

DOCUMENT 1

NON-TECHNICAL SUMMARY OF BESPOKE INSTALLATION PERMIT APPLICATION

ROADWAYS WOODSIDE DEPOT



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EXECUTIVE SUMMARY

Hailsham Roadway Construction Co Ltd (Roadways) is applying for a bespoke installation permit. This application is for the physical treatment, storage and transfer of non-hazardous and hazardous waste under the Environmental Permitting Regulations 2016. Pre-application advice was sought and received under reference number EPR/ZP3992EW.

Roadways is both the applicant and operator of the waste recycling facility located at Woodside Depot, Polegate Road, Hailsham, East Sussex, BN27 3PG. The site is centrally located within the County of East Sussex, adjacent to the A22 dual carriageway between Hailsham and Polegate. The site has operated as a highways depot for over 40 years and has been a permitted waste facility since 2011, when Standard Rules Permit SRN2008 No3 (ref. EPR/ZP/3992EW) was granted. The bespoke installation permit, when issued, will replace the current standard rules permit.

Roadways is a well-established civil engineering, asphalt surfacing and highways maintenance contractor. It has integrated contracting, concrete and cold asphalt production, aggregate sales, waste management and recycling operations. On the contracting side the company works both as a lead contractor and appointed sub-contractor. Key clients include Highways England, East Sussex County Council, West Sussex County Council, and Southampton City Council via Balfour Beatty and Costain.

Despite minimisation efforts, Roadways generates waste, including asphalt waste containing coal tar (AWCCT), principally from its own asphalt surfacing and civil engineering contracting operations across the south east of England. Roadways also accept waste from suitable third parties.

Woodside Depot offers a unique full-service facility for the local circular economy with the re-use, recycling, supply and production of construction materials. Highways and construction waste can be deposited for later re-use or recycling and at the same time already recycled materials, concrete or primary aggregates can be collected. Woodside Depot provides an excellent example of a site with several co-located activities vertically integrated to manage waste and produce products from soil to concrete. This delivers sustainability in materials management through encouraging re-use, recycling, reducing road transportation, reducing waste sent to landfill, and improving economic productivity.

The site is located centrally in an area that sees active housebuilding at present - around Stones Cross, Polegate, Horam, Hailsham, Heathfield and Uckfield. The draft Wealden Local Plan (2019) identifies a need for 14,228 new dwellings in the district in the period 2013 to 2028 (and this figure is likely to be revised upwards following the finding (January 2020) by an appointed Planning Inspector that the draft Local Plan cannot be taken forward to adoption in its current form).

In addition to an increase in local housebuilding the Transport Strategy for the South East (2019) and the East Sussex Growth Strategy (2014) both set out significant investment in infrastructure within the region to support and deliver economic growth. Live projects such as the Highways England A27 East of Lewes Improvement Works and planned work on the A22 all support the need to expand Woodside Depot to enable more waste materials to be reused and recycled in very close proximity to these schemes.

The Woodside Depot is identified in Policy SP4 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Site Plan (adopted February 2017) as a site *“where an existing waste management treatment activity has a vacant adjoining site that is capable, in principle, of also supporting waste treatment”*. Planning permission was granted in December 2020 for *‘Reconfiguration of site layout including: extension to yard; installation of vertical silo; installation of weighbridge; erection of storage building; operation of concrete crusher; new lighting scheme; new drainage infrastructure; full conversion of Brownings to HMO accommodation.’*

Roadways is a modern, innovative, ethically and environmentally focused business in the 'SME' category. It makes a significant contribution to the regional circular economy and the drive for 'carbon net zero'. The main materials Roadways produces to achieve this are set out below:

- Low carbon hydraulically bound subbase materials (HBM)
 - Uses 100% recycled aggregates
 - 100% cement-free binder with a significantly lower carbon footprint
 - Allows roads to be built /rebuilt equally strongly but with shallower foundations than traditional construction. This saves carbon emissions from the construction plant involved in the excavation activity. It also generates less waste soil that is usually landfilled.
 - Hot asphalt can be designed out from the surface layers (reduced layer thickness) giving further savings in embedded CO₂.
- Recycled cold asphalt
 - This material uses 100% recycled aggregate
 - Saves 40% CO₂ compared to traditional hot material
- High quality 100% recycled Type 1
 - Saves material being quarried or dredged from the sea
 - Locally produced, saving on CO₂ emissions from road and rail transport as there are no suitable quarries in East Sussex
- Fresh concrete
 - Using a percentage of recycled aggregates rather than marine aggregate that is dredged from the sea
 - Plans to use low-carbon cement replacement binders
 - Promoting awareness of concrete's very high carbon footprint
 - Encouraging minimisation of concrete use through innovation and good design, for example, by using piled rather than strip foundations

Changes to Roadways' current permit are needed to deliver a range of improvements and generate further operational, safety, environmental and economic efficiencies. The planned improvements include:

- Reconfiguration of the site layout to provide clearer segregation between contracting and waste operations
- Drainage improvements
- Increase to the permitted area to provide additional storage and processing capacity.

A bespoke Installation Permit is needed because asphalt waste containing coal tar (AWCCT) and other hazardous waste codes are in need of management at the site:

- There is not currently any facility permitted in East Sussex for the treatment of AWCCT. Waste must therefore be transported long distances for treatment. This adds to the cost and environmental impact due to the CO₂ emitted from road transport.
- The cost to highways authorities of treating AWCCT in East Sussex is currently high compared to national averages. As a result many public roads that are in desperate need of structural repair are simply treated with short-term temporary solutions to avoid creating AWCCT. This is not a good use of taxpayers' money over the medium to long term.
- Storage and treatment of AWCCT needs to continue at Woodside Depot. Roadways has experience in cold mix coating of AWCCT with bitumen emulsion and cementitious binders to produce cold asphalt and hydraulically bound material (HBM) to full highways specifications. This has taken place firstly under a local EA trial arrangement and then under the terms of RPS 157. RPS 157 Feb 2020 states: "where asphalt is lifted, treated and then re-used at the site where it was lifted it is not waste. It does not matter if the treatment takes place at that site or somewhere else."

- Roadways seeks to store other hazardous wastes using the secure facilities and drainage in place for AWCCT. These other hazardous wastes will be transferred to suitably permitted facilities elsewhere for treatment. These wastes will principally comprise arisings from highways maintenance and other construction activities.
- A number of drainage improvements are proposed. These include extended sealed drainage with underground storage of waste water for removal by tanker off site. A number of sustainable drainage systems (SuDS for short) are proposed, such as a swale, balancing pond, water filtration and further attenuation measures.
- Roadways seeks to increase the depot area available for waste management to match the planning permission granted by East Sussex County Council in December 2020.
 - This increase in the area to be covered by the permit is required in order to operate the site more safely and efficiently.
 - Crucially it will provide clearer segregation between waste activities, highways contracting operations and staff parking.
 - The permitted area will increase from 0.81Ha to 1.73Ha in an overall site of 2.65Ha.
 - No increase to the annual limit of waste processed is sought.
- To be able to produce HBM and cold asphalt straight from waste. Currently they are produced from end-of-waste (post WRAP protocol) recycled Type 1 and Type 4.
- To use the recycling batching plant (cold mix plant) on site to turn non-hazardous wastes including clay, normally sent to landfill, into a useful construction aggregate. This happens through a process known as soil stabilisation. This involves altering the properties of soil by forced action mixing with materials such as lime, cement and recycled low carbon binders like blast furnace slag (GGBS). As a result the clay's strength, durability, compressibility, hydraulic conductivity, and swelling potential are all improved to levels acceptable for re-use in construction as an aggregate. This would save a lot of clay being sent to landfill and a lot of primary aggregate being imported from quarries outside of the county. This treated material can be used as an alternative to crushed concrete. This in turn would free up supplies of crushed concrete which are in short supply locally to be used higher up the value chain in products such as fresh concrete and asphalt. This will reduce CO₂ emissions and the consumption of primary aggregates from quarrying or dredging. This is an established industry process with high quality end products meeting several highways specifications.

ABOUT THE OPERATOR

Since 2015 Roadways has been owned and managed by directors who previously held senior positions at FTSE100 companies. Since then turnover has increased significantly and 30 highly skilled permanent jobs have been created for local people. Major investments have been made in the last five years to achieve ISO9001 (quality management), ISO14001 (environmental management), ISO45001 (health & safety management) and Constructionline Gold status. Some other highlights from the last five years:

People

- Roadways has invested more than £300,000 in staff training and development and will continue to invest at least 5% of wages per year.
- Seven apprentices have been employed by Roadways with a further recruitment round underway.
- Roadways is addressing the gender balance in construction - with women now making up 50% of office-based staff.
- Roadways has trained in-house mental health first aiders.

Community

- Roadways has become an active East Sussex County Council Enterprise Advisor for local schools.
- Roadways is part of the East Sussex County Council Construction Task Group - leading on curriculum development.
- Roadways partners with Little Gate, a local charity, to provide office-based work experience for young people with autism.
- Roadways' Chief Executive is a mentor to unemployed young people in Southampton.

Sustainability

- 97% of all waste generated by Roadways is recycled.
- Roadways have developed new recycled products and materials that save up to 40% CO₂.
- Roadways invests in research, development and innovation to improve the environmental impact of construction, improve safety and productivity, and reduce costs for clients.

Awards

- Employer of the Year 2019, Women in Business Awards
- Large Business of the Year 2019, Business Excellence Awards
- Overall Business of the Year 2019, Business Excellence Awards
- Investor in People, Little Gate Farm
- Shortlisted for SME Business of the Year, Sussex Business Awards 2019

Roadways is committed to maintaining a positive relationship with the local EA and all other regulatory bodies. No specific complaints have been received from these bodies or neighbours in the last 5 years. One non-specific complaint about noise and dust was made to the EA during the recent planning process. As a result a neighbourhood engagement group was set up by Roadways. Neighbours were given a tour of the site and quarterly meetings are held to keep them up to date and answer any questions. No further complaints have been received.

SUMMARY OF CURRENT AND PROPOSED ACTIVITIES

The table below outlines Roadways' current activities and how it is proposed they evolve under the new Permit.

Activity	Incoming wastes of principle relevance	Current finished products / outgoing wastes	Current regulatory framework allowing this activity	Future finished products / outgoing wastes with new permit	Future regulatory framework allowing this proposed activity
Storage and transfer of non-hazardous wastes	Concrete, bricks, tiles and ceramics. Bituminous mixtures, soil and stones.	Not applicable as storage and transfer only	Environment Agency Standard Rules Permit (SR2008 No3 75kte).	No change. Storage and transfer only on some occasions.	Bespoke installation permit
Treatment of non-hazardous wastes	Concrete, bricks, tiles and ceramics. Bituminous mixtures, soil and stones.	Type 1 and Type 4 unbound mixtures for subbase. Within the Specification for Highway Works Series 800 Road Pavements.	Environment Agency Standard Rules Permit (SR2008 No3 75kte). Local Authority installation permit. Covers screening and batching equipment on site. Local Authority mobile plant permits cover visiting crushing plant.	Capping and fill materials. Within the Specification for Highway Works Series 600 earthworks. Type 1 and Type 4 unbound mixtures for subbase. Within the Specification for Highway Works Series 800 Road Pavements. Hydraulically bound mixtures. Within the Specification for Highway Works Series 800 Road Pavements. Cold asphalt (clause 948, ex-situ cold recycled bound material, within the Specification for Highways Works Series 900). Road Pavements - Bituminous Bound Materials.	Bespoke installation permit. Local Authority installation permit. Covers screening and batching equipment on site. Local Authority mobile plant permits cover visiting crushing plant.
Storage of hazardous waste	Bituminous mixtures containing coal tar.	Storage in secure third party locations.	S2 waste exemption: storing waste in a secure place.	Storage in secure third party locations pending transport to Roadways central site with bespoke installation permit. Storage at Roadways site pending treatment as outlined below.	S2 waste exemption: storing waste in a secure place. Bespoke installation permit.

Activity	Incoming wastes of principle relevance	Current finished products / outgoing wastes	Regulatory framework allowing this current activity	Future finished products / outgoing wastes with new permit	Future regulatory framework allowing this proposed activity
Storage and transfer of hazardous wastes	Concrete, bricks, tiles, ceramics Soil and stones Other construction wastes All the above containing dangerous substances	Not applicable currently	N/A	N/A. Transfer only to suitable permitted third parties	Bespoke installation permit
Treatment of hazardous waste	Bituminous mixtures containing coal tar.	Clause 948, ex-situ cold recycled bound material, within the Specification for Highways Works Series 900. Clauses 810 to 880 for cement and other hydraulically bound mixtures within the Specification for Highway Works Series 800.	Environment Agency RPS 157: Storing and treating asphalt waste. Environment Agency RPS 075: The movement and use of treated asphalt waste containing coal tar. Local Authority installation permit. Covers screening and batching equipment on site. Local Authority mobile plant permits cover visiting crushing plant.	No change : Clause 948, ex-situ cold recycled bound material, within the Specification for Highways Works Series 900. Clauses 810 to 880 for cement and other hydraulically bound mixtures within the Specification for Highway Works Series 800.	Bespoke installation permit. Environment Agency RPS 075: The movement and use of treated asphalt waste containing coal tar Local Authority installation permit. Covers screening and batching equipment on site. Local Authority mobile plant permits cover visiting crushing plant.

The proposal above includes the treatment and storage of hazardous wastes. These activities fall under the following sections of the environmental permitting regulations (EPR):

- Schedule 1 Part 2 Section 5.3 (a) (vi) - Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving...recycling or reclamation of inorganic materials other than metals or metal compounds.
- Schedule 1 Part 2 Section 5.6 - Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2. 5.3.

Other non-hazardous recycling operations undertaken at Woodside Depot comprise a 'waste operation' and are currently regulated by a Standard Rules Permit (EPR/ZP3992EW). The Standard Rules Permit would be replaced by the Installation Permit with the non-hazardous recycling operations forming an associated activity.

SUMMARY OF WASTE CODES TO BE ADDED TO THE PERMIT

Incoming waste streams				Description of materials to be produced						
				Specification for Highway Works Series 600 Earthworks		Specification for Highway Works Series 800 Road Pavements		Specification for Highway Works Series 900 Road Pavements		
				Capping and fill materials		Unbound mixtures for subbase	Hydraulically bound mixtures	Bituminous bound materials. Ex situ cold recycled bound material		
EWC code	Description	Store	X-fer	Class 4 fill	2C General fill	Capping unbound or with hydraulic binders	Type 1	Type 4	HBM	Cl. 948
10 01 02	Coal fly ash	x	x			x			x	x
17 01 06*	Mixtures of, or separate fractions of concrete, bricks, tiles and ceramics containing dangerous substances	x	x							
17 03 01*	Bituminous mixtures containing coal tar	x	x						x	x
17 03 03*	Coal tar and tarred products	x	x							
17 05 03*	Soil and stones containing dangerous substances	x	x							
17 09 03*	Other construction and demolition wastes (including mixed wastes) containing dangerous substances	x	x							
19 01 14	Fly ash other than those mentioned in 19 01 13	x	x			x			x	x
19 08 02	Waste from desanding	x	x	x	x	x	x		x	x
19 08 99	Wastes not otherwise specified	x	x	x	x	x	x		x	x

Production of the end products above are always subject to meeting the WRAP quality protocol and technical standards of the individual materials. The above table is reproduced in Appendix 9 along with notes. Appendix 10 lists the waste codes to be added to the permit.

Materials achieving the highways specification end products in the table above via WRAP-compliant quality protocols will achieve 'end of waste' status. Any materials containing AWCCT or other hazardous waste will not achieve 'end of waste' status and will only be used in accordance with RPS 075 if applicable.

EXTENSION OF PERMIT BOUNDARY AREA

Figure 1 below shows the areas of the current and proposed permit areas.



Application Boundary Plan
1:1250 Scale

— Permit Application Boundary
— Existing Permit Boundary

ANNUAL WASTE THROUGHPUT

The maximum quantity of waste currently accepted at the site under the standard rules permit is up to 75,000 tonnes per annum. This application is not seeking any increase in throughput. In the future it is expected that non-hazardous waste will account for up to 40,000 tonnes and hazardous waste 30,000 tonnes per annum.

SITE LOCATION

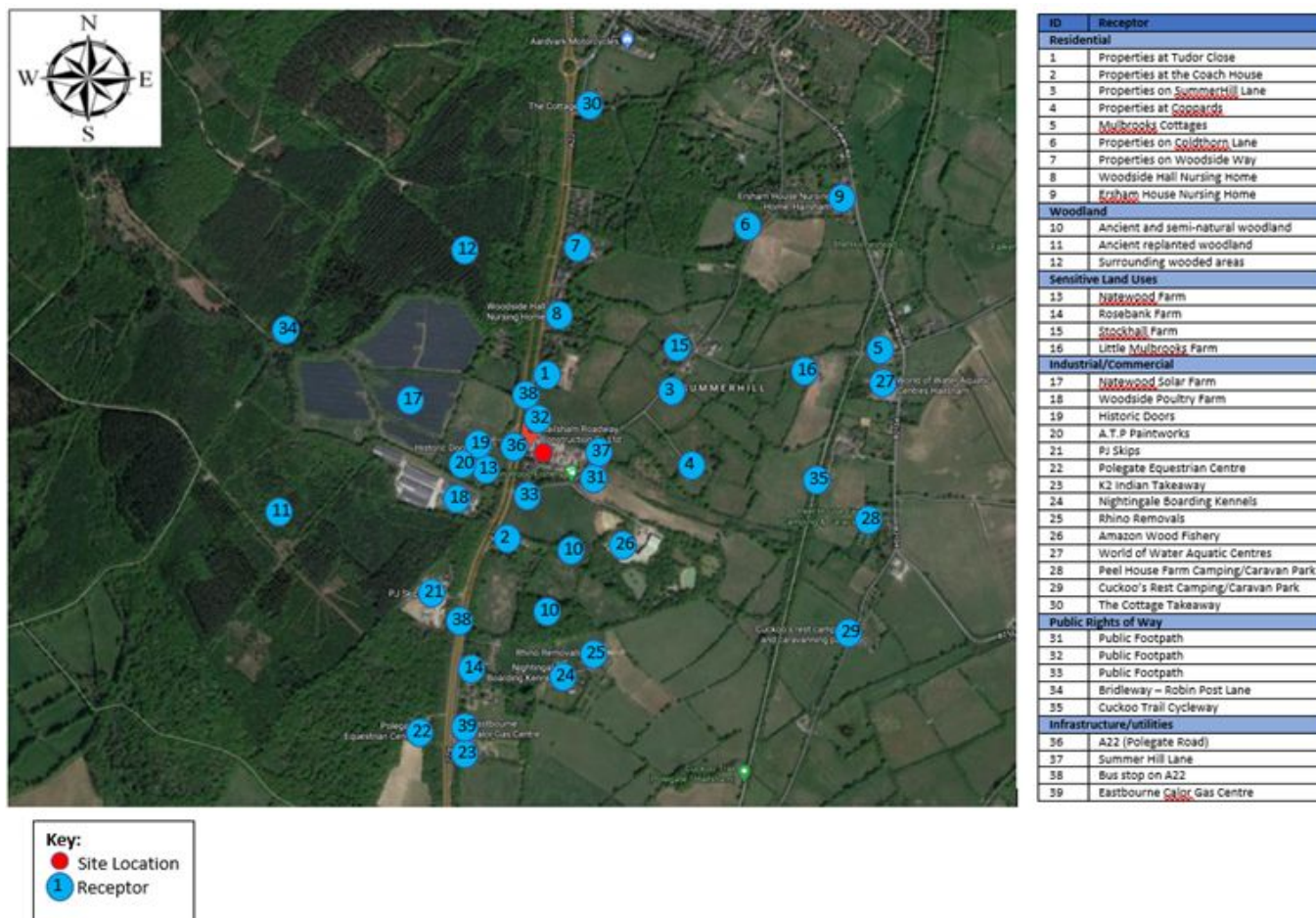
The site is located on Polegate Road, Hailsham, BN27 3PG with the site entrance off the A22 (Figure 2). The national grid reference for the site is TQ 57973 07199. The area surrounding the site is predominantly agricultural, with some industrial and commercial premises, and a small number of residential properties within 1km of the site, reflecting its rural setting.

Figure 2 – Site Location Plan



ENVIRONMENTAL SETTING

Figure 3 below, the Sensitive Receptor Plan, shows all the identified receptors within 1km of the site.



The nearest residential properties are situated approximately 150m to the south-west and 250m north west on the opposite side of the A22. There are also properties 175m to the north, 200m to the south and 300m to the east of the site (the latter including two listed buildings at Coppards). Five houses are located north east of the site at the junction of Summerhill Lane and Coldthorn Lane.

The site is surrounded by a number of mixed commercial units, including ATP Paintworks, Haulaway Waste Transfer Station, Woodside Poultry Farm, Historic Doors, PJ Skips and Rhino Removals.

There are no schools or nurseries located within 1km of the site. There are no hospitals located within 1km of the site, but there are two nursing homes: Woodside Hall Nursing Home, located 352m to the north, and Ersham House Nursing Home, located 1km to the north east of the site.

The site is not within a Groundwater Source Protection Zone and is within flood zone 1 (land at the lowest probability of flooding). The underlying geology is slowly permeable, seasonally wet, slightly acid but base-rich loamy and clay soils with impeded drainage.

The site is not located within an Air Quality Management Area.

APPLICATION SITE CONDITION REPORT

A site condition report has been submitted as part of this Environmental Permit application. This presents a conceptual site model based upon the information available from a Groundsure report for the site and a targeted site investigation.

The site condition report identifies a number of potential source-pathway-receptor linkages but based upon the information available, including the results of the site investigation, the H1 Environmental Risk Assessment and management measures to be employed on site conclude that there is no significant risk to any identified receptor.

OPERATING TECHNIQUES

A detailed operating techniques document is used on site to manage daily operations. The operating techniques document is included with this application. It covers the full scope of activities proposed under the bespoke installation permit. To summarise:

Waste identification and classification

Waste is classified based on the Environment Agency's guidance on the classification and assessment of waste Technical Guidance WM3.

Waste acceptance and rejection

Waste is considered in advance of arrival and once on site against WM3 criteria and with consideration to the waste types Roadways are permitted to accept. Based on this it will be handled in the following ways:

- Accepted
- Rejected
- Quarantined safely for further testing

A weigh bridge will be installed to improve measurement of quantities. Checks are made to ensure third parties are licenced waste carriers.

Non hazardous waste

Aggregates and soils from highway and other construction excavations will be brought back to the depot and segregated into designated storage bays or demarcated areas. Waste streams will be forwarded to permitted third party recyclers or recycled at Woodside Depot.

Recyclable aggregates and soils are crushed or screened using mobile crushing plant.

Hazardous waste excluding AWCCT

This will be stockpiled with excavators and loading shovels. It will then be securely stored pending transfer to suitably permitted disposal or recycling facilities.

Asphalt Waste Containing Coal Tar (AWCCT)

This will be stockpiled with excavators and loading shovels. The material will be crushed or screened and then encapsulated with cold bitumen emulsion or cementitious binders using the forced action mixer on site. This is a computer-controlled plant where encapsulation takes place in an enclosed mixer with added water to minimise dust and noise emissions.

End products

Where waste is not simply transferred treatment results in finished materials that meet specified highways standard products. They are produced inline with stringent quality protocols. A testing regime is established for each of the materials produced.

Daily checks and records

A schedule of inspections and checks are in place with records kept and any improvement actions implemented. Roadways has British Standards Institute (BSI) qualified internal auditors based on site.

All waste movements in, out and involving processing are recorded.

SITE MANAGEMENT

A Technically Competent Manager (TCM) is on site full time as well as one of a number of Nominated Competent Persons (NCP). NCPs are responsible for daily operations. An external technically qualified manager is also available to provide holiday and other cover when needed.

The H1 Environmental Risk Assessment (Appendix 1) submitted as part of this application will be kept under review to identify any new risks and opportunities at the site arising from the variation. Additional control measures will be implemented to prevent or reduce additional risks.

Operational procedures will be amended to take account of changes to waste processing procedures and storage areas, as well as any changes to relevant legislation.

All relevant employees will receive environmental training that incorporates the new site activities and waste streams accepted onsite.

As identified in the H1 Environmental Risk Assessment carried out as part of the permit variation, the Operating Techniques will be followed and specific management plans for noise and dust have been created and implemented as part of the EMS. These management plans account for the new activities to be undertaken on site.

ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

Roadways already operate to the ISO 14001, 9001 and 45001 standards. It has an EMS that is audited by BSI to demonstrate ISO 14001 standards (the most recent audit was completed in January 2021). This covers all of Roadways' operations including waste management. A summary and extracts from the EMS are included in the Operating Techniques report. The full EMS would be updated to incorporate all the proposed activities once they have been approved by the Environment Agency through the issue of the Installation Permit.

COMPLIANCE WITH BEST AVAILABLE TECHNIQUES (BAT)

A Best Available Techniques (BAT) assessment has been undertaken with reference to the Best Available Techniques: environmental permits guidance on gov.uk and Best Available Techniques (BAT) Reference Document for Waste Treatment (2018) as published by the European Commission.

The BAT assessment cross-references the measures to be employed by Roadways in the acceptance and management of hazardous waste streams (as detailed in the Operating Techniques report) with the relevant BAT conclusions for Waste Treatment activities specified in Annex I to Directive 2010/75/EU.

DRAINAGE

A new drainage system (as approved under planning permission WD/843/CM December 2020) would be installed at Woodside Depot to ensure that the waste management operations subject to the Installation Permit do not impact upon water quality or flow rate at the site discharge point.

A plan of the drainage system is presented in Document 4. This shows that there would be a clear separation of drainage from hazardous and non-hazardous operations.

- All waste shall be stored and treated on impermeable ground with sealed drainage
- All hazardous waste will be stored inside or on a concrete pad with sealed drainage leading to a 70,000 litre storage tank. Water from this tank will be tankered off-site by a specialist haulier for onward treatment at suitably permitted facility.
- In the event the concrete pad is unused or utilised for non-hazardous waste storage and treatment (and there are no hazardous wastes present) then the drainage pipe can be diverted to the main surface water drainage system.
- The surface water drainage system for the non-hazardous activities would operate as follows:
 - Surface water would be captured by a series of catchpits and gullies and pass through an interceptor (Downstream Defender) system before being held in a series of geo-cellular crates, swales and a pond.
 - The Downstream Defender will also remove all suspended solids >50 microns.
 - From the pond the surface water would pass through a complex flow-control device before being discharged from the site to highways drainage infrastructure on Summerhill Lane on the southern boundary of the site.
 - From the highways drainage channel the water would form part of a combined flow which discharges to an overland ditch.
 - A separate discharge consent has been applied for from the Pevensey Levels Board.
 - The discharge point is long-established with the site's use as a highways depot dating back over 40 years. The Environment Agency is aware of the current drainage arrangements, which rely on this discharge point, through the operation of the existing Standard Rules Permit. The upgraded drainage system to support the Installation Permit activities has been approved by the Lead Local Flood Authority (LLFA) (incorporating the Pevensey Levels Board and East Sussex CC) as part of the granting of planning permission WD/843/CM.
 - The pond and swale would allow Roadways to extract and re-use water on site for concrete, HBM and asphalt production and for damping down roads and stockpiles.
- This twin storm drainage system approach (haz and non haz) was informed by the EA pre-application advice.
- The new drainage system includes a new foul water treatment package to ensure that foul waste from Offices, the adjacent Brownings house and site welfare facilities is appropriately managed before discharge from site.

FIRE PREVENTION

No combustible waste types are being proposed for acceptance into the permitted area. Measures outlined in the H1 Accident Management Plan will be applied to mitigate the chance of fire. This precaution negates the necessity for a fire prevention plan.

Some combustible wastes (general rubbish and office mixed recycling) generated by Roadways - and not by third parties - will be stored outside of the permitted site in the neighbouring contractors area under S1 and S2 exemptions. These small amounts of incidental combustible wastes will be stored in covered concrete bays or metal skips.

NOISE

The noise-generating activities of screening and batching would only be undertaken between the hours of 07:00 to 18:00 Monday to Friday and 07:30 to 12:30 on Saturday (and crushing would only take place between 08:00 and 18:00 Monday to Friday and 08:00 to 12:30 on Saturday). The site operates on a 24-hour basis to service highways maintenance contracts. Planning permission WD/843/CM states:

- *The operational noise rating level determined at the noise sensitive receptors identified in the 24 Acoustics report, dated 27 August 2020 (ref. R7412-2 Rev 2), shall not exceed +5 dBA above the background noise level at any time during the day (i.e. between the hours of 07.00 - 18.00), as determined in accordance with BS 4142:2014 +A1:2019.*

In addition (for the allowance of batching operations in the night-time period) it also states that:

- *The operational noise rating level determined at the noise sensitive receptors identified in the 24 Acoustics report, dated 27 August 2020 (ref. R7412-2 Rev 2), shall not exceed the background level at any time during the night (i.e. between the hours of 18.00 - 07.00), as measured in accordance with BS 4142:2014 +A1: 2019 except for up to 36 times per calendar year when the operational noise rating level determined at the identified noise sensitive receptors shall not exceed +5 dBA above the background noise level at any time during the night (i.e. between the hours of 18:00 – 07:00), as measured in accordance with BS 4142:2014 +A1: 2019.*

The site would be operated in accordance with a Noise Management Plan (as presented in Appendix X to the Operating Techniques report). Measures set out in this report include:

- All plant and machinery will have effective silencers where practicable and will be maintained in accordance with the manufacturer's requirements to minimise the risk of mechanical failure which could result in increased noise emissions.
- The loading/unloading of wastes will be undertaken in a controlled manner to keep noise/vibration to a minimum. Vehicles will be directed by site operatives to minimise the drop height when depositing loads at the site.
- All noise and vibration generating activity will be monitored closely and site operatives will be vigilant and report any excessive noise or vibration issues to the Site Manager.
- Boundary bunds will be maintained and, together with stockpiling adjacent to operational crushing areas, will act as a physical barrier to noise. Roadways will also install and maintain acoustic screening (with a minimum surface density of 12 kg/m² and height of 1.8 m) around the east side of the HBM batching plant.

In addition, the Noise Management Plan provides details of the monitoring and investigation procedures that would be followed in the event a noise complaint is received.

MANAGEMENT OF DUST

The site would be operated in accordance with a Dust Management Plan (as presented in Appendix 5). This management plan and its related impact assessment were approved by the Environmental Health Officer in the determination of planning permission WD/843/CM.

The measures to be employed on site to prevent and control dust associated with the movement of HGVs and other vehicles around the site include the following:

- Wastes being delivered to the site will be covered or sheeted to prevent the generation of dust while the waste is in transit.
- Vehicle speeds will be limited onsite to 5 mph to prevent re-suspension and movement of dust.
- The site has been designed so that vehicles do not come into contact with mud. The yard surfacing comprises tarmac and concrete. All these surfaces will be kept clean to prevent the accumulation of dust or mud that could be tracked by vehicle's wheels. The cleaning of these surfaces will utilise a water bowser to damp down and/or a road sweeper depending on conditions.
- Automatic sprinklers will be used to wet down road areas and stockpiles.
- A mist cannon will be used when crushing in dry conditions.
- All vehicles will be inspected before departure. The site has a jet wash facility in the event of a vehicle needing cleaning before leaving the site.
- The established boundary vegetation, including vegetated bunds, would act as a screen to prevent any airborne dust escaping from the site boundary.

The Site Manager will also undertake a daily visual assessment of dust including looking at all site surfaces to make sure they are well maintained and free from accumulated dust. Site operatives are trained to be vigilant and report any problems to the Site Manager.

The Dust Management Plan also details the monitoring and investigation procedures that would be followed in the event a dust complaint is received.

ODOUR

The proposed permitted waste types to be stored and processed onsite are not putrescible and so have a low odour potential. There will be strict waste acceptance procedures in place to minimise the risk of non-compliant wastes being accepted. Details of the waste acceptance procedures are provided in the Operating Techniques report.

All site operatives will be vigilant regarding identifying non-compliant wastes. Any non-conformances or odour issues will be reported to the Site Manager.

AIR EMISSIONS

There would be a single point source emission related to air quality from a diesel generator. The short and long term emission impacts of this plant have been considered in an H1 Air Quality Screening Assessment.

SUMMARY OF KEY RISKS FROM H1

The H1 Environmental Risk Assessment (ERA) identified any potential source-pathway-receptor linkages associated with the proposed activities. The potential hazards resulting from the activities to be undertaken at Woodside Depot have been identified as:

- Noise and vibration (from HGV loading and unloading and waste processing, and HGV movements on site)
- Dust emissions (from dust generated by HGV movements, unloading and loading of materials, waste processing and waste storage)
- Water (from surface water run-off in contact with waste materials)

The H1 ERA identified potential pathways for these sources of impact associated with the sensitive receptors identified in the Environmental Setting section (above). The ERA also considered the management of these potential impacts in light of the measures described in the Noise Management Plan and Dust Management Plan and the drainage scheme and waste acceptance procedures (as detailed in the Operating Techniques report). The ERA concluded that none of these potential sources of impact result in a significant or unacceptable impact upon any of the identified receptors.

MONITORING

Noise - There is a requirement under condition 6 of planning permission WD/843/CM (as granted by East Sussex CC in December 2020) to undertake a noise monitoring exercise once the site has become fully operational. This would monitor noise levels at six receptors (residential properties) in closest proximity to the site to ensure the noise mitigation measures are effective in ensuring compliance with conditions 4 and 5 which set maximum noise levels for day-time and night-time operations. The ESCC planning decision notice including conditions is attached at Appendix

Air - There would be a single point source emission related to air quality from the part time operation of a diesel generator. The short and long term emission impact of this plant have been considered in an H1 Air Quality Screening Assessment. This concludes that no formal monitoring of air quality is required.

Groundwater - There is no direct discharge to groundwater and surface water drainage would be managed as detailed above via the two sealed systems. Roadways H1 risk assessment concludes that no formal monitoring of groundwater is required.

Surface water - There is a single discharge point for surface water drainage from the non-hazardous and inert waste storage and processing areas. This is a long-established discharge point and the upgraded drainage system represents a significant improvement to both water quality and flow control. The discharge point is subject to separate approval from the Pevensy Levels Board. Roadways is willing to undertake verification monitoring of the water quality at this discharge point subject to agreement on parameters and concentration levels with the EA and the Pevensy Levels Board.

SUPPORTING DOCUMENTS

In addition to this non-technical summary, the following documents have been submitted to support this permit variation application:

Application Documents	
Non-Technical Summary	DOCUMENT 1
Application Forms	DOCUMENT 2
Operating Techniques	DOCUMENT 3
Application Plans Location / Application Boundary / Layout / Drainage	DOCUMENT 4
Site Condition Report	DOCUMENT 5
BAT Assessment	DOCUMENT 6
H1 Environmental Risk Assessment	APPENDIX 1
Accident Management Plan	APPENDIX 2
H1 Air Quality Screening Assessment	APPENDIX 3
Noise Management Plan	APPENDIX 4
Noise Impact Assessment	APPENDIX 4
Dust Management Plan	APPENDIX 5
Raw Materials	APPENDIX 6
Raw Material safety Data Sheets	APPENDIX 6
COTC Certificates	APPENDIX 7
EMS Extracts	APPENDIX 8
List of waste codes to be retained from current permit and their potential uses	APPENDIX 9
List of waste codes to be added to the current permit and their potential uses	APPENDIX 10
WRAP quality protocol and factory control process for recycled Type 1 and Type 4	APPENDIX 11