Bath & North East Somerset Council

Improving People's Lives

EPR Permit Variation Application

Bath Recycling Centre

19th December 2024

Project No.: SOL_23_P113_SRA

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EPR Permit Variation Application

Bath Recycling Centre

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Acronyms and Abbreviations

Name	Description
AONB	Area of Outstanding Natural Beauty
B&NES	Bath and North East Somerset Council
EWC	European Waste Catalogue
IAQM	Institute of Air Quality Management
LNR	Local Nature Reserve
SSSI	Site of Special Scientific Interest

NON-TECHNICAL SUMMARY

Bath and North East Somerset Council ("B&NES") previously operated a street cleaning depot from their site on Locksbrook Road, Bath, BA1 3EL which was permitted under EPR/FB3401MM.

The site is not fully operational however the existing permit allows for the storage of municipal and street-sweeping waste prior to recovery. The west side of the site is currently operational and in use by B&NES Street Cleaning Services. The site is permitted to accept up to 1,500 tonnes of waste per annum with no waste treatment allowed. The permit only allows the storage of waste collected by Council vehicles as part of street cleaning activities. The site was not open to the public nor allowed for the acceptance of waste from other sources.

B&NES propose to redevelop, redesign and repurpose the existing street cleaning depot to open a local recycling centre (RC) for the local community as part of the council's commitment to providing better services and provisions for the communities it serves. This creation of a recycling centre requires several amendments to the existing EPR/FB3401MM permit and is the reason for this permit variation.

The proposed variation will seek to change the following features of the existing permit:

- Update the site name from *Bath Street Cleaning Depot* to *Bath Recycling Centre;*
- Increase the Installation Boundary of the site;
- Changes to site operations to allow for waste from various sources to be stored on site (i.e. waste deposited by members of the local community) among other changes;
- Increase the total quantity of waste accepted per annum to 12,000 tonnes; and
- Additional European Waste Codes (EWC) to be added. A full list of the proposed EWC codes can be seen in Table 3.2.

This proposed variation does not seek to add any form of treatment or processing, the site will remain as a storage-only waste transfer station.

The proposed changes continue to meet the definition of a Waste Operation as defined by Schedule 2 of *The Environmental Permitting (England and Wales) Regulations 2016* as detailed in Table 3.1 below.

Table 3.1 – Activity Reference Table

Activity Reference	Description of Specified Activity	Limits of Specified Activity
A1 - Storage of non-hazardous waste	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced.	The maximum quantity of non hazardous waste stored at any one time will not exceed 150 tonnes

A summary of the proposed emissions arising from site operations is as follows:

Emissions to Air

There are no point source emissions to air arising from the proposed storage activities.

There is a potential for fugitive emissions to arise on site, in the form of dust and particulates, and odour.

Dust potential is considered minimal, with the greatest risk arising from an increase of traffic in the area as a result of the operations. The effects of particulates have been deemed negligible and therefore no management plan has been proposed.

Waste accepted on site is unlikely to cause significant odour impacts beyond the site boundary, through the use of appropriate odour control measures such as rigorous inspections of waste, rejecting non-conforming wastes and storing all waste in the appropriate containers/bays. An odour management plan has been produced to ensure risk of odour impacts beyond the site boundary is minimised.

Emissions to Controlled Waters and Sewer

There are no emissions to controlled waters arising from the proposed storage activities.

The proposed drainage system splits the site into three distinct catchments:

- Catchment A incorporates the western portion of the site where there will be clean runoff areas. Rainwater within these areas will be collected by new drainage channels which will discharge into the existing surface water sewer underneath Locksbrook Road to the north of the site.
- Catchment B incorporates the western portion of the site where street cleaning vehicles will be cleaned and black sack tipping and weeding waste bays are located. The runoff within this catchment area may be contaminated and will be collected by foul gullies and discharged to the foul water sewer beneath Locksbrook Road.
- Catchment C is the eastern half of the site where surface water will be collected by new rainwater gullies and permeable paving systems before discharging eastwards. The final point of discharge for the proposed surface water system will be to the existing Wessex Water sewer to the east of the development. The sewer lies in land owned by B&NES.

Emissions to Ground or Land

There are no emissions to ground or land arising from the proposed storage activities.

1. INTRODUCTION

This document has been prepared by Sol Environment Ltd on behalf of Bath and North East Somerset Council ("B&NES" or the "Applicant" hereafter) and provides supporting information as required by Environmental Permit Application Forms issued by the Environment Agency (EA).

1.1 Background

The Applicant previously operated a street cleaning depot from their site on Locksbrook Road, Bath, BA1 3EL which was permitted under EPR/FB3401MM.

The existing permit allows for the storage of municipal and street-sweeping waste to be stored on site prior to recovery. The site is permitted to accept up to 1,500 tonnes of waste per annum with no waste treatment allowed. The permit only allows the storage of waste collected by Council vehicles as part of street cleaning activities. The site was not open to the public nor allowed for the acceptance of waste from other sources.

1.2 Reason for Application

This permit variation is being made to address the Applicant wishing to redevelop, redesign and repurpose the existing street cleaning depot into a local refuse recycling centre (RRC) for the local community as part of the council's commitment to providing better services and provisions for the communities it serves.

This new RRC proposes to be open to the public and accept a variety of municipal wastes for storage only, prior to onward transfer to recovery or disposal. The purpose of this facility will be largely unchanged from its previous use as a waste transfer station, however the source and types of waste accepted will differ.

This application support document, as well as the associated annexes and relevant application forms, provide details of the proposed changes to the facility, including a full description of the proposed operations, details on the waste streams to be accepted, potential emissions and their management, as well as general site operations and the required management plans and procedures.

2. SITE DETAILS

2.1 Site Location

The site is located at the former Bath Street Cleansing Depot on Locksbrook Road, Bath, BA1 3EL.

A site location plan can be found below in **Figure 2.1**

2.2 Infrastructure and Design

2.2.1 Site Boundary

The Installation Boundary will be increasing as part of this permit variation. A figure showing the revised Installation Boundary is provided within Annex B – Site Plans. Due to extra land being included within the Installation Boundary, a Site Condition Report has been completed and is included within **Annex G – Site Condition Report.**

All aspects of the site have been designed in accordance to the Environment Agency's Pollution Prevention Guidance.

2.2.2 Site Layout and Design

The proposed site area covers approximately 0.26ha and consists of a mixture of visitor car parking and designated waste storage areas. The site layout plan can be seen below in **Figure 2.2.**

2.2.3 Drainage

The site utilises a sealed drainage system that covers both operational and non-operational areas of the site.

The proposed drainage system splits the site into three distinct catchments:

- Catchment A incorporates the western portion of the site where there will be clean runoff areas. Rainwater within these areas will be collected by new drainage channels which will discharge into the existing surface water sewer underneath Locksbrook Road to the north of the site.
- Catchment B incorporates the western portion of the site where street cleaning vehicles will be cleaned and black sack tipping and weeding waste bays are located. The runoff within this catchment area may be contaminated and will be collected by foul gullies and discharged to the foul water sewer beneath Locksbrook Road.
- Catchment C is the eastern half of the site where surface water will be collected by new rainwater gullies and permeable paving systems before discharging eastwards. The final point of discharge for the proposed surface water system will be to the existing Wessex Water sewer to the east of the development. The sewer lies in land owned by B&NES.

Runoff from site will be intercepted by 2 interceptors on site, one for foul and one for surface water. In the event of a fire, a penstock valve can be operated to isolate the drainage system and prevent potentially contaminated firewater from leaving the site. Full details of potentially contaminated firewater containment in **Annex D – Fire Prevention Plan.**

A copy of the drainage plan can be found in Annex B and below in **Figure 2.3.**

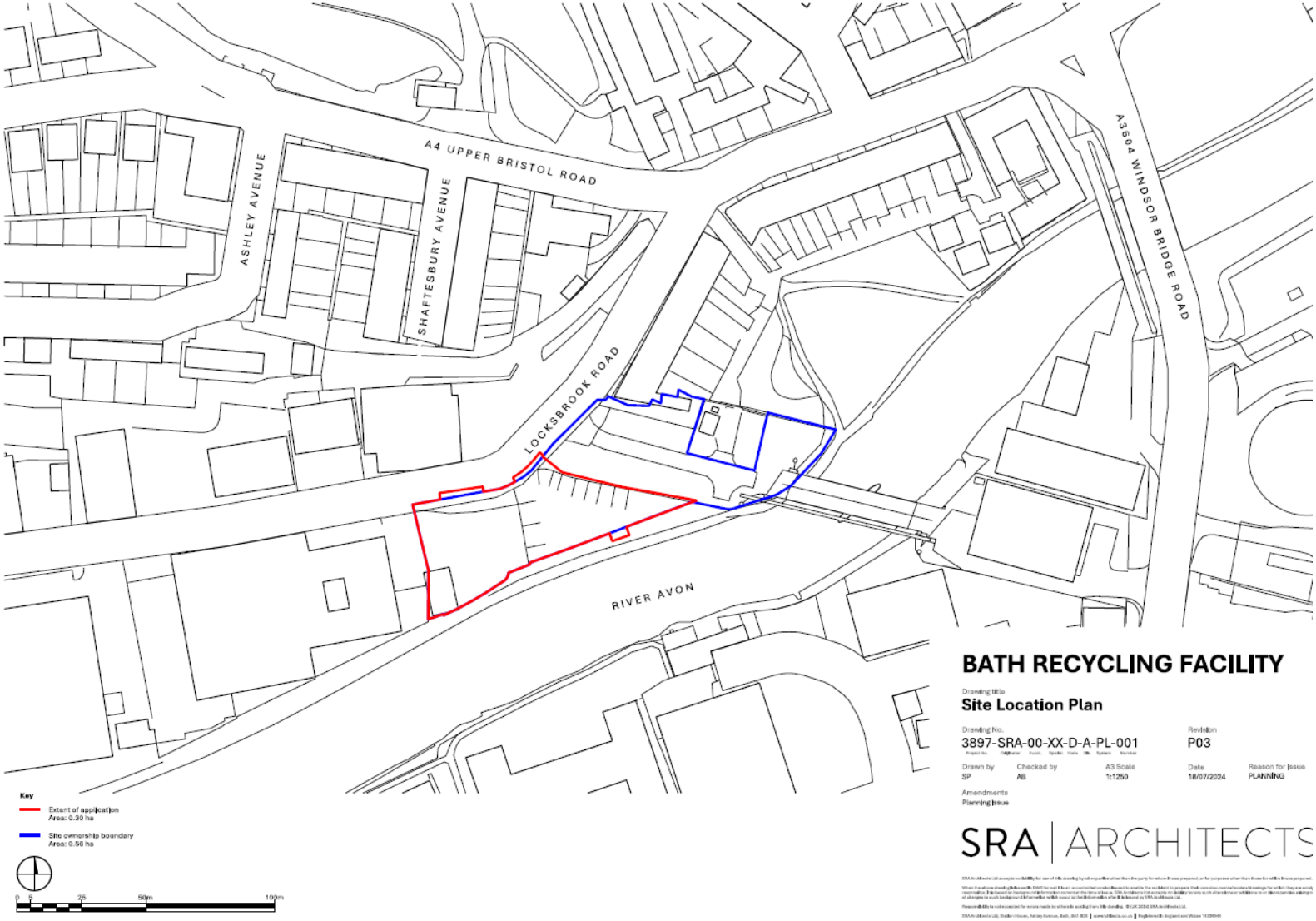

Figure 2.1 - Site Location Plan

Figure 2.2 – Proposed Site Layout

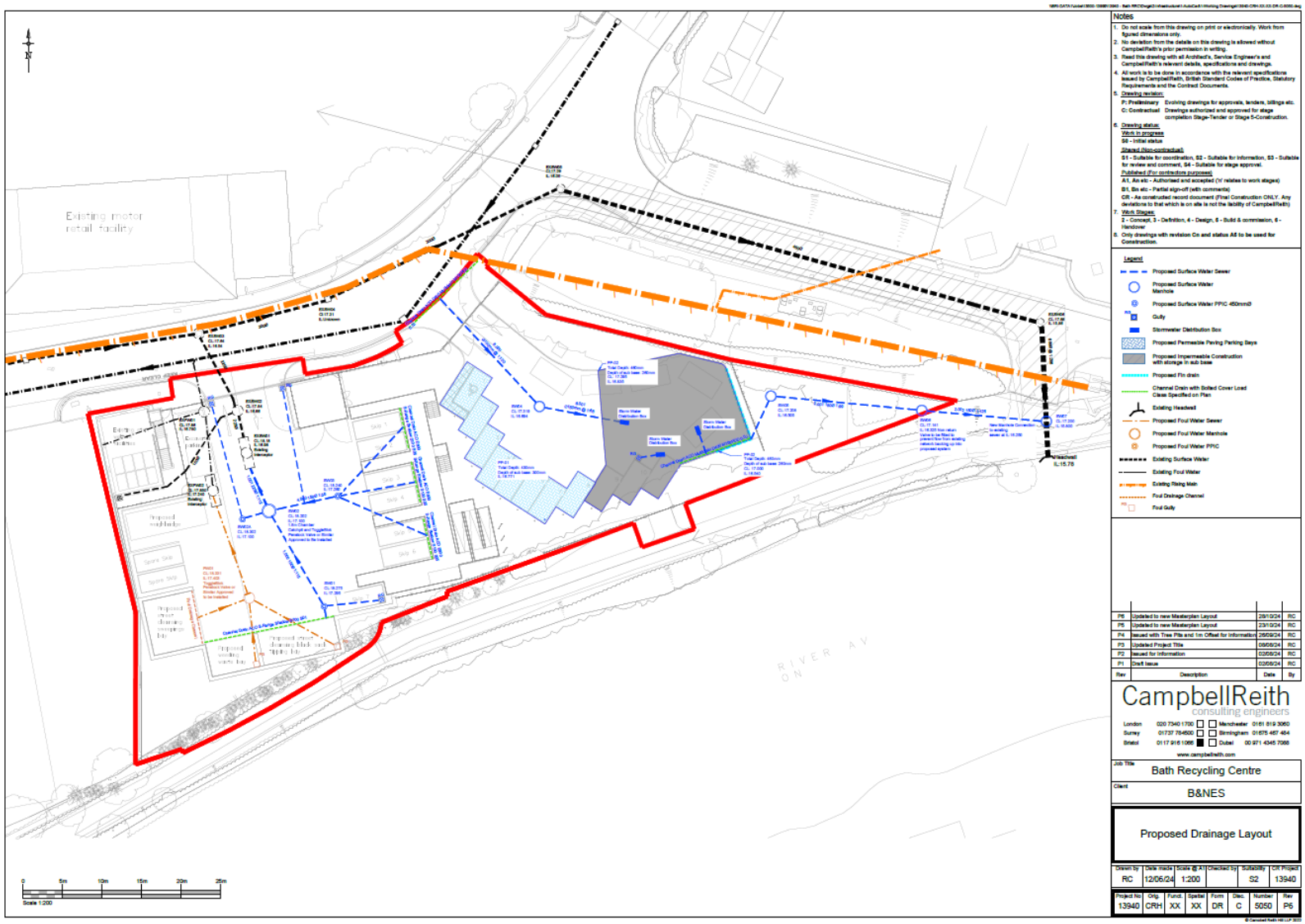

Figure 2.3 - Site Drainage Plan

3. PROPOSED ACTIVITIES

3.1 Type of Permit

B&NES are applying for a permit variation to their current permit EPR/FB3401MM to repurpose the site as a local community recycling centre (RC).

The site is currently permitted as a street cleaning depot with the allowance of accepting up to 1,500 tonnes per annum of municipal and street-sweeping waste. The proposed variation will allow the site to be open to the public, and accept up to 12,000 tonnes of municipal household waste per annum.

The proposed variation will seek to change the following features of the existing permit:

- Update the site name from *Bath Street Cleaning Depot* to *Bath Recycling Centre;*
- Increase the Installation Boundary of the site;
- Changes to site operations to allow for waste from various sources to be stored on site (i.e. waste deposited by members of the local community) among other changes;
- Increase the total quantity of waste accepted per annum to 12,000 tonnes; and
- Additional European Waste Codes (EWC) to be added. A full list of the proposed EWC codes can be seen in Error! Reference source not found..

This proposed variation does not seek to add any form of treatment or processing. The site will remain as a storage-only waste transfer station.

The proposed changes continue to meet the definition of a Waste Operation as defined by Schedule 2 of *The Environmental Permitting (England and Wales) Regulations 2016* as detailed in Table 3.1 below.

Table 3.1 - Activity Reference Table

Activity Reference	Description of Specified Activity	Limits of Specified Activity
A1 - Storage of non-hazardous waste	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced.	The maximum quantity of non hazardous waste stored at any one time will not exceed 150 tonnes All waste will be stored in either containers or designated waste bays.

The technical guidance note used in the preparation of this application document is:

- *'EPR The treatment and disposal of non hazardous waste (reference EPR 5.06)'.*
- *'Non-hazardous and inert waste: appropriate measures for permitted facilities'*

3.2 Process Description

The proposed operation of the site will include the following key processes:

- *Waste Reception*: All waste deposits must be booked in prior to arrival on site, and booking is completed by the local resident at a time available to them. Booking slots are available at 15-minute intervals. The waste will arrive on site by private vehicle, and all vehicles must be parked in one of the 15 designated parking bays on the easterly portion of the site. The car parking area will be regularly inspected for signs

of litter and cleaned as appropriate. There is micro-netting covering the perimeter fencing to prevent the escape of dropped litter offsite.

- *Waste Deposition*: Visitors to the site will transport the waste from their vehicles by hand to the waste storage containers. The waste storage containers are accessed via a raised metal platform, and waste is dropped from the platform directly into the designated containers. All containers are signposted to describe the exact waste type that can be deposited within it and site operatives are available at all times during opening hours to assist visitors in the correct location for any given waste type. These measures seek to prevent the cross-contamination of waste types and to aid in maximal segregation of waste types.

  Most waste stored on site will be stored in the seven 40-yard containers on site. These containers will hold the following wastes:

  - Residual household waste;
  - Cardboard (including items too large for kerbside collection);
  - Soft furnishings;
  - Bulky Waste;
  - Garden Waste;
  - Wood; and
  - Scrap metal and large electrical items, not including fridges, freezers, TVs or computer monitors.

  The remaining waste stored on site will include street cleansing black bags, weeding waste and street cleansing sweepings. These waste types will be collected and deposited by B&NES – there will be no public access to these waste bays. The bays sizes for each of these wastes are as follows:

  - Black bag bay – 9.9m L x 4.2m W x 2.0m H = 83.16m^3;
  - Weeding Waste bay – 6.2m L x 4.2m W x 2.0m H = 52.08m^3;
  - Street cleansing sweepings bay – 7.0m L x 6.6m W x 2.0m H = 92.40m^3.

- *Waste Transportation:* Waste is collected and transported offsite within a maximum of 72 hours for combustible wastes and up to 7 days for non-combustible waste such as metal. Waste being transported will be sheeted to prevent escape of waste material or potential fugitive emissions such as dust or odour escaping during onwards transportation. Waste collected is sent off for a variety of recovery or disposal purposes.

3.3 Raw Materials

B&NES are applying for a permit variation to their current permit EPR/FB3401MM to repurpose the site as a local community recycling centre.

The site is currently permitted as a street cleaning depot with the allowance of accepting up to 1,500 tonnes per annum of municipal and street-sweeping waste. The proposed variation will allow to site to be open to the public, and accept up to 12,000 tonnes of municipal household waste per annum.

Deliveries of wastes will be restricted to the operational capacity of the site and as dictated by the sites Fire Prevention Plan. Wastes will only be accepted if there is sufficient storage capacity within the designated areas of the site so that compliance with the FPP can be maintained.

All wastes will be accepted on site in accordance with the sites newly-proposed Environmental Management System which is provided within **Annex C – EMS Summary.**

The total quantity of wastes stored at the site will not exceed 150 tonnes at any time.

A detailed list of European Waste Catalogue (EWC) codes of wastes that are accepted by the site is provided in below.

Table 3.2 - Proposed List of EWC Codes

Waste Code	Description
02	**wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing**
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 03	plant tissue waste
02 01 04	waste plastics (except packaging)
02 01 10	waste metal
02 01 99	wastes not otherwise specified
08	**wastes from the manufacture, formulation, supply and use (MFSU) of coatings (paints, varnishes and vitreous enamels), adhesives, sealants and printing inks**
08 03	wastes from the manufacture, formulation, supply and use (MFSU) of printing inks
08 03 18	waste printing toner other than those mentioned in 08 03 17
15	**waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified**
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper & cardboard (packaging)
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 07	glass packaging
15 01 09	textile packaging
15 02	absorbents, filter materials, wiping cloths and protective clothing
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16	**wastes not otherwise specified in the list**
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 01 12	brake pads other than those mentioned in 16 01 11
16 02	wastes from electrical and electronic equipment
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 05	gases in pressure containers and discarded chemicals

16 05 05	gases in pressure containers other than those mentioned in 16 05 04
17	**construction and demolition wastes (including excavated soil from contaminated sites)**
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles & ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron & steel
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 06	insulation materials and asbestos-containing construction materials
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08	gypsum-based construction material
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
18	**wastes from human or animal health care and/or related research (except kitchen and restaurant wastes not arising from immediate health care)**
18 01	wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	sharps (except 18 01 03)
18 01 04	wastes whose collection and disposal is not subject to special requirements in order to prevent infection(for example dressings, plaster casts, linen, disposable clothing, diapers)
18 02	wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	sharps (except 18 02 02)
18 02 03	wastes whose collection and disposal is not subject to special requirements in order to prevent infection
19	**wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use**
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper & cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal

19 12 04	plastic & rubber
19 12 05	glass
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	textiles
20	**municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions**
20 01	separately collected fractions (except 15 01)
20 01 01	paper & cardboard
20 01 02	glass
20 01 08	biodegradable kitchen & canteen waste
20 01 10	clothes
20 01 11	textiles
20 01 25	edible oil & fat
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 01 41	wastes from chimney sweeping
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable wastes
20 02 02	soil and stones
20 02 03	other non-biodegradable wastes
20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 02	waste from markets
20 03 03	street-cleaning residues
20 03 07	bulky waste

3.4 Waste

There will be limited waste generated on site, with the only waste streams identified arising from office and canteen waste.

This waste will be managed accordingly, with suitable waste being placed in the relevant collection container on site (as part of the permitted activity) with any non-conforming waste arising from either of these sources being disposed of through the normal refuse collection.

3.5 Energy and Water

The site will use minimal energy and water as part of its operations, with the primary electricity usages arising from normal office operations, operation of the onsite lighting and 24/7 CCTV system. Primary water usage will arise from normal day-to-day use in the office, and operationally as part of the wash down area.

Where possible, the site will use the most resource efficient option for onsite appliance and utilities, including the installation of energy-efficient lightbulbs and eco-flush toilets.

The site will actively encourage staff to switch off appliances when not in use, turn off lights when leaving a room, and only use water when necessary. B&NES encourage responsible resource use at all times and communicate the importance of this to its staff.

4. SITE OPERATIONS

The following sections outline key site operations relevant for this permit variation application.

4.1 Environmental Management System

B&NES will operate the site in accordance with an Environmental Management System which is structured to meet the requirements of the Environmental Permitting Regulations and follows a similar structure to the ISO 14001:2015 standards for environmental management systems (EMS).

A summary of the EMS has been provided in **Annex C – EMS Summary.**

4.2 Operating Hours

The proposed operating hours of the site are as follows:

Proposed public opening hours (facilities are open to the public):

- Monday to Friday – 08:00am -16:00pm (last public slot available at 15:30-15:45);
- Saturday – 09:00am – 15:45pm (last public slot available at 15:15-15:30); and
- Sunday – 09:00am – 13:00pm (last public slot available at 12:30-12:45).

Proposed operational hours (facilities are open to operations):

- Monday to Friday – 08:00am -18:00pm;
- Saturday – 09:00am – 18:00pm; and
- Sunday – 09:00am – 13:00pm.

The site will be closed on Christmas Day, Boxing Day (open if it falls on a Monday) and New Years Day.

4.3 Operator Competency

The Deputy Head of Waste Operations will provide the technical competency required for the site (Level 4 WAMITAB qualifications as required by the WAMITAB competency scheme).

Evidence of WAMITAB certification is provided in **Annex J – Operator Competence.**

4.4 Site Operational Procedures

The site will operate under a suite of operational procedures that will always ensure the safe and efficient running of site operations. Copies of these operational procedures can be provided once available.

4.5 Site Security

Site security measures will comprise:

- A 1.8m high palisade fence which is inspected periodically to ensure that the site security has not been compromised; and
- 24/7 on site security.

4.6 Site Inspection and Maintenance

The site will be subject to a regular inspection and maintenance program to ensure the integrity of the site infrastructure remains high in order to prevent pollution to the environment. Site inspections will aim to

detect signs of degradation, damage or erosion of any of the site features, including site fencing, concrete, site buildings and waste storage containers.

This maintenance program will include, but is not exclusive to:

- Repair of boundary fences and micro-netting as required;
- Repair, or where necessary replacement, of the site's concrete hardstanding;
- Repair to any part of the site that may result in pollution to the environment or risks to human health if not repaired.

4.7 Accident and Emergencies

The following sections outline the proposed accident management procedures.

4.7.1 Accident Management Plan

B&NES has developed its own Accident Management Plan based around the specific risks associated with the site operations.

The key aspects of the site's Accident Management Plan are:

- Reviewed by Site Management annually, and as soon as practicable after an accident.
- Considers hazards presented by:
  - emergency shut-down procedures;
  - actions in case of fire;
  - actions in case of fire/emergencies;
  - contaminated firewater;
  - failure of any equipment;
  - spillages and uncontrolled releases;
  - plant or equipment failure (e.g. blocked drains);
  - vandalism; and
  - flooding.
- Identify events or failures that could damage the environment.
- Assesses the likelihood and the potential environmental consequences from accidents at the site.
- Proposes action to minimise the potential causes and consequences of accidents.

Specific emergency response procedures will be developed by the operator in conjunction with the plant manufacturer. These procedures will be completed prior to operations commencing at the site.

4.7.2 Incident Reporting

The reporting of incidents and non-conformities will form a key component of the organisation's Environmental Management System. Identified non-conformities under the system include, but are not limited to the following:

- Non-compliance to any permitted conditions or consent limit (excessive waste being stored, missing of reporting deadlines, breach of any permitted limits etc);

- Internal Audit findings (legal non-compliances, EMS procedural breaches, system non-compliances);
- External and Internal Complaints; and
- Whenever a plant malfunction, breakdown or failure, or any near miss occurs.

The company's EMS will undergo periodic external audit and review to ensure that both compliance and continuous improvement is achieved. The EMS requires that all identified incidents and non-conformities will be investigated and closed out.

4.7.3 Fire Prevention Plan

B&NES have developed a Fire Prevention Plan that complies with the requirements of the Environment Agency's Fire Prevention Plan guidance. The size and layout of the site storage has been designed to ensure that any fire on site can be brought under control within a four-hour period.

The wider site will be equipped with fire extinguishers and supplementary hoses, as well as being in close proximity to nearby fire hydrants to enable rapid response in the event of a site fire.

To ensure the containment of potentially contaminated fire water generated on site, the site plans to install a 500mm concrete wall along the eastern edge of the containers to retain all contaminated firewater. A series of sandbags will be deployed to contain within this area. Fire risk is generally low on site with the site being designed to contain enough water based on combustion of the largest waste pile (92.4m^3).

All details relating to the site fire prevention measures are detailed within **Annex D – Fire Prevention Plan**.

5. EMISSIONS

The following sections discuss the emissions to air, controlled waters, ground or land and sewer that may arise from the proposed activities:

5.1 Emissions to Air

There are no point source emissions to air arising from the proposed storage activities.

There is a potential for fugitive emissions to arise on site, in the form of dust and/or odour. Details regarding these potential emissions can be found in Section 5.5 below.

5.2 Emissions to Controlled Waters

There are no emissions to controlled waters arising from the proposed storage activities.

5.3 Emissions to Ground or Land

All storage areas are constructed on sealed hardstanding. There are no emissions to ground or land arising from the proposed storage activities.

5.4 Emissions to Sewer

There are no emissions to sewer arising from the proposed storage activities.

5.5 Dust Emissions

As highlighted above, there is considered to be the potential for dust emissions to arise during the deposition of certain waste types, however this potential is considered very low due to the relatively small quantities of waste that will be deposited by any given individual and all waste being stored in high-sided containers that minimise wind-whipping potential.

The greatest risk posed to air quality arises from an expected increase in traffic and road users in the area, although the risks posed by this activity is negligible.

A full air quality and odour emissions assessment for both the construction phase and operational phase has been conducted, and the assessment has been provided in **Annex F – Air Quality and Odour Impact Assessment**.

As part of the assessment, dispersion modelling has been carried out to assess the impact the additional traffic generated by the operational development on local air quality. The report concludes that concentrations of PM_{10} and $PM_{2.5}$ are predicted to be below the relevant objective levels at nearby receptors.

Based on the findings of this report, a dust management plan has been deemed as not required as dust does not pose a significant risk from the proposed activities. The site will still operate in accordance with Best Available Techniques and the appropriate measures guidance set out for non-hazardous waste storage.

5.6 Odour Emissions

A full air quality and odour emissions assessment for both the construction phase and operational phase has been conducted, and the assessment has been provided in **Annex F – Air Quality and Odour Impact Assessment**, as aspects of this report relate to odour emissions.

Key findings of this report, in relation to odour emissions, are summarised below:

- Baseline field surveys were undertaken on the 2nd and 8th June to assess odour by recording FIDO (Frequency, Intensity, Duration and Offensiveness) scores at test locations. The IAQM's odour guidance was followed for the test procedures.
- The wastes proposed for deposition on site have a limited potential for emissions of odour. One container is designated for general waste which may include biodegradable waste that could release odour. This container will be emptied frequently to ensure waste does not release odour.
- No baseline odour impacts were detected at nearby receptors. A slight odour was detected 50% of the time at the current site, but the site itself is not considered a receptor. The baseline survey was carried out in June when the site was still operating.
- The baseline odour assessment demonstrates that existing activity of storage of street cleansing wastes does not produce significant odour impacts beyond the site boundary.
- Odour impacts arising from the proposed operations are likely to be insignificant.

An Odour Management Plan has been produced to ensure that operational assumptions made in this report are adhered to in order to prevent odour emissions at nearby receptors which is provided within **Annex E – Odour Management Plan**.

5.7 Noise Emissions

A full noise impact assessment has been conducted by Entran Ltd and a report dated 13th August 2024 has been produced detailing the results of the assessment. This report has been provided in **Annex H – Noise Impact Assessment.**

Key findings of this report, in relation to potential noise impact, are summarised below:

- The proposed activities have been assessed to ensure compliance with the relevant design standards contained within BS 4142:2014+A1:2019. Operation of the proposed activities is assessed for the operational periods weekdays 08:00 – 18:00, Saturday 08:00 - 18:00, Sunday 09:00 – 13:00. The site activities occur within the BS 4142 daytime period and therefore calculated sound levels have been assessed over an hourly period.
- Screening is inherent to the design of the site, with the proposed skips screening properties to the north/east from sources within the operational area. In addition, the following is proposed:
  - A concrete wall is proposed to the south of the site, with a relative height of 1.6m.
  - An additional 1m height will be required at the southern boundary.
  - A barrier of at least 1.8m in height will be required at the north of the site to mitigate propagation from the operational area of the site.
- The main noise source on site relates to vehicle movements. Mitigation will include limiting of tonal reversing alarms onsite, the use of polyurethane rollers will be employed for onsite skips to reduce sound emitted from contact between the skip rollers and concrete, the screening factors outlined above.
- The report concludes that significant impacts at the nearest residential receptor is unlikely.

6. EMISSIONS MONITORING

6.1 Emissions to Air

There will be no proposed monitoring of emissions to air as part of this application.

6.2 Emissions to Controlled Waters

There will be no proposed monitoring of emissions to controlled waters as part of this application.

6.3 Emissions to Ground or Land

There will be no proposed monitoring of emissions to ground or land as part of this application.

6.4 Emissions to Sewer

There will be no proposed monitoring of emissions to sewer as part of this application.

6.5 Dust Emissions

There will be no active monitoring of dust emissions proposed as part of this application. However, on-site staff will conduct continuous monitoring of dust emissions by visual inspection means, and appropriate actions will be taken to reduce potential impacts as they arise.

All staff will be trained in visual inspections to check for signs of dust.

6.6 Odour Emissions

There will be no active monitoring of odour emissions proposed as part of this application. However, on-site staff will conduct periodic monitoring of odour emissions by olfactory surveys and the operation of vigorous complaints and reports procedures. Appropriate actions will be taken to reduce potential impacts as they arise.

All staff will be trained in olfactory surveys to detect for odour emissions at the earliest opportunity.

Details of odour monitoring can be found in **Annex E – Odour Management Plan.**

6.7 Noise Emissions

Given that the likelihood of noise impacts is unlikely, there are no proposed noise monitoring activities as part of this application.

7. IMPACTS TO THE ENVIRONMENT

7.1 Impacts to Air

There will be insignificant impacts to air as a result of this variation.

As identified, this variation may see an increase in noise and odour emissions, however these impacts are not expected to extend beyond the site boundary and are mitigated in accordance with the measures detailed within the sites Environmental Risk Assessment.

7.2 Impacts to Controlled Waters

There will be no impact to controlled waters as a result of this variation.

7.3 Impacts to Ground or Land

There will be no impacts to ground or land as a result of this variation

7.4 Impacts to Sewer

There will be no impacts to sewer as a result of this variation.