Cleansing Service Group
Waste Solution Specialists

CSG Depot, East Cliff Business Park, Severn Road, Severnside, Avonmouth

Environmental Statement for a Waste Treatment Facility

16th February 2021

Land & Mineral Management

Notice

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Drawings

Reference	Title
189/261121/001A	Location Plan
10599-207 P2	Red Line Plan
10599-200 P6	Site Layout
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10599-250 P3	Drainage Layout
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1 Introduction

1.1 This Environmental Statement (ES) accompanies a planning application made by Cleansing Service Group Ltd (CSG) for a Waste Treatment Facility at their site at Plot 6, East Cliff Business Park, Severn Road, Severnside, Avonmouth, BS10 7SF. The ES contains the information required to assess whether or not there is likely to be any significant environmental impact from the proposed development.

1.2 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, referred to as the EIA Regulations, define when and how Environmental Impact Assessment (EIA) should be undertaken. The Aqueous Waste to be treated at the Site are sometimes contaminated with oil which then deems them hazardous. For this reason, the proposals fall within development set out in Paragraph 9 of Schedule 1 of the EIA Regulations, meaning an Environmental Statement (ES) is required. However, due to the small-scale nature of the proposed development, combined with the context of the application site, it is considered there are no areas where there is potential for significant impact to occur. Therefore, this ES has been prepared without seeking a formal Scoping Opinion.

Content of Environmental Statement

1.3 The 2017 EIA Regulations also specify the information for inclusion in an ES in Part 5:

(a) a description of the proposed development comprising information on the site, design, size and other relevant features of the development;

Comment: Provided in Chapter 2.

(b) a description of the likely significant effects of the proposed development on the environment;

Comment: There are no likely significant effects to describe.

(c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;

Comment: There are no likely significant adverse effects that require mitigation. Some mitigation measures are detailed in the application's Supporting Statement where identified as necessary or simply beneficial.

(d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;

Comment: Dealt with in Chapter 3.

(e) a non-technical summary of the information referred to in sub-paragraphs (a) to (d);

Comment: Provided separately.

(f) any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

1.4 Schedule 4 to the Regulations sets out further detail on the contents of an ES:

1. A description of the development, including in particular:

(a) a description of the location of the development;

(b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;

(c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;

(d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.

Comment: This is addressed where relevant to these proposals in Chapter 2.

2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

Comment: This is dealt with in Chapter 3.

3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

Comment: As the Site already has planning permission for industrial development, there is no significant difference between the existing baseline and evolution due to the development proposed. Furthermore, there are no identified likely significant environmental impacts, that would significantly alter any baseline.

4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

Comment: It is not considered that any of the above factors are likely to be significantly impacted or affected by the proposed development and are therefore discussed within the Supporting Statement rather than having been assessed as part of the EIA process.

5. A description of the likely significant effects of the development on the environment resulting from, inter alia:

(a) the construction and existence of the development, including, where relevant, demolition works;

(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;

(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;

(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);

(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;

(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;

(g) the technologies and the substances used.

Comment: The EIA process concerns itself with the likely significant impacts arising from the development and in this instance no likely significant negative environmental impacts have been identified. The potential for cumulative impact with other development has also been considered with no likely significant negative impact identified.

1.5 The National Planning Policy Guidance expands on the Regulations to say:

There is no statutory provision as to the form of an Environmental Statement. However, it must contain the information specified in Part II of Schedule 4, and such of the relevant information in Part I of the Schedule 4 as is reasonably required to assess the effects of the project and which

the applicant can reasonably be required to compile. It may consist of one or more documents, but it must constitute a "single and accessible compilation of the relevant environmental information and the summary in non-technical language."

1.6 The EIA Regulations include a requirement that the ES must be prepared by persons who, in the opinion of the developer, have sufficient expertise to ensure the completeness and quality of the ES. The EIA Regulations also require a statement outlining the relevant expertise or qualifications of such experts.

1.7 This ES has been produced on behalf of CSG by Oliver Laidler of Land & Mineral Management, a Chartered Mineral & Waste Surveyor with a distinction grade MSc in Survey and Land/Environmental Management, with five years of experience advising on minerals and waste development with a particular focus on planning.

1.8 Copies of this ES can be obtained from Land & Mineral Management either in paper format (£50) or CD format (£10). The Non-Technical Summary is available free upon request electronically or in paper format.

2 Description of the Development

Site Location

2.1 CSG's facility (the Site) is located on Plot 6, East Cliff Business Park, Severn Road, Severnside, Avonmouth, BS10 7SF and has a grid reference of ST 54387 81709 (centre of land holding). The full extent of the CSG Site is approximately 3.5ha in area, shown in blue on Location Plan ref: 189/261121, and is surrounded by a car parking depot to the northwest, rough grazing land to the north and east, a National Grid facility to the southeast, and the remainder of the East Cliff Business Park (partially developed) to the south and southwest. The partially constructed Avonmouth Spine Road, which, if completed, will link the area to the new M49 Avonmouth Junction currently under construction, runs through East Cliff Business Park and into the southeastern third of the Site.

2.2 Surrounding developments and land uses comprise various industrial and sui generis land uses, including warehousing; large scale storage of cars; power generation and distribution; aggregates recycling and two Energy from Waste facilities, as well as the M49 motorway.

2.3 The area subject to this planning application (the Application Area) sits relatively centrally within the Site, on the northwest side of the identified route of the aforementioned Spine Road, as shown red in Location Plan ref: 189/261121/001A, and measures 0.31ha in area.

Proposed Development

2.4 At present, CSG operate a regionally important aqueous waste treatment facility at their site in Easton, Bristol. This site cannot be expanded and the upcoming imposition of the Bristol Clean Air Zone (BCAZ) and associated tariffs, due to begin in summer 2022, has concerned CSG. Any future expansion of the BCAZ would lead to high cumulative costs which would either need to be passed on to customers, at great expense, or absorbed by CSG, which would make the operation commercially unviable.

2.5 CSG are therefore proactively relocating to avoid such a future scenario. It is therefore proposed to relocate the existing operations out of Easton to the Site, hence this planning application.

2.6 The Application Area sits relatively centrally within the Site. The infrastructure and layout are shown on Site Layout Plan ref: 10599 200 P6 and consists of a concrete pad (for the full extent of the Application Area); 16 vessels, 6.55m in height and arranged in a 4x4 grid format and

surrounded by a 1m high concrete bund; a lab/weighbridge/office; and designated areas for the placement of removable bins.

2.7 The area within the concrete bund measures 35.5x35.5m (area of 1,260.25m^2) and each vessel has a diameter of approximately 4m. The vessels shall be Shale Grey in colour and have a capacity each of 70m^3, giving a total storage and treatment volume of 1,120m^3.

2.8 The entire treatment plant, located within the concrete bunded area, shall have sealed drainage, with all drainage being passed through the treatment plant (vessels) described below, prior to discharge to foul sewer under a Discharge Consent. The remainder of the Application area shall drain to an adjacent rhine, via a three-stage interceptor, as shown on Drainage Layout plan ref: 10599-250-P3 (subject to consent from the relevant authority).

Site Operations

2.9 Aqueous waste, which consists of both non-hazardous waste and sludges and hazardous aqueous wastes and sludges (hazardous due to oil content), shall be transported to the Site by road. The waste shall be discharged into the vessels for treatment, via a rotary screen to screen out larger solids, prior to undergoing physiochemical treatment using Ferrous Sulphate and, where necessary, potentially other treatment chemicals such as Sodium Hypochlorite. Gravitational separation shall then occur within the vessels to give a sludge, an aqueous layer and an oil layer.

2.10 This treatment and storage is a fully sealed system from offloading of vehicles to output of treated materials and effluents. The treated aqueous effluent is analysed for compliance and then discharged to foul sewer under Discharge Consent.

2.11 Screened solids are held in enclosed bins, which are positioned on impermeable concrete surfacing, for removal from Site for disposal / treatment elsewhere. Oils are separated off and sent for recovery. Sludges are removed by tanker for further processing at other suitably permitted facilities.

2.12 Maximum annual throughput is expected to be 50,000m^3.

3 Reasonable Alternatives

3.1 The EIA Regulations require a description of the reasonable alternatives studied by the developer and this is expanded on in the Planning Practice Guidance Notes which state " *Where alternative approaches to development have been considered, the Environmental Statement should include a description of the reasonable alternatives studied which are relevant to the proposed development and its specific characteristics and provide an indication of the main reasons for the choice made, including a comparison of the environmental effect.*"

3.2 The Applicant considered retention of the waste treatment at the existing site at Easton, Bristol. Retention of the treatment plant at the central Bristol site, which is regionally important and been operational since 1995. This was however dismissed as the current site cannot be further developed is within 400m of the Bristol Clean Air Zone (BCAZ) which may be expanded in the future. BCAZ tariffs would result in prohibitively expensive services to customers meaning loss of trade that would render the continued operation inviable and so proactive action is being taken.

3.3 The Applicant has been looking for a site to relocate to since 2008. Alternative sites were considered but no appropriate alternatives (good proximity to the road network, sewer connection and lack of sensitive receptors) could be found.

3.4 Alternative layouts and plant were not considered. CSG's expertise, experience and knowledge has dictated that the proposed layout and plant to be used are the most effective and efficient. The treatment techniques employed for the wastes accepted will constitute the Best Available Techniques. This is also a permit requirement under the Environmental Permitting Regulations.

4 Vulnerability to Major Accidents or Disasters

4.1 The EIA Regulations require consideration of the development's vulnerability to Major Accidents and / or Disasters. It is not considered that the proposals are specifically vulnerable to a major accident or disaster or, should one occur, that there would be a significant risk to human health, cultural heritage, or the environment.

4.2 All waste related activities shall operate under the codes of practice of the Health & Safety Executive as well as normal good industry practice and standards. All waste management activities shall also be subject to an Environmental Permit which sets out controls on the management, handling and storage of all wastes, including any potentially hazardous waste or raw materials.

4.3 There is a 0.1% chance (1 in 1000 year) flood risk, under which scenario flood waters would vary between 100-300mm across the Site. The main waste management infrastructure would remain protected in this circumstance by a 1m concrete bund and the remaining limited development located outside of the concrete bund wall, (offices), can readily be raised a minimum of 300mm above finished site levels and include flood resilient design.

4.4 A Flood Action Plan forms part of the management procedures required for the Environmental Permit and will ensure that in the event of a flood, staff are safe and all potentially polluting materials are cleared of any areas that might be impacted.

COMAH

4.5 The Site is within proximity of several operational COMAH sites (operations that fall within the Control of Major Accident Hazards Regulations 2015).

4.6 The nearest of these is the Berwick Wood Petroleum Storage Depot, which is a Lower Tier COMAH site, roughly 1.9km to the southeast. The nearest Upper Tier COMAH site is the Esso Terminal, approximately 2km to the southwest.

4.7 The local COMAH sites predominantly store hydrocarbons, with the main associated risks being explosion, fire and environmental pollution. Given the distance between the Site and the nearest operational COMAH sites, impacts at the Site from any incident would likely be minimised and the Site's employees would follow the Major Emergency Safety Advice or the instructions of emergency services.

4.8 Due to distance and small-scale nature of the proposed development (and limited storage of chemicals) it is not considered that the proposed development would present an additional threat or risk to any operational COMAH site that requires special consideration.