



## SOUTHERN OFFICE

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### **Waste Recycling Facility at Beddingham: Non-Technical Summary for Waste Recycling Facility Permit Application**

Phlorum have been asked by Robins of Hermonceaux to assist with the permit application for a new Inert Waste Recycling Facility at Beddingman, Benimons Road, Beddingham BN8 6JS. National Grid Reference TQ 43567 06531.

The site will be owned and operated by Robins of Herstmonceaux as an additional site to their existing sites at Herstmonceaux and Newtimber (EA Permit Licence Numbers: EPR/AB3303HD/V002 and EPR/AB3303GR/A001).

The site operations will be covered by an Environmental Management System which will uphold the control measures identified.

#### **The Scope of the Environmental Permit**

The scope of the Environmental Permit is to cover the waste recycling operation at the Waste Recycling Facility at Beddingman Beddingham site. The following activities are to be undertaken on site and to be covered in this permit:

- Recycling concrete;
- Top soil;
- Road planning;
- Sand/Ballast;
- Hardcore; and
- Recycling Lampposts.

The following materials are produced from the above activities:

- Type 1 crushed concrete;
- Recycled type 1 crushed concrete;
- 75mm clean crushed concrete (graded);
- 6F1, 6F2, 6I/6J, 6N, Type 2 crushed concrete, type 4 , 1B, 1C, 6A, 6E, 6K,

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6M, 6P, 6R and 1A;

- 20 and 40mm recycled single size crushed concrete (recycled aggregate);
- Recycled oversized crushed concrete cobbles; and
- Screed soils.

### **Site Condition Report**

As required for the Environmental Permit, a site condition report has been carried out of the site. This report included a desk study site walkover and an intrusive survey of the site.

The findings of the site condition report show that the site is located on superficial deposits of clay, silt, sand and peat, and the underlying bed rock is Lower Chalk.

Phlorum assessed the site history and took soil samples from the site, which were sent to a laboratory for analysis. Other than Chrysotile asbestos present in microscopic bitumen fragments fibres, from one sample in the north-east of the site, no contaminants were recorded for commercial land use.

### **Generic Risk Assessment**

As well as the ground testing which was carried out and is detailed in the Site Condition Report, we have considered the potential impacts of: ecology, flood risk, landscape, noise, and dust on the site and adjacent habitats.

#### Ecology

A Preliminary Ecological Assessment (PEA) found the site as having low potential to support reptiles, negligible potential for breeding and foraging newts, negligible potential for roosting bats, badger, hazel dormice, water voles, otters, stag beetles and hedgehogs, and moderate potential for breeding birds.

Habitats within the site are considered largely to be of ecological value within the immediate vicinity only. The site provides suitable habitat to support several protected species and groups including breeding birds and reptiles. However, populations of these are unlikely to be locally significant and any reptiles are likely to be confined to the vegetated areas around the site boundary.

A Biodiversity Net Gain Assessment found an overall net loss of 5.09% in habitat units from the existing baseline has been calculated. It should be considered that the bare ground being lost is of very low ecological value and has resulted from the site's state of disuse. In addition, the BNG assessment does not capture other methods of ecological enhancement such as the inclusion of bat and bird boxes.



### Flood Risk

The assessment found the site has been shown to be protected by significant flood defences and will remain so until at least 2100.

The site has been shown to be located outside of all Defended and undefended Fluvial/Tidal flood extents, including the once per 200 year tidal and once per 100 year fluvial design event for 'Less Vulnerable' developments.

The management of the surface water will either involve the use of concrete box culvert along the western boundary or, an alternative option is for a small swale at the base of the bund along the western boundary, but allow part of the site to flood in extreme flood periods.

### Landscape

The landscape areas on site and their maintenance, monitoring and management of habitats will be managed by Robins of Herstmonceux.

The site was historically a green waste management facility. The proposed use of the site is as an inert waste recycling facility which means the principle use of the site will not change significantly. The vegetative bund around the site boundary will be kept which will act as a screen to the site.

### Noise & Vibration

An assessment indicates that recycling activities will have less than a 'low noise impact' it is considered that no further noise mitigation measures are required to minimise noise from site operations at the proposed Beddingham Recycling Facility.

The traffic noise assessment indicates that the change in noise level due to traffic at the Beddingham Recycling Facility would be negligible at the nearest residential properties.

On the basis of this assessment, it is considered that noise does not pose a constraint to the proposed Recycling Facility at Beddingham.

### Dust

A Dust Impact Assessment (DIA) was required to consider the impact of the soil recycling and concrete crushing facility on local air quality and identify the risk of dust impacts at nearby sensitive receptors.

The DIA identifies the following key sources of potential dust emissions:

- general handling of materials before, during and after processing;
- windblow from stockpiles of friable materials;



- operation of plant, including specific processes such as crushing; and
- traffic travelling over unpaved and/or soiled road surfaces.

An Operation Phase Mitigation Plan (OPMP) has been prepared for the operational phase of the soil recycling and concrete crushing facility. Through implementation of the measures within this OPMP, it is considered that dust impacts during operation will be effectively mitigated to ensure off site impacts are negligible.

### **Environmental Management**

An evaluation of all activities was conducted to determine the environmental aspects of the activities that can be controlled, whether direct or indirect.

Resources needed to implement and maintain the IMS to meet the requirements of the ISO14001 standards were provided.

- Environmental Policy – which has ensured compliance to appropriate legislation and other requirements, pollution prevention, continual environmental improvement, and support from top management.
- Objectives and targets – have been set for fuel efficiency of the drivers.
- Environmental aspects – these have been reviewed for the site with dust impact and surface water runoff the main environmental issues.
- Resources – the staff and their roles have been highlighted with cover in place if someone is away.
- Training – training records are kept for all staff and a register has been produced to show the training of staff,
- Communication – communication of issues and faults are regularly communicated from managers to staff and vice-versa, through daily inspections, and work notices.
- Operational controls – procedures have been drafted for the normal environmental operations of the site. These include a review of the waste carriers used. Records of waste carriers are kept in the head office.
- Emergency procedures – main issues are seen as spillages and leaks from vehicles and silt and/or contaminates entering a water course.



- Documentation /records /distribution /revisions – The EMS has been produced and system set up to document, record and amend the EMS as required.
- Audits and management review – procedures have been produced and templates provide for periodic audit of the site and management reviews.

### **Control Measures**

An Environmental Monitoring Plan has been produced for the site. The main monitoring required is daily inspections of the site for signs of dust generation and or surface water runoff.

Yours sincerely

A handwritten signature in black ink, appearing to read "Stefan Cannon".

Stefan Cannon

Senior Environmental Consultant