



**AN APPLICATION TO VARY ENVIRONMENTAL
PERMIT NUMBER EPR/WE9072AB FOR THE INERT
AND EXCAVATION WASTE TRANSFER STATION
OPERATED BY TARMAC TRADING LIMITED AT
HALECOMBE RECYCLING, FROME**

Report reference: TAR/HAL/EH/5792/01/AR
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Baddesley Colliery Offices, Main Road, Baxterley, Atherstone, Warwickshire, CV9 2LE
Tel. (01827) 717891

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This report has been prepared by MJCA with all reasonable skill, care and diligence, and taking account of the Services and the Terms agreed between MJCA and the Client. This report is confidential to the client and MJCA accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by MJCA beforehand. Any such party relies upon the report at their own risk.

1. Proposed changes

1.1 MJCA is commissioned by Tarmac Trading Limited (Tarmac) to prepare an application to vary Environmental Permit number EPR/WE9072AB (the permit) for the inert and excavation waste treatment facility operated by Tarmac at Halecombe Recycling, Halecombe Quarry, Limekiln Lane, Frome, BA11 3RD (the site). The permit was first issued to Tarmac on 27 July 2023 as a Standard Rules Permit (SRP) SR2009No6 – inert and excavation waste transfer station with treatment permitted to accept up to 250,000 tonnes of waste per year. The site location is shown on Figure 1 and is centred approximately at National Grid Reference (NGR) ST 70134 47309. The current permit boundary of the site is shown on the drawing at Schedule 1 of the permit and the proposed permit boundary the subject of this application is shown outlined in green on Figure 2. As the site boundary is being increased a Site Condition Report (SCR) has been prepared and is presented at Appendix A.

1.2 SR2009No6 authorises the receipt, storage and processing of up to 250,000 tonnes per annum (tpa) of inert and excavation wastes. The limits of the activities specified in SR2009No6 are treatment consisting only of manual sorting, separation, screening or crushing of waste into different components for disposal, (no more than 50 tonnes per day) or recovery. Following the completion of the Environment Agency (EA) Consultation Number 25 on SRPs, SR2009No6 was withdrawn by the EA on 18 December 2024 and consolidated into SRP SR2022No1 treatment of waste to produce soil, soil substitutes and aggregate. The EA provided letters to operators to explain the changes and published on 12 February 2025 a Regulatory Position Statement (RPS) 'Extension to comply with new standard rules permits: RPS 331' which states that if permit holders do not comply with the new Standard Rules, they must apply for a bespoke permit by 27 June 2025.

1.3 In order to determine whether the site complies with the new SR2022No1, a nature and heritage screening report was requested from the EA. The Screening Report presented at Appendix B shows that the site does not meet the Standard Rules due to the presence of a 'Watercourse - Tertiary River' within 10m of the site. For this reason, Tarmac are applying to vary the current SRP to a bespoke environmental permit. There are no proposals to vary the activities which will remain consistent with those specified in SR2009No6. The list of wastes permitted to be accepted at the site are presented in Table 1.

Content of the application

- 1.4 The application has been prepared with reference to relevant guidance provided by the EA on the gov.uk website. Parts A, C2, C3 and F1 of the Environment Agency Environmental Permit Application Forms have been completed and are presented at Appendix C. A Non-Technical Summary of the application is presented at Appendix D.
- 1.5 The application is supported by a qualitative Environmental Risk Assessment (ERA) for accidents, odour, noise and fugitive emissions presented at Appendix E. The ERA assesses the potential impacts to the surrounding environment from the activities. In the ERA it is concluded that the operation of the facility with the implemented controls has a low or very low risk of adverse impact on amenity or the surrounding environment including sites of heritage or nature conservation interest. Based on the assessment presented in the ERA it is unnecessary to provide an odour management plan with this application.
- 1.6 A dust and emissions management plan (DEMP) is presented at Appendix F. The DEMP identifies the operations at the site which may have a potential impact on air quality as a result of emissions of particulate matter, presents the details of the operational controls which are implemented to minimise emissions and describes the monitoring which will be carried out to confirm the effectiveness of the management controls.
- 1.7 Environment Agency guidance *Risk assessments for your environmental permit*¹ states that:

"The Environment Agency may ask you to submit a noise and vibration impact assessment and a noise management plan if:

- *your activity uses noisy plant or machinery, for example cooling equipment or fans*

¹ <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit> Environment Agency and Defra. Published 1 February 2016. Last updated 3 January 2025.

- *you will be doing any noisy operations, such as loading or unloading, shredding, shearing, crushing, grinding, combustion, using trommels and conveyors or moving bulk materials*
- *your activities are not contained within buildings*
- *some of your activities take place at night*
- *the area where you are planning to carry out your activity is sensitive to noise, for example rural areas may have quieter background noise levels than urban areas*
- *there are sensitive receptors close to the site, for example houses or habitats”*

1.8 As there are no receptors that are sensitive to noise within 250m of the site and based on the absence of noise complaints in respect of the current activities at the site since operations commenced in 2023, and as there are no proposals to change the current activities, it is considered unlikely that the activities will have a significant adverse environmental impact in respect of noise and therefore a quantitative noise impact assessment and noise management plan is not required. Noise mitigation measures implemented at the site include ensuring that all plant and equipment are regularly serviced and maintained to identify and address any faults or wear and tear that may result in excessive noise, use of audible reversing warning systems on mobile plant and vehicles which, whilst ensuring that they give proper warning, has a minimum noise impact, instructions to vehicle users to discourage unnecessary horn usage, revving of engines and aggressive accelerating/braking, minimising drop height of materials where possible, switching off or throttling down of plant and vehicles when not in use and maintaining vehicle routes and inspecting for potholes and repairing as necessary.

2. Additional information to support the Application Forms

Application form Part A – Appendix 1 – Date of birth information

2.1 As the Appendix states “*Only complete if you are applying for a new permit or to transfer an existing one*”, Appendix 1 has not been completed.

Application form Part A - Section 7.2 Contact for receipt of official documents

2.2 A letter of authorisation is provided with the application to authorise Lisa Sumner to receive the documentation on behalf of Tarmac Trading Limited.

Application form Part C2 – Section 3

2.3 The site will continue to be managed in accordance with an environmental management system (EMS) pursuant to Condition 1.1.1(a) of the permit using sufficient competent persons and resources pursuant to Condition 1.1.1(b) of the permit. A summary of the EMS and a copy of Tarmac’s ISO14001 accreditation is presented at Appendix G and the Certificate of Technical Competence (COTC) for the technically competent site manager is presented at Appendix H.

Application form Part C2 – Q5a – Site Condition Report

2.4 As it is proposed that the permit boundary is extended to cover an area of approximately 4.1 ha, a SCR has been prepared and is presented at Appendix A. The SCR is based on information presented in an Envirocheck Report obtained from Landmark Information Group on 3 June 2025.

Application form Part C4 – Table 3a – Technical standards

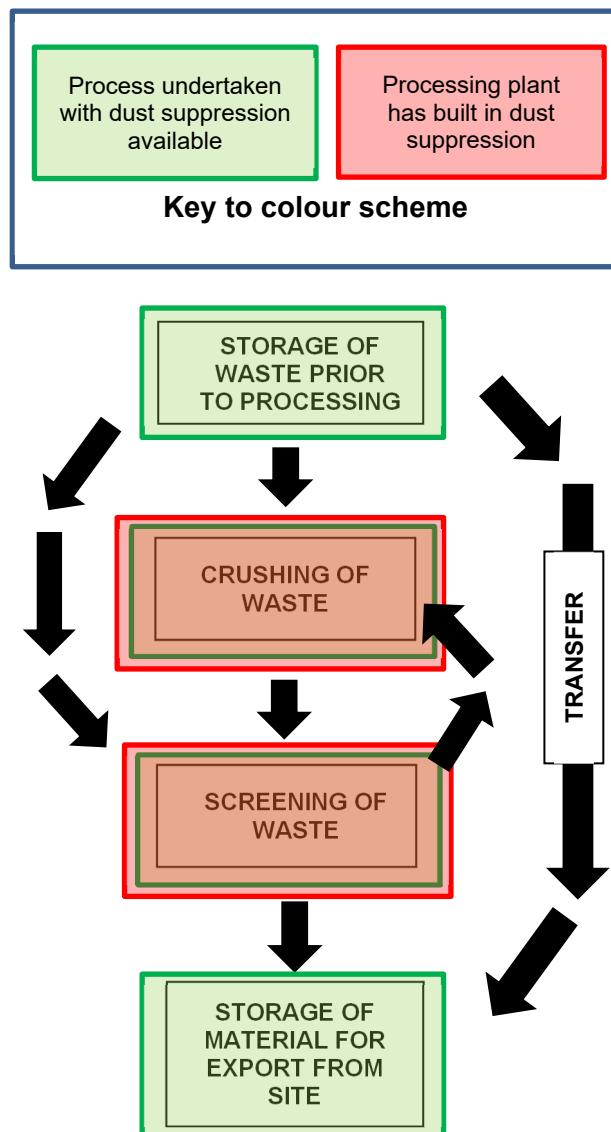
2.5 As the site comprises an inert and excavation waste transfer station with treatment, the appropriate measures which are most relevant are “*Non-hazardous and inert waste: appropriate measures for permitted facilities*²” (the appropriate measures). Section 1 of the appropriate measures (*when appropriate measures apply*) states in paragraph 1.2 (*assessing appropriate measures for your site*)

² <https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities>
Published 12 July 2021. Last updated 1 August 2023.

“Some measures in this guidance may not be suitable or relevant for your operation. Appropriate measures will depend on the:

- *activities being carried out*
- *size and nature of the activities*
- *location of the facility”*

2.6 The schematic diagram below illustrates the limited and low risk nature of the activities undertaken at the site which comprise the crushing and screening of a small range of inert and excavation wastes on a campaign basis.



2.7 As shown on Figure 2 the site is located adjacent to an operational quarry located east of the village Leigh upon Mendip. Access to the site is from the north east via the road that connects Limekiln Lane with Leigh Street. Based on the wind rose for Frome shown on Figure 2 the prevailing wind direction is from the south west hence areas to the north east are considered to be down prevailing wind direction from the site. As shown on Figure ERA1 in the ERA, there are no residential properties within 1km downwind of the site. The closest residential receptor to the site is over 300m from the site boundary.

2.8 The appropriate measures are subdivided into the following categories:

1. When appropriate measures apply
2. General management appropriate measures
3. Waste pre-acceptance, acceptance and tracking
4. Waste storage
5. Waste treatment
6. Emissions control
7. Emissions monitoring and limits
8. Process efficiency appropriate measures
9. Waste minimisation, recovery and disposal

2.9 Further details relevant to Section 6 - emissions control are presented in the ERA and in the DEMP provided with this application. Section 6.1 of the appropriate measures refers to enclosure within buildings and states the following:

1. *Enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution*
2. *If your waste treatment activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you must*

carry out that waste treatment activity within an enclosed building.

3. *You must also carry out non-treatment activities, such as storing and transferring waste (including loading and unloading) in enclosed buildings if these activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures. [Our emphasis]*

2.10 Taking into consideration the guidance in relation to when appropriate measures apply which specifies that the appropriate measures will depend on the activities being carried out, the size and simple nature of the activities and the location of the facility, the absence of any noise or dust complaints for the currently permitted activities since the permit was issued, the fact that there are no proposals to change the currently permitted activities and the conclusions of the ERA it is considered that it is unnecessary to enclose the waste treatment activities within a building as there is a very low risk that the activities are likely to cause significant pollution to sensitive receptors. The control measures in respect of dust are specified in the DEMP. The control measures in respect of noise are described in the ERA and in paragraph 1.8 above.

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APPENDIX F

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APPENDIX G

ENVIRONMENTAL MANAGEMENT SYSTEM SUMMARY

APPENDIX H

TECHNICAL COMPETENCE CERTIFICATES