller vehicles will be utilised in the future this does not fully replace the larger vehicles and restrictions by maximum gross weight (for example to a medium sized HCV) will unnecessarily limit operational flexibility and only serve to further increase required vehicle movements. The proposed vehicle movements will enable optimum flexibility coupled with optimum means to measure compliance within the planning system.

Comment

- *Roads are not built for HGV traffic with traffic calming measures as it is residential not industrial area.*

- *Damage to mini roundabout at Danebury and Woodbury Road due to HGV use as road is too narrow. There are too many HGVs already in Hatch Warren and so dangerous for pedestrians and cyclists*
- *Why cannot Beggarwood Lane be used as the travel route?*
- *Residential area will expand with new houses and add to pressure on roads as small vehicles conflict with buses and HGVs*
- *Community Centre in Long Cross Lane. Access to Woodbury Park via Woodbury Road.*
- *Improvements to the chicane in Woodbury Road have not been undertaken*
- *The proposal should include the instillation of a pedestrian crossing.*
- *As the site cannot stack vehicles, they will cause congestion and chaos on local roads when there are increased numbers to deal with, as they cannot deal with what they already have.*

Response

- The previous applicant undertook detailed studies of the road network and potential routes for vehicular movements associated with the facility. These were reviewed with County Planning and County Highways and the preferred routing along Woodbury Road agreed. This would not have been agreed by Highways if the road were unsuitable or the risks to other users would be increased. In reaching this solution Beggarwood Lane was discounted as an option as it is unsuitable due to several sharp bends and a substantial amount of housing closer to the road than is the case on Woodbury Road.
- To mitigate the issue with overlap of school traffic the permission was granted with a restriction on vehicle arrivals/departures from the site during strategic school hours.
- The road has sufficient capacity for the proposed increase in vehicular movements and further, the proposal is a very small percentage of existing movements. This increase is well within normal daily fluctuations of traffic volumes.
- At the time of granting the original approval a legal agreement was entered into (Section 106 agreement) and the original applicant paid a substantial 'Highways contribution' as part of that process. This sum is specifically identified as a contribution to maintenance and improvement works required as a result of vehicles associated with the development passing along Woodbury Road. It is County Highways responsibility to implement such works as and when they are required.
- Vehicles will not *cause congestion and chaos* on local roads. At the maximum number average vehicle movements will be two per hour and therefore multiple vehicles associated with the development are not likely to be on Woodbury Road at the same time. (Woodbury Road is some 0.8miles long so a vehicle travelling at 15mph will be on Woodbury Road for approximately 3-4 minutes).
- The site layout does not allow for a significant number of vehicles to 'stack' however there is room for a small number of vehicles to be on site at the same time. Typical offload turnaround time is 15-25minutes (from weighbridge approval coming in to weighbridge approval exiting) and there is sufficient waiting and passing opportunity on the site, and on the private access road from the site to the highway, for vehicles to overlap during this time frame.

Comment

- *HGVs produce emissions harmful to local residents, noise and vibrations.*
- *Frequent reported instances of nuisance from emissions also results in no action.*
- *Noise from traffic keeps those awake that work nights and need to sleep during the day.*
- *The proposal should include a night shift.*

Response

- All vehicles are subject to road safety checks to ensure they are roadworthy. Commercial operators are more likely than private individuals to ensure their vehicles are maintained to a suitable standard and therefore emissions etc will be within acceptable standards.
- The existing agreed access route has a significant margin from road edge to any dwellings and in most cases there are garden fences and landscaping which helps to reduce impacts from noise and vibration etc.
- There is no benefit in the plant operating with a night shift and any night time HCV movements would likely cause greater disturbance as they will then be less likely to be within general traffic flows.

Comment

- *There should be a link from the M3 directly to the site to take traffic off the local roads*

Response

- This would be a matter for the national highways agency but in any case the cost of implementing such a proposal would be far too prohibitive.

Comment

- *Mitigations given in earlier consent have not been delivered*
- *The resident's liaison panel is organised by Tamar and does not hold Tamar to account*
- *Smell from plant blighting lives of those residents at Kennel Farm.*
- *Local residents do not benefit from this proposal*

Response

- Tamar Energy are implementing the planting which had not been delivered before. We are not aware of any other mitigation measures that have not been delivered.
- The liaison panel and the planning enforcement system do hold Tamar Energy to account. It is through these processes that the current issues have been raised and measures are now being put into place to address these.

Comment

- *The digestate is not being kept to farm land but being transported over roads*

Response

- The original planning application strategy suggested the local estate would receive all of the digestate. The strategy is having to be adapted now the facility is in production and as part of the measures being implemented to better comply with planning restrictions, the digestate management will be passed to a 3rd party. This will include spreading on the local estate and a proportion of transportation to local farming nodes using the road network. Where the transportation is using the road network to take digestate away from the local estate this will come under the vehicle movements control being applied for.

Comment

- *Site and activities will expand drip by drip*

Response

- This is not intended to be the case and this current proposal is considered a 'last chance' to get things correctly formatted in the planning system for long term control of the plant.

Comment

- *Drivers of HGVs are above the speed limit*

Response

- This is not a matter that Tamar Energy can have any control over, other than providing driver briefings about the approved access route and safe driving etc. HCV vehicles operate with significant measures of recording activity and it is not in driver's interest to exceed the speed limit.

Comment

- *Devalue prices of local houses*

Response

- This is not a material planning consideration.