Widdington Recycling Ltd

Haverhill Waste Management Site
Land West of Falconer Road
Haverhill
CB9 8QE

Bespoke Permit Application (variation from Standard Permit reference EPR/WE8118AB)

Non Technical Summary

February 2025

Document Control

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THIS DOCUMENT WILL BE REVIEWED AS A RESULT OF ANY INCIDENTS WHICH MAY LEAD TO THE REQUIREMENT FOR IMMEDIATE REVIEW

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1. Introduction

General Site Information

1.1 Widdington Recycling Ltd (WRL) operates a waste transfer station at Falconer Road, Haverhill CB9 8QE. The site is operated as a non-hazardous Household, commercial and industrial (HCI) waste transfer station with treatment. The site accepts a variety of non-hazardous and inert wastes from a number of sectors including skip waste from a variety of sources including household, and commercial and industrial waste sources. The waste is brought into the site as bulked waste via HGV or in smaller loads via skips or small bespoke waste collection vehicles.

1.2 A Standard Rules permit 2015 No6 (reference EPR/WE8118AB) for a 75ktpa household, commercial and industrial waste transfer station with treatment was issued for the site on 15 March 2023.

1.3 In December 2024, revised site criteria applicable to all existing and future Standard Rules permits were issued by the Environment Agency. The Agency require all sites which currently have a Standard Rules permit, and no longer meet the new criteria to apply to vary the permit to a bespoke permit by 7 March 2025.

1.4 One of the revised site criteria introduced in December 2024 is the requirement for any compliant Standard Rules permitted site to be a minimum of 50 m from any Local Wildlife Site (LWS). A LWS is located adjacent to the western boundary of the site, and therefore, there is a requirement to vary the permit to a bespoke permit.

1.5 This application is for the variation of permit EPR/WE8118AB to a bespoke permit based on the issued Standard Rules Permit SR2015 No.6. The application does not seek any changes to the operations of the site.

Pre-Application Advice

1.6 Prior to preparing the application to vary the Standard Rules permit to a bespoke permit, pre-application advice was sought from the Environment Agency. The advice confirmed that a Noise Impact Assessment and Management Plan would be required, along with a Dust Environmental Management Plan and Odour Management Plan.

1.7 These plans have been prepared and are included as appendices.

1.8 In addition, Nature and Heritage Conservation Screening advice was provided. This identified nature and Heritage conservation sites that must be considered as part of the application.

Site Description

1.9 The site is located approximately 1 km to the south east of the centre of Haverhill in the county of Suffolk.

1.10 The site is accessed off the end of Falconer Road, which runs through the centre of an industrial area located off the A143.

1.11 There is a single access point into the site through lockable steel gates. The site extends to approximately 1.27 ha (3.13 acres), which comprises an open level site which falls gradually from a high of 72 m AOD in the east to 69 m AOD in the west.

1.12 Along the western margin of the site is a 2.5m high screening bund. Along the western and south-western boundary is a mature tree belt and along the northern boundary there is a mature hedgerow which has been supplemented by recent planting of leylandii trees.

1.13 Beyond the screening bund to the east lies a number of industrial units. To the north the hedgerow are a number of smaller industrial units and to the northwest is vehicle storage beyond which lies further industrial units.

1.14 To the south-west is a mature belt of trees, which follows a former railway line that originally ran through the centre of Haverhill. Beyond the tree belt to the south lies further industrial units.

1.15 The site comprises a concrete apron of 1.14 hectares which provides an impermeable surface for all waste storage on site. There is a drainage system incorporated into the apron. There is a waste transfer building located in the eastern third of the site, close to the site entrance. The building is closed along three sides and extends to 90m x 30m and 13m to eaves.

1.16 The WTS building provides internal storage and waste-sorting operations. There is a misting system incorporated into the open side to provide a spray curtain to control potential dust emissions generated by the waste processing operations.

1.17 Additional misting is provided at the site entrance and a mobile bowser to dampen down external stockpiles.

1.18 There is a concrete retaining wall located around the perimeter of the site.

1.19 The facility is open over the following hours:

Monday to Friday	06:00 hours to 18:00 hours
Saturdays	06:00 hours to 14:00 hours

No operations on Sundays or bank holidays.

1.20 Whilst the site opens at 06:00 hours, in order to minimise noise impact on the local amenity, no noisy activities will take place until 07:00 hours on any working day.

Site Operations

1.21 Waste brought to the site is separated and sorted into various waste types, e.g. waste wood/metal/hard-core etc. and dependent on the waste type subject to further sorting or treatment to maximise the recovery of resources from the waste streams.

1.22 Treatment of the waste ranges from simple extraction, either by hand or by specific equipment, e.g. over band magnet to remove ferrous metals, to shredding and crushing. All materials recovered for recycling are up and removed off-site for further processing. Waste material that cannot be recycled is sent to a suitably licensed landfill.

1.23 In general, the waste treatment processes carried out on-site on the date of this plan includes the following:

i. Compacting (by loading shovel or grab)

ii. Sorting (with loading shovel, 360^0 excavator with grab/bucket or by hand/picking line

iii. Screening/separation (by using appropriate plant and equipment i.e. trommel screen)

iv. Shredding

v. crushing

The site has been the location for waste operations for over 12 years, however, in the past year the site has been entirely redeveloped to enable suitable controls to be in place to ensure all emissions can be controlled to acceptable levels.

2. Habitat Protection Considerations

2.1 This section outlines the measures to be taken for the protection of nearby habitats, as required by the Environment Agency's pre-application advice. Specifically, the site's proximity to deciduous woodland, a Local Nature Reserve (LNR) and Local Wildlife Site (LWS), and the identified presence of water voles within 500 meters of the site are addressed.

2.2 The location of the LNR and deciduous woodland, as identified in the Magic database are shown on Drawing WID/HAV/EP/03. The designated areas are considered in further detail below.

Deciduous Woodland

2.3 The site is located in proximity to deciduous woodland, which lies within 50 meters of the site boundary. This woodland area is a significant natural habitat, providing shelter and food for various species of flora and fauna.

2.4 The site consists of an open and level concreted area with a waste transfer building located adjacent to the eastern boundary. Along the western boundary (adjacent to the deciduous woodland) is a 4-metre-high concrete wall. The deciduous woodland ground level rises by approximately 3 m beyond the site ground level. It is essential to minimise any potential impact on the woodland habitat. To mitigate risks, the following measures will be implemented.

2.5 **Buffer Zones:** The waste transfer station is physically separated from the woodland by the concrete retaining wall, effectively creating a physical buffer between site operations and the woodland. This

buffer zone will be maintained and monitored to ensure no encroachment or degradation of the woodland occurs.

2.6 **Dust and Emission Control:** To prevent air pollution, dust, and particulate matter from affecting the nearby woodland, dust suppression systems will be in place throughout the site. Additionally, any potential emissions will be controlled in accordance with the conditions of the bespoke permit to ensure they do not impact the surrounding environment, including the deciduous woodland. Dust emission controls within the site are set out in the Dust Environmental Management Plan (DEMP), which will be kept under regular review (either annually or if there are any complaints or notable impacts on the adjacent woodland, whichever is earlier).

2.7 **Waste Management Practices:** The handling and transfer of waste will be conducted in a manner that prevents leakage, spillage, or runoff into the surrounding areas. The concrete retaining wall is tied into the concrete surface of the operational area, thereby providing an impermeable barrier to all run-off from the site. In addition, the operational area has been designed to ensure a 4 to the centre of the site for drainage purposes away from the site boundaries. Waste containers and transfer equipment will be regularly inspected and maintained to avoid contamination.

Local Nature Reserve (LNR)

2.8 The site lies within a 50m proximity to a Local Nature Reserve (LNR), designated as the Hill Railway Walks LNR which extends to a total of 14 ha to the north and south of the site. The Natural England database states '*with much of its length now covered with scrub and larger trees, the railway provides a valuable wildlife corridor. It offers food and shelter to a wide range of birds, animals, insects and plants. All 5 km (3 miles) of the disused line is now part of the Helical Local Nature Reserve*'.

2.9 Whilst the LNR does not contain any protected or rare species, the wildlife corridor provides an important local area that is sensitive to external effects. Whilst the waste operations at the site will not give rise to any direct impacts, the potential for indirect effects on the LNR must be addressed.

2.10 To protect the LNR, the following measures will be implemented:

2.11 **Access Control:** Site access and activities will be managed to prevent unregulated human disturbance in the direction of the LNR. All operations will be confined to the waste transfer station site, ensuring no unauthorized access to the LNR and reducing the risk of any ecological damage.

2.12 **Noise and Vibrational Monitoring**: Given the proximity to the LNR, noise and vibrations from site operations will be regularly monitored to ensure they remain within permissible limits. Steps will be taken to minimise noise pollution, particularly during operations that could cause disturbances to wildlife in the LNR. The noise limits imposed on the site will meet BS standards for daytime and nighttime working, as set out in the Noise Impact Assessment and Management Plan.

2.13 **Runoff and Drainage Control:** Due to the change in levels between the waste management site and the ground level of the LNR, there is no requirement to control surface water run-off from the site. In addition, the site drainage has been designed to accommodate all potential surface water run-off

generated within the site and the concrete retaining wall along the western margin of the site provides an impermeable barrier which further ensures no potential site run-off can reach the LNR.

Water Voles (Within 500 meters)

2.14 The site is located within 500 metres of a known population of water voles (Arvicola amphibius), a protected species under UK and EU wildlife legislation. The presence of water voles in the area requires careful consideration of potential impacts from site activities, particularly in terms of water quality, runoff, and disturbance to their habitat.

2.15 The European water vole (Arvicola amphibius) is typically found in wetland habitats, particularly in areas with abundant water and dense vegetation. The main characteristics of its habitat include:

2.16 **Waterways:** Water voles are closely associated with rivers, streams, ponds, marshes, and lakes. They require areas with slow-flowing or standing water, where they can create burrows and access aquatic plants for food. The water should be relatively shallow, allowing them to forage for plants and build their burrows along the banks.

2.17 **Vegetation:** Dense vegetation is crucial for water voles, both for cover and as a food source. They prefer areas with tall grasses, sedges, and other aquatic plants along the banks of watercourses. These plants not only provide food but also help protect them from predators.

2.18 **Riparian Zones**: Water voles are often found in riparian zones—areas where land meets water. These habitats have both terrestrial and aquatic elements, offering water voles a combination of shelter, food, and space to forage. The riparian vegetation provides cover from predators and allows voles to travel along the waterway in search of food.

2.19 **Good Water Quality:** Clean, unpolluted water is essential for water vole populations. Polluted or stagnant water can degrade the quality of their habitat and the availability of food sources. Water voles require good water quality to thrive, as they feed on a variety of aquatic and semi-aquatic plants.

2.20 The nearest water body is located approximately 300 m away from the site operations. The land between the site and the water body comprises industrial and residential development and a main road. There is therefore no pathway between the site and habitat associated with water voles. Notwithstanding this, however, surface water run-off from the site will continue to be controlled to ensure there is no site run-off.

2.21 This approach ensures that the operation of the waste transfer station will not adversely affect the nearby deciduous woodland, the Local Nature Reserve, or the water vole population, in compliance with the requirements of the bespoke permit. These habitat protection measures will be regularly reviewed and updated as necessary to maintain environmental standards and ensure long-term protection of the surrounding ecosystems.

3. Odour Management Plan

3.1 An Odour Management Plan (OMP) has been prepared which will be incorporated into the site's environmental management system. A copy of the Plan is provided in appendix iii.

3.2 If additional processes are to be used at the site, the OMP will be updated accordingly and sent to the EA for comment. The OMP identifies potential emission sources of odour at the site.

IAQM Guidance (2018)

3.3 IAQM 'Guidance on the assessment of odour for planning' (2018) assesses the effect of odour on amenity and not on human health. It gives guidance on the assessment of odour for planning purposes i.e. predictive assessments.

3.4 Odour is subjective to individuals. The odour effect which is assessed is the **negative appraisal** by a human receptor of the odour exposure. Once exposure to odour has occurred, the process can lead to adverse effects such as disamenity, annoyance, nuisance and possibly complaints.

3.5 For exposure to odour to occur, there must be an emission source to the atmosphere, a pathway for the odour to travel along and a receptor that has the potential to experience adverse effects.

3.6 In addition, the scale of exposure is determined by the following factors:

- **F**requency: how often an individual is exposed to odour;
- **I**ntensity: the individual's perception of the strength of the odour;
- **D**uration: the overall duration that individuals are exposed to an odour over time;
- **O**dour unpleasantness: the 'hedonic tone' of the odour (pleasant, neutral or unpleasant, expressed on a nine-point scale); and
- **L**ocation: the type of land use and nature of human activities in the vicinity of an odour source. This can be considered to encompass the receptor characteristics, receptor sensitivity and socio-economic factors.

3.7 Odour testing is undertaken using a sniff test – whereby a trained member of staff who has not been exposed to strong odours (either from waste on site or other sources such as food) for at least half an hour before undertaking the test. The test records any offensive odours (whether site derived or off-site), description of the odour and record of location and prevailing weather conditions.

3.8 Where now odours are detected, then the source will be investigated. If the odour is site derived then the procedures set out in the Odour Management Plan will be actioned.

3.9 As the site only accepts construction and demolition waste and skip waste, the potential for odorous waste to be delivered to site is negligible. The risk of odours emanating from the site is considered to be **very low.**

Sensitive Receptors

3.10 A review of potentially sensitive receptors within 1 km of the site has been undertaken. The Haverhill Site lies within a small industrialised area of Haverhill. There are industrial units surrounding the site, however there are residential properties and other sensitive locations within 100m of the site.

3.11 The general land use within 1 km of the site has been identified on the Google Earth extract below. The site is identified edged red with the industrial areas shaded brown, water areas shaded blue, residential areas shaded, recreational areas shaded yellow and allotments shaded green.

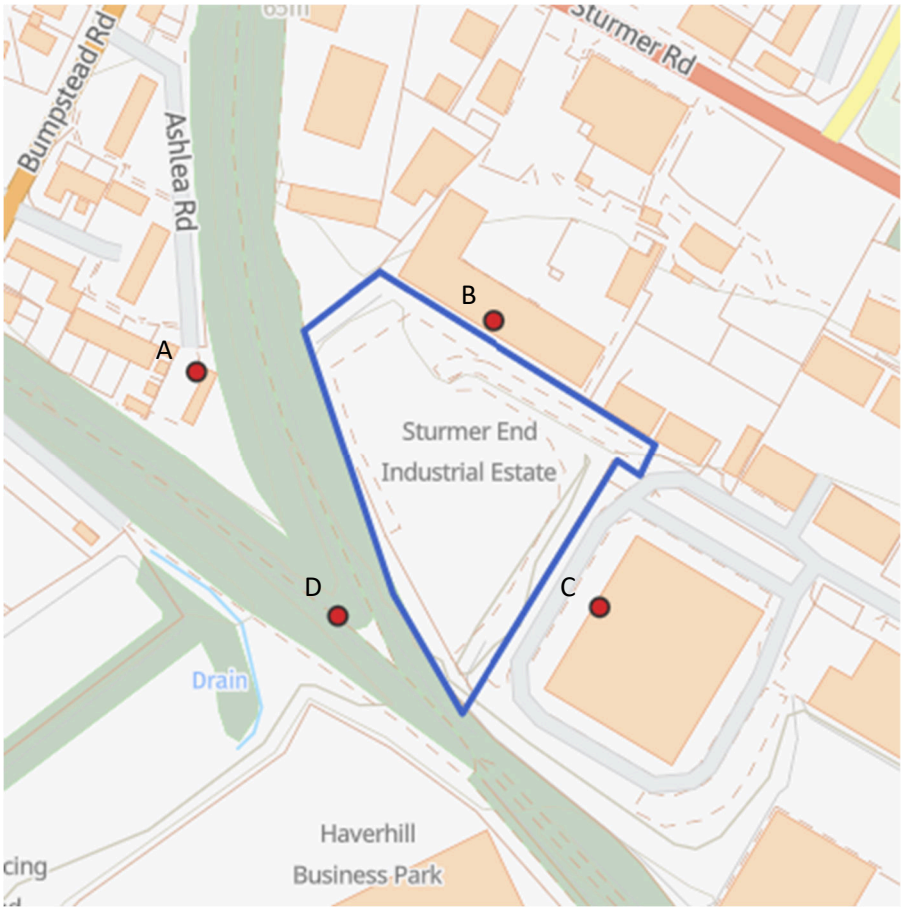
3.12 The land use classification confirms the extent of the industrialised areas, but also the proximity of the sensitive receptors to the west of the site.

3.13 Table 1.1 below confirms distances to selected representative sensitive locations from the site.

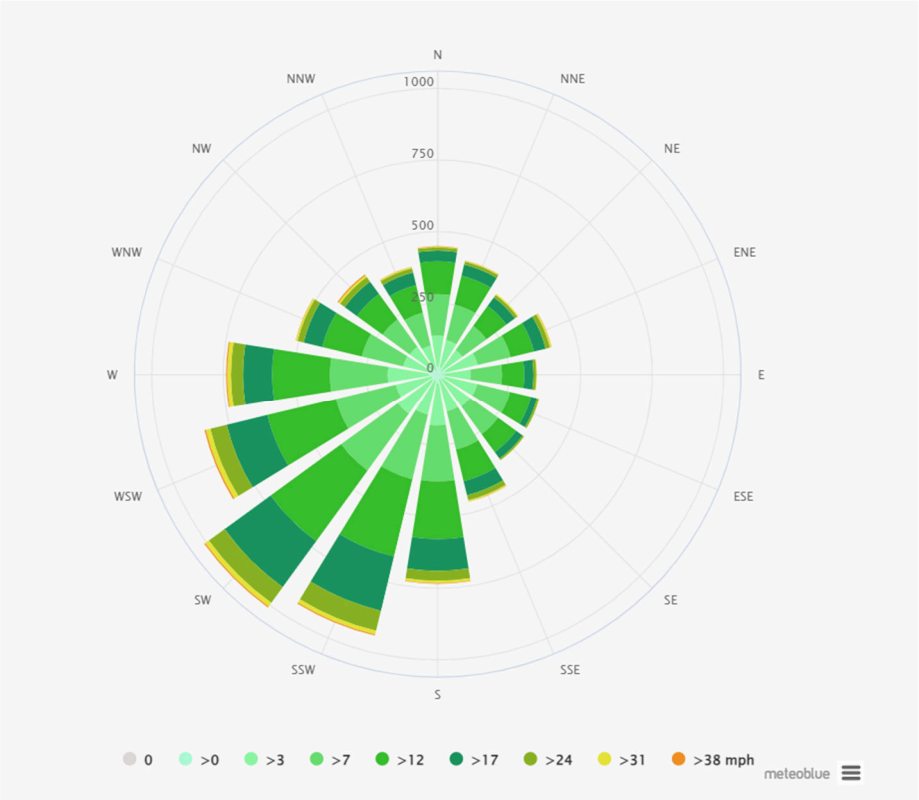
Table 1.1 Distances to Selected, Representative Sensitive Locations

Receptor reference	Land use e.g. house, school, hospital, commercial	Direction from site (North, South, East, West)	Approximate distance to site boundary (m)	Sensitivity to odour
A	House	North West	50m	High
B	Commercial	North	10m	Medium
C	Commercial	South East	20m	Medium
D	Footpath	West	25m	Low

3.14 These areas have been selected due to their perceived sensitivity to odour. Residential areas are particularly susceptible from both an amenity viewpoint. The locations of the receptors are identified on the drawing below



3.15 The predominant wind directions for Haverhill are shown on the wind rose below.



3.16 The wind rose has been generated by Meteoblue based on 30 years of hourly weather model data for the Edmonton area. The wind rose confirms that the prevailing direction is from the south west and west, which will generally ensure that any emissions to air are directed away from the nearby sensitive receptors identified.

Site Operations

3.17 In the event that the nature of the waste to be received at the site is to change and include potentially odorous waste, then the handling, storage and processing methods at the site will be reviewed.

3.18 Potentially odorous waste will be identified prior to receipt at the site. The Site Manager will give consideration to the following:

- Location for the storage of the waste (internal within the MRF building, loose stockpile or covered).
- Maximum tonnage to be stored on site
- Maximum duration for waste to be stored on site
- Processing of the waste (e.g. screening/sorting)
- Odour mitigation
    - Covering of waste
    - Spraying of waste

- Perimeter deodorising system
- Increased odour monitoring

Reporting of Complaints

3.19 A complaint form will be used to log complaints, feedback will be given either in person to the complainant or over the phone or via email. Complaints will be reviewed to ensure that the cause of the problem does not re-occur.

4. Noise

4.1 The site is located within a predominantly industrial estate. Residential properties lie to the west and north west, including on Ashlea Road, and other sensitive locations are within approximately one hundred metres. The Noise Management Plan identifies representative receptors that include a dwelling approximately fifty metres to the north west, commercial premises approximately ten metres to the north and approximately twenty metres to the south east, and a public footpath approximately twenty five metres to the west. Please confirm the receptor labels and exact locations if they differ.

4.2 The facility opens from 06:00 to 18:00 on Monday to Friday and from 06:00 to 14:00 on Saturday. No noisy activities take place before 07:00 and there are no operations on Sundays or Bank Holidays. These limits are enforced through staff briefings and site rules.

4.3 The main sources of noise are movements of heavy goods vehicles and mobile plant, loading and off loading, sorting and screening, and the use of crushing and shredding plant when required. A road sweeper operates for housekeeping and is also a potential source.

4.4 Noise is controlled through good practice. Plant is started in sequence, unnecessary idling is avoided, and the use of horns and unnecessary revving is discouraged. Drop heights are kept low. Where practicable, plant is located and oriented away from the most sensitive receptors and doors and covers are kept closed during processing. The majority of handling and processing occurs within the waste transfer station building which is enclosed on three sides and roofed. External working areas are screened by concrete retaining and push walls and by existing bunds and vegetation. Routine inspections are undertaken to maintain the performance of cladding and enclosures and to keep plant in good order.

4.5 Noise monitoring is undertaken during normal operating periods in accordance with the Noise Management Plan. Complaints are investigated promptly and any actions are recorded. Please confirm the monitoring locations and the monitoring frequency and confirm whether any site specific limits have been agreed with the Environment Agency or the Environmental Health Officer.

4.6 Taking account of the operational hours, the enclosure and screening that are in place, and the good practice measures described above, noise from the site is managed so that significant adverse effects at nearby receptors are avoided.

5. Dust and Emissions (Particulates)

5.1 The operational surface of the site comprises impermeable concrete with integral drainage and interceptors. Most handling and sorting takes place inside the waste transfer station building which is enclosed on three sides and roofed. A spray curtain misting system is installed along the open elevation. External sources of dust include traffic on hardstanding and the handling and storage of materials such as processed aggregates. Crushing, screening and shredding are carried out only when required.

5.2 Dust and fine particulates are controlled through a combination of engineered and operational measures. The spray curtain operates on timed cycles. Hydrants fitted with fine spray nozzles provide coverage across the yard so that dusty activities and stockpiles can be damped as needed.

5.3 A mobile water bowser is available during dry or windy weather. Stockpiles are kept within concrete push wall bays with side walls that are approximately four metres high and push walls that are up to approximately five metres high. The maximum stockpile height is four metres.

5.4 The extended side walls shield open faces from prevailing winds, and damping is applied when required. Crushers and screeners are fitted with manufacturer spray bars at key transfer points before and after the crushing stage. Housekeeping includes daily road sweeping across the yard and manual cleaning inside the building. The site speed limit is ten miles per hour, double handling is minimised, and all vehicles are sheeted.

5.5 Water consumption is reduced by using grey water harvested from the waste transfer station roof. The current working assumption is a total grey water storage capacity of approximately two hundred thousand litres.

5.6 Monitoring and triggers are proportionate to risk. Routine visual checks are carried out at least twice each day and more often during adverse weather or following any complaint. Findings are recorded in the site log. If visual monitoring indicates off site dust or if a validated complaint is received, the Dust and Emissions Management Plan is reviewed and additional measures, such as fixed monitors, are considered in discussion with the Environmental Health Officer and the Environment Agency. Activities are adjusted or temporarily ceased during high winds if dust cannot be adequately controlled. Any repeated stoppages prompt an operational review and remedial actions.

5.7 Perimeter retaining and push walls and the mass of the waste transfer station building provide effective physical screening and reduce wind effects. The southern boundary benefits from the wind shadow of the building. The continuous hardstanding together with the contained drainage and interceptors prevent the migration of dusty run off to the wider environment.

5.8 With enclosure, engineered containment, active suppression, housekeeping and weather based triggers, dust is managed so that significant impacts at nearby industrial and residential receptors are prevented.

5.9 The prevailing wind direction is away from the western boundary and away from the Local Wildlife Site. Notwithstanding this, dust monitoring along the western boundary will be carried out to establish any

potential adverse impacts on the LWS. A baseline ecological health survey will be conducted of the LWS along the western boundary, and follow-up surveys will be undertaken, initially after 12 months and reviewed thereafter. The surveys will specifically address any dust-related issues impacting the LWS. The findings of the surveys will be reported to the Environment Agency along with proposed recommendations for additional measures/changes in working practice and operations where necessary.