Silica Developments Limited

Storage and Transfer Facility for Waste Glass
At

Gate 3, Shoreham Port, Brighton Terminal, Basin Road South, Shoreham, BN41 1WF

Environmental Management System

Pest Management Plan

Reference: EMS-OP-05

18 August 2025
Version 1

DOCUMENT CONTROL SHEET

Version Reference	Date	Reason for Change	Issued by
1	18.8.2025	Application for Environmental Permit	ISL

EMS-OP-05

Pest Management Plan

Contents

1 Introduction

This Pest Management Plan (PMP) has been prepared to support an application for a bespoke permit for Silica Developments Limited (SDL) at Gate 3, Shoreham Port, Brighton Terminal, Basin Road South, Shoreham, BN41 1WF.

The purpose of this document is to identify the operations at the site which may have the potential to attract pests to present the details of the operational controls which will be implemented to minimise this risk and describe the monitoring which will be carried out to confirm the effectiveness of the management controls.

The PMP comprises a living document and will be reviewed in the event of a complaint being received.

The Environmental Risk Assessment is provided as a separate spreadsheet SDL-SBS-ERA-V2.

1.1 Background

Since 2012 Silica Developments Limited has leased the land from Shoreham Port Authority (SPA).

Silica Developments Limited has been based at the port since 2012, operating under an exemption, with no known complaints regarding pests.

1.2 Site Description

The procedures relate to the permitted activities at Gate 4, Shoreham Port, Brighton Terminal, Basin Road South, Shoreham, BN41 1WF. The site is centred on NGR TQ 26109 04715.

The site is in Shoreham Port, which is a busy industrial estate for loading / unloading at the dockside.

Waste glass will be received and stored inside a building. The building is enclosed on four sides with two vehicular entrances and pedestrian fire escapes.

The permit boundary also includes an external area which will be used to temporary store the glass prior to loading. This temporary storage area will enable the crane to load the waste glass into the ship.

The waste glass will only be transferred to this holding area when the export process can commence, i.e. the ship is arriving or is alongside.

1.3 Scope

These Operational Procedures cover the storage and transfer of waste glass pending export.

The site is a bulk haulage facility for storing and transferring waste glass.

No treatment takes place. No other waste will be received.

For the purposes of this assessment, the term pests could include scavenging birds, flies, and vermin.

1.4 Management System

The Management System covers all aspects of operations and aims to effectively manage the impacts of the business on the environment. The key documents include:

a) Documents: Procedures to set out how to undertake operations and checking for any issues.

b) Forms on which to record information and provide evidence of the system functioning properly.

The EMS will include the following documents:

- EMS OP 01 Operational Procedures
- EMS OP 02 Fire Prevention Plan Odour Management Plan
- EMS OP 03 Dust and Emissions Management Plan
- EMS OP 04 Odour Management Plan
- EMS OP 05 Pest Management Plan

All documents will be kept at SDL head office, with copies available electronically at SPA.

1.5 Responsibility

The Director has the overall responsibility of implementing this plan. The TCM and Site Supervisor will both be responsible for implementing the plan on a day to day basis.

The Pest Management Plan will be reviewed at least annually, or sooner if there are substantiated complaints received.

2 Operations

2.1 Waste Deliveries to Site

The site will only handle waste glass. The following codes will be accepted:

150107	Glass packaging
170202	Glass
191205	Glass
191212	Mixed waste containing Glass
200102	Glass

With exception of EWC 191212, all other glass is inert and clean, with a low likelihood of attracting pests.

The waste coded as EWC191212 will include glass that has been separated at a Materials Recycling Facility and classified as such by the producer. On occasions, it may contain small volumes of carboard, plastic and metal, which are other items separated at MRFs. However, it can also contain a small volume of organic matter. Such matter may be the residual contents from food cans or plastic/glass containers.

The company will only accept wastes which are allowed under the permit. The site is a specialist facility and therefore no non-permitted wastes will be delivered to the site. All deliveries are pre-booked. There can be no ad-hoc deliveries of waste to the site. This is due to the security controls provided by Shoreham Port.

For glass produced at Material Recycling Facilities (MRF), the following checks will be carried out.

Before accepting a new contract for the supply of waste glass from a MRF, a representative of SDL will visit the source site and visually inspect the glass. Samples will be collected for analysis. The mixed glass is typically from large Material Recycling Facilities operated by established, reputable waste management companies (e.g. Biffa, Veolia). They manage the dry recyclables collected from households by local authorities.

SDL will request the previous 12 months testing data generated at the source site. MRF sites are required to carry out output sampling.

The testing will check the glass by weight. A sample is taken and weighed. It is then hand sorted to remove any incidental material (cardboard, metal, plastic and organic). The separated fractions are all weighed. The acceptable limit for SLD will be 95% glass by weight.

Once these checks have been used to classify the waste and confirm it is permitted, the producer will be registered with SDL for delivering waste glass.

During the first week of deliveries from a new source, each load is checked. A sample of glass is taken every 250 tonnes for weight testing.

SDL visually inspect the waste glass stockpile twice per week and maintain a weekly photographic record.

Glass produced at MRFs can be classified as 191205 Glass, or 191212 Waste Glass containing other non-hazardous waste. The producer (MRF operator) will be required classify the waste glass leaving their site.

SDL will carry out compliance checks to confirm the correct code has been used. With reference to the guidance[1], the decision should be made on a case by case basis.

As part of the classification, SDL will confirm if the source site is a Mixed Dry Recyclable Facility (MRF). This will help to confirm that the input material is non-hazardous waste. SDL will review the site's Waste Acceptance Procedures and check their procedures for removing non-compliant waste such as vapes and batteries.

The waste acceptance procedures at the MRF will be important to ensure that any mixed glass containing non-hazardous waste (EWC191212) is non hazardous. The MRF operators also work with Waste Collection Authorities to inform residents and businesses about the materials that can be placed in the collection bin. This will help reinforce the position that batteries and vapes should not be placed in the recycling bin.

With reference to the Environment Agency guidance, when the composition of the waste and its components is widely understood not to include hazardous substances, and visual inspections would easily identify materials likely to be hazardous, then the waste assessment may not need to include sampling and testing.

Prior to removal from the MRF, the waste producer will carry out periodic sampling to confirm the weight of glass, and other components. At this stage, the visual assessment will allow the operator to remove any non-compliant waste such as batteries and vapes.

The MRF glass will typically be from a dry mixed recyclable input which is mixed with paper, plastics, and metal cans only. The input and output waste are consistent and as such no testing will be required.

Receipt and Management of Organic Materials

The site operations do not involve waste that has a high potential for containing organic material. The site will manage waste glass, some of which has been transferred from MRFs. As MRFs handle waste collected from household waste recycling collection services, there is a chance that some glass may contain residual organic waste. For example, glass jars that contained food which have not been washed out.

However, this residual organic waste will have a low risk of attracting pests, for the following reasons:

- It will be a very small percentage of the overall load.
- It will be mixed and contained within a high volume of waste glass.
- The load is removed from the site on a first in, first out principle.
- The waste will be turned.
- No nearby sensitive receptors.

[1] Glass from waste treatment facilities, Guidance LIT 72733, published 21 May 2024.

The waste glass will be delivered in enclosed vehicles. For all waste glass deliveries, there could be 6 - 7 loads delivered per day, with only half of these handling glass from MRFs.

All loads are pre-booked into the site and therefore the vehicles do not queue.

As the waste is unloaded inside the building, any incidental items of waste (plastic bags, cardboard) will be placed in a general waste bin.

Any waste that contains obvious organic waste will also be manually removed and placed into a container.

For other glass, SDL will visit the source site and check the procedures generating the glass. For single source collected glass, no testing is required.

All waste delivery vehicles will use the weighbridge located at Gate 3. Once weighed, the driver will be provided directions to the building.

The loading shovel operator will be present at the storage bay and will direct the driver to unload into one of the bays, depending on the load.

Once unloaded, the driver will leave the site via the weighbridge. The vehicles are not washed on site.

The loading shovel operator will check the waste, removing any clear and obvious non-compliant waste such as plastic sacks. These will be placed in a general waste container.

The loading shovel driver will push the waste into the storage bay, ensuring that all waste remains in the bay and below the height marker.

2.2 Overview of Waste Processing and Pest Controls

The site layout is shown on Drawing No. SDL-SP-LAY-01. This will be a facility for bulk storage and transfer only.

The bulk storage facility includes a building in which to receive and store waste glass. There will be separate storage bays inside the building for different waste glass.

Bay 1 will be used for storing MRF Glass. This will be coded EWC 191205 Glass or 191212 mixed waste containing glass, depending on the classification.

Bay 2 will be used for storing MRF Glass or other glass.

The waste will be removed from the building when a ship is ready for loading. The waste glass will be loaded onto a bulk haulage vehicle and transferred to the temporary holding area outside. There will be a concrete wall to provide a contained area. The crane will be positioned north of this wall and will grab the waste glass and load the ship.

This external area will be used for temporary storage only pending loading for export.

Table 1 –Wastes Typically Accepted at the Site

EWC Code	Description	Risk	Mitigation
150107	Glass packaging	Negligible. Waste glass from these sources will be clean and unlikely to contain any organic waste.	None required.
170202	Glass		
191205	Glass		
191212	Mixed waste containing Glass	Low risk of attracting pests. The waste glass will be from Material Recycling Facilities that handle dry mixed recyclables only (glass, cans, paper, cardboard). May contain incidental organic contents such as food residue but this is mixed in with the glass, which is the majority of the waste mix.	Waste handling advice provided to residents. Residents informed to wash glass waste before placing into recycling container. Waste unloaded and stored inside a building. The site will be checked daily. If pests becomes a problem, the operator will review the waste acceptance procedures and if necessary agree alternative arrangements with the MRF producer. Any noticeable organic waste encountered on site, will be placed in the quarantine containers. Arrangements will be made to remove such waste within the next 2 working days. Following any substantiated pests complains, SDL will re-assess the PMP and commission a pest control contractor to assess the situation and recommend action. This could include the use of rodent boxes, bird scarers.
200102	Glass	Negligible. Waste glass from these sources will have a low potential for attracting pests.	None required.

2.2.1 Waste Storage and Quantities

The annual permitted throughput of the facility will be 100,000 tonnes.

The maximum storage capacity at the site is 8,000 tonnes.

3 Pest Management

3.1 Responsibility for Implementation of the DEMP

The Technically Competent Manager (TCM) has responsibility for ensuring these procedures are adhered to which includes communication with staff and contractors, and the provision of adequate training. The TCM is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures. The TCM will be the main point of contact for ensuring implementation of this plan. In their absence, the Site Supervisor will be responsible for implementation.

All staff will be trained in these procedures. The TCM is responsible for delivering training and maintaining records. Training is reviewed on an annual basis.

All Shoreham Port staff involved with this bulk storage facility, will receive training associated with this specific waste stream.

SPA will notify SDL of any pest issues.

3.2 Sources

The following are potential sources of attracting pests:

- Mixed waste containing glass EWC 191212

This waste may contain residues. However, this will be a very small percentage of the overall volume of waste and is unlikely to attract pests.

With reference to the wind rose for the site, the prevailing wind direction is from the south west and therefore areas to the north east of the site are down prevailing wind of the site.

Windrose data has been obtained for Shoreham by Sea.

Figure 1 - Wind Rose Data[2]

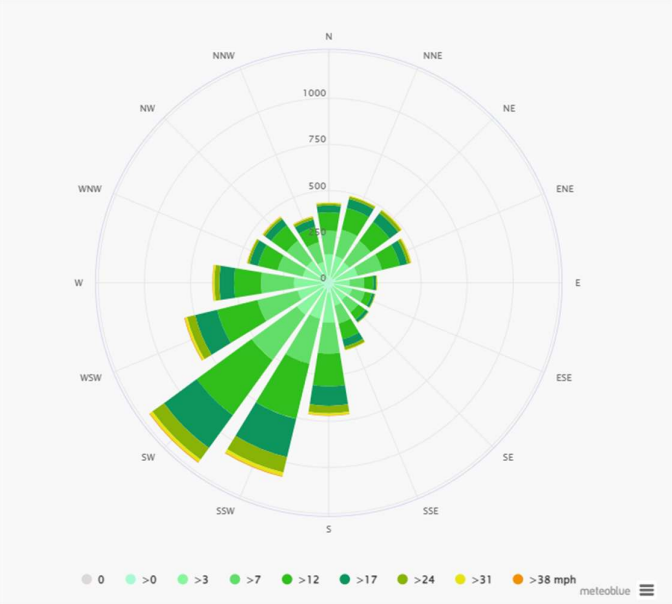


Figure 2 shows the site and broad location of the main receptors within 1km. Table 2 provides a description of those receptors and the distance and direction from the site. The distance has been measured from the permit boundary, at the closest point. The receptors list and plan have been derived from the Environmental Risk Assessment and identify all receptors that may be sensitive to a risk. Not all listed will be sensitive to pests.

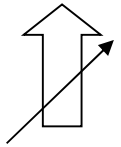
In terms of the sensitivity to dust the following has been adopted:

Type of Receptor	**Sensitivity**
Residential, schools, hospitals, nursing homes,	High
Industrial premises, recreational grounds,	Medium
Roads, Industrial premises	Low

There may be other unique receptors that do not fall within any of the above categories. These have been considered separately depending on the nature of the business and use. People on footpaths are transient receptors. There are no public rights of way through the port.

[2] Simulated historical climate & weather data for Shoreham-by-Sea - meteoblue

Figure 2 - Site Setting and Receptors (The permitted site is shown with a green boundary). Blue shows 500m radius from centre point of site. The red line shows 1km radius from the centre of the site.



South Westerly
Wind Direction

Table 2 – Receptors

Receptor	Legend	Type	Sensitivity to Pests	Distance and Direction from Permitted site
River Adur	A	Surface Water	Low	Immediately North
English Channel	B	Surface Water	Low	140m South
Shoreham Port	C	Industrial	Low	Immediately South, East and West
Aggregate Processing	D	Industrial	Low	530m West
Aggregate Processing	E	Industrial	Low	220m North West
Industrial Estate	F	Industrial	Low	310m North West
Industrial Estate	G	Industrial	Low	180m North
Fishersgate Terrace	H	Residential	High	530 North West
Industrial Estate	I	Industrial Estate	Low	65m North
Kingsway	J	Residential	High	160m North East
Western Esplanade	K	Residential	High	485m South East
Wish Park	L	Recreational	Medium	835 North East
Hove Lagoon	M	Recreational	Medium	660m East
Middle Street	N	Residential	High	230m North West
A259	O	Road	Negligible	150m North
Train line	P	Railway	Negligible	710m North
St Marys Primary School	Q	Education	High	645m North West
Vale Park	R	Recreational	Medium	475m North West
Kingsway	S	Residential	High	125m North East

3.3 Risk Assessment and Control Measures

The waste will be stored in a bulk storage facility, which will be housed inside a building. The building is enclosed on four sides, with two vehicular entry points, plus pedestrian fire escapes.

Within the building, there will be concrete push walls to contain the glass.

The storage of waste inside a building will prevent windwhip.

The waste is loaded out on a first in – first out principle, ensuring that waste glass is not stored for long periods on site.

The loading shovel driver will turn the waste as it is loaded out of the site.

There will be a temporary storage area to facilitate the export of glass. This comprises of a 3m high concrete wall, in an east-west orientation. This will act as a wind break, preventing any dust leaving the area. The waste glass will only be transferred to this area when the export process is due to begin. The crane will be positioned on the north side of the wall and will contain the waste.

EWC191212 mixed waste containing glass, is the only waste code that could have a potential to attract pests, through residual organic waste. Control measures are in place at the MRF, with the Waste Collection Authority providing educational material to local residents to ensure that only clean dry recyclables are placed in the recycling bin. This should remove any residual food waste. Glass is required to be washed before being placed in the recycling container.

The MRF uses sorting technology to separate the dry recyclables into the various components. There will be some non-hazardous waste such as cardboard and plastics that remain with the glass. These items are not odorous.

The main risk with EWC191212 will be the presence of any residual organic waste, that could attract pests. However, the low levels of such contents will minimise the likelihood. SDL will accept this waste stream containing 95% glass.

In terms of specific pests, the following applies:

Flies: any organic waste would have been residual within containers. Less likely to provide a breeding site, compared to food waste and manure.

Vermin: Typically attracted to sewers, culverts, pipes and areas of abundant vegetation. None apply at this site. Vermin are also attracted to odours from food waste. There is a low risk associated with food waste, other than residual volumes in glass containers.

Birds: Birds may be able to scavenge on the waste stockpile. Typically, seagulls associated with coastal location. However, access to the waste stockpiles will be limited by the building.

Table 3 - Pest Impact Assessment

Pest	Impact	Assessment
Flies	Visual – negative association as being unhygienic.	Unlikely given distance and intervening topography between the site and the nearest houses. No history of complaints. No known issues with flies. No fly control required. Waste stored inside a building.
	Nuisance – Disruption, annoyance, irritating, unpleasant.	
Vermin	Fear – spread of disease	Unlikely given no direct linkage between site and receptors. Receptor separated by water. No history of vermin at the site. No vermin control required.
	Damage to buildings	
	May attract birds	
Birds	Visual – negative association with scavenging	Seagulls typically encountered as coastal location. No history of complaints. Waste will be unloaded and stored inside a building, until ready for loading on to a ship. The building will help to prevent birds accessing the waste. If birds are present during the external loading process, SDL will arrange for bird control.
	Noise – circling in the area and feeding	
	Health & safety – bird droppings can cause: Histoplasmosis (respiratory difficulties), Cryptococcosis (flu, fever and sometimes fatalities), Ornithosis (flu type disease, can cause fatalities) and Campylobacteriosis (can cause diarrhoea or dysentery syndrome, mostly but can also include cramps, fever and pain).	

A pest control contractor has been commissioned to carry out bird scaring techniques in the port. This uses birds of prey to scare and deter birds. The technique is carried out three times per week, at different times each day/week to prevent customisation.

For all Pests, a pest control contractor will be commissioned if pests are present and lead to substantiated complaints.

This Pest Management Plan will be reviewed within six months after the permit has been issued to assess the effectiveness of the Pest Management Plan and if necessary be updated to include further techniques. This work will be carried out in consultation with SPA and the pest contractor, with results and recommendations provided to the Environment Agency for approval.

3.4 Routine Cleaning

The bays will be cleaned following a transfer period. That is, when a ship has been loaded and the bay cleared of waste. This is recorded by the operator in the site diary.

The cleaning schedule is provided in Table 4.

Table 4 – Cleaning Schedule

	Daily *	Weekly	Annually
Site Entrance	✓	✓	
Site Access	✓	✓	
Storage Bays – concreted	✓	✓	Full site Audit
Plant	✓	✓	Subject to Planned Preventative Maintenance

*carried out by SPA as part of their overall function of maintaining the Port.

The SPA site management team also has access to the CCTV, which is monitored throughout the day.

This cleaning schedule is implemented at the frequencies set out in Table 4.

The TCM will follow up any complaints or incidents with a full inspection.

3.5 Monitoring

The site management and all site operatives will check for pests during any site inspection.

This will involve standing at the monitoring points identified below and confirming that no pests are present.

All SDL staff and Shoreham Port staff will be trained to notify the Site Management if they detect pests at any time during their work.

The following monitoring locations are provided.

Figure 3 Monitoring Locations

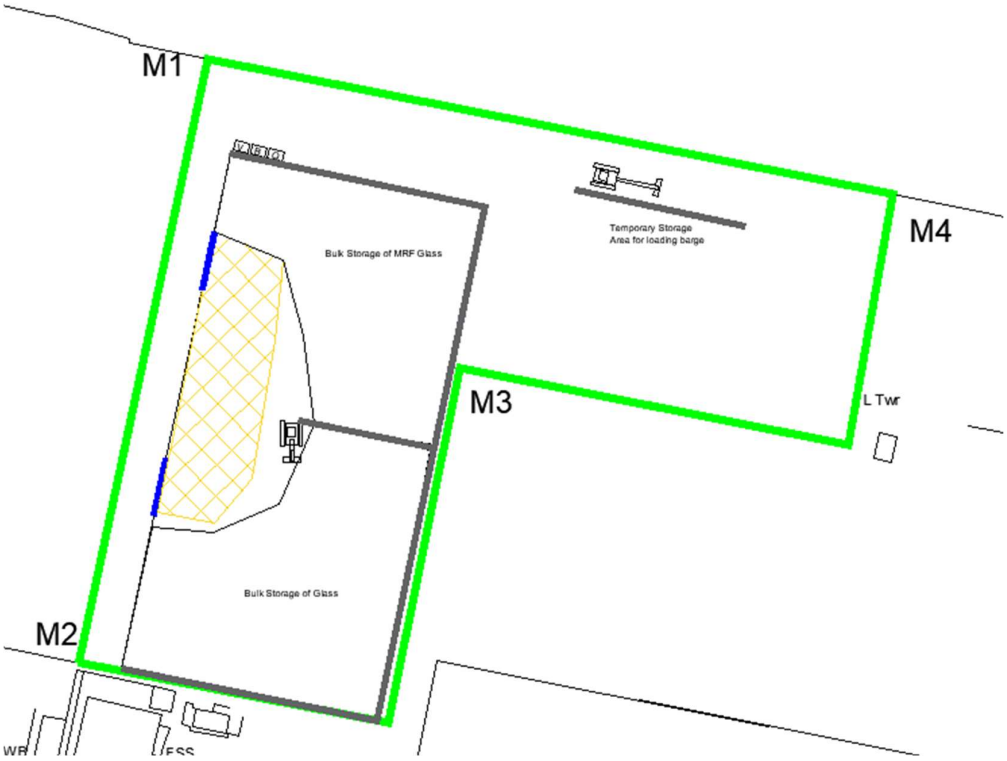


Table 5 – Monitoring Locations.

Monitoring Location	Target Area
M1	To check if pests are detected either within or outside the site boundary.
M2	
M3	
M4	

If pests are detected, a record will be made in the Site Diary. This will include the following information:

- Who detected the pests (if SPA staff, who at SDL was contacted).
- What pest encountered.
- What number of pests
  - Low (1 -5)
  - Medium (5-20)
  - High (>20)
- Where sighted?
- Action taken (including turning the waste), site visit by SDL staff.

The Local Environment Agency officer will be contacted by email if pests have been detected. The email will include information about the timing, source, corrective action taken. SDL will notify the Environment Agency within 24 hours of the pests being detected.

The PMP will be reviewed on an annual basis or sooner if requested by the EA. It will also be updated if the operator changes the operation.

In the event of complaints being received, the complaint procedure will be implemented to record details and findings.

3.6 Operational Failure

The site has minimal opportunities for operational failure. SPA provide plant and machinery for moving the glass once unloaded and for loading the ships. SPA has a dedicated team of operatives and mechanics for ensuring continued availability of plant.

The TCM will be contacted by staff in the event of any operational failure such as the breakdown of plant. The TCM will liaise with SPA to make sure that contingency plant is provided. This is especially important for loading waste on to the ship.

SPA has on-site mechanics available to assist with any breakdowns and they have additional plant available.

4. Reporting and Complaints Response

The Site Manager has the overall responsibility for this procedure.

The administration staff will all be responsible for handling complaints and recording on the correct form. All complaints must be referred to the Site Manager.

In this context, a complaint may be received directly from a resident, customer, adjoining business, staff at Shoreham Port, or from a Regulator.

It is likely that complaints will be directed to SPA. If SPA receives a complaint, a record will be passed to the TCM and summarised in a Site Diary. The Complaint Form in Appendix A will be completed.

The TCM will review the activities that may have given rise to the complaint. Other actions will include:

- Review of site diary and check for any unusual regional weather events occurring during the day on which the compliant was made.
- Review site diary and establish what site activities were taking place at the time the complaint even occurred.
- Review waste types currently stored on site.
- Identify whether there were any other activities in the area taking place that could have attracted pests.
- If it is established that the emissions were attributable to activities being undertaken at the site, as necessary review the relevant operational procedures and implement improvements and provide additional training to site.

The TCM will aim to provide feedback to each complainant within 48 hours of receiving the complaint.

If the site receives several substantiated complaints, the operator will carry out a detailed assessment of the waste being stored. If the source is determined, the TCM will notify the contractor producing the waste. The contractor will check their procedures and work with Waste Collection Authority to reinforce message about acceptable recyclables.

If necessary, the TCM will consider increasing the frequency of waste removal from the site during the weather periods that increase the risk of pest activity (prolonged warm weather). A pest control contractor will also be commissioned.

The site has been used for bulk storage of waste glass since 2022, without any pest complaints.

4.1 Engagement with the Community

The immediate neighbours will be contacted, and direct dial telephone details provided for the TCM and main officer number. Email contact details will also be provided.

SPA carries out engagement with all users in the Port and will contact SDL directly should any complaint be received.

Appendix A – Complaint Form

Incident/Complaint Details	
Nature of Incident / or Complaint	
Location	
Date and Time of Incident/Complaint	
Details of complainant (if possible)	
Plant and Machinery involved? (Make/Model, Vehicle Registration, Driver/Operator)	
Other Vehicles involved?	
Witnesses	
Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Incident/Complaint Description -	
Cause of Incident / Complaint-	
Report to Senior Management and if necessary, the Environment Agency	
Feedback given to Staff -	
Feedback given to Complainant -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
Does the EMS need to be updated? -	
Date that the EMS was updated -	
Closure	
SDL manager review date	
SDL manager signature to confirm no further action required	