



Non-technical Summary

Steel Bright Road Metal Recycling Facility

FOR: DUNN BROS RECYCLING LTD

PROJECT NUMBER: ECCS 117 005

PREPARED BY: EC CONSULTANCY SERVICES LTD

Non-technical Summary

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Non-technical Summary – ECCS 117 005 R 001 B

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For:	Dunn Bros Recycling Ltd
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1 NON-TECHNICAL SUMMARY

1.1 INTRODUCTION

This non-technical summary has been prepared in support of an application submitted to the Environment Agency (EA) for a variation application to the existing permitted site (EPR/GB3106HM) located in Smethwick, Birmingham. The site is operated by Dunn Bros Recycling Ltd.

The existing Environmental Permit is a Standard Rules Permit (SR2015No.14 Metal Recycling site) which permits the site to conduct sorting, separation, grading, shearing, shredding, baling, compacting, crushing, granulating and cutting of ferrous metals or alloys and non-ferrous metals for recovery. The total quantity of waste that can be accepted at a site under these rules must be less than 75,000 tonnes a year.

The Operator is applying to upgrade their existing Standard Rules Permit to a bespoke installation permit, in order to accommodate additional waste types and increase in throughput capacity (which breaches the 75 tonnes per day Industrial Emissions Directive (IED) threshold).

1.2 SITE OPERATOR

Dunn Bros Recycling Ltd (Company No. 11263960) was incorporated on 20 March 2018. The company's registered office address is: Unit 4 Castle Court 2, Dudley, United Kingdom, DY1 4RH. The Dunn Family have a long history within the UK's metal recycling industry, centralizing in the Birmingham / Midlands region.

1.3 SITE LOCATION AND ENVIRONMENTAL SETTING

The existing site is situated within the Borough of Sandwell in a heavily industrial area, surrounded by several existing waste management facilities. The warehouse (17,000 square foot in size) is situated on the corner of Steel Bright Road and Rabone Lane, immediately north of the Rugby-Birmingham-Stafford Railway line (which itself is approximately 3 miles northwest of Birmingham New Street Station).

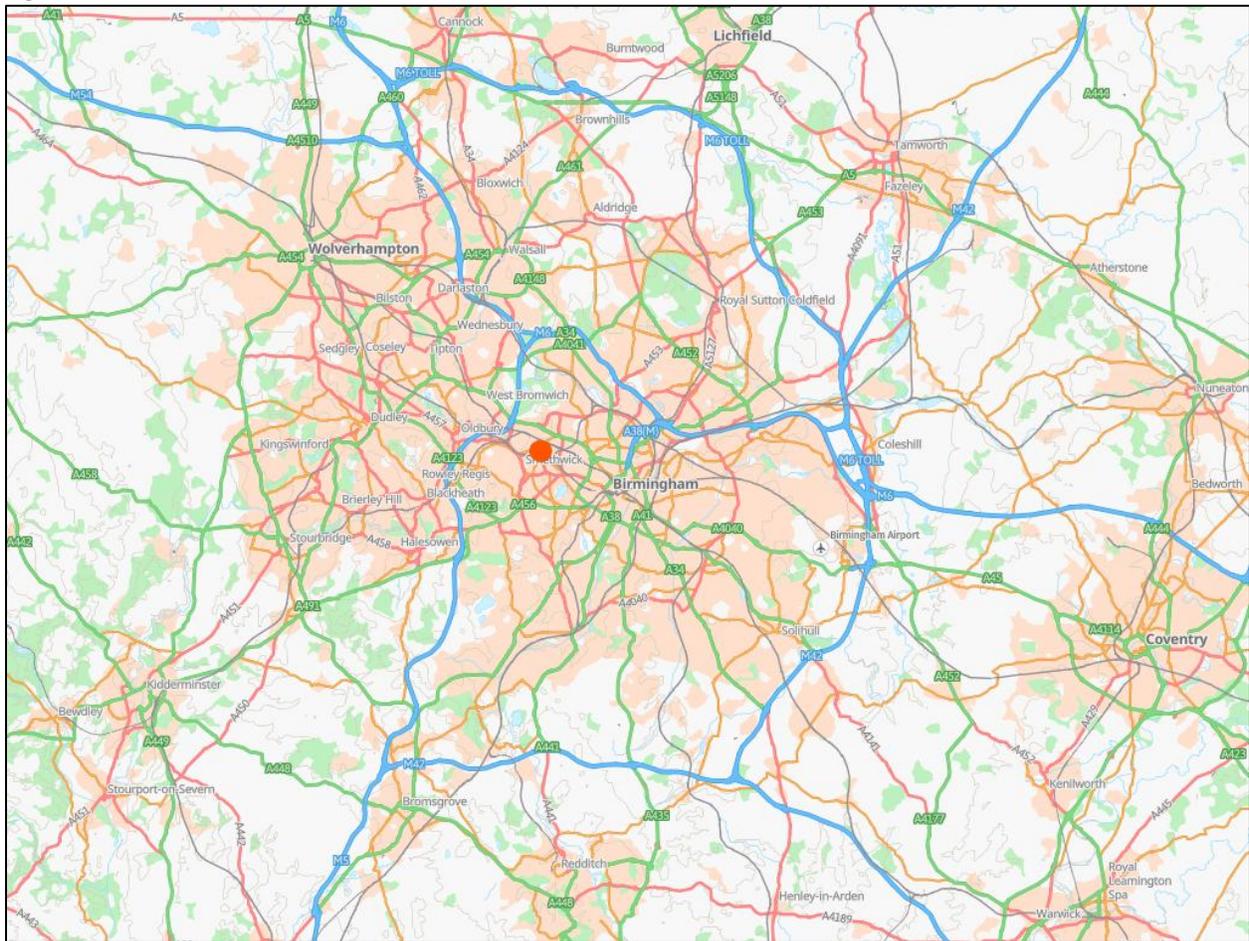
The site is situated above a bedrock aquifer which is designated as a high groundwater vulnerability zone / major aquifer. Superficial deposits are designated as a minor aquifer / secondary aquifer. There are no Source Protection Zones within close proximity to the site.

The nearest human receptor is The Old Corner House Pub, which is situated 55 m directly West of the warehouse, on the corner of SoHo Street (B4136) and Rabone Lane, with residential properties located 100m to the south west, across a dual carriageway.

The full site address is:

Unit 1
James Watt Industrial Park
Steel Bright Road,
Smethwick,
Birmingham,
B66 2NW
Grid Reference: SP 03127 88744

Figure 1.3.1 Site Location



Source: Magic.defra.gov.uk © 2025

1.4 SENSITIVE RECEPTORS

A search was carried out using the government website 'www.magic.gov.uk' as well as a nature and heritage conservation screen assessment obtained from the Environment Agency. The site is located within a heavily industrialised area. There are several human sensitive receptors within 1km of the site. The nearest receptors are other businesses co-located within the James Watt Industrial Park Estate.

There are no European ecological designated sites within the relevant Environment Agency screening distances. There is however a waterway canal located 86m west of the site and 165 m to the north of the industrial warehouse. The closest sensitive receptors are illustrated within Figure 1.4.1a below.

Figure 1.4.1 Location of Human Sensitive Receptors

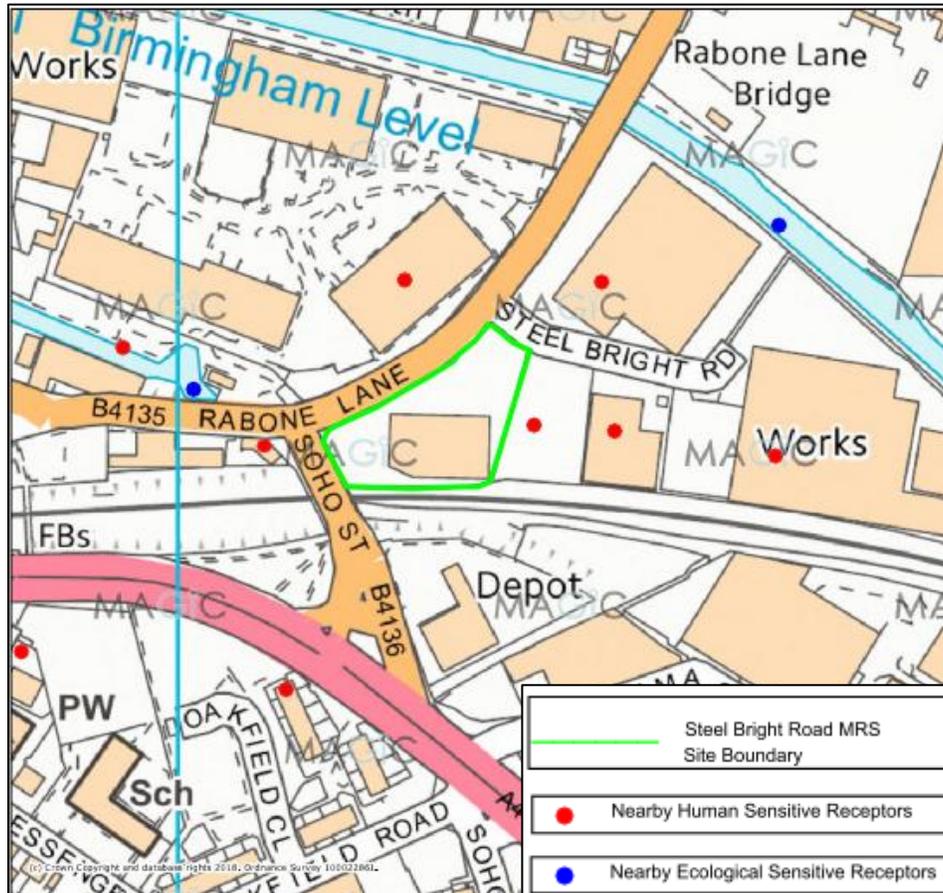


Image source: 2025

1.5 EXISTING PERMITTED ACTIVITIES

A Standard Rules Permit and two Exemptions are currently registered at the site. These are summarised below:

- **Standard Rules Permit SR2015No.14 Metal Recycling Site (EPR/GB3106HM);**
- **T9 Exemption for the recovery of scrap metal (Registration WEX419400); and**
- **S2 Exemption for the storage of waste in a secure place (Registration WEX419400).**

1.6 CHANGES PROPOSED TO EXISTING PERMIT

The changes being applied for, as part of this variation application, are as follows:

- Upgrading of the existing Standard Rules Permit to a Bespoke Installation Permit;
- The primary activity at the site will become the following:

- a. S5.4A(1)(b)(iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC - treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components;

The primary waste type that will be accepted at the site for treatment will be non-hazardous non-ferrous metals (19-10-02), ferrous metals (19 10 01), and other wastes (19 12 12) which will be primarily sourced from Incinerator Bottom Ash (IBA) processors. Deliveries of these sourced materials will exceed 75 tonnes per day.

- The operator is seeking to add additional waste codes to allow the acceptance of burnt motors which fall under the definition of waste electrical and electronic equipment (WEEE) The burnt motors will primarily be delivered to site under the EWC code of 16 02 15*, which is defined as an absolute hazardous waste code. That said, it should be noted that the motors have gone through an incineration process, and tests have been undertaken to confirm they no longer contain electrical parts, plastics or hazardous materials including POPs;
- The Operator is applying to incorporate a new fire detection and suppression system at the site, which will replace the previous system and provide a more robust fire prevention system. As a result, the Fire Prevention Plan has been updated to reflect the new infrastructure; and
- As a result of site expansion plans, there will be a number of changes to the site layout and outside yard drainage arrangement, along with changes to the proposed emergency fire water containment measures.

All changes proposed will take place within the sites existing permitted site boundary line, thus there will be no need for any additional land to be added as part of this variation. There will also be no new point source emissions from the site, as a result of the changes proposed. There will be no other changes proposed to the permit, as part of this variation application.

The activities being applied for are further described within Table 1.6.1 below.

Table 1.6.1 Newly Proposed Regulated Activities

Proposed Permitted Activities at Metal Recycling Site			
Activity Reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A1	S5.4 A(1) (b) (iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste, including waste electrical and electronic equipment	Shredding of non-hazardous metal waste. R4: Recycling/reclamation of metals and metal compounds	From treatment of waste by shredding to storage of treated waste. Treatment consisting only of shredding of waste containing ferrous and non-ferrous metals for recovery.
Waste Activity			

A2	Storage of hazardous waste pending onward transfer	<p>R4: Recycling/reclamation of metals and metals Compounds</p> <p>R13: Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>Disposal and/or recovery of hazardous waste will not exceed a capacity of 10 tonnes per day</p> <p>There shall be no treatment of hazardous waste at the site.</p> <p>The maximum quantity of hazardous waste stored at the site shall not exceed 50 tonnes at any one time.</p>
Directly Associated Activities			
A3	Storage of non-hazardous waste pending treatment	R13: Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	From receipt of waste to storage of waste prior to treatment by shredding
A4	Physical treatment for the purpose of recycling	<p>Manual and mechanical sorting, separation, grading, shearing, plasma cutting, and gas cutting.</p> <p>R4: Recycling/reclamation of metals and metal compounds</p>	<p>From treatment to shredding to dispatch off site for recovery.</p> <p>Treatment consisting of sorting, separation, grading, shearing, plasma cutting, and gas cutting of ferrous and non-ferrous metals into different components for recovery.</p>
A5	Raw material handling and storage	Handling and storage of raw materials	From the receipt of raw materials to despatch for use within the facility
A6	Site surface and process water collection and recirculation	Collection of site surface water and process water from treatment process	<p>From the collection of sites surface water and process water from treatment process to re-use within the facility or discharge to sewer</p> <p>Only clean surface water run-off will discharge to sewer under normal operations</p>

1.7 EXISTING ENVIRONMENTAL MANAGEMENT SYSTEM

The Environment Agency relies heavily upon the use of effective Environmental Management Systems (EMS) as a driver for environmental compliance and improvement.

The site currently implements a comprehensive Environmental Management Systems (EMS) which is accredited to ISO14001 Standards. The existing EMS remains effective and will not require any significant changes as a result of this variation application, with the exception of the inclusion of updated supplementary documentation as submitted within this application. The existing management teams, staffing levels and systems in place remain fit for purpose. Further details of the existing EMS are provided within Variation Report (ECCS 117 005 R 002 B VR Final).

Dunn Bros Recycling Ltd will remain responsible for making all investment decisions with regard permitted activities across both sites and will remain as the company responsible for overall compliance with any relevant permit conditions, power to employ and dismiss the key staff, and will ensure that emergency procedures are followed should a serious incidents occur across either of the two sites.

1.8 ENVIRONMENTAL RISK ASSESSMENTS

An Environmental Risk Assessment has been completed as part of the preparatory work undertaken to support this permit variation application. The assessments undertaken have followed relevant guidance specified within the Environment Agency's Risk Assessment Guidance.

A number of assessments have been considered to determine the environmental risks posed by the additional activities, and to identify whether the level of risk is considered acceptable. The risk assessment does not assess existing activities that will remain unchanged, as these have already undergone assessment and are authorised under the existing permit.

All risk hazards identified have been considered and either assessed qualitatively or screened out as not requiring further detailed assessment.

The Operator has an existing Sewerage Discharge Consent from Severn Trent. The Fire Service have been consulted on the proposed changes to the Fire Prevention Plan and have raised no objection to the changes proposed.

1.9 OPERATING TECHNIQUES, BAT ASSESSMENT AND MONITORING PLAN

Within the Variation Report (ECCS_117_005_R_002_B_VR_Final) full details are provided of the operating techniques that will be implemented across the site to minimise and control emissions from the proposed activities and to demonstrate that the technology selection and control measures to be implemented will follow Best Available Techniques (BAT).

Operations fall within the following Best Available Techniques (BAT) conclusions:

- COMMISSION IMPLEMENTING DECISION (EU) 2018/1147, of 10 August 2018, establishing best available techniques (BAT) conclusions for **waste treatment**, under Directive 2010/75/EU of the European Parliament and of the Council; and

A BAT assessment has been submitted as part of this application to demonstrate compliance against the above standards.

An updated Fire Prevention Plan has also been developed for the site, which incorporates a new fire detection, suppression system, and drainage system across the site.

1.10 SITE LAYOUT PLANS

A number of drawings have been submitted in support of this variation application. These drawings include the following:

- Existing Site Boundary Plan;
- Site Layout Plans;
- Sensitive Receptor Plan;
- Drainage Plans;
- Waste Storage Area Plans (Operational hours and out-of-hours);
- Secondary Containment Measures Plans; and
- Fire Suppression Plans.

These drawings are contained within the Drawings Section of the submission.