Non-Technical Summary and Supporting Statement

Haven Road Recycling Facility

Silverton Aggregates Limited

Haven Road, Colchester, Essex, C02 8HT

Prepared by:

SLR Consulting Limited

Mill Barn, 28 Hollingworth Court, Turkey Mill,
Maidstone, ME14 5PP

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Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	1 February 2024	Rebecca Holland	Samantha Pople	Samantha Pople
	Click to enter a date.			
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Basis of Report

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1.0 Introduction

Silverton Aggregates Limited (Silverton) has instructed SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) variation application.

The application seeks to allow for the acceptance of Incinerator Bottom Ash Aggregate (IBAA) at their existing facility at Haven Road under the Environmental Permitting (England and Wales) Regulations 2016.

This document provides a Non-Technical Summary (NTS) of the proposed operations on site, including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed changes.

To support this application, the following documentation is submitted in addition to this NTS:

- Application Forms – A, C2, B3, C4 and F1 and supporting information;
- Non-Technical Summary;
- Environmental (Amenity) Risk Assessment;
- Baseline Site Condition Report;
- Operating Techniques and Management System;
- Best Available Techniques (BAT) Assessment;
- Dust and Emissions Management Plan; and
- Drawings including Site Layout, Drainage and Environmental Site Setting.

1.1 The Site

The site is located to the south-east end of Commerce Park, an industrial estate within Colchester. The entrance to the facility is via a track located off Haven Road which runs from the north of the site through to the south. The national grid reference for the site is TM022234 and the site location is illustrated on Drawing 01.

The closest residential property is located to the southwest approximately 300m away from the site.

The site lies in close proximity to a number of European and nationally designated sites. The Blackwater, Crouch, Roach and Colne Estuaries (Marine Conservation Zone) lies adjacent to the site's eastern boundary. The Upper Colne Marshes of Special Scientific Interest (SSSI) is located approximately 180m to the southeast of the site. Other designated sites within a 2km radius of the site boundary include Local Nature Reserves, a Registered Parks & Gardens and Cultural Heritage Sites including Listed Buildings and Scheduled Monuments.

Surrounding land-use and receptors are identified on Drawing 02 – Environmental Site Setting, and Drawing 03 - Cultural and Natural Heritage, and are identified in Table 3-1 below.

1.2 Current Environmental Permit

Silverton operate a recycling facility on Haven Road under a ‘fixed condition’ license (for an inert and excavation waste transfer station with treatment) issued to Duncan Leslie Charles Fowle and David Peter Arthur Goodwin. The environmental permit (EA Ref: VP3194NH) was originally issued in March 2007 and has not been varied during this time.

A transfer of the EP to Silverton Aggregates Limited was submitted and issued in 2024.

The EP allows for the acceptance of up to 75,000 tonnes of waste for manual sorting, separation, screening or crushing.

2.0 Environmental Permit Variation Application

2.1 Overview of Variation

This variation application seeks to include the following changes, thereby changing the current EP to a bespoke one:

- Acceptance, storage and treatment of IBAA (blending) as a listed activity; and
- Extension to the current site boundary.

No further changes are proposed to the existing operations undertaken on site.

2.2 Acceptance, Treatment and Storage of IBAA

2.2.1 Listed Activity

Silverton wish to accept over 75 tonnes per day of IBAA for further treatment and storage. As this exceeds the installation treatment limit of 75 tonnes per day, the activity will fall within;

- *Section 5.4, Part A (1) (b) (iii) recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day… for the treatment of slags and ashes.*

2.2.2 Addition of EWC Code

The relevant EWC code to allow for the acceptance of IBAA will need to be included in Table 2.2 of the EP, and is detailed in Table 1 below;

Table 1 EWC Code for IBAA

Waste Code	Description
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	**Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – for the acceptance of Incinerator Bottom Ash (IBAA)**

2.2.3 Acceptance, Storage and Treatment of IBAA

IBAA will be delivered to site and stored in a dedicated bay located in the north west corner of the site, the location of which is illustrated on Drawing 01. The area will benefit from the following;

- Legio block bay walls at a height of 3.2m with a 0.5m offset maintained at all times to prevent wind whipping.
- Impermeable concrete surfacing and sealed drainage – all runoff will flow to a sump located at the back of the bay.

Up to 2,000 tonnes of IBAA will be stored at any one time.

2.2.4 Update to the EP

Table S1.2 of the EP would need to be updated to include the following details (highlighted in green), with no changes proposed to the existing activities, detailed in Activity AR2 in Table 2 below;

Table 2 Waste Activities

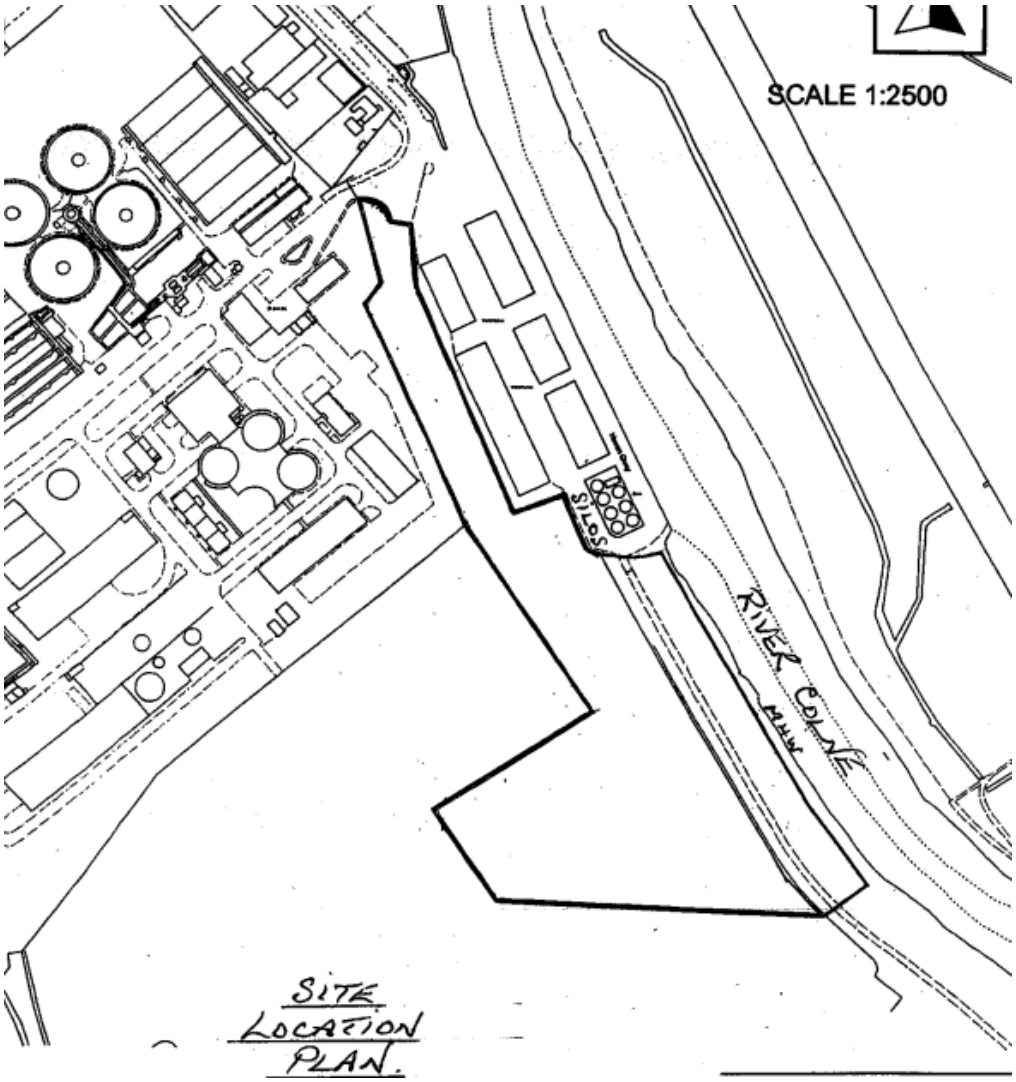
Activity Reference	EP Regulations Reference	Activity Description	Limits of Activity
Installation			
AR1	Section 5.4, Part A (1) (b) (iii)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving… (iii) treatment of slags and ashes.	Waste will be accepted and stored on an impermeable surface with sealed drainage. Storage limit of up to 2,000 tonnes at any one time.
Waste Operation			
AR2	Inert and excavation waste transfer station with treatment	D15: Storage pending, on this site any of the category "D" operations authorised under this column, or elsewhere than on this site, any of the operations listed in Part III of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced). R13: Storage of waste consisting of materials intended for submission, on this site to any of the category "R" operations authorised under this column, or elsewhere than on this site, to any of the operations listed in Part IV of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced).	Inert wastes must be kept on hard standing or on impermeable pavement with sealed drainage.

Activity Reference	EP Regulations Reference	Activity Description	Limits of Activity
		D14: Repackaging of waste prior to waste being submitted on this site to any of the category "D" operations authorised under this column, or elsewhere than on this site, by means of any of the operations listed in Part III of Schedule 4 of the 1994 Regulations.	
		D9: Physico-chemical treatment of waste not listed elsewhere in this table which results in final compounds or mixtures which are disposed of on this site by means of any of the category "D" operations authorised under this column, or elsewhere than on this site, by means of any of the operations listed in Part III of Schedule 4 of the 1994 Regulations. R3: Recycling or reclamation of organic substances which are not used as solvents. R4: Recycling or reclamation of metals and metal compounds. R5: Recycling or reclamation of other inorganic materials.	Treatment consisting only of manual sorting, separation, screening, or crushing of waste into different components for disposal, (no more than 50 tonnes per day) or recovery. Inert wastes must be treated on hard standing or on impermeable pavement with sealed drainage.

2.3 Extension to the Site Boundary

This variation application also seeks to extend the site boundary. Figure 1 below illustrates the current boundary (shown in bold black), whilst Drawing 001 shows the new extended boundary in the north west area of the site, where the IBAA will be stored and treated in a dedicated bay.

Figure 1 Current Environmental Permit Boundary



2.4 Type of Variation Application and EA Fee

With the addition of a new listed activity for the acceptance of IBAA the application fee for this activity will be **£12,357** (Ref. 1.16.2.4).

In addition, a normal variation fee for the existing facility to increase the EP boundary for the 'physical treatment of non-hazardous waste' will be **£3,965** (Ref: 1.16.12).

A Dust and Emissions Management Plan has also been included which has a fee of **£1,241** (Ref: 1.19.5).

Therefore, the total fee is; £17,563.

3.0 Application Contents

3.1 Application Forms

Parts A, C2, B3, C4 and F1 of the EA's EP variation application forms have been completed in support of this application and are enclosed as Appendix A.

3.2 Drawings

The following drawings have been updated to support this variation application.

- Drawing 001 Site Plan
- Drawing 002 Site Setting Plan – Local Receptors
- Drawing 003 Site Setting Plan – Cultural and Natural Heritage

These are included in Appendix B.

3.3 Environmental Risk Assessment

An Environmental Risk Assessment has been carried out to assess the environmental risk posed by the new activity on site. The assessment has been carried out in accordance with the EA's Environmental Risk Assessment technical guidance dated August 2022[1].

The aim of the assessment is to identify any significant risks and demonstrate that the risk of pollution or harm will be acceptable by taking the appropriate measures to manage these risks.

Operational procedures at the site have been developed to monitor and manage amenity risks from the proposed activities and include provision for the monitoring of scavenging birds, vermin, insects, litter, mud on roads, dust, odour and noise. The potential impact of the proposed development on surrounding human and environmental receptors is assessed in the risk assessment and the receptors illustrated on Drawing 002 and 003.

Subject to the implementation of management measures, the conclusion of the assessment is that the proposed activities are unlikely to result in a significant risk to the amenities of the local environment.

A copy of the updated Environmental Risk Assessment is included in Appendix C.

3.4 Baseline Site Condition Report

A Baseline Site Condition Report has been prepared as required by the EA's application forms and the addition of land to the current EP boundary to establish the baseline environmental conditions within the current and extended EP boundary. The SCR has been prepared in accordance with EA guidance H5 (version 3), April 2013.

The facility will continue to operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the site does not pose a significant risk to the surrounding human and natural environment.

The SCR (reference 416.04370.00014/SCR) is enclosed as Section 4 of this EP Application.

[1] EA Website – Environmental Risk Assessments, https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit

3.5 Operating Techniques and Management Systems

The document details the management measures that are implemented at the facility to minimise the risk of accidents or emissions that could impact site operatives, local receptors and the environment.

To summarise, the existing document includes the following information:

- Management;
- Site operations;
- Process Controls;
- Emissions; and
- Information.

These existing operational management procedures will continue to ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system and the Operating Techniques;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The Operating Techniques and Management Systems document is included in Appendix

3.6 BAT Assessment

The inclusion the blending of IBAA, as a listed activity, requires assessment under the relevant Best Available Technique (BAT) guidance[2]. BAT obligations are only required for listed activities, and so therefore only the acceptance and treatment of IBAA has been considered.

Guidance reviewed for the compilation of this document includes but is not limited to:

- European Commission Joint Research Centre – Best Available Techniques Reference document on Waste Treatment (October 2018) available at Waste Treatment | EU-BRITE
- Environment Agency – Non-hazardous and inert waste: appropriate measures for permitted facilities (August 2023) at Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK
- Environment Agency - Develop a management system: environmental permits (April 2023) available at Develop a management system: environmental permits - GOV.UK; and
- Environment Agency - Control and monitor emissions for your environmental permit (November 2022) available at Control and monitor emissions for your environmental permit - GOV.UK.

The BAT Assessment is included as Appendix F of this Non-Technical Summary.

[2] Relevant guidance: S5.06 and the appropriate sections of the BREF document for waste treatment.

3.7 Dust and Emissions Management Plan

A Dust and Emissions Management Plan (DEMP) has been prepared in support of this application, which will be implemented under the control of site management.

The DEMP includes a review of the site's location, potentially sensitive receptors and local wind speed and direction data. The sources of dust associated with the proposed operations on site have been considered and appropriate techniques for monitoring, management and mitigation will be in place.

Subject to the implementation of the stated management measures, the conclusion has been reached that the proposed activities are unlikely to result in a significant risk of dust emissions that would affect the amenity of the local environment.

The DEMP is enclosed in Appendix G of this Non-Technical Summary.

3.8 Other Documents of Note

3.8.1 Climate Change Risk Assessment

A Climate Change Risk Assessment and associated Adaptation Plan will be prepared for the site and will be included in the Environmental Management System (EMS).

3.8.2 Noise Management Plan

A Noise Management Plan is not required to support this variation application. The variation only seeks to add an additional EWC code for the acceptance of IBAA, whilst a listed activity, is a waste similar to those already treated and stored on site and no additional treatment activities are being proposed. Therefore, the points listed below summarise the rationale behind this decision;

- The site has never received any noise complaints from nearby industrial receptors or any other type of receptor located further afield;
- There is no proposed increase in existing permitted tonnages;
- The site is bunded, providing noise attenuation to adjacent neighbours; and
- There is no change to existing activities or additional ones proposed.

4.0 Technical Standards and Control Measures

The key technical standards laid out in this Non-Technical Summary and Supporting Statement govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- Developing a management system: environmental permits;
- Control and Monitor emissions for your environmental permit;
- Non-hazardous and inert waste: appropriate measures for permitted facilities;
- Waste Treatment BREF: and
- Relevant EA Guidance e.g. Environmental Risk Assessment's, etc.

The control measures relevant to the proposed operations are described in the Operating Techniques and Management Systems document.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed changes to Haven Road Recycling Facility.

Silverton are fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the Company's Environmental Policy and OT and Management System.

Appendix A Environment Agency Application Forms

Application for an environmental permit Part A – About you

You will need to fill in this part A if you are applying for a new permit, applying to change an existing permit or surrender your permit, or want to transfer an existing permit to yourself. Please check that this is the latest version of the form available from our website.

You can apply online for Waste standard rules environmental permits, bespoke waste permits and bespoke Medium combustion plant permits

Apply online for an environmental permit.

Please read through this form and the guidance notes that came with it.

The form can be:

1) **saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.**
2) **printed off and filled in by hand. Please write clearly in the answer spaces.**

Note: if you believe including information on a public register would not be in the interests of national security you must enclose a letter telling us that you have told the Secretary of State. We will not include the information in the public register unless directed otherwise.

It will take less than one hour to fill in this part of the application form.

Where you see the term 'document reference' on the form, give the document references and send the documents with the application form when you've completed it.

Contents

1 About you

Are you applying as an individual, an organisation of individuals (for example, a partnership), a company (this includes Limited Liability Partnerships) or a public body?

An individual	☐ Now go to section 2 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1
An organisation of individuals (for example, a partnership)	☐ Now go to section 3 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1
A public body	☐ Now go to section 4
A registered company or other corporate body	☑ Now go to section 5 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

2 Applications from an individual

2a Please give us the following details

Name

Title (Mr, Mrs, Miss and so on) _____

First name _____

Last name _____

Now go to section 6

3 Applications from an organisation of individuals or charity

3a Type of organisation

For example, a charity, a partnership, a group of individuals or a club

3b Details of the organisation or charity

If you are an organisation of individuals, please give the details of the main representative below. If relevant, provide details of other members (please include their title Mr, Mrs and so on) on a separate sheet and tell us the document reference you have given this sheet

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to question 3c or section 6

3c Details of charity

Full name of charity

This should be the full name of the legal entity not any trading name.

3d Company registration number

If you are registered with Companies House please tell us your registration number

3e Charity Commission number

If you are registered with the Charity Commission please tell us your registration number

Now go to section 6

4 Applications from public bodies

4a Type of public body

For example, NHS trust, local authority, English county council

4b Name of the public body

4c Please give us the following details of the executive

An officer of the public body authorised to sign on your behalf

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position

Now go to section 6

5 Applications from companies or corporate bodies

5a Name of the company

Silverton Aggregates Limited

5b Company registration number

10733260

Date of registration (DD/MM/YYYY)

21/04/2017

If you are applying as a corporate organisation that is not a limited company, please provide evidence of your status and tell us below the reference you have given the document containing this evidence.

Document reference

5 Applications from companies or corporate bodies, continued

5c Please give details of the directors

If relevant, provide details of other directors and company secretary, if there is one, on a separate sheet and tell us the reference you have given this sheet.

Document reference

Details of company secretary (if relevant) and director/s

Title (Mr, Mrs, Miss and so on) Mr

First name Duncan

Last name Fowle

Title (Mr, Mrs, Miss and so on) Mr

First name David

Last name Goodwin

Now go to section 6

6 Your address

6a Your main (registered office) address

For companies this is the address on record at Companies House.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address Devereux Farm
Walton Road
Kirby-Le-Soken
Finton-On-Sea

Postcode CO13 0DA

Contact numbers, including the area code

Phone

Fax

Mobile

Email

For an organisation of individuals every partner needs to give us their details, including their title Mr, Mrs and so on. So, if necessary, continue on a separate sheet and tell us below the reference you have given the sheet.

Document reference

6b Main UK business address (if different from above)

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

6 Your address, continued

Contact numbers, including the area code

Phone

Fax

Mobile

Email

Now go to section 7

7 Contact details

7a Who can we contact about your application?

It will help us if there is someone we can contact if we have any questions about your application. The person you name should have the authority to act on your behalf.

Please add a second contact on a separate sheet if this person is not always available.

Document reference of this separate sheet

This can be someone acting as a consultant or an 'agent' for you.

Contact name

Title (Mr, Mrs, Miss and so on) Ms

First name Samantha

Last name Pople

Address SLR Consulting Ltd
28 Hollingworth Court
Turkey Mill
Maidstone

Postcode ME14 5PP

Contact numbers, including the area code

Phone

Fax

Mobile 07964 985089

Email spople@slrconsulting.com

7b Who can we contact about your operation (if different from question 7a)?

Contact name

Title (Mr, Mrs, Miss and so on) Mr

First name Luke

Last name Thurston

Address Silverton Aggregates Limited
Haven Road
Colchester

Postcode CO2 8HT

Contact numbers, including the area code

Phone 01206 793800

Fax

Mobile

Email luke.thurston@silverton.uk.com

7 Contact details, continued

7c Who can we contact about your billing or invoice?

Note: Please provide the name and address that all invoices should be sent to for your subsistence fees.

As in question 7a ☐

As in question 7b ☑

Please give details below if different from question 7a or 7b.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

8 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it. More information on how to do this is available at: www.gov.uk/government/organisations/environment-agency/about/complaints-procedure.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

9 Where to send your application

For how many copies to send see the guidance note on part A.

For water discharges by email to PSC-WaterQuality@environment-agency.gov.uk

For waste and installations by email to PSC@environment-agency.gov.uk

For flood risk activity permits send 1 copy only to enquiries@environment-agency.gov.uk or to the local Environment Agency office for where the work is proposed to be carried out.

Or

Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please ☐

No thank you ☐

Crystal Mark 19101
Clarity approved by Plain English Campaign

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐ Amount received

£

Appendix 1 – Date of birth information for installation and waste activities (applications for a new permit or transferring a permit) only

Date of birth information in this appendix will not be put onto our Public Register

Are you applying as an individual, an organisation of individuals (for example, a partnership) or a company (this includes Limited Liability Partnerships)?

An individual ☐ Now go to 2

An organisation of individuals (for example, a partnership) ☐ Now go to 3

A registered company or other corporate body ☐ Now go to 4

2 Applications from an individual

Please give us the following details

Name

Date of birth (DD/MM/YY)

3 Applications from an organisation of individuals or charity

Details of the organisation or charity

If you are an organisation of individuals, please give the date of birth details of the main representative below. If relevant, provide details of other members on a separate sheet and tell us the document reference you have given this sheet.

Name

Date of birth (DD/MM/YY)

Document reference

4 Applications from companies or corporate bodies

Name of the company

Please give the date of birth details for all directors and company secretary if there is one. If relevant, provide those details of other directors on a separate sheet and tell us the document reference you have given this sheet.

Details of company secretary (if relevant) and director/s

Name

Date of birth (DD/MM/YY)

Name

Date of birth (DD/MM/YY)

Name

Date of birth (DD/MM/YY)

Document reference

Application for an environmental permit
Part C2 – General – varying a bespoke permit

Environment Agency

Fill in this part of the form, together with part A and the relevant parts of C3 to C7 and part F1 or F2, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or changing existing ones).

Waste operation changing to installation or vice versa?

If your changes mean that a waste operation becomes an installation (or vice versa) you also need to fill in either part C3 (waste to installation) or part C4 (installation to waste).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

Contents

1 About the permit

Note: If you are applying to convert your existing permit to a standard permit or add a standard facility you need to fill out form C1.

1a Discussions before your application

If you have had discussions with us before your application, give us the permit reference or details on a separate sheet. Tell us below the reference you have given this extra sheet.

Permit or document reference

1b Permit number

What is the permit number that this application relates to?

EPR/VP3194NH

1c Site details

What is the name, address and postcode of the site?

Site name: Haven Road Recycling Facility

Address: Haven Road
Colchester
Essex

Postcode: C02 8HT

2 About your proposed changes

2a Type of variation

What type of variation are you applying for?

Minor technical ☐

Normal variation ☑

Substantial ☐

2 About your proposed changes, continued

2b Changes or additions to existing activities

Please give us brief details in the box below. More detailed information can be given in Table 1 below.

This variation application seeks to include the following changes:
- Acceptance and storage of IBAA (and addition of the associated EWC waste code);
- Treatment of IBAA (blending) as a listed activity; and
- Extension to the current site boundary.

Further information is included within the Non-Technical Summary and Supporting Statement.

Fill in Table 1 with details of all the proposed changes to current activities. In the final column of the table, give us the document reference for the proposed changes and send them to us with your filled in application form.

Fill in a separate table for each activity you are applying to vary or add. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given this document.

Document reference: 409.010103.00001/Non Technical Summary and SS

You only need to fill in one table for your mining waste operations.

2c Consolidating (combining) or updating existing permits

If your proposed change is to modernise (update) your permit, now answer 2c1; otherwise go to 2d.

If your proposed change is to consolidate (combine) a number of permits, now answer 2c2; otherwise go to 2d.

Note: In both cases we may require additional information from you about, for example, your management system. Therefore we would always advise you to talk to us before you submit any application to modernise or consolidate permits.

2c1 Do you want to have a modern style permit?

No ☐

Yes ☑

2c2 Identify all the permits you want to consolidate (combine) by listing the permit numbers in Table 2 below

Table 2 – Permit numbers

2d Treating batteries

2d Are you proposing to treat batteries?

No ☑

Yes ☐ Tell us how you will do this and send us a copy of your explanation and tell us below the reference you have given this explanation

Document reference for the explanation

2e Ship recycling

2e1 Is your activity covered by the Ship Recycling Regulations 2015? (See the guidance notes on part C2.)

No ☑

Yes ☐ Tell us how you will do this. Please send us a copy of your explanation and your facility recycling plan, and tell us below the reference numbers you have given these documents

Document reference for the explanation

Document reference for the facility recycling plan

2e2 Is this a renewal of an existing authorisation covered by the Ship Recycling Regulations 2015?

No ☑

Yes ☐ Tell us the expiry date of your existing authorisation (DD/MM/YYYY)

2 About your proposed changes, continued

Table 1 – Changes to existing activities

Fill in Table 1 with details of all the proposed changes to current activities. In the final column of the table, give us the document reference for the proposed changes and send them to us with your filled in application form.

Name	Installation schedule 1 references	Description of the installation activity	Description of waste operation	Description of the mining waste operations	Description of water discharge activity	Description of groundwater activity	Proposed changes document reference
i.e. name of installation, waste operation, mining waste operation, water discharge activity or groundwater activity							
Example – effluent unique name					Example – treated sewage effluent		
If you do not have enough room, go to the line below or send a separate document and give us the document reference here							
Haven Road			Inert and Excavation				Non-Technical
Recycling Facility			Waste Transfer				Summary and
			Station with				Supporting Statement
			treatment for recovery				
			or disposal				

2 About your proposed changes, continued

2f Low impact installations (installations only)

2f1 Will any changes mean that any of the regulated facilities will become low impact installations?

No ☑ Now go to section 3

Yes ☐ If yes, tell us how you meet the conditions for a low impact installation (see the guidance notes on part C2 – Appendix 1)

Document reference

Tick the box to confirm you have filled in the low impact installation checklist in appendix 1 for each regulated facility ☐

3 Your ability as an operator

If you are applying to add waste installations or waste operations to a permit that has not previously had them, you need to fill in all of section 3.

If you are applying to consolidate (combine) two or more permits or have an updated permit you must fill in question 3d.

This section does not apply for applications to surrender a permit.

3a Relevant offences

Installations and waste operations only (see the guidance notes on part C2).

3a1 Have you, or any other relevant person, been convicted of any relevant offence?

No ☑ Now go to question 3b

Yes ☐ Please give details below

Name of the relevant person

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position held at the time of the offence

Name of the court where the case was dealt with

Date of the conviction (DD/MM/YY)

Offence and penalty set

Date any appeal against the conviction will be heard (DD/MM/YYYY)

If necessary, use a separate sheet to give us details of other relevant offences and tell us below the reference number you have given the extra sheet.

Document reference

Now go to question 3b

Please also complete the details in Appendix 2.

3b Technical ability

Specified waste management activities and waste operations only (see the guidance notes on part C1).

Please indicate which of the two schemes you are using to demonstrate you are technically competent to operate your facility and the evidence you have enclosed to demonstrate this.

ESA/EU skills

I have enclosed a copy of the current Competence Management System certificate ☐

CIWM/WAMITAB scheme

Please select **one** of the following:

- I have enclosed a copy of:
  - the relevant qualification certificate/s ☑

  or
  - evidence of deemed competence ☐

  or

3 Your ability as an operator, continued

- Environment Agency assessment ☐

or

- evidence of nominated manager status under the transitional provisions for previously exempt activities ☐

and, if deemed competent or Agency-assessed, or if there is evidence of a nominated manager, or if the original qualification is over two years old:

I have enclosed a copy of the relevant current continuing competence certificate/s ☐

For each technically competent manager please give the following information. If necessary, use a separate sheet to give us these details and tell us below the document reference you have given the extra sheet.

Title (Mr, Mrs, Miss and so on) Mrs

First name Beverley

Last name Ewers

Phone

Mobile 07949 669277

Email bev.ewers@silverton.uk.com

Please provide the environmental permit number/s and site address for **all** other waste activities that the proposed technically competent manager provides technical competence for, including permits held by other operators. Continue on a separate sheet as required.

Permit number	Site address	Postcode
	N/A - no other sites.	

Document reference Appendix A-1: WAMITAB Certificates

Now go to question 3c

Please also complete the details in Appendix 2.

3c Finances

Installations, waste operations and mining waste operations only (see the guidance notes on part C2).

Please note that if you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

Do you or any relevant person or a company in which you were a relevant person have current or past bankruptcy or insolvency proceedings against you?

No ☑

Yes ☐ Please give details below, including the required set-up costs (including infrastructure), maintenance and clean up costs for the proposed facility against which a credit check may be assessed

We may want to contact a credit reference agency for a report about your business's finances.

3 Your ability as an operator, continued

Landfill, Category A mining waste facilities and mining waste facilities for hazardous waste only

How do you plan to make financial provision (to operate a landfill or a mining waste facility you need to show us that you are financially capable of meeting the obligations of closure and aftercare)?

Renewable bonds ☐

Cash deposits with the Environment Agency ☐

Other – provide comprehensive details ☐

Document reference

Provide a cost profile and expenditure plan of your estimated costs throughout the aftercare period of your site.

Document plan reference

Now go to question 3d

3d Management systems

You must have an effective, written management system in place that identifies and reduces the risk of pollution. You may show this by using a certified scheme or your own system.

Your permit requires you (as the operator) to ensure that you manage and operate your activities in accordance with a written management system.

You need to be able to explain what happens at each site and which parts of the overall management system apply. For example, at some sites you may need to show you are carrying out additional measures to prevent pollution because they are nearer to sensitive locations than others.

You can find guidance on management systems on our website at www.gov.uk/government/organisations/environment-agency.

Tick this box to confirm that you have read the guidance and that your management system will meet our requirements ☐

What management system will you provide for your regulated facility?

ISO 14001 ☐

BS 8555 (Phases 1–5) ☐

Acorn ☐

Green dragon ☐

Own management system ☑

Please make sure you send us a summary of your management system with your application.

Document reference/s: Appendix E - Operating Techniques and Management System

4 Consultation

Fill in 4a to 4c for installations and waste operations and 4d for installations only.

Could the waste operation or installation involve releasing any substance into any of the following?

4a A sewer managed by a sewerage undertaker?

No ☑

Yes ☐ Please name the sewerage undertaker

4b A harbour managed by a harbour authority?

No ☑

Yes ☐ Please name the harbour authority

4c Directly into relevant territorial waters or coastal waters within the sea fisheries district of a local fisheries committee?

No ☑

Yes ☐ Please name the fisheries committee

4 Consultation, continued

4d Is the installation on a site for which:

4d1 a nuclear site licence is needed under section 1 of the Nuclear Installations Act 1965?

No ☐

Yes ☐

4d2 a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards Regulations 2015, or a safety report is needed under regulation 7 of those Regulations?

No ☐

Yes ☐

5 Supporting information

5a Provide a plan or plans for the site

See the guidance notes on part C2 for what needs to be marked on the plan.

Clearly mark the site boundary or discharge point, or both. Also include site drainage plans, site layout plans, and plant design drawings/process flow diagrams (as required). (See the guidance notes on part C2.)

Document reference/s of the plans: Drawing 001

5b Do any of the variations you plan to make need extra land to be included in the permit?

No ☐

Yes ☑ Please provide a site report for the extra land

Document report reference/s: Appendix D - Baseline Site Condition Report

5c Provide a non-technical summary of your application

Document reference of the summary: 409.010103.00001/Non Technical Summary and SS

5d Risk of fire from sites storing combustible waste

Are you applying for an activity that includes the storage of combustible wastes?

(This applies to all activities excluding standalone water and groundwater discharges.)

No ☑ Go to question 5f

Yes ☐ Go to question 5e

5e Will your variation increase the risk of a fire occurring or increase the environmental risk if a fire occurs?

See the guidance notes on part C2.

No ☐

Yes ☐ Provide a fire prevention plan. You need to highlight any changes you have made since your pre-application discussions

Document reference of the plan:

5f Adding an installation

If you are applying to add an installation, tick the box to confirm that you have sent in a baseline report and provide a reference ☑

Document reference of the report: Appendix D - Baseline Site Condition Report

6 Environmental risk assessment

If you need one, see the guidance notes on part C2.

Provide an assessment of any additional risks the proposed changes or additions to your regulated facilities poses to the environment as part of your application to vary this permit. The risk assessment must follow the methodology set out in 'Risk assessments for your environmental permit' at https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit or an equivalent method.

Document reference for the assessment: Appendix C - Environmental Risk Assessment

7 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please ☐

No thank you ☑

Crystal Mark 19110 Clarity approved by Plain English Campaign

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐ Amount received

£

Plain English Campaign's Crystal Mark does not apply to appendix 1.

Appendix 1 – Low impact installation checklist

Installation reference				
Condition	Response			Do you meet this?
A – Management techniques	Provide references to show how your application meets A			Yes ☐ No ☐
	References			
B – Aqueous waste	Effluent created		m^3/day	Yes ☐ No ☐
C – Abatement systems	Provide references to show how your application meets C			Yes ☐ No ☐
	References			
D – Groundwater	Do you plan to release any hazardous substances or non-hazardous pollutants into the ground?		Yes ☐ No ☐	Yes ☐ No ☐
E – Producing waste	Hazardous waste		Tonnes per year	Yes ☐ No ☐
	Non-hazardous waste		Tonnes per year	
F – Using energy	Peak energy consumption		MW	Yes ☐ No ☐
G – Preventing accidents	Do you have appropriate measures to prevent spills and major releases of liquids? (See 'How to comply'.)		Yes ☐ No ☐	Yes ☐ No ☐
	Provide references to show how your application meets G			
	References			
H – Noise	Provide references to show how your application meets H			Yes ☐ No ☐
	References			
I – Emissions of polluting substances	Provide references to show how your application meets I			Yes ☐ No ☐
	References			
J – Odours	Provide references to show how your application meets J			Yes ☐ No ☐
	References			
K – History of keeping to the regulations	Say here whether you have been involved in any enforcement action as described in Compliance History Appendix 1 explanatory notes		Yes ☐ No ☐	

Appendix 2 – Date of birth information for Relevant offences and/or Technical ability questions only

Date of birth information in this appendix will not be put onto our Public Register

Have you filled in the Relevant Offences question?

Yes ☐

No ☑

Have you filled in the Technical ability question?

Yes ☑

No ☐

2 Relevant Offences - date of birth information

Please give us the following details

Name

Date of birth (DD/MM/YY)

3 Technical ability - date of birth information

Name Mrs Beverley Ewers

Date of birth (DD/MM/YY) [redacted]

Application for an environmental permit Part C4 – Varying a bespoke waste operation permit

Fill in this part of the form, together with parts A, C2 and F1, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or making changes to existing ones).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

Contents

1 What waste operations are you applying to vary?

Fill in Table 1a with details of what you are applying to vary.

Fill in a separate table for each waste operation you are applying to vary. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given this document.

Document reference: n/a

Types of waste accepted

For each line in Table 1a, fill in a separate document to list those wastes you will accept on the site for that operation, giving the List of Wastes catalogue code (search for 'Technical guidance on how to assess and classify waste' at www.gov.uk/government/organisations/environment-agency). If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

1 What waste operations are you applying to vary?, continued

Table 1a – Waste operations which do not form part of an installation

Name of the waste operation	Description of the waste operation	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 1)	Non-hazardous waste treatment capacity (if this applies) (See note 1)
Add extra rows if you need them. If you do not have enough room, go to the line below or send a separate document and give us the document reference here	Use the description from the guidance. Include any extra detail that you think would help to accurately describe what you want to do			
Tipner Recycling Facility	Waste Recycling Facility	R13, R3, R4, R5, D9, D13, D14, D15		75,000.00
For all waste operations	Total storage capacity (see note 2)			
	New total if varying to increase			
	Annual throughput (tonnes each year)			
	New total if varying to increase			

1 What waste operations are you applying to vary?, continued

Notes

1 By 'capacity', we mean:

- the total landfill capacity (cubic metres) for landfills
- the total treatment capacity (tonnes each day) for waste treatment
- the total storage capacity (tonnes) for waste-storage operations

2 By 'total storage capacity', we mean the maximum amount of waste in tonnes you store on the site at any one time.

Please provide the document reference. You can use Table 1b as a template.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description of the waste in the document, (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste.

Document reference n/a

Table 1b – Template example – types of waste accepted and restrictions

Waste code	Description of the waste
Example	Example
02 01 08*	Agrochemical waste containing hazardous substances
18 01 03*	Infectious clinical waste, not contaminated with chemicals or medicines – human healthcare (may contain sharps) for alternative treatment
17 05 03*/17 06 05*	Non-hazardous soil from construction or demolition contaminated with fragments of asbestos cement sheet

1c Deposit for recovery purposes (see the guidance notes on part C4)

Are you applying for a waste recovery activity involving the permanent deposit on waste on land for construction or land reclamation (including landfill restoration)?

No ☑ Go to section 2

Yes ☐

Are you applying for an inert landfill permit that includes a restoration activity using waste?

No ☐ Go to section 2

Yes ☐ Please send us a copy of your restoration plan in accordance with our guidance at https://www.gov.uk/guidance/landfill-operators-environmental-permits/restore-your-landfill-site

Have we advised you during pre-application discussions that we believe the activity is waste recovery?

No ☐ Go to section 2

Yes ☐

Have there been any changes to your proposal since the discussions?

No ☐

Yes ☐

Please send us a copy of your waste recovery plan that complies with our guidance at https://www.gov.uk/guidance/waste-recovery-plans-and-permits. You need to highlight any changes you have made since your pre-application discussions. Also give us the reference number of the document with your justification.

Please note that there is an additional charge for the assessment of a waste recovery plan that must be submitted as part of this application. For the charge see https://www.gov.uk/topic/environmental-management/environmental-permits.

Document reference

2 Point source emissions to air, water and land

Fill in Table 2 below with details of the point source emissions that result from the operating techniques at each of your waste operations.

Fill in one table for each waste facility.

Table 2 – Emissions

Name of the waste operation	Tipner Recycling Facility			
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
Point source emissions to water (other than sewers)				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
Point source emissions to sewers, effluent treatment plants or other transfers off site				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
Point source emissions to land				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				

Supporting information

3 Operating techniques

3a Technical standards

Fill in Table 3a for each waste operation you refer to in Table 1a above and list the 'appropriate measures' you are planning to use. If you are using the standards set out in the relevant technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a.

You must justify your decisions in a separate document if:

- there is no technical standard
- the technical guidance provides a choice of standards, or
- you plan to use another standard

This justification could include a reference to the Environmental Risk Assessment provided in part C2 of the application form.

Table 3a should summarise:

- the operations undertaken
- the measures you will use to control the emissions from your process, as identified in your risk assessment or the relevant technical guidance
- how you will meet other standards set out in the relevant technical guidance

Table 3a – Technical standards

Fill in a separate table for each waste operation.

Waste operation		
Description of the waste operation Add extra rows if you need them	Appropriate measure (TGN reference)	Document reference (if appropriate)
Waste Recycling Facility	Risk Assessments for your Environmental Permit	Environmental Risk Assessment
	Develop a Management System: environmental	Non Technical Summary
	permits	

In all cases, describe the type of facility or operation you are applying for and provide site infrastructure plans, location plans and process flow diagrams or block diagrams to help describe the operations and processes undertaken. Give the document references you use for each plan, diagram and description.

Document reference: n/a

3b General requirements

Fill in a separate table for each waste operation.

Table 3b – General requirements

Name of the waste operation	
If the technical guidance or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references Appendix G - DEMP
If the technical guidance or your risk assessment shows that odours are an important issue, send us your odour management plan. **If your activity type is listed in the guidance document 'Control and monitor emissions for your environmental permit' as needing an odour management plan, or your risk assessment shows that odours are an important issue, you need to send us your odour management plan.**	Document reference or references N/A
If the technical guidance or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references N/A

3 Operating techniques, continued

We may need to ask for management plans or risk assessments in other circumstances based on our regulatory experience. If you are unsure as to whether you need to submit a management plan with your application, please discuss this with the Environment Agency prior to submission.

Search for 'Risk assessment for your environmental permit' at www.gov.uk/government/organisations/environment-agency.

3c Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed in Table 3c, you must answer the questions in the related document.

Table 3c – Questions for specific sectors

Sector	Appendix
Recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes	See the questions in appendix 1
Inert landfill and deposit of waste on land for construction, land reclamation, restoration or improvement	See the questions in appendix 2

General information

4 Monitoring

4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures
- the methods you use
- the procedures you follow to assess the measures

Document reference

4b Point source emissions to air only

Provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must use M1 (search for 'M1 sampling requirements for stack emission monitoring' at www.gov.uk/government/organisations/environment-agency).

Document reference of the assessment

5 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

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We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please ☐

No thank you ☑

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐ Amount received

£

Plain English Campaign's Crystal Mark does not apply to appendices 1 to 2.

Appendix 1 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes

1 Please provide an accurate and reliable characterisation of your compost like outputs (CLO). This should be based on sampling and analysis of the CLO produced by the treatment (MBT) process over a 12-month period and in accordance with section 2 of TGN 6.15

Document reference

2 Please provide an agricultural benefit assessment for the use of your CLO. This should be based on section 2 of TGN 6.15 and should be signed and dated by an appropriate technical expert

Document reference

3 Please provide a site-specific risk assessment of risks to soil and food chain receptors. This should be based on Schedule 2 of TGN 6.15 and include a map with a green outline showing the boundary of the area being treated and include:

- locations where the waste will be stored and spread
- any spring, well or borehole used to supply water for domestic or food production purposes that is within 250 metres of the area being treated
- any spring, well or borehole not being used for domestic or food production purposes that is within 50 metres of the area being treated
- any European designated sites (candidate or Special Area of Conservation, proposed or Special Protections Area in England and Wales or Ramsar Site) or Sites of Special Scientific Interest (SSSI) which are within 500 metres of the place where waste is to be stored or spread
- the location of public rights of way
- any Groundwater Source Protection Zones
- surface watercourses
- any buildings or houses within 250 metres of the area being treated
- land drains within the boundary

Document reference

4 Are the technical standards and measures fully in line with those set out in section 3 of TGN 6.15?

No ☐ Provide justification for departure from TGN 6.15 and a copy of the proposed technical standards, measures or procedures

Document reference

Yes ☐

Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations

1 Please provide your Environmental Setting and Site Design (ESSD) report

Document reference

Note: You should use the Environment Agency template to help you develop an environmental setting and site design (ESSD) report.

2 Please provide your Waste Acceptance Procedures (including Waste Acceptance Criteria)

Document reference

3 Have you provided a hydrogeological risk assessment (HRA) for the site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

4 Have you completed an outline engineering plan for the site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

5 Have you provided a stability risk assessment (SRA) for your site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations, continued

6 Have you completed a monitoring plan for the site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

7 Have you completed a plan for closing the site and procedures for looking after the site once it has closed?

No ☐ If no for deposit for recovery activities please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ For inert waste landfill you must provide a closure plan

Document reference

Spreading waste to support plant growth

8a Does the activity involve the deposit of waste to create or treat a growing medium (R10 for land treatment)?

No ☐

Yes ☐

8b If you answered 'yes' to question 8a, does the R10 activity include the spreading of waste to improve the quality of the growing medium (e.g. soil conditioner to improve existing soil profile)?

No ☐

Yes ☐ Go to question 8c

8c If you have answered 'Yes' to question 8b, have you completed a benefit statement?

No ☐ Please explain why

Document reference

Yes ☐

Note: Refer to our guidance when completing your statement (including EPR 8.01, section 6).

Application for an environmental permit
Part B3 – New bespoke installation permit

If you are applying for a new bespoke permit for an installation, fill in this part of the form, together with parts A, B2 and F1.

Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that go with it.

If you are applying for a permit for an intensive farm do not use this form, but complete application form part B3.5 instead.

The form can be:

1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

Contents

1 What activities are you applying for?

Fill in Table 1a below with details of all the activities listed in schedule 1 or other references (see note 1) of the Environmental Permitting Regulations (EPR) and all directly associated activities (DAAs) (in separate rows), that you propose to carry out at the installation.

Fill in a separate table for each installation you are applying for. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given the document.

Document reference

1 What activities are you applying for?, continued

Table 1a – Types of activities

Schedule 1 listed activities						
Installation name	Schedule 1 or other references (See note 1)	Description of the activity (See note 2)	Activity capacity (See note 3)	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 3)	Non-hazardous waste treatment capacity (if this applies) (See note 3)
If there are not enough rows, send a separate document and give the document reference number here	Put your main activity first			For installations that take waste only	For installations that take waste only	For installations that take waste only
Haven Road Recycling Facility	5.4, A (1) (b) (iii)	recovery of non-haz	over 75 tonnes	R5 and R13		over 75 tonnes per day
		waste - treatment of	per day			
		slags and ashes				

Directly associated activities (See note 4) Also note: if the DAA is a Medium Combustion Plant or Specified Generator (MCP/SG) please also fill in part B2.5, (see https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b25-new-bespoke-medium-combustion-plant-and-specified-generator-permit)		
Name of DAA If there are not enough rows, send a separate document and give the document reference number here	Description of the DAA (please identify the schedule 1 activity it serves)	
For installations that take waste (See note 5 below)	Total storage capacity	2000
	Annual throughput (tonnes each year)	30,000

1 What activities are you applying for?, continued

Notes

1. Quote the section number, part A1 or A2 or B, then paragraph and sub-paragraph number as shown in EPR part 2 of schedule 1, schedule 13 and 14 for Local Authority regulated activities, or schedule 25/25B for Medium Combustion Plant or Specified Generators.
2. Use the description from the relevant schedule of the regulations. Include any extra detail that you think would help to accurately describe what you want to do.
3. By 'capacity', we mean:

- the total incineration capacity (tonnes every hour) for waste incinerators
- the total landfill capacity (cubic metres) for landfills
- the total capacity (cubic metres) for the recovery of hazardous waste on land
- the total treatment capacity (tonnes each day) for waste treatment operations
- the total storage capacity (tonnes) for waste storage operations
- the processing and production capacity for manufacturing operations, or
- the thermal input capacity for combustion activities

Fill each listed activity as a separate line and give an accurate description of any other activities associated with your schedule 1 activities. You cannot have Directly Associated Activities (DAAs) as part of a mobile plant application. If the DAA is a Medium Combustion Plant or Specified Generator (MCP/SG) please fill in the table in appendix 1 question 13.

By 'total storage capacity', we mean the maximum amount of waste, in tonnes, you store on the site at any one time.

Types of waste accepted

For those installations that take waste, for each line in Table 1a (including DAAs), fill in a separate document to list those wastes you will accept on to the site for that activity. Give the List of Wastes catalogue code and description (see https://www.gov.uk/government/publications/waste-classification-technical-guidance).

If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

Please provide the reference for each document.

You can use Table 1b as a template.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description of the waste in the document, (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste.

Document reference of this extra information | Non-technical summary and supporting statement

1 What activities are you applying for?, continued

Table 1b – Template example – types of waste accepted and restrictions

Waste code	Description of the waste
Example	Example
02 01 08*	Agrochemical waste containing hazardous substances
18 01 03*	Infectious clinical waste, not contaminated with chemicals or medicines – human healthcare (may contain sharps) for alternative treatment
17 05 03*/17 06 05*	Non-hazardous soil from construction or demolition contaminated with fragments of asbestos cement sheet

1c Recovery of hazardous waste on land

Are you applying for a waste recovery activity involving the permanent deposit of inorganic hazardous waste on land for construction or land reclamation?

No ☑ Now go to question 2

Yes ☐

Have you written a waste recovery plan (WRP) that shows that you will use waste to perform the same function as non waste materials you would have used?

No You must write a WRP to support your application.

Yes

Have we advised you during pre-application discussions that we believe the activity is waste recovery?

No

Yes

Have there been any changes to your proposal since the discussions?

No

Yes

Please send us a copy of your current waste recovery plan that complies with our guidance at https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits. You need to highlight any changes you may have made since your pre-application discussions.

Document reference

Please note that there is an additional charge for the assessment or re assessment of a waste recovery plan that must be submitted as part of this application. For the charge see https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance

2 Point source emissions to air, water and land

Fill in Table 2 below with details of the point source emissions that result from the operating techniques at each of your installations.

Fill in one table for each installation, continuing on a separate sheet if necessary.

Table 2 – Emissions (releases)

Installation name	Haven Road Recycling Facility			
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
Point source emissions to water (other than sewers)				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
Point source emissions to sewers, effluent treatment plants or other transfers off site				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
Point source emissions to land				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				

You will also need to complete application form part B6 if your installation includes a point source emission(s) to:

- water
- groundwater or
- sewer

Supporting information

3 Operating techniques

3a Technical standards

Fill in Table 3a for each activity at the installation you refer to in Table 1a above and list the 'Best Available Techniques' you are planning to use. If you use the standards set out in the relevant BAT conclusion(s), BAT reference document(s) (BREF) and/or technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a.

For Part A(2) activities refer to https://www.gov.uk/government/collections/integrated-pollution-prevention-and-control-sector-guidance-notes and for Part B and Schedule 14 activities see https://www.gov.uk/government/collections/local-air-pollution-prevention-and-control-lappc-process-guidance-notes

You must justify your decisions in a separate document if:

- there is no technical standard
- the technical guidance provides a choice of standards, or
- you plan to use another standard

This justification could include a reference to the Environmental Risk Assessment provided in part B2 (General bespoke permit) of the application form.

For each of the activities listed in Table 1a, the documents in Table 3a should summarise:

- the operations undertaken
- the measures you will use to control the emissions from your process, as identified in your risk assessment or the relevant BAT conclusions, BREF or technical guidance
- how you will meet other standards set out in the relevant BAT conclusions document, BREF or technical guidance

Table 3 – Technical standards

Fill in a separate table for each activity at the installation.

Installation name	Haven Road Recycling Facility	
Description of the schedule 1 activity or directly associated activity	Best available technique (BATC, BREF or TGN reference) (see footnote below)	Document reference (if appropriate)
Acceptance of slags and ashes for treatment	BREF waste treatment	Appendix E - Operating Techniques and MS
	EA appropriate measures guidance - inert and non-haz waste	Appendix E - Operating Techniques and MS

* Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control)

In all cases, describe the type of facility or operation you are applying for and provide site infrastructure plans, location plans and process flow diagrams or block diagrams to help describe the operations and processes undertaken. Give the document references you use for each plan, diagram and description.

Document reference: Appendix E - Operating Techniques and MS

3b General requirements

Fill in a separate Table 4 for each installation.

Table 4 – General requirements

Name of the installation	Haven Road Recycling Facility
If the technical guidance or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references Appendix G DEMP
Where the technical guidance or your risk assessment shows that odours are an important issue, send us your odour management plan	Document reference or references N/A
If the technical guidance or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references N/A

For guidance on risk assessments for your environmental permit see https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit

3c Types and amounts of raw materials

Fill in Table 5 for all schedule 1 activities. Fill in a separate table for each installation.

Table 5 – Types and amounts of raw materials

Name of the installation		Haven Road Recycling Facility		
Capacity (See note 1 below)				
Schedule 1 activity	Description of raw material and composition	Maximum amount (tonnes) (See note 2 below)	Annual throughput (tonnes each year)	Description of the use of the raw material including any main hazards (include safety data sheets)
Section 5,4 Part A (1) (b) (iii)	N/A - none			N/A - none

Notes

1 By 'capacity', we mean the total storage capacity (tonnes) or total treatment capacity (tonnes each day).

2 By 'maximum amount', we mean the maximum amount of raw materials on the site at any one time.

Use a separate sheet if you have a long list of raw materials, and send it to us with your application form. Please also provide the reference of this extra sheet.

Document reference N/A

3d Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed below, you must answer the questions in the related document.

Table 6 – Questions for specific sectors

Sector	Appendix
Combustion	See the questions in appendix 1
Chemicals	See the questions in appendix 2
Incinerating waste	See the questions in appendix 3
Landfill and recovery of hazardous waste on land	See the questions in appendix 4

General information

4 Monitoring

4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures
- the methods you use
- the procedures you follow to assess the measures

Document reference: N/A - no point source emissions

4b Point source emissions to air only

4b1 Has the sampling location been designed to meet BS EN 15259 clause 6.2 and 6.3?

No ☐

Yes ☐

4b2 Are the sample ports large enough for monitoring equipment and positioned in accordance with section 6 and appendix A of BS EN 15259?

No ☐

Yes ☐

4b3 Is access adjacent to the ports large enough to provide sufficient working area, support and clearance for a sample team to work safely with their equipment throughout the duration of the test?

No ☐

Yes ☐

4b4 Are the sample location(s) at least 5 HD from the stack exit

No ☐

Yes ☐

4b5 Are the sample location(s) at least 2 HD upstream from any bend or obstruction?

No ☐

Yes ☐

4b6 Are the sample location(s) at least 5 HD downstream from any bend or obstruction?

No ☐

Yes ☐

4b7 Does the sample plane have a constant cross sectional area?

No ☐

Yes ☐

4b8 If horizontal, is the duct square or rectangular (unless it is less than or equal to 0.35 m in diameter)

No ☐

Yes ☐

4b9 If you have answered 'No' to any of the questions 4b1 to 4b8 above, provide an assessment to how the standards in BS EN 15259 will be met.

Document reference of the assessment

5 Environmental impact assessment

5a Have your proposals been the subject of an environmental impact assessment under Council Directive 85/337/EEC of 27 June 1985 [Environmental Impact Assessment] (EIA)?

No ☑ Now go to question 6

Yes ☐ Please provide a copy of the environmental statement and, if the procedure has been completed:

- a copy of the planning permission
- the committee report and decision on the EIA

Document reference of the copy

6 Resource efficiency and climate change

If the site is a landfill or a recovery of hazardous waste on land activity, you only need to fill in this section if the application includes gas engines.

6a Describe the basic measures for improving how energy efficient your activities are

Document reference of the description: Appendix E - Operating Techniques and MS

6b Provide a breakdown of any changes to the energy your activities use up and create

Document reference of the description: Appendix E - Operating Techniques and MS

6c Have you entered into, or will you enter into, a climate change levy agreement?

No ☑ Describe the specific measures you use for improving your energy efficiency

Document reference of the description

Yes ☐ Please give the date you entered (or the date you expect to enter) into the agreement (DD/MM/YYYY)

Please also provide documents that prove you are taking part in the agreement.

Document reference of the proof

6d Explain and justify the raw and other materials, other substances and water that you will use

Document reference of the justification: Appendix E - Operating Techniques and MS

6e Describe how you avoid producing waste in line with Council Directive 2008/98/EC on waste

If you produce waste, describe how you recover it. If it is technically and financially impossible to recover the waste, describe how you dispose of it while avoiding or reducing any effect it has on the environment.

Document reference of the description: Appendix E - Operating Techniques and MS

7 Installations that include a combustion plant (excluding waste incinerators)

7a List all your combustion plant at the site and provide thermal input and operating hours for each

Document reference

7b Do any of your combustion plants have a net rated thermal input of 1 or more MW and is not an excluded MCP?

No ☐ Go to 7c

Yes ☐ Please fill in the table in appendix 1 question 13

7c Is the aggregated net thermal input of your combustion plant more than 20 MW?

No ☐

Yes ☐ Please go to appendix 1 question 11

8 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: https://www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please ☐

No thank you ☐

Crystal Mark 19107
Clarity approved by Plain English Campaign

For Environment Agency use only

Date received (DD/MM/YYYY)

Payment received?

No ☐

Our reference number

Yes ☐ Amount received

£

Plain English Campaign's Crystal Mark does not apply to appendices 1 to 4.

Appendix 1 – Specific questions for the combustion sector

1 Identify the type of fuel burned in your combustion units (including when your units are started up, shut down and run as normal). If your units are dual fuelled (that is, use two types of fuel), list both the fuels you use

Fill in a separate table for each installation.

Installation reference			
Type of fuel	When run as normal	When started up	When shut down
Coal	☐	☐	☐
Gas oil	☐	☐	☐
Heavy fuel oil	☐	☐	☐
Natural gas	☐	☐	☐
WID waste	☐	☐	☐
Biomass (see notes 1 and 2 below)	☐	☐	☐
Biomass (see notes 1 and 2 below)	☐	☐	☐
Biomass (see notes 1 and 2 below)	☐	☐	☐
Biomass (see notes 1 and 2 below)	☐	☐	☐
Biomass (see notes 1 and 2 below)	☐	☐	☐
Landfill gas	☐	☐	☐
Other	☐	☐	☐

Notes

1. Not covered by Industrial Emissions Directive 2010/75/EU.
2. 'Biomass' is referred to The Renewables Obligation Order 2002 (https://www.legislation.gov.uk/uksi/2002/914/contents/made)

Give extra information if it helps to explain the fuel you use.

Document reference

Appendix 1 – Specific questions for the combustion sector, continued

2 Give the composition range of any fuels you are currently allowed to burn in your combustion plant

Fill in a separate table for each installation, continuing on a separate sheet if necessary

Fuel use and analysis					
Installation reference					
Parameter	Unit	Fuel 1	Fuel 2	Fuel 3	Fuel 4
Maximum percentage of gross thermal input	%				
Moisture	%				
Ash	% wt/wt dry				
Sulphur	% wt/wt dry				
Chlorine	% wt/wt dry				
Arsenic	% wt/wt dry				
Cadmium	% wt/wt dry				
Carbon	% wt/wt dry				
Chromium	% wt/wt dry				
Copper	% wt/wt dry				
Hydrogen	% wt/wt dry				
Lead	% wt/wt dry				
Mercury	% wt/wt dry				
Nickel	% wt/wt dry				
Nitrogen	% wt/wt dry				
Oxygen	% wt/wt dry				
Vanadium	mg/kg dry				
Zinc	mg/kg dry				
Net calorific value	MJ/kg				

Appendix 1 – Specific questions for the combustion sector, continued

3 If NOx factors are necessary for reporting purposes (that is, if you do not need to monitor emissions), please provide the factors associated with burning the relevant fuels

Fill in a separate table for each installation.

Installation reference	
Fuel	NOx factor (kgt^{-1})
Fuel 1	
Fuel 2	
Fuel 3	
Fuel 4	

Note: kgt^{-1} means kilograms of nitrogen oxides released for each tonne of fuel burned.

4 Will your combustion plant be subject to Chapter III of the Industrial Emissions Directive 2010/75/EU?

No ☐ Now fill in application form part F

Yes ☐

5 What is your plant?

an existing one ☐ A plant licensed before 1 July 1987

a new one ☐ A plant licensed on or after 1 July 1987 but before 27 November 2002, or a plant for which an application was made before 27 November 2002 and which was put into operation before 27 November 2003

a new-new one ☐ A plant for which an application was made on or after 27 November 2002

6 If you run more than one type of plant or a number of the same type of plant on your installation, please list them in the table below

Fill in a separate table for each installation.

Installation reference	
Type of plant	Number within installation
Existing	
New	
New-new	
Gas turbine (group A)	
Gas turbine (group B)	

Appendix 1 – Specific questions for the combustion sector, continued

7 If you run an existing plant, have you submitted a declaration for the 'limited life derogation' set out in Article 33 of Chapter III of the Industrial Emissions Directive?

No ☐ Now go to question 9

Yes ☐

8 Have you subsequently withdrawn your declaration?

No ☐

Yes ☐

9 List the existing large combustion plants (LCPs) which have annual mass allowances under the National Emission Reduction Plan (NERP), and those with emission limit values (ELVs) under the LCPD

Installation reference	
LCPs under NERP	LCPs with ELVs

10 Do you meet the monitoring requirements of Chapter III of the Industrial Emissions Directive?

No ☐

Yes ☐ Document reference

11 Have you carried out a cost–benefit assessment (CBA) of opportunities for cogeneration (combined heat and power) or district heating under Article 14 of the Energy Efficiency Directive?

No ☐ Please provide supporting evidence of why a CBA is not required (for example, an agreement from us)

Document reference of this evidence

Yes ☐ Please submit a copy of your CBA

Document reference of the CBA

Appendix 1 – Specific questions for the combustion sector, continued

12 Does your installation need to be combined heat and power-ready (CHP-ready)?

No ☐ Please provide supporting evidence of why a CHP-ready assessment is not required (for example, an agreement from us)

Document reference of this evidence

Yes ☐ Please provide a copy of your CHP-ready assessment

Document reference of the CHP-ready assessment

13 Information to be provided by the operator to the competent authority for each Medium Combustion Plant as identified in Annex I of Medium Combustion Plant Directive (EU/2015/2193)

MCP specific identifier*	
12-digit grid reference or latitude/longitude	
Rated thermal input (MW) of the MCP	
Type of MCP (diesel engine, gas turbine, other engine or other MCP)	
Type of fuels used: gas oil (diesel), natural gas, gaseous fuels other than natural gas, landfill gas	
Date when the new MCP was first put into operation	
Sector of activity of the MCP or the facility in which it is applied (NACE code)	
Expected number of annual operating hours of the MCP and average load in use	

Where the option of exemption under Article 6(8) is used the operator (as identified on Form A) should sign a declaration here that the MCP will not be operated more than the number of hours referred to in this paragraph	

* identifier – the MCP must be traceable via a serial number or other unique identifier, name plate, manufacturer and or model

NACE code means Nomenclature of Economic Activities and is the European statistical classification of economic activities (http://www.export.gov.il/files/EEN/ListNACEcodes.pdf).

To find out the 12-digit grid reference you can search on the UK Grid Reference Finder website at https://gridreferencefinder.com/

Appendix 2 – Specific questions for the chemical sector

1 Please provide a technical description of your activities

- The description should be enough to allow us to understand:
- the process
- the main plant and equipment used for each process
- all reactions, including significant side reactions (that is, the chemistry of the process)
- the material mass flows (including by products and side streams) and the temperatures and pressures in major vessels
- the all emission control systems (both hardware and management systems), for situations which could involve releasing a significant amount of emissions – particularly the main reactions and how they are controlled
- a comparison of the indicative BATs and benchmark emission levels standards: technical guidance notes (TGNs) (see https://www.gov.uk/government/collections/technical-guidance-for-regulated-industry-sectors-environmental-permitting); additional guidance 'The production of large volume organic chemicals' (EPR 4.01); 'Speciality organic chemicals sector' (EPR 4.02); 'Inorganic chemicals sector' (EPR 4.03); and best available techniques reference documents (BREFs) for the chemical sector

Document reference

2 If you are applying for a multi-purpose plant, do you have a multi-product protocol in place to control the changes?

No ☐

Yes ☐ Provide a copy of your protocol to accompany this application

Document reference

3 Does Chapter V of the Industrial Emissions Directive (IED) apply to your activities?

No ☐

Yes ☐ Fill in the following

3a List the activities which are controlled under the IED

Installation reference	
Activities	

3b Describe how the list of activities in question 3a above meets the requirements of the IED

Document reference

Appendix 3 – Specific questions for the waste incineration sector

If you are proposing to accept clinical waste, please complete your answer to question 3a 'Technical standards' with reference to relevant parts of our healthcare waste appropriate measures guidance (see https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities)

1a Do you run incineration plants as defined by Chapter IV of the Industrial Emissions Directive (IED)?

No ☐ You do not need to answer any other questions in this appendix

Yes ☐ IED applies

1b Are you subject to IED as

An incinerator? ☐

A co-incinerator? ☐

2 Do any of the installations contain more than one incineration line?

No ☐ Now go to question 4

Yes ☐

3 How many incineration lines are there within each installation?

Fill in a separate table for each installation.

Installation reference		
Number of incineration lines within the installation		
Reference identifiers for each line		

You must provide the information we ask for in questions 4, 5 and 6 below in separate documents. The information must at least include all the details set out in section 2 ('Key Issues') of S5.01 'Incineration of waste: additional guidance' (under the sub heading 'European legislation and your application for an EP Permit'). See https://www.gov.uk/government/collections/technical-guidance-for-regulated-industry-sectors-environmental-permitting.

You must answer questions 7 to 13 on the form below.

4 Describe how the plant is designed, equipped and will be run to make sure it meets the requirements of IED, taking into account the categories of waste which will be incinerated

Document reference

5 Describe how the heat created during the incineration and co-incineration process is recovered as far as possible (for example, through combined heat and power, creating process steam or district heating)

Document reference

Appendix 3 – Specific questions for the waste incineration sector, continued

6 Describe how you will limit the amount and harmful effects of residues and describe how they will be recycled where this is appropriate

Document reference

For each line identified in question 3, answer questions 7 to 13 below

Question 3 identifier, if necessary

7 Do you want to take advantage of the Article 45 (1)(f) allowance (see below) if the particulates, CO or TOC continuous emission monitors (CEM) fail?

No ☐

Yes ☐ This allows 'abnormal operation' of the incineration plant under certain circumstances when the CEM for releases to air have failed. Annex VI, Part 3(2) sets maximum half hourly average release levels for particulates (150 mg/m3), CO (normal ELV) and TOC (normal ELV) during abnormal operation.

Describe the other system you use to show you keep to the requirements of Article 13(4) (for example, using another CEM, providing a portable CEM to insert if the main CEM fails, and so on).

8 Do you want to replace continuous HF emission monitoring with periodic hydrogen fluoride (HF) emission monitoring by relying on continuous hydrogen chloride (HCl) monitoring as allowed by IED Annex VI, Part 6 (2.3)?

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you control hydrogen chloride and keep it to a level below the HCl ELVs.

No ☐

Yes ☐ Please give your reasons for doing this

Appendix 3 – Specific questions for the waste incineration sector, continued

9 Do you want to replace continuous water vapour monitoring with pre-analysis drying of exhaust gas samples, as allowed by IED Annex VI, Part 6 (2.4)?

Under this you do not have to continuously monitor the amount of water vapour in the air released if the sampled exhaust gas is dried before the emissions are analysed.

No ☐

Yes ☐ Please give your reasons for doing this

10 Do you want to replace continuous hydrogen chloride (HCl) emission monitoring with periodic HCl emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for hydrogen chloride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No ☐

Yes ☐ Please give your reasons for doing this

Appendix 3 – Specific questions for the waste incineration sector, continued

11 Do you want to replace continuous HF emission monitoring with periodic HF emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No ☐

Yes ☐ Please give your reasons for doing this

12 Do you want to replace continuous SO2 emission monitoring with periodic sulphur dioxide (SO2) emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for sulphur dioxide if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No ☐

Yes ☐ Please give your reasons for doing this

Appendix 3 – Specific questions for the waste incineration sector, continued

13 If your plant uses fluidised bed technology, do you want to apply for a derogation of the CO WID ELV to a maximum of 100 mg/m³ as an hourly average, as allowed by IED Annex VI, Part 3?

No ☐

Does not apply ☐

Yes ☐ Please give your reasons for doing this

14 Have you carried out a cost–benefit assessment (CBA) of opportunities for cogeneration (combined heat and power) or district heating under Article 14 of the Energy Efficiency Directive?

No ☐ Please provide supporting evidence of why a CBA is not required (for example, an agreement from us)

Document reference of this evidence

Yes ☐ Please submit a copy of your CBA

Document reference of the CBA

15 Does your installation need to be combined heat and power-ready (CHP-ready)?

No ☐ Please provide supporting evidence of why a CHP-ready assessment is not required (for example, an agreement from us)

Document reference of this evidence

Yes ☐ Please provide a copy of your CHP-ready assessment

Document reference of the CHP-ready assessment

Appendix 4 – Specific questions for the landfill sector and recovery of hazardous waste on land activities

1. For the landfill sector, provide your Environmental Setting and Installation Design (ESID) report and any other risk assessments to control emissions.

For recovery of hazardous waste on land activities, provide your Environmental Setting and Site Design (ESSD) report and any other risk assessments to control emissions

Document reference

2. For recovery of hazardous waste on land activities, provide your Waste Acceptance Procedures (including Waste Acceptance Criteria)

Document reference

Refer to our guidance at

https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-acceptance-procedures-for-deposit-for-recovery

3. Provide your hydrogeological risk assessment (HRA) for the site

Document reference

4. Provide your outline engineering plan for the site

Document reference

5. Provide your stability risk assessment (SRA) for the site

Document reference

6. Provide your landfill gas risk assessment (LFGRA) for the site

Document reference

We have developed guidance on these assessments and their reports which can be found at
https://www.gov.uk/government/collections/environmental-permitting-landfill-sector-technical-guidance

7. For recovery of hazardous waste on land activities, have you completed a monitoring plan for the site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference of this evidence

Yes ☐ Document reference

Appendix 4 – Specific questions for the landfill sector and recovery of hazardous waste on land activities, continued

8. Have you completed a proposed plan for closing the site and your procedures for looking after the site once it has closed?

No ☐ If you have answered 'no' for recovery of hazardous waste on land activities, refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference of this evidence

Yes ☐ For landfill you must provide a closure and aftercare plan

Document reference

Application for an environmental permit Part F1 – Charges and declarations

You will need to use an Adobe Acrobat reader product to complete this form. The form may not work properly if you use a different pdf reader, such as the one built-in to your internet browser.

Fill in this part for all applications for:

- installations (excluding new permit and variation applications for intensive farming. Use application form Part B3.5 or C3.5 instead)
- waste operations
- mining waste operations
- medium combustion plant
- specified generators
- water discharges (excluding small discharges of 23m^3 per day if using Part B6.5)
- groundwater activities (excluding small discharges of 15m^3 per day or less if using Part B6.5 OR existing small discharges to Source Protection Zone1 if using Part B6.6)

Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

1) saved onto a computer and then filled in.
2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

Contents

1 Working out charges

You must fill in this section.

You have to submit an application fee with your application. For guidance on the fee and how to pay your charges, please see our charging guidance (**https://www.gov.uk/government/publications/environmental-permitting-charges-guidance**) and associated links to the current charging scheme. You can also contact us for pre-application to help work out charges

Please that there is an annual subsistence charge to cover the costs we incur in the ongoing regulation of the permit.

1 Working out charges, continued

Table 1 – Type of application (fill number of activity being applied for in each column)

Installation	Waste	Mining waste	Medium Combustion Plant (MCP)/ Specified Generator (SG)	Water discharge	Groundwater activity
1	1				

Table 2 – Charge type (A)

Charge activity reference	Charge activity description	What are you applying to do? For example, a new permit, minor variation, normal variation, substantial variation, surrender, low risk surrender, transfer	Amount
e.g. 1.17.3	e.g. Section 5.2 – landfill for hazardous waste	e.g. transfer application	e.g. £5,561
1.16.2.4	Section 5.4 - non haz waste installation	New application	12,357
	treatment of slags and ashes		
1.16.12	Physical treatment of non - haz waste	Normal variation	3,965
Total A			16322

1 Working out charges, continued

Table 3 – Additional assessment charges (B)

Part 1.19 Charges for plans and assessments			Tick appropriate
Reference	Plan or assessment	Charge	
1.19.1	Waste recovery plan	£1,231	☐
1.19.2	Habitats assessment (except where the application activity is a flood risk activity)	£779	☐
1.19.3	Fire prevention plan (except where the application activity is a farming installation)	£1,241	
1.19.4	Pests management plan (except where the application activity is a farming installation)	£1,241	☐
1.19.5	Emissions management plan (except where the application activity is a farming installation)	£1,241	✔
1.19.6	Odour management plan (except where the application activity is a farming installation)	£1,246	☐
1.19.7	Noise and vibration management plan (except where the application activity is a farming installation)	£1,246	☐
1.19.8	Ammonia emissions risk assessment (intensive farming applications only)	£620	☐
1.19.9	Dust and bio-aerosol management plan (intensive farming applications only)	£620	☐
	Advertising	£500	☐
Total B			

Total charges

Total A plus total B

17563

2 Payment

Tick below to show how you have paid.

- Cheque
- Credit or debit card
- ✔ Electronic transfer (for example, BACS)

Cheques

You should make cheques payable to 'Environment Agency' and make sure they have 'A/c Payee' written across them if it is not already printed on.

Please write the name of your company and application reference number on the back of your cheque. We will not accept cheques with a future date on them.

2 Payment, continued

Credit/debit cards

If you are paying by credit or with debit card we will call you. We can accept payments by Visa, MasterCard or Maestro card only.

☐ Call me to arrange payment by debit or credit card

Electronic transfer BACS

If you choose to pay by electronic transfer, you will need to use the following information to make your payment:

Company name	Environment Agency
Company address	SSCL (Environment Agency), PO Box 797, Newport Gwent, NP10 8FZ
Bank	RBS/NatWest
Address	London Corporate Service Centre, CPB Services, 2nd Floor, 280 Bishopsgate, London EC2M 4RB
Sort code	60-70-80
Account number	10014411
Account name	EA RECEIPTS
Payment reference number	PSCAPPXXXXXYYY

You need to create your own reference number. It should begin with PSCAPP (to reflect that the application is for a permitted activity) and it should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). The reference number that you supply will appear on our bank statements.

You should also email your payment details and reference number to **ea_fsc_ar@gov.sscl.com**.

If you are making your payment from outside the United Kingdom, it must be in sterling. Our IBAN number is GB23NWBK60708010014411 and our SWIFTBIC number is NWBKGB2L.

If you do not quote your reference number, there may be a delay in processing your payment and application.

Provide a unique reference number for the application, i.e. do not only use the company name only

PSCAPPSILVER001

State who is paying (full name and whether this is the agent/applicant/other)

Silverton Aggregates Limited

Fee paid

£ 17563

Date payment sent (DD/MM/YYYY)

3 Privacy notice

The Environment Agency runs the environmental permit application service.

See **https://www.gov.uk/guidance/environmental-permits-privacy-notice** for how we use your personal information in services to services to support environmental permitting.

4 Confidentiality and national security

Confidentiality

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential.

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application. You can find guidance on confidentiality in 'Environmental permitting guidance: core guidance', published by Defra and available at **https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2**.

Only tick the box below if you wish to claim confidentiality for parts of your application

☐ Please treat the specified information in my application as confidential

National security

You can tell the Secretary of State that you believe including information on a public register would not be in the interests of national security. You must enclose a letter with your application telling us that you have told the Secretary of State and you must still include the information in your application. We will not include the information in the public register unless the Secretary of State decides that it should be included.

You can find guidance on national security in 'Environmental permitting guidance: core guidance', published by Defra and available at **https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2**

You cannot apply for national security via this application.

Now fill in section 5

5 Declaration

If you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

Each individual (or individual trustee) who is applying for their name to appear on the permit must complete this declaration. You will have to print a separate copy of this page for each additional individual to complete.

If you are transferring all or part of your permit, both you and the person receiving the permit must make the declaration. You must fill in the declaration directly below; the person receiving the permit must fill in the declaration under the heading 'For transfers only'.

Note: we will issue a letter to both current and new holders to confirm the transfer. If you are changing address we will need to send this letter to your new address; therefore please tell us your new address in a separate letter.

If you are unable to trace one or more of the current permit holders please see below under the transfers declaration.

5 Declaration, continued

I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

✔ Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

☐ I confirm that my standard facility will fully meet the rules that I have applied for (this only applies if the application includes standard facilities)

☐ Tick this box if you do not want us to use information from any ecological survey that you have supplied with your application (for further information please see the guidance notes on part F1)

Name

Title

Mr

First name

David

Last name

Goodwin

on behalf of (if relevant; for example, a company or organisation and so on)

Silverton Aggregates Limited

Position (if relevant; for example, a company or organisation and so on)

Director

Today's date (DD/MM/YYYY)

04/03/2025

For transfers only – declaration for person receiving the permit

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this application to transfer an environmental permit to me is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

Note: If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration as above. Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

☐ Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

5 Declaration, continued

Name

Title

First name

Last name

on behalf of (if relevant; for example, a company or organisation and so on)

Position (if relevant; for example, a company or organisation and so on)

Today's date (DD/MM/YYYY)

Now go to section 6

6 Application checklist

You must fill in this section.

If your application is not complete, we will return it to you. If you aren't sure about what you need to send, contact us before you submit your application. For further information on pre-application advice, see **https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit.**

You must do the following:

- ✔ Complete legibly all parts of the application form that are relevant to you and your activities
- ✔ Identify relevant supporting information in the form and send it with the application
- ✔ List all the documents you are sending in the table below. If necessary, continue on a separate sheet. This separate sheet also needs to have a reference number and you should include it in the table below
- ☐ For new permit applications or any changes to the site plan, provide a plan that meets the standards given in the guidance note on part F1
- ☐ Provide a supporting letter for any claim that information is confidential
- ✔ Get the declaration completed by a relevant person (not an agent)
- ✔ Send the correct fee

6 Application checklist, continued

Question reference	Document title	Document reference
	Refer to the non - technical summary	
	and supporting statement	

7 How to contact us

If you have difficulty filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422549 (Monday to Friday, 8am to 6pm)

Email: **enquiries@environment-agency.gov.uk**

Website: **www.gov.uk/government/organisations/environment-agency**

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, or you would like us to review a decision we have made, please let us know. More information on how to do this is available at: **https://www.gov.uk/government/organisations/environment-agency/about/complaints-procedure.**

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

8 Where to send your application

For how many copies to send see the guidance note on part F1.

Please send your filled in application form and supporting documents to:

For water discharges and groundwater activities by email to
PSC-WaterQuality@environment-agency.gov.uk

For waste, installations, medium combustion plant and specified generators by email to
PSC@environment-agency.gov.uk

For large electronic documents (too large for email attachment) you can upload your applications to file sharing sites and send us a link to download the documents. Alternatively, you can send more than one email with documents attached.

Or by post to:

Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Do you want all information to be sent to you by email?

☐ Please tick this box if you wish to have all communication about this application sent via email (we will use the details provided in part A)

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

- ☐ Yes please
- ✔ No thank you

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

- ☐ No
- ☐ Yes

Amount received (£)

Appendix B Drawings

N

Site Entrance

Haven Quay

Bollards

Drain

4.6m

4.7m

Bollards

Weigh Bridge and Office

Non Waste Product Storage

Non Waste Product Storage

IBAA Store and Treatment

Fuel Tank

Waste Storage and Treatment Mobile Processing Plant

Mud

Mean High Water

River Colne

Mean High Water

Outfall

Mud

0 25 50 75 100 125m

Scale 1:1,250

Legend:

- Environmental Permit Boundary
- Access Route

Rev	Amendments	Date	By	Chk	Auth

SLR

www.slrconsulting.com

Client
Silverton Aggregates Limited

Project
Haven Road Recycling Facility
Environmental Permit Variation Application

Figure Title
Site Plan

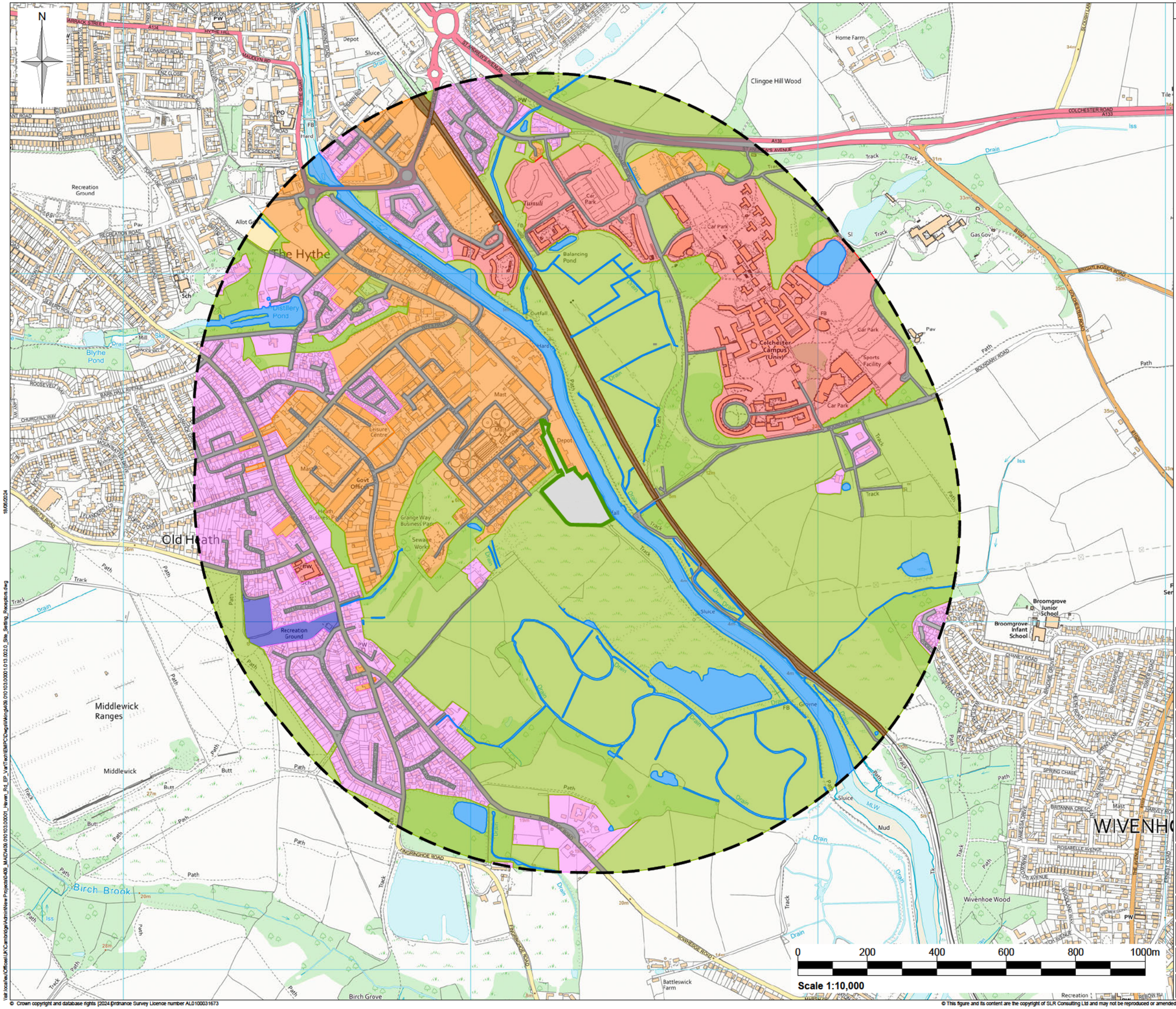
Scale	SLR Project No.
1:1250 @ A3	409.010103.00001

Designed	Drawn	Checked	Authorised
	TS	SP	
Date	Date	Date	Date
	June 2024	June 2024	

Figure Number	Rev.
01	0

14/06/2024

\\slr.local\ea\Offices\UK\Cambridge\Admin\New Projects\409_MAIDH\409.010103.00001_Haven_Rd_EP_VarTech\EMP\CDPwg\sWkng\409.010103.00001.013.0010_Site_Plan.dwg



Legend:

- Environmental Permit Boundary
- 1km Permit Boundary Offset
- Local Road Network
- Railway
- Residential
- Commercial / Indsutrial
- Allotments
- Recreational Facilities
- Educational
- Open Water / Ditches
- Open Gound

Rev	Amendments	Date	By	Chk	Auth

SLR

www.slrconsulting.com

Client
Silverton Aggregates Limited

Project
Haven Road Recycling Facility
Environmental Permit Variation Application

Figure Title
Site Setting Plan - Local Receptors

Scale		SLR Project No.	
1:10,000	@ A3	409.010103.00001	
Designed	Drawn	Checked	Authorised
	TS	SP	SP
Date	Date	Date	Date
	June 2024	June 2024	June 2024

Figure Number
02

Rev.
0

18/09/2024

\\slr.local\ex\Offices\UK\Cambridge\Admin\New Projects\409_MAD\409.010103.00001_Haven_Rd_EP_Var\Tech\EMP\CDwgs\Wingfield\409.010103.00001.0013.0020_Site_Setting_Receptors.dwg

N

Legend:

- Environmental Permit Boundary
- Listed Buildings
- Scheduled Monuments
- Local Nature Reserve (LNR)
- Site of Special Scientific Interest (SSSI)
- Registered Parks and Gardens
- Marine Conservation Zone

Rev	Amendments	Date	By	Chk	Auth

SLR

www.slrconsulting.com

Client
Silverton Aggregates Limited

Project
Haven Road Recycling Facility
Environmental Permit Variation Application

Figure Title
Site Setting Plan - Cultural and Natural Heritage

Scale		SLR Project No.
1:10,000	@ A3	409.010103.00001

Designed	Drawn	Checked	Authorised
	TS	SP	SP
Date	Date	Date	Date
	June 2024	June 2024	June 2024

Figure Number: 03 Rev.: 0

0 200 400 600 800 1000m

Scale 1:10,000

18/06/2024

\\slr.local\ea\Offices\UK\Cambridge\Admin\New Projects\409_MAIDN\409.010103.00001_Haven_Rd_EP_Var\Tech\EMP\CIDwgs\Wking\409.010103.00001.0103.003.0_Site_Setting_Cultural&Natural_Her.dwg

Appendix C Environmental Risk Assessment

Environmental Risk Assessment

Haven Road Waste Facility

Silverton Aggregates Limited

Haven Rd, Colchester, CO2 8HT

Prepared by:

SLR Consulting Limited

Mill Barn, 28 Hollingworth Court, Turkey Mill,
Maidstone, ME14 5PP

SLR Project No.: 409.010103.00001

10 February 2025

Revision: 01

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	31 October 2024	Rebecca Holland	Samantha Pople	Samantha Pople
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Silverton Aggregates Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

Table of Contents

Tables in Text

1.0 Introduction

Silverton Aggregates Limited (Silverton) has retained SLR Consulting Limited (SLR) to prepare an Environmental Risk Assessment (ERA) in support of a variation application to the existing Environmental Permit (EP) (Ref: VP3194NH) for the Haven Road waste facility, Colchester.

This variation application seeks to include the following changes, thereby changing the current EP to a bespoke one:

- Acceptance, storage and treatment of IBAA (blending) as a listed activity; and
- Extension to the current site boundary.

1.1 Methodology

This ERA is an assessment of the risks to the environment and to human health from accidents, odour, noise and fugitive emissions that may be associated with the proposed addition of relevant EWC codes at the Site.

The assessment has been completed in accordance with the Environment Agency (EA) Technical Guidance *'Risk Assessments for your Environmental Permit'* dated May 2018[1]. The aim of the assessment is to identify any significant risks and demonstrate that the risk of pollution or harm will be acceptable by taking the appropriate measures to manage these risks.

This ERA uses the following approach for identifying and assessing the risks from the proposed operation:

Step 1 Identify risks and sources of risk from your activity.

Step 2 Where risks are identified from Step 1 then identify the receptors that could be affected.

Step 3 Identify potential pathways between the sources of risk and receptors.

Step 4 Assess the risks and check that they are acceptable. Justify appropriate measures to control your risks, if necessary.

Step 5 Submit your assessment.

Section 2.0 of this document is a screening step to identify the risks requiring consideration as part of this assessment.

Section 3.0 identifies people or parts of the environment that could be harmed (at potentially significant risk) by the activity. The ERA for an EP variation application requires all receptors that are near the Site and could reasonably be affected by the activities to be identified and considered as part of the assessment.

For the purposes of this ERA the following distances have been used to identify potentially sensitive receptors:

- A 2km radius from the Site's EP boundary has been used to identify potentially sensitive receptors of European ecological importance including RAMSAR sites, Special Areas of Conservation (SAC) and Special Protection Areas (SPA);

[1] Environment Agency - 'Risk Assessments for your Environmental Permit' June 2024, https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit, accessed June 2024.

- A 2km radius from the Site's EP boundary has been adopted in reviewing potentially sensitive receptors of ecological importance along with features such as sites of cultural and natural heritage. This includes National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Special Scientific Interest (SSSI), in line with EA guidance; and
- A radius of 1km from the Site's EP boundary has been adopted for all other potentially sensitive receptors (for example, residential, commercial, industrial, agricultural and surface water receptors).

Section 4.0 of this document presents the assessment and demonstrates that any risks of pollution or harm will be mitigated to manage the risk.

This ERA should be read in conjunction with the following documents submitted with this EP variation application:

- Non-Technical Summary;
- Baseline Site Condition Report; and
- Dust Emissions Management Plan.

2.0 Identifying the Risks

Step 2 is a screening step to identify the potential risks to the environment from the development. The following are generally considered to require assessment for bespoke operations:

- Amenity and Accidents;
- Site Waste;
- Global Warming Potential;
- Odour;
- Noise; and
- Point source emissions to air, water and land.

There will continue to be no point source emissions to groundwater, surface water, air or land resulting from the proposed variation application and neither will there be any Site waste arising or global warming potential.

Therefore only ‘Amenity and Accidents’, remains applicable for assessment in this instance, and includes the consideration of odour, noise and vibration, fugitive emissions (including dust, mud, litter and pests) and accidents.

3.0 Site Setting & Receptors

3.1 Site Setting

The site is located to the south-east end of Commerce Park, an industrial estate within Colchester. The entrance to the facility is via a track located off Haven Road which runs from the north of the site through to the south. The national grid reference for the site is TM022234 and the site location is illustrated on Drawing 01.

The closest residential property is located to the southwest approximately 300m away from the site.

The site lies in close proximity to a number of European and nationally designated sites. The Blackwater, Crouch, Roach and Colne Estuaries (Marine Conservation Zone) lies adjacent to the site's eastern boundary. The Upper Colne Marshes of Special Scientific Interest (SSSI) is located approximately 180m to the southeast of the site. Other designated sites within a 2km radius of the site boundary include Local Nature Reserves, a Registered Parks & Gardens and Cultural Heritage Sites including Listed Buildings and Scheduled Monuments.

Surrounding land-use and receptors are identified on Drawing 02 – Environmental Site Setting, and Drawing 03 - Cultural and Natural Heritage, and are identified in Table 3-1 below.

Table 3-1 Surrounding Land Uses

Boundary	Description
North	Industrial and commercial premises, open space, University of Essex Colchester campus, residential areas, River Colne and a railway line.
East	Industrial premises, River Colne, a railway line, areas of open space, residential properties and the University of Essex Colchester campus.
South	Predominantly open space with a residential area and surface water including Hythe Lagoons.
West	Industrial premises and an educational premises and residential areas.

The immediate surrounding land use is described in further detail below:

Residential properties

The closest residential property is located to the southwest approximately 300m away from the site.

Industrial and Commercial Premises

Industrial and commercial premises lie adjacent to the site to the north, northwest and northeast.

Areas of Open Space

Areas of open space lie adjacent to the site boundary to the west and south. Further areas lie to the east approximately 80m away.

Further open spaces are located approximately 320m north and 900m northwest of the site.

Educational premises

University of Essex Colchester campus is located approximately 400m northeast of the site.

Old Heath Community Primary School is located approximately 680m west of the site.

Recreational premises

There is one recreational premises within 1000m of the site which consists of two playing fields and a play space approximately 690m southwest of the site.

Major Roads

The A134 lies approximately 800m north of the site boundary.

The A133 lies approximately 850m northeast of the site boundary.

The wider local road network is illustrated on Drawing 002.

3.2 Hydrology & Hydrogeology

3.2.1 Geology

The Envirocheck Report (included as Appendix SCR1 of the approved Site Condition Report) shows the site is underlain by made ground (undivided) and infilled ground. The superficial geology comprises of alluvium and intertidal deposits (undifferentiated) which both comprise of clay and silty material.

The bedrock geology is comprised of the Thames Group Formation which comprises of clay and silt which date to the Eocene period.

3.2.2 Hydrogeology

The Envirocheck report indicates the bedrock aquifer designation beneath the site is Unproductive Strata. The superficial aquifer designation is classed as a Secondary Aquifer - A. The Envirocheck report indicates that the application site lies within a Zone III – Total Catchment Source Protection Zone (SPZ). This zone is defined as the total area needed to support the abstraction or discharge from the protected groundwater source.

3.2.3 Hydrology

Although there are no surface water features within the site boundary, it is worth noting that the River Colne, a Marine Conservation Zone, is adjacent to the eastern boundary.

Hythe Lagoons lies approximately 505m southeast of the site. Several unnamed streams surround the Lagoons to west, south and southeast.

The site is located within a “Moderate” flood warning area according to the Environment Agency flood mapping website[2]. This area has a medium chance of flooding. The chance of

[2] https://flood-map-for-planning.service.gov.uk/ accessed July 2024.

flooding each year is 1.3% (1 in 75) or less, but greater than 0.5% (1 in 200). This takes into account the effect of any flood defences that may be in this area, whether or not these are currently illustrated on the Flood Map.

3.3 Ecology

3.3.1 European/International Sites

Searches on the Multi-Agency Geographic Information for the Countryside (MAGIC)[3] website confirm that there are no Special Area of Conservation (SAC) sites within 2km of the permit boundary.

There are two Local Nature Reserves within 1km of the site boundary as well as the River Colne which is a Marine Conservation Zone adjacent to the site. There is also a Registered Parks & Gardens in Wivenhoe Park, which also contains Listed Buildings.

3.3.2 Site of Special Scientific Interest (SSSI)

There is one designated SSSI within 2km of the permit boundary named Upper Colne Marshes. It consists of grazing marshes with associated ditch and open water habitats, a series of tidal salt marshes behind old flood defence walls following a number of breaches, the sea walls themselves, and a small area of intertidal mud.

It is considered to be of special interest as it supports an important assemblage of nationally scarce plants and diverse ditch types. The grassland is species rich, with rare types such as sea barley, and salt marsh has the nationally uncommon lax-flowered sea-lavender. Insects include the nationally scarce Roesel's bush-cricket.

3.3.3 Local Nature Reserves

There are two Local Nature Reserves within 1km of the site boundary, the closest is Salary Brook which is approximately 950m northwest of the site. Conservation grassland meadows and 3 fishing ponds. There are sections of wetland (the area is a hot spot for water voles) with open farmland along the south end border of the reserve.

The second Local Nature Reserve is Colne, located approximately 730m southeast of the site boundary. Most of the site lies on fluvial sand and gravels interleaved with clays.

To the south end, several streams rise from springs and discharge into Wivenhoe Ferry Marsh to the west. At the north end a surface water drain discharges into a deep gulley through woodland and into the river through salt marsh.

3.3.4 Marine Conservation Zone

There is one Marine Conservation Zone within 2km of the site, named Blackwater, Crouch, Roach and Colne Estuaries located adjacent to the site boundary to the east. The MCZ comprises the most important area for both wild and cultivated native oyster (Ostrea edulis) in the south-east region. Where native oysters are found in large numbers they form beds made up of the oysters themselves and dead shells. Many marine species such as sea snails, crabs and sea urchins live amongst these beds, with some using them as a place of shelter whereas others attach themselves to the surface.

[3] www.magic.gov.uk accessed July 2024.

3.3.5 Other ecological receptors

Searches on the MAGIC[1] website confirm there are none of the following ecological receptors within 1km of the permit boundary:

- Ancient Woodland;
- National Nature Reserves;
- Areas of Outstanding Natural Beauty;
- World Heritage Sites;
- RAMSAR Sites;
- Special Protection Areas; and
- Woodland Trust Sites.

3.4 Cultural Heritage

Searches on the MAGIC[1] website confirm that there are none of the following within 1km of the application site:

- National Trust Properties; and
- Registered Battlefields.

There are several National Forests within 1km of the site boundary, all being broadleaved, with the closest lying approximately 115m southeast.

There is one Registered Parks & Gardens site named Wivenhoe Park which is located approximately 920m northeast of the site boundary.

There are two Scheduled monuments located within a 2km radius of the site:

- Bourne Mill which is located approximately 1.8km northwest; and
- Group of Barrows at Annan Road located approximately 570m north.

There are six grade II Listed Buildings within a 1000m radius of the site:

- Heathfield located approximately 680 west;
- Hull House immediately east of Laundry located approximately 780m northwest of the site;
- Salarybrook Farmhouse located approximately 790m north;
- West Lodge located approximately 955m northwest;
- Barn to northeast of Wivenhoe Lodge located approximately 820m east;
- Wivenhoe Lodge located approximately 780m east.

3.4.1 Receptors

Table 3-2 and Drawings 02 and 03 show the locations of receptors that are considered to be potentially sensitive and could reasonably be affected by the waste management activities.

Table 3-2 Identified Receptors

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from site boundary (at nearest point)
Identified receptors within 1000m of the Environmental Permit Boundary as shown on Drawing 02 Environmental Site Setting			

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from site boundary (at nearest point)
Haven Road and wider local road network	Local Road Network	North	Adjacent
River Colne	Surface water	East	Adjacent
Industrial and commercial units	Industrial	North, Northwest and Northeast	Adjacent
Open space	Open land	West and South	Adjacent
Open space	Open land	East	80m
Residential properties	Residential	Southwest	300m
Open space	Open land	North	320m
University of Essex Colchester	Educational	Northeast	400m
Hythe Lagoons	Surface water	Southeast	505m
Old Heath Community Primary School	Educational	West	680m
Playing fields and play space	Recreational	Southwest	690m
A134, A133 and wider local road network	Local Road Network	North	800m
A133	Local Road Network	Northeast	850m
Open space	Open land	Northwest	900m
Identified receptors within 2km of the Environmental Permit Boundary as shown on Drawing 03 Cultural and Natural Heritage			
Blackwater, Crouch, Roach and Colne Estuaries MCA	Marine Conservation Area	East	Adjacent
Upper Colne Marshes SSSI	Site of Special Scientific Interest	Southeast	180m
Group of barrows at Annan Road	Scheduled Monuments	North	570m
Heathfield – Grade II	Listed Buildings	West	680m
Colne LNR	Local Nature Reserve	Southeast	730m
Wivenhoe Lodge – Grade II	Listed Buildings	East	780m

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from site boundary (at nearest point)
Hull House immediately east of Laundry – Grade II	Listed Buildings	Northwest	780m
Salarybrook Farmhouse – Grade II	Listed Buildings	North	790m
Barn to northeast of Wivenhoe Lodge – Grade II	Listed Buildings	East	820m
Wivenhoe Park Grade II Registered Parks & Gardens	Registered Parks & Gardens	Northeast	920m
Salary Brook LNR	Local Nature Reserve	Northwest	950m
West Lodge – Grade II	Listed Buildings	Northwest	955m
Bourne Mill	Scheduled Monuments	Northwest	1780m

4.0 Environmental Risk Assessment

4.1 Amenity and Accidents Risk Assessment

The following tables (4.1 - 4.4) in this section assess the Site in terms of potential hazards posed to amenity and by accidents, the associated receptors and pathways, along with measures to manage the identified risks.

The probability of exposure is the likelihood of the receptors being exposed to the hazard, and is defined as low, medium or high. These terms are qualified as follows;

- Low: exposure is unlikely, barriers in place to mitigate against exposure.
- Medium: exposure is fairly probable, barriers to exposure less controllable.
- High: exposure is probable, direct exposure likely with few barriers.

The methodology outline in Section 1.1 of this report is the basis on which it is determined whether the proposed operations will lead to significant impacts on the surrounding environment. Where a conclusion of ‘not significant’ has been reached, it is proposed that the mitigation and management measures that will be in place at the Site will be sufficient to ensure that there will be no impact at the surrounding environment.

There will be no point source emissions to surface water, groundwater or air resulting from the proposed variation and neither will there be any Site waste arising or global warming potential. Therefore, it is only considered to be applicable for standard assessment in this instance, and includes the consideration of odour, noise and vibration, fugitive emissions (including dust, mud, litter and pests) and accidents in relation to the proposed development.

Table 4-1 Odour Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	**Receptor**	**Pathway**	**Risk Management**	**Probability of Exposure**	**Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk what do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? – Who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains? The balance of probability and consequence**
Acceptance, processing and storage of wastes	Potentially sensitive receptors as listed in Table 3-2.	Air	The waste types to be accepted on Site are not considered to be putrescible or contain degradable residues. The waste types to be accepted, are inert in nature and are not considered to be odorous.	Negligible	Odour Nuisance and loss of amenity.	**Insignificant – due to the type of waste accepted on site (inert in nature)**

Table 4-2 Noise Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	**Receptor**	**Pathway**	**Risk Management**	**Probability of Exposure**	**Consequence**	**What is the overall risk?**

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
What has the potential to cause harm?	**What is at risk what do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? – Who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains? The balance of probability and consequence**
Noise from vehicular movements (site access road and internal haul roads) Noise from operation of site plant due to loading and unloading of materials Intermittent operation of mobile plant (processing waste)	Potentially sensitive receptors as listed in Table 3-2, including industrial / commercial premises, residential areas, educational facilities and recreational areas. As illustrated on Drawings 002.	Air	The Site is located within Commerce Park industrial estate. The nearest residential receptors are located approximately 300m to the southwest. The closest educational facility is approximately 400m to the northwest with the nearest recreational area being 690m southwest. The Site is accessed via a track off Haven Road. Residential properties do not exist in close proximity to the access route. A 5mph speed limit is in place for vehicles using the Site. Site access & haul roads and operational areas are maintained and repaired to minimise emissions of noise due to uneven and poor surfacing. There are sprays located at the entrance to the site, located by the weighbridge. Plant is selected & operated to minimise noise. All Site plant and machinery are operated and maintained in accordance with manufacturer's specifications. The mobile crushing & screening plant will only crush every couple of days once stockpiles have been made. Auditory inspections of the Mobile Plant are carried out regularly & in response to complaints. The crusher has its own integrated suppression system which is used when required. The yard is scraped regularly and pot-holes are repaired to prevent damage to vehicles and unnecessary noise	Mobile Plant. Intermittent throughout the day. Medium.	Noise nuisance and loss of amenity.	**Not significant due to location of the facility and the history of no complaints since the EP was originally issued. In addition the site is already bunded providing further noise attenuation to local industrial units.**

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
			from vehicles. Vehicle and Plant horns shall only be used on site to 'warn' other road users of a potential collision. A record of the inspection findings and any complaints are made in the site diary. The Site Manager is responsible for implementing risk management measures in accordance with Silverton Aggregates' Environmental Management System (EMS).			

Table 4-3 Fugitive Emissions Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	**Receptor**	**Pathway**	**Risk Management**	**Probability of Exposure**	**Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk what do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? – Who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains? The balance of probability and consequence**
Dust from: • Processing operations. • Waste storage. • Vehicle Movements. • Crushing.	Potentially sensitive receptors as listed in Table 3-2, including industrial / commercial premises, residential areas, educational facilities and recreational areas, surface water features, transport infrastructure, River Colne, Upper Colne Marshes SSSI, Upper Colne Marshes, Colne LNR, Salary Brook LNR, Blackwater,	Air	A DEMP has been prepared as part of the permit application and is included in Appendix G of this EP variation application. The DEMP includes the following: • Overview of operations and potential for dust emissions. • Potential dust effects. • Review of meteorological conditions. • Local sources of dust. • Institute of Air Quality Management (IAQM) assessment of dust impacts. • Control of dust emissions. • Site management. • Complaints procedure. • Contingency action plan. The Site Manager will be responsible for implementing risk management measures in accordance with the Operating Techniques and the approved DEMP.	Medium	Dust nuisance	**Not Significant due to the mitigation measures already in place.**

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
	Crouch, Roach & Colne Estuaries MCZ. A registered Parks & Gardens and various listed buildings and scheduled monuments. As illustrated on Drawings 002 and 003.					
Treatment and Storage	Surface water, including the River Colne. As illustrated on Drawings 003 and 004.	Land and surface water	The site already benefits from compacted hardstanding throughout. IBAA will be stored on a concrete pad (impermeable surfacing) surrounding by bay walls (Legioblocks) that slope to the back, so that all runoff will flow to a sump. All other waste will continue to be stored on compact hardstanding, which is inert in nature with low potential to create contaminated surface water under normal operating conditions. The Site surfacing will be inspected daily to ensure it is in good condition. Any weaknesses will be repaired or re-surfaced as required with suitable material. All 'loaded' vehicles leaving the Site will be checked at the main gate to ensure the load has been evenly distributed and sheeted, to prevent the creation of airborne dust and any loss of material on the public highway. During prolonged spells of hot, dry weather a 'dust suppression unit' containing water will be used to prevent dust becoming airborne, this will occur a minimum of four times per day.	Low	Contamination of surface water and groundwater.	**Not significant**

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
			The Site Manager will be responsible for implementing risk management measures in accordance with the Operating Techniques document.			
Birds, vermin and pests	Potentially sensitive receptors as listed in Table 3-2.	Via air (flies) or over ground (vermin).	The proposed waste types to be accepted at the Site will not attract birds, vermin & pests. Waste acceptance procedures will ensure that only authorised wastes are accepted.	Negligible	Nuisance, loss of amenity and harm to human health.	**Insignificant**
Litter from waste	Potentially sensitive receptors as listed in Table 3-2.	Air	The proposed waste types to be accepted at the Site will not create litter. Waste acceptance procedures will ensure that only authorised wastes are accepted.	Negligible	Nuisance and loss of amenity	**Insignificant**
Mud from vehicle movements.	Site Access Road (via Haven Road) See Drawing 002.	Land	The Site will continue to benefit from good housekeeping and all areas of the Site will be maintained/cleaned daily including daily scraping of the yard. All vehicles and mobile plant leaving operational areas will be checked to ensure that they are clear of loose waste. Before leaving the site, vehicles will be checked to ensure that their load is secure and sheeted. During prolonged wet spells, the yard shall be swept 'as required' to prevent mud being carried onto the adjacent access road. The DEMP will discuss the mitigation measures in place to reduce this particular risk. The Site Manager will be responsible for implementing risk management measures in accordance with the Operating Techniques document and DEMP.	Medium	Mud on road, road safety	**Not significant – due to the management measures in place in the DEMP.**

Table 4-4 Accidents Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	**Receptor**	**Pathway**	**Risk Management**	**Probability of Exposure**	**Consequence**	**What is the overall risk?**
What has the potential to cause harm?	**What is at risk what do I wish to protect?**	**How can the hazard get to the receptor?**	**What measures will you take to reduce the risk? – Who is responsible for what?**	**How likely is this contact?**	**What is the harm that can be caused?**	**What is the risk that still remains? The balance of probability and consequence**
Unauthorised Waste Acceptance	Potentially sensitive receptors as listed in Table 3-2, including industrial / commercial premises, residential areas, educational facilities and recreational areas, surface water features, transport infrastructure, River Colne, Upper Colne Marshes SSSI, Upper Colne Marshes, Colne LNR, Salary Brook LNR, Blackwater, Crouch, Roach & Colne Estuaries MCZ. A registered Parks & Gardens and various	Via air (odours) Overland (to sewers, surface and groundwater)	Waste will be subject to strict pre acceptance and waste acceptance procedures to identify, reject and/or segregate potentially non-conforming waste. All waste accepted on the site shall be checked at the main gate by the Weighbridge Operator or TCM or another competent person. Only waste authorised by the EP will be accepted at the Site. All wastes will be subject to inspection and checking against the declaration on the waste transfer note. If unauthorised waste is delivered to the Site, it will be segregated and stored in a designated quarantine area prior to export from Site. Any rejected waste will also be subject to a 'waste rejection slip' which shall be retained in a folder on site and retained for a minimum of 12 months. The Site Manager will be responsible for implementing risk management measures in accordance with the Operating Techniques document.	Low	Nuisance, harm to human health	**Insignificant**

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
	listed buildings and scheduled monuments. As illustrated on Drawings 002 and 003.					
Fire	Potentially sensitive receptors as listed in Table 3-2, including industrial / commercial premises, residential areas, educational facilities and recreational areas, surface water features, transport infrastructure, River Colne, Upper Colne Marshes SSSI, Upper Colne Marshes, Colne LNR, Salary Brook LNR, Blackwater, Crouch, Roach & Colne Estuaries MCZ. A registered Parks & Gardens and various listed buildings and scheduled monuments.	Air (smoke) Ground (spillages and firewater)	The waste types accepted on Site will not readily burn due to the inherent inert nature of the material. The plant inspection schedule will include checks of electrical equipment within the Site to ensure that any faults are identified, reported and repaired. Smoking will not be permitted in the operational areas of the Site. Silverton Aggregate's working practices will ensure assessment of fire hazards and training of employees in fire prevention, e.g. use of fire extinguishers and emergency procedures. All staff training records will be maintained at Devereux Farm. No waste shall be burned on the Site and any fire at the Site will be treated as an emergency. Actions to be taken in the event of a fire: • Notify the Fire & Rescue Service immediately and the EA as soon as practicable. • Isolate the burning area and attempt to extinguish the fire utilising the on-site fire extinguishers, if it is safe to do so. • Prevent, if possible, contaminated drainage from entering surface/groundwater.	Low	Harm to human health and the environment and nuisance	**Insignificant**

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
	As illustrated on Drawings 002 and 003.		• Evacuate the Site if the fire is not containable. The Site Manager will be responsible for implementing risk management measures in accordance with the Operating Techniques document.			
Spillage and Leakage of fuels and oils	Local land quality, surface water and groundwater	Runoff and percolation through ground	Tanks used for the storage of fuel and maintenance oil, will be stored over drip trays or within a bunded area bund capable of containing at least 110% of the volume of the largest container within the bund or 25% of the total tank volume within the bund, whichever is the greater. Drip trays/bunds will be inspected visually daily by the site staff to ensure their continued integrity and to identify the requirement for any remedial action. Individual sorbent spill kits are available on all plant. Site staff will undertake daily monitoring for evidence of spillage and leakage. In the event of a major spillage immediate action will be taken to contain the spillage and prevent liquid from entering surface water drains and the unsurfaced ground. The spillage will be cleared immediately and placed in containers for off-site disposal and the EA will be notified. The Site Manager will be responsible for implementing risk management measures in accordance with the Operating Techniques document.	Low	Contamination of land, groundwater and surface water	**Insignificant**
Vandalism and Security	Harm to Human Receptors, Ecological		The following security measures will be in place for the Site:	Low	Theft, Plant failure, harm to human health	**Insignificant**

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
	Receptors, Commercial/industrial receptors, Land and Water		• Site perimeter: the Site will continue to benefit from the bund surrounding the majority of the site, from 2.4m fencing and the storage bays around the perimeter. • CCTV: Security cameras shall be positioned in various locations. • Security gates: The entrance gates to Silverton Aggregates shall be secured with a combination lock. At the top of Haven Road, there are gates which are padlocked outside of site operating times. • Inspection: the gate and fencing extending around the Site will be inspected regularly by the operations staff to identify deterioration, damage or the need for any repairs. • Maintenance and repair: fencing and the gate will be maintained and repaired to ensure their continued integrity. If damage is sustained, repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable. • Authorised access system: all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on-site. • Monitoring techniques: operational procedures, including regular inspections, will ensure continual monitoring of security provision at the Site.			

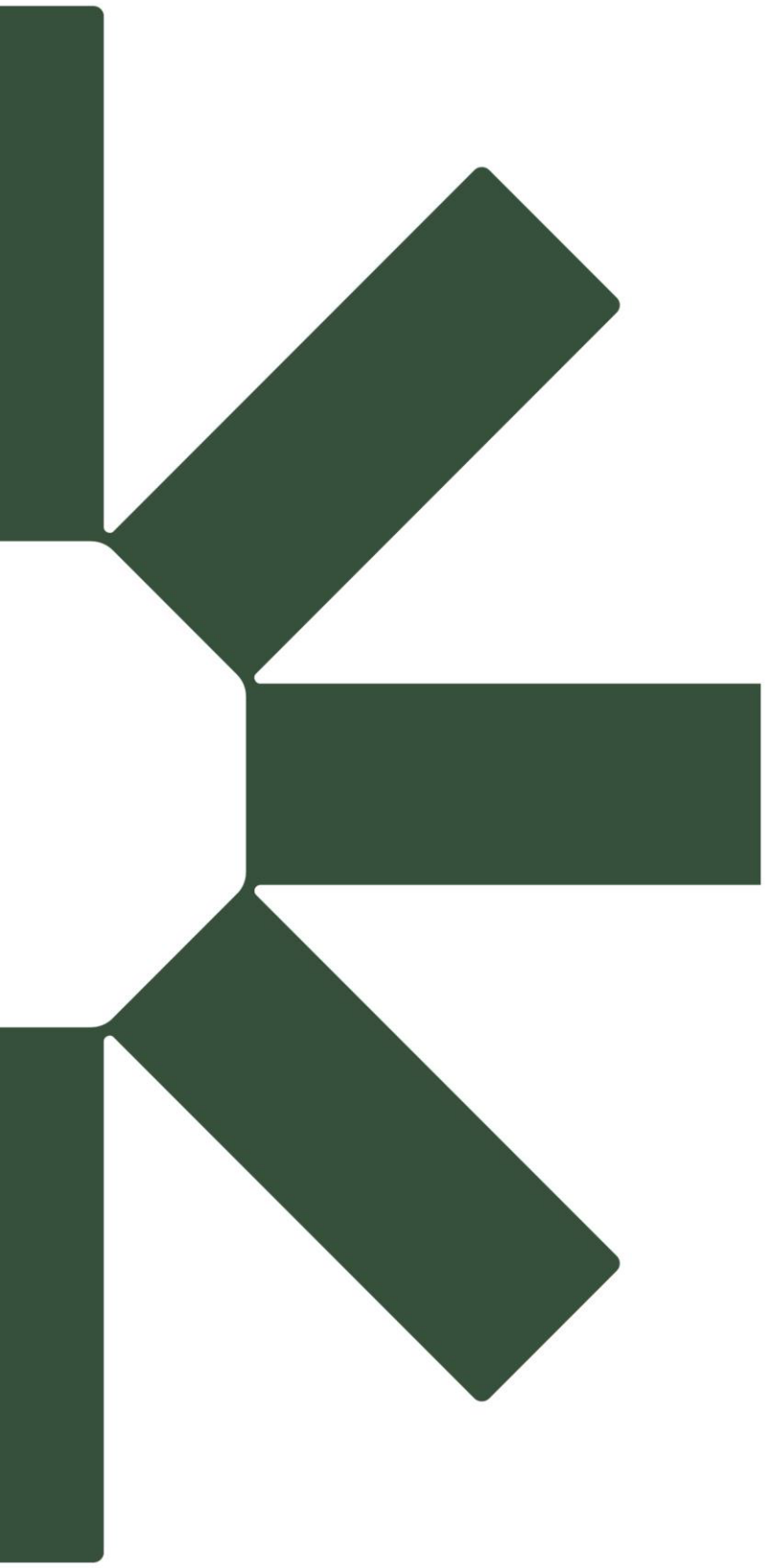
What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
			In the event of a breach of security at the Site, the cause will be investigated, and appropriate mitigation measures implemented. Records to be maintained include inspections and maintenance of security fencing and the gate, breaches of security, investigations and actions taken. The Site Manager will be responsible for implementing risk management measures in accordance with the Operating Techniques document.			
Flooding	Potentially sensitive receptors as listed in Table 3-2, including industrial/commercial premises, residential areas, educational facilities and recreational areas, surface water features, transport infrastructure, River Colne, Upper Colne Marshes SSSI, Upper Colne Marshes, Colne LNR, Salary Brook LNR, Blackwater, Crouch, Roach & Colne Estuaries MCZ. A Registered Parks & Gardens and various listed buildings and	Flood waters over land	The Site lies within Flood Zone 3; therefore, the Site has a high probability of flooding from rivers and the sea. A large bund surrounds the Site, which can provide flood defence. Further details surrounding climate change and impacts of flooding will be discussed in the EMS. An evacuation plan will be implemented in the event of flooding. The Site Manager will be responsible for implementing risk management measures in accordance with appropriate procedures outlined in Operational Techniques.	Medium	Contaminated flood waters impacting land in, ecological and commercial areas	**Not significant**

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
	scheduled monuments. As illustrated on Drawings 002 and 003.					

5.0 Conclusion

This ERA has been undertaken in accordance with EA guidance. The assessment is provided as part of the variation application for the Haven Road waste facility.

This qualitative risk assessment has considered odour, noise, fugitive emissions, dust, releases to water, litter and potential for accidents and incidents. The assessment concluded that with the continued implementation of the risk management measures described above, potential hazards from the application are not likely to be significant and no further assessment is required.



Making Sustainability Happen

Appendix D Baseline Site Condition Report

Baseline Site Condition Report

Environmental Permit Variation Application

Silverton Aggregates Limited

Haven Rd, Colchester, CO2 8HT

Prepared by:

SLR Consulting Limited

Mill Barn, 28 Hollingworth Court, Turkey Mill,
Maidstone, ME14 5PP

SLR Project No.: 409.010103.00001

19 February 2025

Revision: 1

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	4 March 2025	Rebecca Holland	Sam Pople	Sam Pople
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Silverton Aggregates Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

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Appendices

1.0 Introduction

Silverton Aggregates Limited (Silverton) has retained SLR Consulting Limited (SLR) to prepare a Baseline Site Condition Report (SCR) in support of a variation application to the existing Environmental Permit (EP) (Ref: VP3194NH) for the Haven Road waste facility, Colchester. Herein the facility will be referred to as 'the Site'.

The location of the Site is illustrated on Drawing 01.

This variation application seeks to extend the current EP boundary. The new boundary is illustrated on Drawing 01.

1.1 EP Variation Application - 2025

Since the original application was submitted in 2007, the Environment Agency (EA) have produced updated guidance for the requirements of a baseline SCR (originally released in 2008). Therefore, for this variation application to extend the boundary of the Site, the H5 template has been prepared in accordance with the EA's SCR H5 guidance[1]. Sections 1 – 3 have been compiled for completeness.

When an EP variation application is made which incorporates an extension to the boundary, the H5 template requires updating, specifically Sections 4 – 7. This H5 template therefore includes these sections.

This updated and consolidated SCR will provide a point of reference and baseline environmental data so that when the EP is surrendered it can be demonstrated that there has been no deterioration in the condition of the land as a result of the proposed operations and ensure that the condition of the land is in a 'satisfactory state' on surrender of the EP.

Sections 1 to 3 of the EA's SCR template have been completed within this document and comprise the following aspects:

- Site details.
- Condition of the land at permit issue:
    - Geology.
    - Hydrology.
    - Hydrogeology.
    - Pollution history.
    - Evidence of historic contamination.
- Permitted activities.

Sections 4 to 7 of the SCR template have been updated to reflect the extension to the EP boundary in this variation application.

The SCR template will continue to be maintained during the life of the permit and Sections 8 to 10 will be completed and submitted in support of the application to surrender the EP.

[1] Environmental Permitting Regulations; Site Condition Report – guidance and templates, Version 3.0, May 2013

2.0 Site Condition Report H5 Template

2.1 Site Details

Name of the applicant	Silverton Aggregates Limited
Activity address	Haven Rd, Colchester, CO2 8HT
National grid reference	TM 022234

Document reference and dates for Site Condition Report at permit application and surrender	Appendix A Envirocheck Report No original SCR was prepared for the original EP application.

Document references for site plans (including location and boundaries)	• Drawing 01 – Site Plan • Drawing 002 – Site Setting Receptors • Drawing 003 – Site Setting Cultural & Natural Heritage

Note:

In Part A of the application form you must give us details of the site's location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part B2 of the application form, then you should submit the additional plan or plans with this site condition report.

2.2 Condition of the Land at Permit Issue[2]

Environmental setting including: • geology • hydrogeology • surface waters	**2.2.1 Geology** A review of the British Geological Survey (BGS) map[3] reveals that the Site is underlain by a bedrock of Thames Group - Clay, silt and sand. Sedimentary bedrock formed between 56 and 33.9 million years ago during the Palaeogene period. Superficial deposits for the western half of the site have been identified as Intertidal Deposits - Clay and silt. Sedimentary superficial deposit formed between 11.8 thousand years ago and the present during the Quaternary period. **2.2.2 On Site Geology** Made ground (undivided) has been identified across the site and is made of artificial deposits. Composition was found to vary considerably depending on location, with Made Ground adjacent to roadways typically granular material of brick, concrete and clinker. Adjacent to the western side of the site boundary, there is some landscaped ground. Intertidal superficial deposits (undifferentiated) – clay and sand as well as clay and silt are underlying the Made Ground across the entirety of the Site. The Thames Group consisting of clay, silt and sand underlies the superficial deposits across the entirety of the Site. This can have a thickness up to approximately 150m. A BGS borehole (TM02SW95) from 1968, which is adjacent to the Site on its north eastern boundary, encountered 'made ground (brown sandy clay with brick & stones)' up to approximately 1.2m below ground level (bgl). Directly under the made ground is 'brown silty sand with flint gravel' to a maximum depth of 2.1m bgl, which is underlain by 'dense sand and flint gravel' to a maximum depth of 3.6m bgl. The bottom of the borehole, at a depth of 9.1m bgl, encountered 'firm grey silty clay'. **2.2.3 Hydrogeology** **2.2.3.1 Aquifer Characteristics** The Groundwater Vulnerability layer on the Multi-Agency information for the Countryside (MAGIC) website map reveals that the Site lies within an area known for Medium-Low risk groundwater vulnerability. The bedrock underlying the Site is classified as Unproductive Strata. The superficial deposits are classed as a Secondary A Aquifer.

[2] Information provided in Section 2.2 of this SCR has been extracted from the Envirocheck report included as Appendix A, which provides an overview of all existing information.

[3] British Geological Survey, Available at www.bgs.ac.uk, accessed in July 2024.

	#### 2.2.3.2 Source Protection Zones and Groundwater Abstractions There is a potable groundwater abstraction located in the west of the Site that is protected by a groundwater source protection zone (SPZ). This is a Zone III (Total Catchment) SPZ. ### 2.2.4 Hydrology The closest natural watercourse is the River Colne which is a tidal river located approximately 20m north-east of the site. There are numerous unnamed inland rivers with the closest being approximately 68m east of the site. Another tidal river, the Salary Brook is 289m north of the site. There is also a pond, Bourne Pond, located approximately 571m northwest of the site. There are no active discharge consents for the Site relating to the discharge of effluent. ### 2.2.5 Flooding The Site lies within Flood Zone 3; therefore, the Site has a high probability of flooding from rivers and the sea[4].
Pollution history including: • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination • evidence of damage to pollution	### 2.2.6 Pollution History #### 2.2.6.1 Historic and Existing Activities The historic land uses at the Site are detailed below. • Before 1881: Undeveloped farmland. • 1924: Sewage Works (Colchester Corporation) has been constructed within the Site boundary with an outfall into the River Colne. • 1975-1977: The sewage works continue to develop. A refuse or slag heap was formed during this period in the southern area of the Site. • 1983-1999: The refuse or slag heap continues to be present in the southern area of the Site. • 2006 to Present: The Site now has three new buildings; two in the northern area of the Site and one in the Southwest corner. The outfall into the River Colne is still present on the map. ### 2.2.7 Pollution Incidents There have been no recorded pollution incidents within the boundary of the Site. There have been no pollution incidents within 500m of the Site since the issue of the EP in 2007.

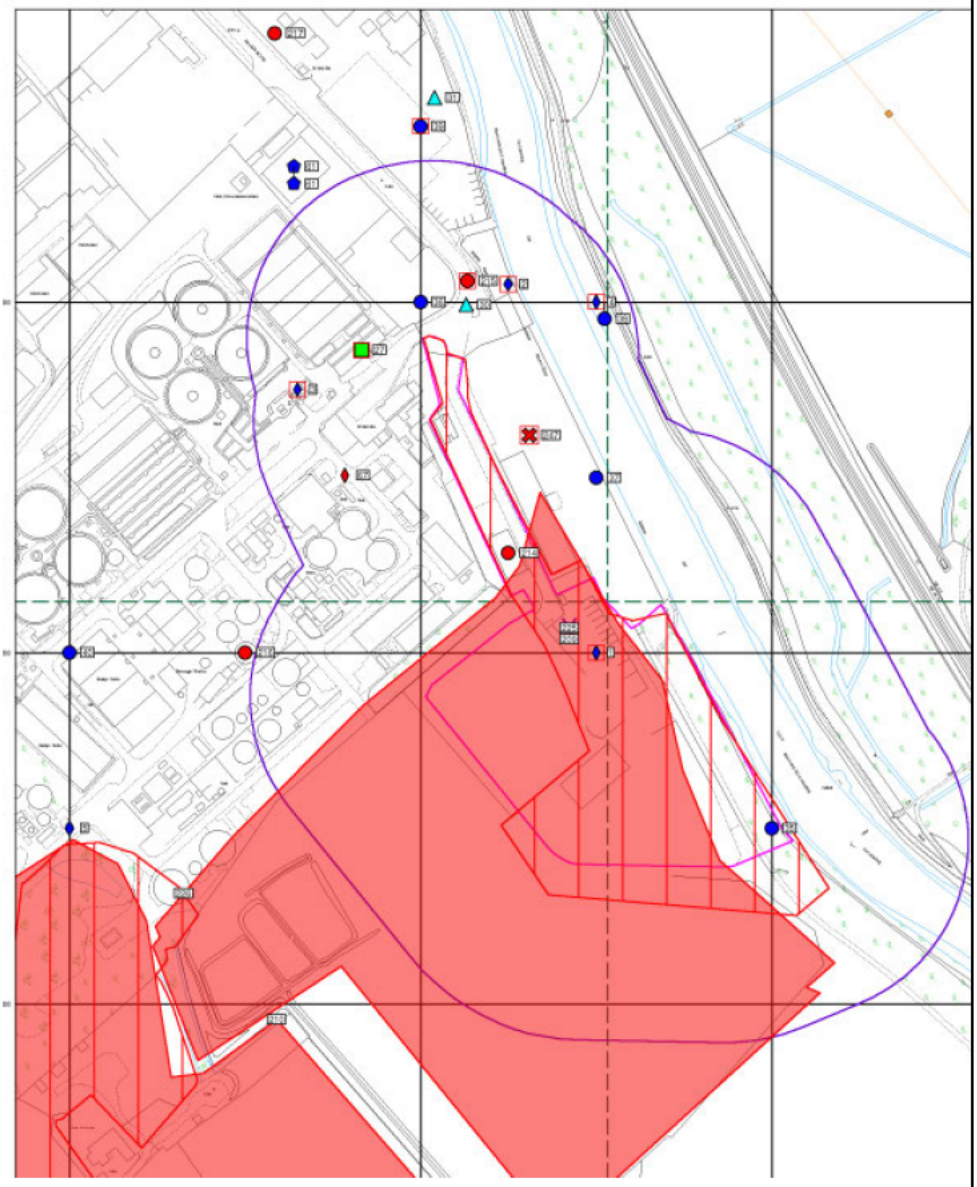
[4] Flood Map for Planning https://flood-map-for-planning.service.gov.uk, accessed July 2024

prevention measures

2.2.8 Historic Landfills

A historic landfill is detailed in the Envirocheck within the boundary of the facility. The Haven Quary landfill was regulated by Colchester Borough Council but no information is provided regarding the type of waste accepted.

The area highlighted in red below illustrates the area which is recorded as a historical landfill. It is likely, in the review of the historical mapping for the area, that the landfill was associated with the sewage works located to the north and northwest of the facility. The area surrounding the site are illustrated as sludge lagoons. Within the site slag heaps are illustrated up until 1983.



There are a further three historic landfill sites located within 500m of the Site.

Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	Refer to Section 2.2.8 above. It is likely that the land was once used by the sewage treatment facility located to the north and north east of the site between 1898 – 1983.
Baseline soil and groundwater reference data	No BGS Registered boreholes are located within the site. A BGS borehole (TM02SW95) from 1968, which is adjacent to the Site on its north eastern boundary, encountered 'made ground (brown sandy clay with brick & stones)' up to approximately 1.2m below ground level (bgl). Directly under the made ground is 'brown silty sand with flint gravel' to a maximum depth of 2.1m bgl, which is underlain by 'dense sand and flint gravel' to a maximum depth of 3.6m bgl. The bottom of the borehole, at a depth of 9.1m bgl, encountered 'firm grey silty clay'. Made ground (undivided) has been identified across the site and is made of artificial deposits. Composition was found to vary considerably depending on location, with Made Ground adjacent to roadways typically granular material of brick, concrete and clinker. Adjacent to the western side of the site boundary, there is some landscaped ground.
Supporting information	Appendix A – Envirocheck Report

3.0 Permitted Activities

Permitted activities	As detailed in Schedule 2 of the EP, Table 2.1 Licence Activities: D15: Storage pending, on this site any of the category "D" operations authorised under this column, or elsewhere than on this site, any of the operations listed in Part III of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced). R13: Storage of waste consisting of materials intended for submission, on this site to any of the category "R" operations authorised under this column, or elsewhere than on this site, to any of the operations listed in Part IV of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced). D14: Repackaging of waste prior to waste being submitted on this site to any of the category "D" operations authorised under this column, or elsewhere than on this site, by means of any of the operations listed in Part III of Schedule 4 of the 1994 Regulations. D9: Physico-chemical treatment of waste not listed elsewhere in this table which results in final compounds or mixtures which are disposed of on this site by means of any of the category "D" operations authorised under this column, or elsewhere than on this site, by means of any of the operations listed in Part III of Schedule 4 of the 1994 Regulations. R3: Recycling or reclamation of organic substances which are not used as solvents. R4: Recycling or reclamation of metals and metal compounds.

	R5: Recycling or reclamation of other inorganic materials.
Non-permitted activities undertaken	There are no non-permitted activities taking place at the Site.
Document references for: • Plan showing activity layout; and • Environmental risk assessment.	• Drawing 01 – Site Plan • Drawing 02 – Site Setting Receptors • Drawing 03 – Site Setting Cultural & Natural Heritage. Environmental Risk Assessment, SLR Consulting Limited (ref: 409.010103.00001_ERA_2), 2025 for a bespoke EP variation application.

Note:

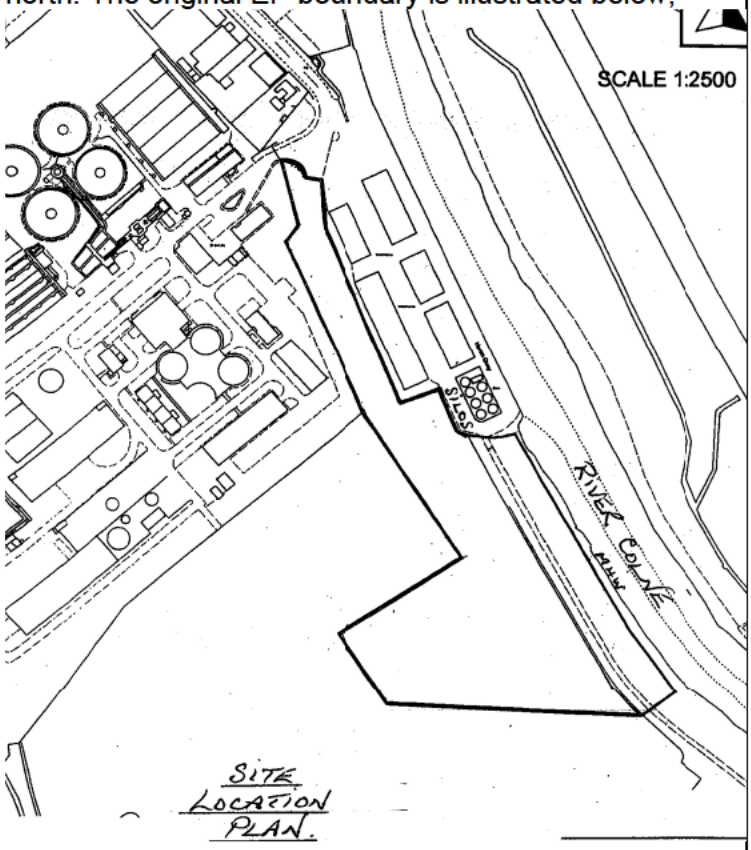
In Part B of the application form you must tell us about the activities that you will undertake at the site. You must also give us an environmental risk assessment. This risk assessment must be based on our guidance (*Environmental Risk Assessment*) or use an equivalent approach.

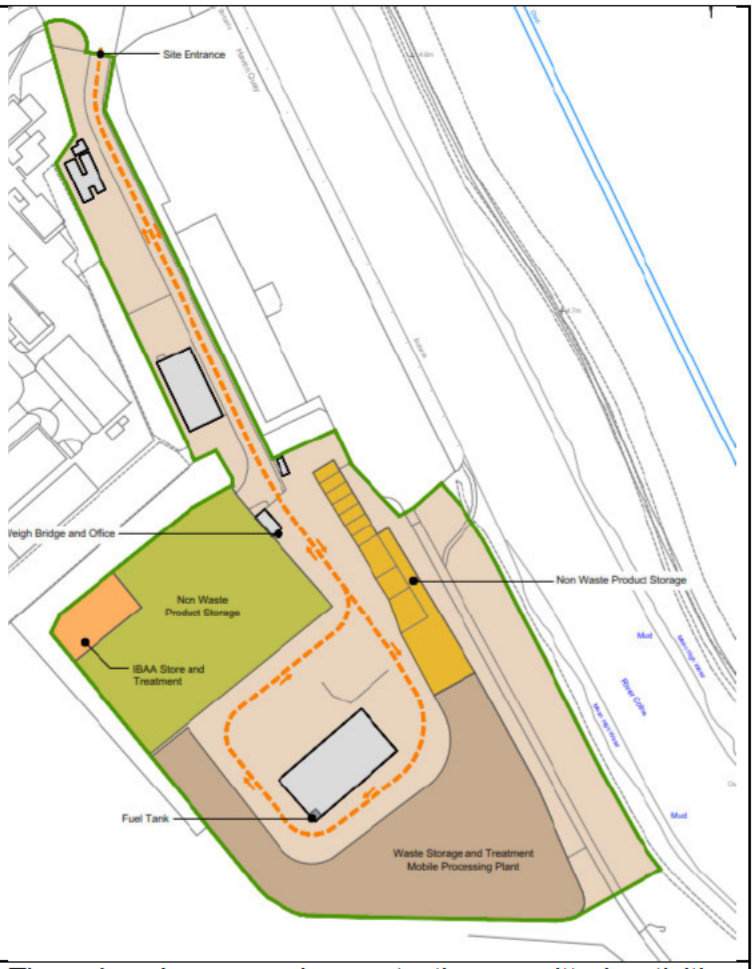
It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail.

These include substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) regulations and also raw materials, fuels, intermediates, products, wastes and effluents.

If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater we may need to request further information from you or even refuse your permit application.

4.0 Changes to the Activity

Have there been any changes to the activity boundary?	There has been no change to the boundary since the permit was issued in 2007 until 2025. The 2025 variation seeks to extend the boundary to the north. The original EP boundary is illustrated below;  The below image illustrates the extension to the EP boundary is 2025 along the north west boundary;

	
Have there been any changes to the permitted activities?	There has been no change to the permitted activities since the permit was issued in 2007. **2025 EP Variation** Silverton wish to accept over 75 tonnes per day of IBAA for further treatment and storage. As this exceeds the installation treatment limit of 75 tonnes per day, the activity will fall within; • *Section 5.4, Part A (1) (b) (iii) recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day… for the treatment of slags and ashes.*
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No 'dangerous substances' have been used or produced as a result of the permitted activities taking place at the Site.
Checklist of supporting information	• Plan showing any changes to the boundary (where relevant)

	• Description of the changes to the permitted activities (where relevant) • List of 'dangerous substances' used/produced by the permitted activities that were not identified in the Application Site Condition Report (where relevant)

5.0 Measures taken to protect land

Measures taken to the protect the land include the following: • Only waste inert in nature has been accepted, stored and processed on site; • Site surfacing is compacted hardcore (appropriate for the risk involved with dealing with inert waste); • No hazardous wastes is accepted or stored on site: • The fuel tank is maintained and fully bunded: and • Good housekeeping procedures have been maintained throughout the facilities operation.	
Checklist of supporting information	• Inspection records and summary of findings of inspections for all pollution prevention measures • Records of maintenance, repair and replacement of pollution prevention measures

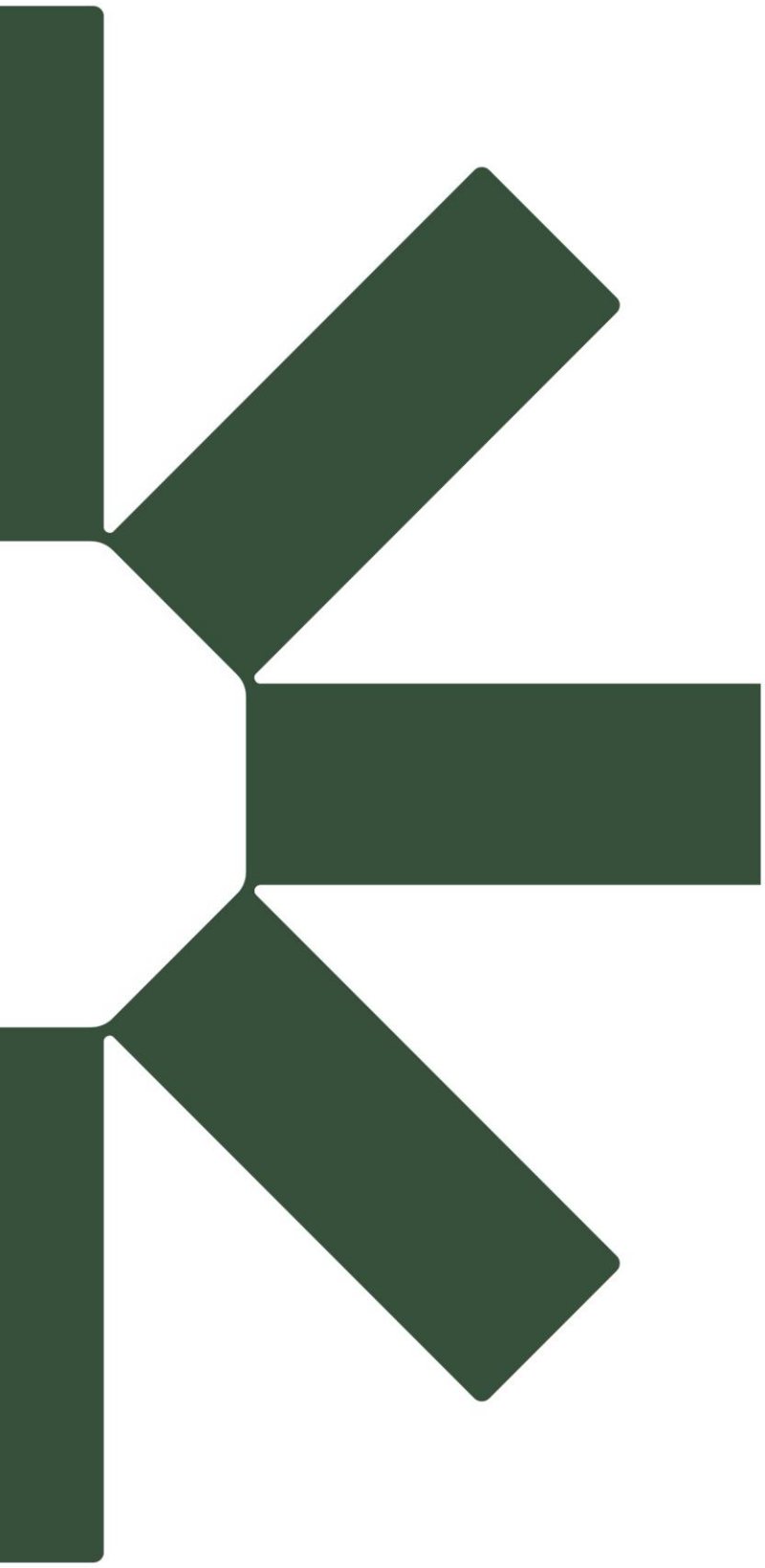
6.0 Pollution incidents that may have had an impact on land, and their remediation

No recorded pollution incidents on site.	
Checklist of supporting information	• Records of pollution incidents that may have impacted on land • Records of their investigation and remediation

7.0 Soil gas and water quality monitoring (where undertaken)

No SCR was prepared in support of the original EP application. No BGS recorded boreholes are located within or near the site.	
Checklist of supporting information	• Description of soil gas and/or water monitoring undertaken • Monitoring results (including graphs)

Appendix A: Envirocheck report (provided as a separate electronic folder)



Making Sustainability Happen

Appendix E Operating Techniques and Management System

Operating Techniques and Management System

Haven Road Recycling Facility

Silverton Aggregates Limited

Haven Road, Colchester, Essex, C02 8HT

Prepared by:

SLR Consulting Limited

Mill Barn, 28 Hollingworth Court, Turkey Mill,
Maidstone, ME14 5PP

SLR Project No.: 409.010103.00001

Client Reference No: EPR/VP3194NH

10 February 2025

Revision: 1

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	3 February 2025	Rebecca Holland	Samantha Pople	Samantha Pople
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Silverton Aggregates Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

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Table of Contents

Tables in Text

1.0 Introduction

1.1 Report Context

Silverton Aggregates Limited (Silverton) has retained SLR Consulting Limited (SLR) to prepare an Operating Techniques and Management System in support of a variation application to the existing Environmental Permit (EP) (Ref: EPR/VP3194NH) for the Haven Road waste facility, Colchester.

This Operating Techniques and Management System (OT) document sets out best practice for operating the site, based on legislation and best available techniques in the industry.

The OT will be reviewed and updated on an annual basis or because of any of the following activities (list not exhaustive):

- The issue of an EP variation by the Environment Agency (EA);
- A material change to the operational process;
- A substantial complaint; or
- Any changes in legislation or guidance documents applicable to the operations undertaken at Haven Road.

This OT document is supplemented by the following documents submitted in the 2025 EP application, which should be read in conjunction with this report; Dust and Emissions Management Plan, Environmental Risk Assessment and Associated Drawings.

1.2 Site Location

The site is located to the south-east end of Commerce Park, an industrial estate within Colchester. The entrance to the facility is via a track located off Haven Road which runs from the north of the site through to the south.

The national grid reference for the site is TM022234 and the site location is illustrated on Drawing 01.

The closest residential property is located to the southwest approximately 300m away from the site.

The site lies in close proximity to a number of European and nationally designated sites. The Blackwater, Crouch, Roach and Colne Estuaries (Marine Conservation Zone) lies adjacent to the site's eastern boundary. The Upper Colne Marshes of Special Scientific Interest (SSSI) is located approximately 180m to the southeast of the site. Other designated sites within a 2km radius of the site boundary include Local Nature Reserves, a Registered Parks & Gardens and Cultural Heritage Sites including Listed Buildings and Scheduled Monuments.

Surrounding land-use and receptors are identified on Drawing 02 – Environmental Site Setting, and Drawing 03 - Cultural and Natural Heritage, and are identified in Table 1-1 below.

Table 1-1 Surrounding Land Uses

Boundary	Description
North	Industrial and commercial premises, open space, University of Essex Colchester campus, residential areas, River Colne and a railway line.
East	Industrial premises, River Colne, a railway line, areas of open space, residential properties and the University of Essex Colchester campus.

South	Predominantly open space with a residential area and surface water including Hythe Lagoons.
West	Industrial premises and an educational premises and residential areas.

1.3 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the EP. The report is divided into the following sections;

- **Section 1** Introduction
- **Section 2** General management and appropriate measures
- **Section 3** Accident prevention and management plan
- **Section 4** Operations
- **Section 5** Waste pre-acceptance, acceptance and tracking
- **Section 6** Emissions control
- **Section 8** BAT Assessment
- **Section 9** Information

1.4 Document Revision

Any changes are labelled in chronological order and the date of the change is recorded. All records of the changes are listed in the revision history table below:

Table 1-2 Document Revisions

Version	Reason for Revision	Date of Revision	Signature of Site Manager

2.0 General Management and Appropriate Measures

The following sections details how the facility will be managed on a daily basis.

2.1 Management System

This bespoke OT will be implemented on site by Silverton Aggregates and will ensure that:

- The risks that the activities pose to the environment are identified;
- The against measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system;
- Performance the management system is audited at regular intervals; and
- The EP is complied with.

2.2 Management Structure and Responsibilities

The Site Manager will be responsible for day to day operations and compliance with the OT and the EP.

Whenever the site is open to receive waste, or carry out any of the waste management operations, it will be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the permit relating to:

- Waste acceptance and control procedures;
- Operational controls;
- Maintenance;
- Record-keeping;
- Emergency action plans; and
- Notifications to the EA.

2.3 Technical Competence and Training

The site is manager by sufficient staff, competent to operate the site.

A fully trained member of staff is on site at all times during waste acceptance hours, in order to provide supervision for waste acceptance. This staff member is fully conversant with the waste acceptance procedure, EP and contents of this OT.

An assessment of general staff training needs is carried out to identify the posits for which specific environmental awareness training is needed, and to determine the scope and level of such training. The assessment of training needs is reviewed on an annual basis with records retained.

Silverton Aggregates' OT and training procedures ensure the following:

- All staff have clearly defined roles and responsibilities;
- Records are maintained of the skills required for each post;
- Records are maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- Operations are governed by standard operating instructions.

Operations at the site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

All staff are aware of the following:

- Regulatory implications of the EP for the site and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- Incident management;
- The need to report deviations from the EP; and
- Prevention of accidental emissions and the action to be taken should accidental emissions occur.

Weighbridge operatives receive thorough training on waste identification, acceptance procedures and classification. This training is conducted at the start of employment, in response to any non-conformances, incidents or significant changes in operation, and annually.

All members of the management team including those responsible for overseeing site activities receive thorough training with regards to the conditions of the EP and their resultant duties. Management also become conversant with and annually refresh their knowledge of this OT.

2.4 Site Security

In order to prevent unauthorised access, a number of site security measures will be in place Haven Road, including;

- Fencing along the wider site boundary;
- CCTV system;
- A gate located at the entrance to the wider site, which will be locked when the site is closed; and
- All visitors to the site will be required to sign in and out of the visitors book. This minimises the risk of unauthorised visitors gaining access to the site.

The site will be inspected at the commencement of each working day to identify any deteriorations and need for repairs. Any defects or damage which compromises the integrity of the enclosures will be made secure by temporary repair within 24 hours. Permanent repairs will be affected as soon as practicable after this.

All inspections, any defects, damage or repairs will be recorded in the Site Diary.

2.5 Display of EP

A copy of the EP will be kept available for reference by all staff and contractors whose work may have an impact on the environment.

2.6 Permit Surrender

A Baseline Site Condition Report (SCR) has been prepared in support of this EP variation application, setting out the baseline conditions of the site for comparison at the point of surrender.

This will be updated during the operational life of the site as appropriate. To assist with permit surrender, records will be maintained to demonstrate how the land has been protected at all times between the date of permit issue and surrender.

2.7 Managing Documentation and Records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

Documents included in the scope of controls are as follows:

- Policies;
- Responsibilities;
- Targets;
- Maintenance records;
- Procedures;
- Monitoring records;
- Results of audits;
- Results of reviews;
- Complaints and incident records; and
- Training records.

Records of all imported material will be made and kept up to date to reflect deliveries. All records relating to waste acceptance will be maintained and kept readily available on site and kept for a minimum of 2 years.

2.8 Reporting Non-Compliance and Taking Corrective Action

Procedures will ensure appropriate corrective action is taken in response to problems identified at the site. The procedures will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

- Actual or potential non-compliance;
- System failure discovered at internal audit;
- Suppliers or subcontractors breaking the agreed operating rules;
- Incidents, accidents, and emergencies;
- Other operational system failure; and
- Complaints.

The action taken in response to the non-conformance may include:

- Obtaining additional information on the nature and extent of the non-conformance;
- Discussing and testing alternative solutions;
- Modifying procedures and responsibilities;
- Seeking approval for additional resources and training; and
- Contacting suppliers and contractors (as applicable).

2.9 Auditing and Legal Compliance

There will be a formalised internal auditing procedure to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored.

2.10 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure will review environmental performance, and ensure any necessary actions are taken.

2.11 Operational Control, Preventative Maintenance and Calibration

The management system will complement operational procedures so as to ensure effective control of site operations, the use of approved suppliers and contract services, the maintenance of operational equipment and calibration of monitoring equipment.

All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

2.12 Design and Construction Quality Assurance

All relevant elements of the site which are not already constructed will be designed in accordance with recognised standards, methodologies and practices.

The design process will use a risk-based approach and will be appropriately documented using drawings, specifications and method statements to provide an adequate audit trail.

Construction Quality Assurance (CQA) plans will govern all construction activities necessary in the future. These CQA plans will be prepared by competent and suitably qualified persons.

A competent and suitably qualified person will supervise the construction activities and prepare a validation report confirming that the key construction activities have been carried out in accordance with the CQA plan.

3.0 Accident Prevention and Management Plan

Silverton Aggregates recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

An accident management plan will be implemented and maintained at the site to ensure that the site and staff are fully prepared for any such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence.

The following accident management plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

3.1 Hazard Identification

The following potential hazards have been identified in the Environmental Risk Assessment (ERA) that was prepared using the ERA methodology and has been submitted in support of this EP variation application.

- Unauthorised waste;
- Fire;
- Loss of containment - spillage and leakage;
- Security and vandalism; and
- Flooding.

The following sections summarise the measures necessary to minimise the potential causes and consequences of accidents, as detailed in the ERA.

3.2 Unauthorised Waste

The acceptance of unauthorised materials could result in unacceptable wastes being deposited at the site. The Waste Acceptance Procedure (WAP) will be implemented on site with strict enforcement, to ensure no unauthorised waste is accepted. The procedures will include: pre-acceptance checks, an approved suppliers list, basic characterisation and visual checks against the declaration on the transfer note. In the event that unauthorised waste is delivered to the site, the waste will be segregated and stored in a designated quarantine/isolation area prior to export from site.

3.3 Fire

The waste types authorised to be accepted on site are ‘inert’ in nature and therefore will not readily burn.

To prevent and minimise the potential impact of fire, the following action will be taken:

- Flammable wastes and incompatible materials will not be accepted at the site;
- The plant inspection schedule will include checks of electrical equipment within the site to ensure that any faults are identified and repaired. Any faults which are identified during these checks will be reported and repaired;
- Fire extinguishers will be provided at designated locations;
- Smoking will not be permitted in the operational areas of the site;

- Working practices will ensure the assessment of fire hazards and training of employees in fire prevention e.g. the use of fire extinguishers and emergency procedures; and
- No wastes will be burned on site and any fire at the site will be treated as an emergency.

In the event of a major fire, the following action will be taken:

- The Site Manager and Fire Rescue Service will be notified immediately and the EA as soon as practicable;
- The burning area will be isolated, and attempts will be made to extinguish the fire utilising the on-site fire extinguishers if safe to do so;
- Prevent, if possible, contaminated site drainage from entering unsurfaced ground; and
- The site and buildings will be evacuated.

3.4 Loss of Containment

There is one above ground 10,000litre fuel tank located within the EP boundary.

Loss of containment could lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented:

- All vehicles and mobile plant will be subject to a programme of planned preventative maintenance in accordance with the manufacturer's recommendations to prevent oil/fuel leaks from vehicles;
- Spill kits will be kept on site; and
- Site staff will undertake daily visual inspections to identify any evidence of spillage or leakages. The results of any inspections or investigations will be recorded.

In the event of any potentially polluting leak or spillage occurring on site, the following action will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- Any dry wastes spilled on site will be collected and transported to the appropriate area of the site.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from flowing outside the EP boundary. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed.

3.5 Security and Vandalism

The following security measures are in place:

- Site perimeter: the site benefits from fencing around the perimeter of the facility;
- Lockable gates: the site benefits from gates at the wider site entrance which will be locked outside of operational hours;
- CCTV Security system around the site;
- Inspection: gates and fencing extending around the site will be inspected daily by the operations staff to identify deterioration and damage, and the need for repairs;

- Maintenance and repair: fencing and gates will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained repairs will be made within 24 hours. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;
- Authorised access system: all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and
- Monitoring techniques: operational procedures, including regular inspections will ensure continual monitoring of security provision at the site.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded in the Daily Site Log. Records maintained will include inspections and maintenance of security fencing and the gate, breaches of security, investigations and actions taken.

3.5.1 Flooding

There are no surface water features within the site boundary.

The site is located within a "Moderate" flood warning area according to the EA flood mapping website[1]. This area has a medium chance of flooding. The chance of flooding each year is 1.3% (1 in 75) or less, but greater than 0.5% (1 in 200). This takes into account the effect of any flood defences that may be in this area, whether or not these are currently illustrated on the Flood Map.

In the event that an accident occurs, or additional risks are identified, the Site Manager is responsible for carrying out an investigation to determine the cause and implementing remedial action prior to logging this in the Site Diary.

3.6 Contingency Plans and Procedures

The site will implement a contingency plan to ensure that the following are achieved:

- Compliance with all EP conditions and operating procedures during maintenance or shutdown at the site;
- No exceedance of limits in the EP and that appropriate measures for storing and handling waste are continued to be applied; and
- Cessation of waste acceptance unless there is a clearly defined method of recovery and enough permitted capacity on site.

3.7 Facility Decommissioning

The site will require a simple decommissioning consisting of the mechanical and electrical removal of all plant and equipment. There will be no subsurface tanks or pipework, drains or potential dusty insulation to remove.

The decommissioning plan will demonstrate that:

- The plant can be decommissioned without causing pollution; and
- The site will be returned to a satisfactory state.

[1] https://flood-map-for-planning.service.gov.uk/ accessed July 2024.

4.0 Operations

4.1 Waste Activities

The site is currently operated by Silverton Aggregates Limited and treats up to 75,000 tonnes per annum (tpa) of a range of waste management, construction, demolition and excavation waste materials to produce recovered secondary aggregates.

This variation seeks to allow the acceptance of Incinerator Bottom Ash Aggregate (IBAA) for storage, treatment and transfer.

Table 4-1 below details the addition of the waste installation and existing waste operation.

Table 4-1 Description of Waste Installation and Operation

Activity Reference	EP Regulations Reference	Activity Description	Limits of Activity
Installation			
AR1	Section 5.4, Part A (1) (b) (iii)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving… (iii) treatment of slags and ashes.	Waste will be accepted and stored on an impermeable surface with sealed drainage. Up to 2,000 tonnes of IBAA will be stored at any one time.
Waste Operation			
AR2	Inert and excavation waste transfer station with treatment	D15: Storage pending, on this site any of the category "D" operations authorised under this column, or elsewhere than on this site, any of the operations listed in Part III of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced). R13: Storage of waste consisting of materials intended for submission, on this site to any of the category "R" operations authorised under this column, or elsewhere than on this site, to any of the operations listed in Part IV of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced). D14: Repackaging of waste prior to waste being submitted on this site to any of the category "D" operations authorised under this column, or elsewhere than on this site, by means of any of the operations listed in Part III of Schedule 4 of the 1994 Regulations.	Inert wastes must be kept on hard standing or on impermeable pavement with sealed drainage.
		D9: Physico-chemical treatment of waste not listed elsewhere in this table which results in final compounds or	Treatment consisting only of manual sorting, separation, screening, or crushing of waste

Activity Reference	EP Regulations Reference	Activity Description	Limits of Activity
		mixtures which are disposed of on this site by means of any of the category "D" operations authorised under this column, or elsewhere than on this site, by means of any of the operations listed in Part III of Schedule 4 of the 1994 Regulations. R3: Recycling or reclamation of organic substances which are not used as solvents. R4: Recycling or reclamation of metals and metal compounds. R5: Recycling or reclamation of other inorganic materials.	into different components for disposal, (no more than 50 tonnes per day) or recovery. Inert wastes must be treated on hard standing or on impermeable pavement with sealed drainage.

4.2 Process Description

Only scheduled waste delivery vehicles are allowed access. It is likely that the majority of vehicles entering the site will be owned by Silverton, with only a small number of 3rd party loads accepted. Site operations are carried out as follows, and should be read in conjunction with Drawing 01:

- Vehicles enter the site to the north of the facility.
- On delivery to the site, vehicles are checked at the weighbridge by the Technically Competent Manager (TCM) (WAMITAB holder) or another competent person in their absence[2].
- The vehicles driver is advised on where to offload in the 'waste storage and treatment area', the location of which is illustrated on Drawing 01.
- For the delivery of IBAA, drivers will be directed, via the one way transport system, to the dedicated storage bay located in the north west corner of the site.
- Materials are held for varying lengths of time dependant on the waste type and weather conditions. Once treated, all non waste material is transferred to the 'non waste product storage' area located along the eastern side shall be stored on a clean, dry surface, away from incoming stored material to avoid re-contamination.
- Screening process:
    - Once materials have been screened, they are to be transferred to the appropriate screened stockpile/bay.
    - Any concrete or similar material or inert material only fit for landfill is moved to the appropriate bay.
    - As the need arises the screening medium is changed to suit the conditions i.e. dry and or the products to be screened i.e. C&D or soils.

[2] If loads are non-conforming, the vehicle will be refused entry and turned away at the gate.

- The various products created from the screening operation are stored in the finished product bays according to their specification.
- Any inert materials rejected from the screening process which are not suitable for resale are to be moved to the appropriate stockpile/bay for eventual re-loading.

- Finished products for sale and inert materials not suitable for recycling are loaded onto vehicles by a loading shovel, weighed at the weighbridge and the load sheeted before leaving the site.

4.3 Waste Types and Quantities

The EWC waste list is shown in Tables 4-1 below.

Table 4-2 Waste List

Waste Code	Description
10	WASTE FROM THERMAL PROCESSES
10 01	Wastes from power stations and other combustion plants (except 19)
10 01 01	Bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	Wood, glass and plastic
17 02 02	Glass
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 05	Soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 05 08	Track ballast other than those mentioned in 17 05 07
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – for the acceptance of Incinerator Bottom Ash (IBAA)
20	MUNCIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS

Waste Code	Description
20 02	Garden and park wastes (including cemetery waste)
20 02 02	Soil and stones

4.4 Site Infrastructure and Equipment

4.4.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight will be provided by the main site entrance.

The identification board will be inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board it will be repaired or replaced within a timescale agreed upon with the EA.

The board will display the following information:

- Site name and address;
- Permit holder;
- Permit number;
- Emergency contact name and telephone number;
- EA national telephone numbers; and
- Days and hours site is open to receive waste.

4.4.2 Mobile Plant and Equipment

The following items of plant and equipment will be held on site from time to time. This is not a fixed list of plant:

- 2 x wheel loading shovels
- 2 x excavators
- Concrete crusher (mobile)
- 2 x screeners

Additional plant and equipment including, but not limited to, water bowser, spray equipment and road sweeper are made available as required.

All items of plant and equipment used on site will be maintained in accordance with manufacturer's recommendations.

4.4.3 Plant Maintenance

All maintenance audits and monitoring will be carried out in accordance with the Manufacturer's specifications, which are kept in the site office or available online.

Silverton Aggregates will take a proactive approach involving a planned preventative maintenance program for the site. A Maintenance Checklist will allow all site operatives to actively take part in the site's maintenance schedule.

The checklist is completed and maintained by the Site Manager, with the following information compiled:

- The item that requires maintenance;

- How often maintenance needs to be carried out (daily, weekly, monthly or yearly);
- A record of any particular maintenance instructions; and
- Who on site is responsible for each maintenance check.

The checklist ensures that all site operatives are aware of their particular responsibilities for maintenance checking. The Site Manager ensures that all site operatives are aware of any amendments and additions to the checklist.

When a maintenance issue is dealt with, a maintenance record form is completed for each separate piece of equipment or infrastructure. The record form will include the following information to be recorded:

- The item requiring maintenance;
- The frequency of the required maintenance;
- Completed date and who carried out by; and
- Any particular comments.

The record forms will be kept in the site office to ensure there is access for all site operatives to the records.

In the even that plant replacement is required, Silverton Aggregates will choose new plant with the lowest emission standard available at the time of purchase.

The following control measures will be in place to reduce emissions as much as possible during operations:

- Use of low sulphur fuel;
- Mobile plant to be switched off when not in use to avoid idling; and
- Planned, preventative maintenance schedule to be rigidly followed to avoid the operation of poor performing or inefficient plant.

5.0 Waste pre-acceptance, acceptance and tracking

5.1 Waste Pre-Acceptance

The waste pre-acceptance procedures follow a risk-based approach considering:

- The source and nature of the waste;
- Potential risks to process safety, occupational safety and the environment (for example from odour and other emissions); and
- Knowledge about the previous waste holder(s).

The objective of the waste pre-acceptance procedure is to evaluate customer information at the enquiry stage to determine whether the waste could be accepted at the site.

The waste producer/holder will be required to send the necessary waste characterisation information to Silverton Aggregates in advance of delivery of waste materials to the site.

This information enables Silverton Aggregates to determine whether the waste stream can be accepted at the site.

No waste will be accepted at the site unless the necessary characterisation information has been received in advance and approved for receipt.

Both new and existing customers will be required to provide characterisation information for each new waste stream.

The waste producer/holder must provide the following waste characterisation information for each new waste stream proposed for treatment at the facility. The description must include the following:

- Waste source and origin;
- The process producing the waste (including a description of the process, its SIC code and characteristics of the waste types used to comprise the batch of material);
- The waste treatment applied;
- The appearance of the waste (including smell, colour, consistency and physical form); and
- Analysis and determination of waste code in accordance with WM3.

An assessment of the reliability of the information received by Silverton Aggregates including:

- Ensuring all waste analysis certificates are complete, and analysis has been carried out for all relevant parameters;
- Analysis has been carried out by well-known and reputable laboratories which hold suitable quality accreditation and have used relevant test methods;
- Ensuring that the analytical information is provided in secure PDF format;
- Undertaking a visit to the waste producer’s site; and
- Ensuring that data is current and relates to the waste proposed for delivery to the site.

5.2 Waste Acceptance

The site will implement waste acceptance procedures (WAP) to check that the characteristics of the waste received matches the information provided during waste pre-acceptance. This will ensure the waste is as expected and that it can be accepted at the site.

The procedure will follow a risk-based approach considering:

- The source, nature and age of the waste;
- Potential risks to process safety, occupational safety and the environment;
- The potential for self-heating; and
- Knowledge about the previous waste holder(s).

All vehicles bringing waste material to the site will report to the weighbridge or site office. All wastes will undergo a visual inspection during deposition to confirm its description and composition against the relevant accompanying documentation.

Waste will only be stored and treated at the site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the description provided.

Should the wastes be found not to conform during the visual inspection, then the details will be recorded, and the waste will be removed to the designated quarantine area as appropriate.

Records of non-compliant waste received at the site will include details on:

- The quantity;
- Characteristics;
- Origin;
- Delivery date and time; and
- The identity of the producer and carrier.

Waste will not be accepted unless the site is adequately resourced to receive the waste.

The quantity of waste accepted and despatched from the facility will be calculated by recording the volume of waste entering the site and the application of standard EA conversion factors as appropriate or via a weighbridge.

A record will be kept in the site diary of all rejected wastes. In the event of non-conformance, the waste producer and the EA will be notified.

5.3 Load Inspection and Waste Control

All vehicles bringing waste material to the site will report to the weighbridge where the load will be visually inspected, where possible, to confirm its description and composition against the relevant accompanying documentation. All wastes will undergo a further visual inspection during deposition.

Waste will only be accepted at the site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the description provided.

Should the wastes be found not to conform during the initial visual inspection, then the details will be recorded, and the vehicle turned away. If wastes have already been discharged and are deemed not to conform or otherwise not be permitted, then the waste will be:

- Reloaded on to the delivery vehicle; or
- Removed to a designated quarantine area as appropriate.

Records of non-compliant waste received at the site will include details on:

- The quantity;
- Characteristics;
- Origin;

- Delivery date and time; and
- The identity of the producer and carrier.

Waste will not be accepted unless the site is adequately resourced to receive the waste.

A record will be kept in the Site Diary of all rejected wastes. In the event of non-conformance, the waste producer and the EA will be notified.

5.4 Quarantine Procedure

The quarantine and rejection procedures will ensure that all non-confirming waste is removed from the site and that the waste producer and carrier are informed so that appropriate action can be taken to prevent recurrence.

Non-conforming waste will be identified by either Site Manager or TCM at the operational area. Non-conforming waste will be identified by visual and olfactory means.

If unauthorised waste is identified it will be moved to a temporary quarantine storage area, before being exported from the site.

5.5 Means of Measurement (Tracking)

The quantity of waste accepted and despatched from the facility will be measured via the weighbridge.

A register of the quantities and characteristics of waste accepted at the site will be maintained on a computerised database.

The database will include the following details:

- Date of delivery;
- Waste quantity;
- Waste description and classification code; and
- Waste producer and/or carrier.

6.0 Emissions control

6.1 Point Source Emissions

The site will be operated so that there are no point source emissions to air, land, sewer or water.

6.2 Fugitive Emissions to Air

6.2.1 Dust

The site will be managed in accordance with the Dust and Emissions Management Plan (DEMP).

To summarise, in order to minimise the emissions of dust from the facility, the following measures will be implemented:

- Speed limits of 5 mph will be implemented for vehicles using the site;
- Site access and haul roads and operational areas will be maintained and repaired to minimise emissions of dust due to uneven and poor surfacing;
- All roads and operational areas will be swept where necessary to reduce dust emissions with a road sweeper used on haul roads as required;
- Waste will be transported to the site by enclosed or sheeted HGV's;
- Discharge heights will be kept as low as possible;
- Dusty wastes will be damped down prior to unloading to minimise dust generation;
- Dusty wastes will be deposited from tipper lorries as slowly as practicable to reduce dust generation;
- No deposit of dusty waste shall occur during particularly high winds or if dust suppression water is unavailable;
- Daily, visual inspection at all areas of the site and site boundary will be carried out by site personnel;
- In the event that significant visual dust is observed at the boundaries of the operational areas, action will be taken to suppress the dust; and
- A record of the inspection findings and remedial action taken will be made in the site diary.

The Site Manager will be responsible for implementing the DEMP.

6.3 Fugitive Emissions to Land and Water

6.3.1 Surfacing

Waste and aggregates will continue to be stored on compacted hardstanding.

IBAA will be stored and treated within a dedicated bay which benefits from impermeable surfacing and a sealed drainage system (sump).

6.3.2 Engineered Containment

The site will be operated to prevent fugitive emissions to surface water and groundwater. Site surfacing will be maintained as required to ensure surfacing is fit for purpose. The surface will be maintained such that the working surface will;

- Remain even;
- Not be subject to settlement of differential settlement;
- Not be subject to rutting by vehicles even when wet;
- Have sufficient durability to allow cleaning, for example, by scraping; and
- Remain free of standing water.

All operational areas and quarantine areas will be inspected to ensure the integrity and fitness for purpose of their construction is maintained at all times.

6.3.3 Containment Bunding

Chemicals or fuel used on site will be stored in an appropriate tank that benefits from a bund with the capacity to store 110% of the tank capacity. Bunds will be:

- Impermeable and resistant to the stored materials;
- Have no outlet;
- Be designed to catch leaks from tanks or fittings;
- Have a capacity greater than 110% of the largest tank or 25% of the total tankage (whichever is greater);
- Have pipework routed within bunded areas with no penetration of contained surface;
- Have tanker connection points within the bund; and
- Be subject to regular visual inspection.

6.3.4 Litter

The proposed waste types to be accepted on site will not generate litter.

Site waste acceptance procedures will be followed to ensure that no unauthorised waste is accepted on site.

The Site Manager will be responsible for implementing risk management measures in accordance with appropriate procedures.

6.3.5 Mud and Debris

The access road for the site is via Haven Road.

Within the site the following measures will be taken in order to prevent the deposition of tracking of mud and debris from the site onto public areas or highways:

- An adequate area of hard surfaced road between site activities and the site entrance/exit will be maintained to reduce the amount of mud and dirt the vehicles leaving site can pick up;
- The site will benefit from good housekeeping and site roads will be maintained free of significant quantities of mud and debris;
- All operational areas will be subject to monitoring by staff throughout the working day to identify accumulations of mud requiring remedial action;
- Where necessary road cleaning equipment will be deployed;
- All vehicles leaving operational areas will be checked to ensure that they are clear of loose waste; and
- Before leaving the site, vehicles will be checked for loose debris and if required will be power washed.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:

- The affected public areas outside the site will be cleaned;
- Traffic will be isolated from sources of mud and debris within the site to prevent further tracking and measures will be taken to clear any such sources as soon as practicable; and
- If required, provision will be made for road sweepers on the site access roads to stop any mud being carried onto public roads, and bowsers made available to damp down areas during dry periods to ensure that dust is not a problem.

The Site Manager will be responsible for implementing risk measures.

6.4 Odour

Due to the nature of the waste accepted on site, odour will not pose a significant risk. No specific management measures are considered necessary.

Strict waste acceptance procedures on site will be enforced to ensure that no unauthorised waste will be accepted on site to minimise the chance of odorous waste being on site.

6.5 Noise

The site will **continue** to be operated so as to minimise noise emissions from the site. No complaints to date have been made regarding operations at the facility.

Incoming material is stored and treated in an area benefiting from a bund which already reduces noise from operations.

Continued measures that will be undertaken at the site include:

- Any site operations including vehicles and site machinery will be restricted to only operate during daylight hours;
- On-site plant will be turned off when not in use;
- Plant will be fitted with noise silencers if necessary;
- Speed limits of 5 mph will be implemented for vehicles on site and traffic calming measures introduced to help enforce these speed limits;

- Site access and operational areas will be maintained and repaired to an appropriate standard, to reduce any unnecessary noise emissions due to uneven/poor surfacing;
- Drop heights for waste deposition will be minimised to minimise noise emissions due to uneven/poor surfacing; and

All visitors and haulage companies will be made aware of the noise procedures.

Auditory inspections will be carried out daily and in response to complaints. If noise levels are deemed a nuisance, then a full investigation of mitigation measures will be carried out.

If a complaint is received, it will be logged in the Site diary. The Site Manager will be responsible for investigating the complaint and taking action to identify the source of the noise and implement remedial measures where appropriate.

6.6 Pests

Due to the 'inert' nature of the wastes proposed to be accepted at the site, pests will not pose a risk at the facility.

No biodegradable or putrescible waste will be accepted on site and the WAP detailed in Section 5.0, will ensure that no unauthorised wastes are accepted.

7.0 Best Available Techniques (BAT) Assessment

This BAT assessment describes the proposed design, operation and management of the acceptance and treatment of IBAA and how it will meet the requirements and standards set out in regulatory and industry sector guidance. Guidance reviewed for the compilation of this document includes but is not limited to:

- European Commission Joint Research Centre – Best Available Techniques Reference document on Waste Treatment (October 2018) available at Waste Treatment | EU-BRITE
- Environment Agency – Non-hazardous and inert waste: appropriate measures for permitted facilities (August 2023) at Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK
- Environment Agency - Develop a management system: environmental permits (April 2023) available at Develop a management system: environmental permits - GOV.UK; and
- Environment Agency - Control and monitor emissions for your environmental permit (November 2022) available at Control and monitor emissions for your environmental permit - GOV.UK.

The BAT Assessment, produced in line with the BREF for waste treatment, is included as Appendix F of this EP variation application. This excel spreadsheet assesses whether or not each BAT point is applicable to this facility.

The following table below provides an overview of the process in line with the additional guidance detailed above.

BAT/Appropriate Measures	Assessment
Management	Biffa recognises that an effective system of management is a key technique for ensuring that all appropriate pollution, prevention and control techniques are delivered reliably and on an integrated basis. This OT and Management System assists in maintaining compliance with regulatory requirements and managing environmental impacts.
In Process Controls	**The WAP is included in Section 5.0 of this OT document.** **Storage:** IBAA will be delivered to site and stored in a dedicated bay located in the north west corner of the site, the location of which is illustrated on Drawing 01. The area will benefit from the following; • Legio block bay walls at a height of 3.2m with a 0.5m offset maintained at all times to prevent wind whipping. • Impermeable concrete surfacing and sealed drainage – all runoff will flow to a sump located at the back of the bay. **Maintenance** - all equipment and mobile plant used on site will be in good repair. The Site and all of its components will benefit from ongoing daily and dedicated weekly inspections to ensure that all equipment is in good working order. Any defects will be repaired immediately with a temporary solution, and a permanent solution will be implemented within 7 days.
Emissions – fugitive emissions to air,	Fugitive emissions management is detailed in Section 6.0 of this OT document.

BAT/Appropriate Measures	Assessment
groundwater, surface water etc. **No point source emissions to sewer, surface water, air or groundwater**	
Noise and Vibration	No further noise reduction techniques are required in support of the acceptance of the IBAA. The intrinsic nature of the facility is not changing.
Odour	No odorous waste will be accepted at the facility.
Raw Materials Selection	No raw materials will be required for the acceptance, treatment and storage of IBAA.
Waste Minimisation Audit	Given the nature of the process, the opportunity for waste minimisation is limited. However, minimisation of waste will be considered as and when appropriate. Measures will be in place for the prevention and reduction of waste and will include: • Process control to minimise the creation of rejects or unacceptable materials; and • Plant and equipment will be maintained on a routine basis to prevent breakdowns. Use of raw materials and opportunities for substitution or minimisation will be considered.
Water	No water is required for the IBAA treatment process.
Waste Recovery and Disposal	Any containers will be segregated, labelled, covered and maintained in a satisfactory condition. Storage areas will be protected from vandalism by site security arrangements. Storage areas will be designated and marked as appropriate. Any waste produced in the process will be transferred off site to a suitably licensed facility for further recovery or disposal.
Reuse of Packaging	No packaging is required for the activity.
Energy Requirements and Efficiency	No fixed plant is used in the treatment of the IBAA. Periodic energy audits and training for key staff will take place. Areas where new technology provides an opportunity for energy reduction will be identified and incorporated.
Accidents	The AMP is included in Section 3 of this OT document.

8.0 Information

All relevant notifications and submissions to the EA regarding the site will be made in writing and quote the EP reference number and the name of the EP holder.

Records will be maintained for at least six years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater, the records are to be kept until permit surrender. Duty of Care records will be kept for a minimum of two years.

8.1 Reporting and Notifications

8.1.1 Changes in Technically Competent Persons

The EA will be informed in writing of any changes in the technically competent management of the site and the name of any incoming person, together with evidence that such person has the required technical competence.

8.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted at the site for each quarter, will be submitted to the EA within one month of the end of the quarter unless otherwise required by the permit conditions.

8.1.3 Relevant Convictions

The EA will be notified of the following events:

- Silverton Aggregates being convicted of any relevant offence; and
- Any appeal against a conviction for a relevant offence and the results of such an appeal.

8.1.4 Notification of Change of Operator's or Holder's Details

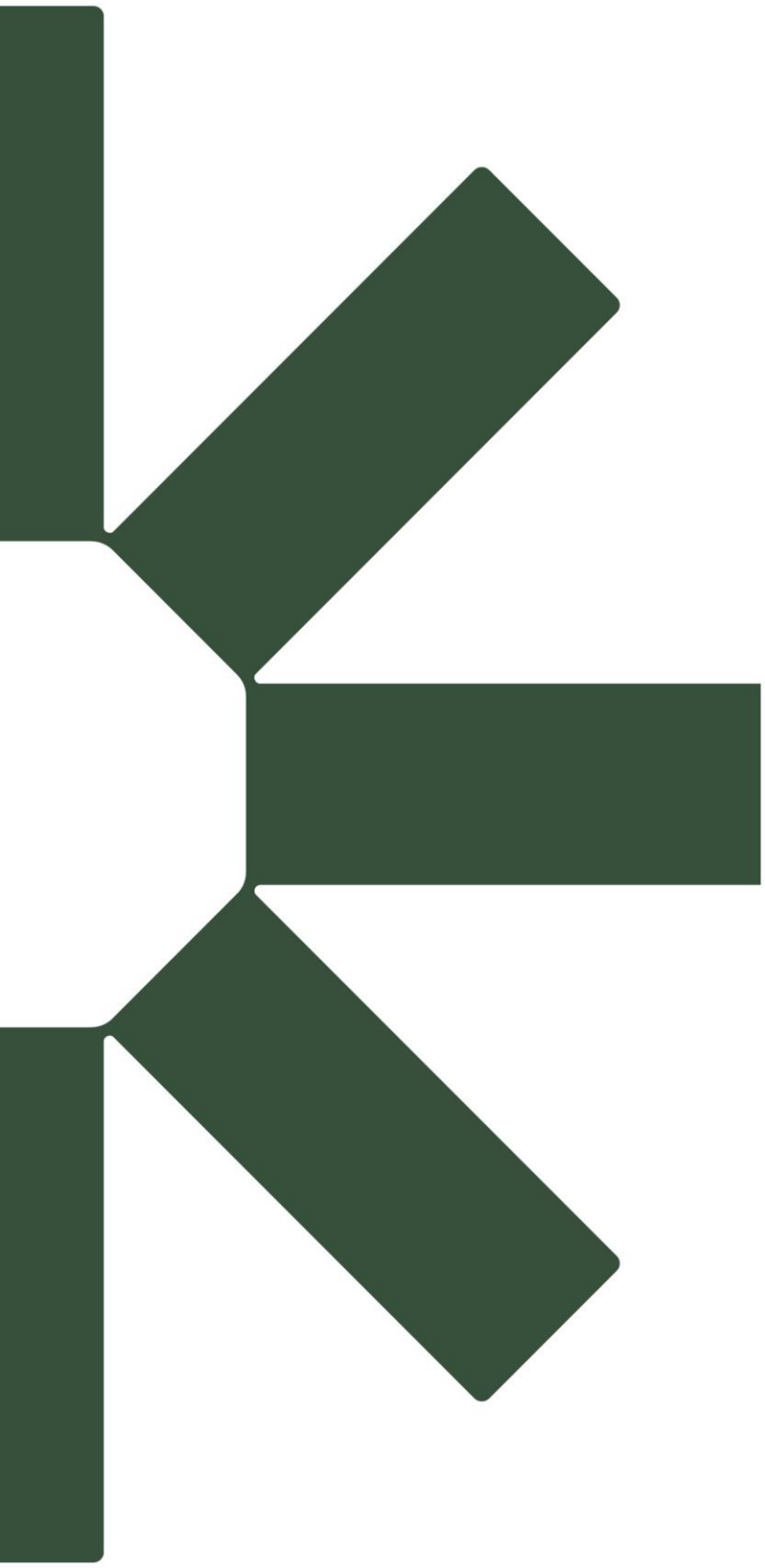
The EA will be notified of the following:

- Any change in the operator's trading name, registered name or registered office address; and
- Any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up.

8.1.5 Adverse Effects

The EA must be notified without delay following the detection of the following:

- Any malfunction, breakdown or failure of equipment or techniques;
- Any accident;
- Fugitive emissions which have caused, is causing or may cause significant pollution; and
- Any significant adverse environmental and health effect.



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Appendix F BAT Assessment

Sections highlighted in orange - not applicable to the treatment proposed at Haven Road.

BAT No.	Topic	Brief Description	BAT summary [Refer to the BAT conclusions]	BAT relevant to your waste installation? Yes or No	Additional information relevant to meeting this BAT
1	Overall environmental performance	EMS	In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS)	Yes	Silverton operate a site specific Opreating Techniques and Management System document.
2	Overall environmental performance	Waste pre-acceptance, acceptance and tracking	In order to improve the overall environmental performance of the plant, BAT is to use all of the techniques listed	Yes	Silverton follow a strict waste pre-acceptance and acceptance procedure, detailed fully within the Operating Technique and Management System document.
3	Overall environmental performance	Inventory of waste water and waste gas streams	In order to facilitate the reduction of emissions to water and air, BAT is to establish and to maintain an inventory of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the features listed	No	N/A - no wastewater or waste gas is produced on site.
4	Overall environmental performance	Storage procedures	In order to reduce the environmental risk associated with the storage of waste, BAT is to use all of the techniques listed	Yes	Storage arrangements are illustrated on Drawing 01 - Site Layout and detailed in the Operating Techniques and Management System document.
5	Overall environmental performance	Handling and transfer procedures	In order to reduce the environmental risk associated with the handling and transfer of waste, BAT is to set up and implement handling and transfer procedures	Yes	The Operating Techniques and Management System document details environmental management measures which include; handling and transfer of waste by competent staff and are duly documented (including Waste Transfer Notes), measures are taken to prevent, detect and mitigate spills.
6	Monitoring	Monitor key process parameters	For relevant emissions to water as identified by the inventory of waste water streams (see BAT 3), BAT is to monitor key process parameters (e.g. waste water flow, pH, temperature, conductivity, BOD) at key locations (e.g. at the inlet and/or outlet of the pretreatment, at the inlet to the final treatment, at the point where the emission leaves the installation)	No	N/A - no process undertaken on site which would require this level of monitoring
7	Monitoring	Monitor emissions to water	BAT is to monitor emissions to water with at least the frequency given below, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality	No	N/A - no emissions to water
8	Monitoring	Monitor channelled emissions to air	BAT is to monitor channelled emissions to air with at least the frequency given below, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality	No	N/A - no channelled emissions to air
9	Monitoring	Monitor diffuse emissions of organic compounds to air	BAT is to monitor diffuse emissions of organic compounds to air from the regeneration of spent solvents, the decontamination of equipment containing POPs with solvents, and the physico-chemical treatment of solvents for the recovery of their calorific value, at least once per year using one or a combination of the techniques given below.	No	N/A - no diffuse emissions of organic compounds.
10	Monitoring	Monitor odour	BAT is to periodically monitor odour emissions	No	N/A - no odorous wastes accepted at site
11	Monitoring	Monitor consumption of water, energy and raw materials, and generation of residues and waste water	BAT is to monitor the annual consumption of water, energy and raw materials as well as the annual generation of residues and waste water, with a frequency of at least once per year	Yes	Silverton do not use water or raw materials in the process. Energy consumption will be managed and recorded.
12	Emissions to air	Odour management plan	In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1), that includes all of the elements listed	No	N/A - no odorous wastes accepted at Site
13	Emissions to air	Reduce odour emissions	In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to use one or a combination of the techniques listed	No	N/A - no odorous wastes accepted at Site
14	Emissions to air	Reduce diffuse emissions to air	In order to prevent or, where that is not practicable, to reduce diffuse emissions to air, in particular of dust, organic compounds and odour, BAT is to use an appropriate combination of the techniques listed	Yes	The site will follow the approved Dust and Emissions Management Plan which sets out the appropriate measures applicable to the operations undertaken at the Site.
15	Emissions to air	Minimise use of flaring	BAT is to use flaring only for safety reasons or for non-routine operating conditions (e.g. start-ups, shutdowns) by using both of the techniques listed	No	N/A - no flaring is used on Site.
16	Emissions to air	Reduce emissions to air from flares	In order to reduce emissions to air from flares when flaring is unavoidable, BAT is to use both of the techniques listed	No	N/A - no flaring is used on Site.
17	Noise and vibrations	Noise and vibration management plan	In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to set up, implement and regularly review a noise and vibration management plan, as part of the environmental management system (see BAT 1), that includes all of the elements listed	Yes	The site will follow the approved Noise Management Plan which sets out the appropriate measures applicable to the operations undertake at the Site.
18	Noise and vibrations	Reduce noise and vibration emissions	In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to use one or a combination of the techniques listed	Yes	The site will follow the approved Noise Management Plan which sets out the appropriate measures applicable to the operations undertake at the Site.
19	Emissions to water	Optimise water consumption, reduce waste water and prevent or reduce emissions to soil and water	In order to optimise water consumption, to reduce the volume of waste water generated and to prevent or, where that is not practicable, to reduce emissions to soil and water, BAT is to use an appropriate combination of the techniques listed	No	N/A - no emissions to water
20	Emissions to water	Waste water treatment	In order to reduce emissions to water, BAT is to treat waste water using an appropriate combination of the techniques listed	No	N/A - no emissions to water
21	Emissions from accidents and incidents	prevent or limit the environmental consequences of accidents and incidents	In order to prevent or limit the environmental consequences of accidents and incidents, BAT is to use all of the techniques listed, as part of the accident management plan (see BAT 1)	Yes	The Accident Management Plan is included in the Operating Techniques and Management System Document.
22	Material efficiency	Substitute materials with waste	In order to use materials efficiently, BAT is to substitute materials with waste	No	N/A - not applicable due to the type of site - waste is accepted to be treated to produce soil products.
23	Energy efficiency	Energy efficiency plan, energy balance record	In order to use energy efficiently, BAT is to use both of the techniques listed	Yes	Energy effiency management techniques are included in the Operating Techniques and Management System Document, which sets out the appropriate measures applicable to the operations undertaken at the Site.
24	Reuse of packaging	Maximise reuse of packaging	In order to reduce the quantity of waste sent for disposal, BAT is to maximise the reuse of packaging, as part of the residues management plan (see BAT 1)	No	N/A - no requirement for a residue management plan and no packaging is required on site.
Mechanical Treatment of Waste					
25	General - Emissions to air	Techniques to reduce plus AEL for dust.	In order to reduce emissions to air of dust, and of particulate-bound metals, PCDD/F and dioxin-like PCBs, BAT is to apply BAT 14d and to use one or a combination of the techniques listed	N/A	
26	Metal shredders	Reduce accidents & incidents	In order to improve the overall environmental performance, and to prevent emissions due to accidents and incidents, BAT is to use BAT 14g and all of the techniques listed	N/A	
27	Deflagrations	Prevent & reduce emissions from deflagrations	In order to prevent deflagrations and to reduce emissions when deflagrations occur, BAT is to use technique a. and one or both of the techniques b. and c. listed	N/A	
28	Energy efficiency	Shredder feed stability	In order to use energy efficiently, BAT is to keep the shredder feed stable	N/A	
29	WEEE containing VFCs and/or VHCs	Emissions of organic compounds to air including AELs	In order to prevent or, where that is not practicable, to reduce emissions of organic compounds to air, BAT is to apply BAT 14d, BAT 14h and to use technique a. and one or both of the techniques b. and c. listed	N/A	
30	Explosions when treating WEEE	Prevent emssions due to explosions	In order to prevent emissions due to explosions when treating WEEE containing VFCs and/or VHCs, BAT is to use either of the techniques listed	N/A	
Mechanical Treatment of Waste with Calorific Value					
31	Emissions to air	Techniques to reduce emissions to air including AEL	In order to reduce emissions to air of organic compounds, BAT is to apply BAT 14d and to use one or a combination of the techniques listed	N/A	
32	WEEE containing mercury	Emissions to air including AEL	In order to reduce mercury emissions to air, BAT is to collect mercury emissions at source, to send them to abatement and to carry out adequate monitoring	N/A	
Biological Treatment of Waste					
33	Odour emissions	Waste input controls	In order to reduce odour emissions and to improve the overall environmental performance, BAT is to select the waste input - which consists of pre-acceptance, acceptance and sorting of the waste input	N/A	
34	Emissions to air	Techniques to reduce emissions to air including AEL	In order to reduce channelled emissions to air of dust, organic compounds and odorous compounds, including H2S and NH3, BAT is to use one or a combination of the techniques listed	N/A	
35	Emissions to water	Techniques to reduce waster use	In order to reduce the generation of waste water and to reduce water usage, BAT is to use all of the techniques given below: segregation of water streams, water recirculation and minimisation of the generation of leachate	N/A	
Biological Treatment of Waste including aerobic and anaerobic, and MBT general BAT					
36	Aerobic treatment	Emissions to air	In order to reduce emissions to air and to improve the overall environmental performance, BAT is to monitor and/or control the key waste and process parameters	N/A	
37	Aerobic treatment	Diffuse emissions to air	In order to reduce diffuse emissions to air of dust, odour and bioaerosols from open-air treatment steps, BAT is to use one or both of the techniques given below	N/A	
38	Anerobic treatment	Emissions to air	In order to reduce emissions to air and to improve the overall environmental performance, BAT is to monitor and/or control the key waste and process parameters	N/A	
39	Mechanical biological treatment	Emissions to air	In order to reduce emissions to air, BAT is to use both of the techniques listed	N/A	

Physico-chemical treatment of Solid and/or Pasty Waste					
40	Environmental performance	Waste input controls	In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures (see BAT 2)	N/A	-
41	Emissions to air	Techniques to control including AEL	In order to reduce emissions of dust, organic compounds and NH3 to air, BAT is to apply BAT 14d and to use one or a combination of the techniques given below	N/A	-
42	Re-refining of waste oil	Environmental performance	In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures (see BAT 2)	N/A	-
43	Waste sent for disposal	Techniques to reduce quantity of waste output	In order to reduce the quantity of waste sent for disposal, BAT is to use one or both of the techniques listed	N/A	-
44	Emissions to air	Techniques to control	In order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques listed	N/A	-
Physico-chemical treatment of Waste with Calorific Value					
45	Emissions to air	Techniques to control emissions	In order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques listed	N/A	-
46	Regeneration of spent solvents	Environmental performance	In order to improve the overall environmental performance of the regeneration of spent solvents, BAT is to use one or both of the techniques listed	N/A	-
47	Emissions to air	Techniques to control emissions including AEL	In order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d and to use a combination of the techniques listed	N/A	-
48	Thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil	Environmental performance	In order to improve the overall environmental performance of the thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil, BAT is to use all of the techniques listed	N/A	-
49	Emissions to air	Techniques to control emissions	In order to reduce emissions of HCl, HF, dust and organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques listed	N/A	-
50	Water washing of excavated contaminated soil	Emissions to air	In order to reduce emissions of dust and organic compounds to air from the storage, handling, and washing steps, BAT is to apply BAT 14d and to use one or a combination of the techniques listed	N/A	-
51	Decontamination of equipment containing PCBs	Environmental performance	In order to improve the overall environmental performance and to reduce channelled emissions of PCBs and organic compounds to air, BAT is to use all of the techniques listed	N/A	-
Treatment of Waste-Based Liquid Waste					
52	Environmental performance	Techniques to improve environmental performance	In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures (see BAT 2)	N/A	
53	Emissions to air	Techniques to reduce emissions to air including AEL	In order to reduce emissions of HCl, NH3 and organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques listed	N/A	

Appendix G Dust Management Plan

Dust and Emissions Management Plan

Haven Road Recycling Facility

Silverton Aggregates Limited

Haven Road, Colchester, Essex, C02 8HT

Prepared by:

SLR Consulting Limited

Mill Barn, 28 Hollingworth Court, Turkey Mill,
Maidstone, ME14 5PP

SLR Project No.: 409.010103.00001

Client Reference No: EPR/VP3194NH

10 February 2025

Revision: 1

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	1 November 2024	Rebecca Holland	Samantha Pople	Samantha Pople
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Silverton Aggregates Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

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Tables in Text

Appendices

1.0 Introduction

The Dust and Emissions Management Plan (DEMP) has been created as part of the Environmental Permit (EP) variation application. This plan shall be incorporated into the site procedures and shall be revised as necessary to ensure that it remains appropriate to the activities occurring on site and that any changes in conditions relating to dust management are dealt with as part of those revisions. In particular, the monitoring procedures and compliance actions will be updated as required by the procedures within the DEMP.

1.1 Scope

The objective of this document is to specify a range of measures to manage the environmental impacts that could arise during the activities taking place on site, in respect of managing dust emissions. A series of site-specific control measures as described will therefore minimise potential risks to surrounding receptors and the environment.

The components of the DEMP are set out within this document as follows:

- Section 2 – Operations at Haven Road;
- Section 3 – Dust & Particulate (PM10) Management;
- Section 4 – Control of Dust Emissions;
- Section 5 - Site Management; and
- Section 6 – Contingency Action Plan.

This DEMP sets out the potential sources of dust at the Site, the measures in place to control dust generation and monitor releases, and the management and monitoring actions that will be taken in response to a dust event.

The DEMP is a ‘live document’, in this respect the dust control measures and management procedures contained within it will be updated on a periodic basis. This DEMP will be kept in the Site office and be available to all employees.

1.2 Site Activities

The activities on site include:

- Reception of materials;
- Storage of materials;
- Treatment of materials; and
- Bulk removal of materials.

It is recognised that activities on Site could lead to release of fugitive emissions of dust particles (between 2.5 and 10 micrometers) and therefore it is a requirement to control activities on Site in order to prevent or mitigate potential releases of dust.

Measures incorporated into the design of the Site to assist with dust control include:

- Pre-Acceptance and Waste Acceptance Procedures (WAP) are in place to avoid receipt of unsuitable waste types;
- Cutting, grinding or sawing equipment is not used on site in general practice;
- Wastes comprising of only dusts are not accepted at the site;
- Particularly dusty loads will be classified as non-conforming waste and the WAP will be followed;

- Incoming material is stored in stockpiles which are protected from wind whipping by the bund that surrounds the site. Incinerator Bottom Ash Aggregate (IBAA) and treated aggregate (non-waste) are stored in designated bays which provide additional shelter;
- Drop heights are minimised where possible to reduce resuspension of dust;
- Stockpiling and processing are undertaken on compacted hardstanding for most material storage areas;
- IBAA is stored on impermeable surfacing (a pad) with a sealed drainage system (sump); and
- Internal haul routes are compacted hardstanding.

It should also be noted that the point at which dust is raised is considered to be winds exceeding 11 knots. The average wind speed range is between 5-8 knots at the site, as illustrated in the Windrose in Table 1.

1.2.1 External Operations

Due to the management and mitigation measures in place at the site, the type of waste being processed at the facility and industry common practices (i.e. aggregate processing is not sited within buildings), the operator does not believe that the operation should be enclosed within a building. The current structures on site are the weighbridge office and a small warehouse which could not accommodate stockpile storage or the mobile plant, therefore the processing plant could not be located within this building.

Storage bays are located adjacent to the west and north-east of site, away from prevailing wind but also at a distance from the east side of the boundary which is adjacent to the River Colne.

The waste plant is located in the northern area of the site where there is sufficient space for the fixed plant. The incoming material stockpile is located within the central area of the site, located near to the waste plant so as to avoid unnecessary movement of material.

Waste is stored in bays or stockpiles, not containers. Due to operational reasons and h&s, material stockpile cannot be covered. There is no requirement for additional wind screening due to the bund surrounding the site.

1.3 Identified Receptors

The site is located to the south-east end of Commerce Park, an industrial estate within Colchester. The entrance to the facility is via a track located off Haven Road which runs from the north of the site through to the south. The national grid reference for the site is TM022234 and the site location is illustrated on Drawing 01.

The closest residential property is located to the southwest approximately 300m away from the site.

The site lies in close proximity to a number of European and nationally designated sites. The Blackwater, Crouch, Roach and Colne Estuaries (Marine Conservation Zone) lies adjacent to the site’s eastern boundary. The Upper Colne Marshes of Special Scientific Interest (SSSI) is located approximately 180m to the southeast of the site. Other designated sites within a 2km radius of the site boundary include Local Nature Reserves, a Registered Parks & Gardens and Cultural Heritage Sites including Listed Buildings and Scheduled Monuments.

Table 1-1, Drawing 02 and 03 identify the receptors which are considered to be potentially sensitive and could reasonably be affected by activities at the site.

Table 1-1: Identified Receptors

Company Name	Receptor Type Address	Direction from Site	Distance from Site (metres)
Disused council land	Haven Road Colchester CO2 8HT	East	Adjacent
Core Fusion Skip Hire Colchester	Haven Quay Haven Road Colchester CO2 8HT	West	Adjacent (within the EP boundary)
Veolia	6 Haven Road Colchester CO2 8HT	North	Adjacent
ATS Skip Hire Colchester	Unit 1-3 Oyster Haven Haven Road Colchester CO2 8HT	Northwest	310m
Status Graphite	Unit 6A Commerce Way Colchester CO2 8HR	Northwest	330m
Nationwide Metal Recycling	16 Commerce Way Colchester CO2 8HH	West	330m
Harvey Steel Lintels Ltd	Commerce Way Colchester CO2 8HH	West	320m
Jones & Whymark Engineering Limited	2 Commerce Way Colchester CO2 8HH	Northwest	230m

1.3.1 Other Potential Sources of Dust

A review of other potential sources of dust in the Site locale has been undertaken through use of aerial imagery.

No specific sources of dust emissions (such as industrial/commercial activities) are identified within the Site locale, as illustrated in Table 1-1 above.

1.4 Meteorological Conditions

The most important climatic parameters governing the generation and dispersal of fugitive dust are:

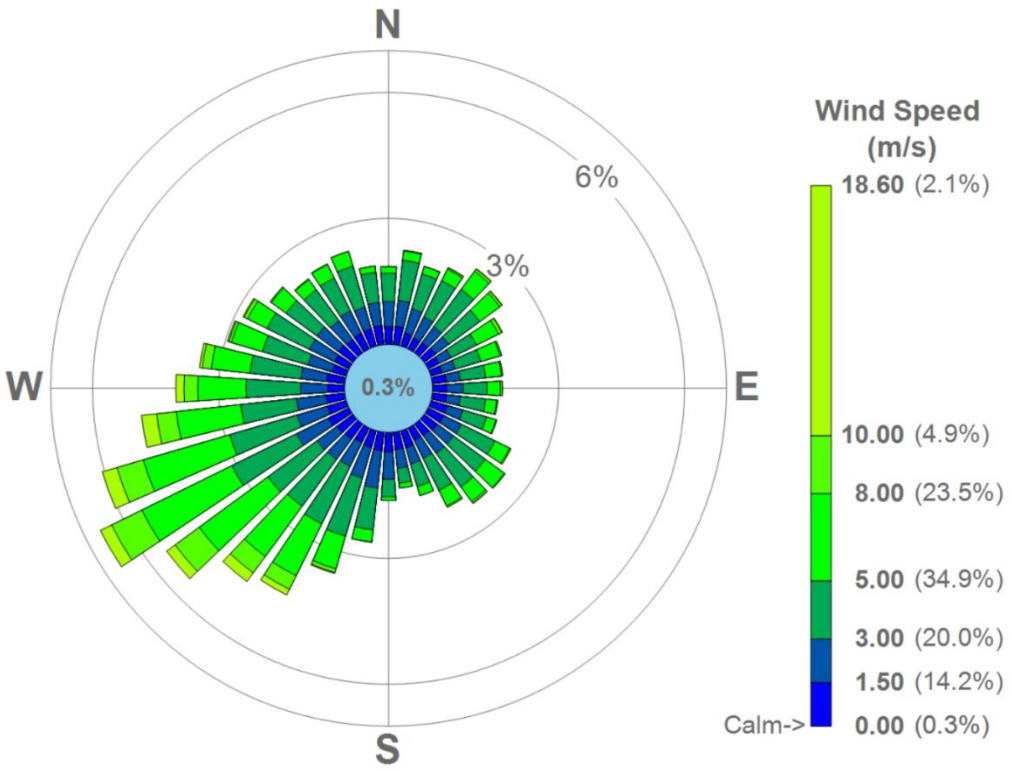
- Wind speed will affect the potential for dust entrainment and the distance it may travel;
- Wind direction determines the broad transport of the emission and the sector of the compass into which the emission is dispersed; and
- Rainfall is an important climatological parameter in the generation of dust; sufficient amounts of rainfall can suppress dust at the source and eliminate the pathway to the receptor. According to Arup (1995)[1] rainfall greater than 0.2mm per day is sufficient to suppress dust emissions.

1.4.1 Local Wind Speed & Direction Data

Wind speed and direction data from Andrewsfield meteorological station at located approximately 33km to the west of the site and is the closest that can be utilised for the facility however it is considered to be broadly representative of the local site conditions.

A windrose for Andrewsfield Meteorological Station is presented in Figure 1.

Figure 1 Windrose



[1] Arup & Ove Arup Environmental. Environment Effects of Surface Mineral Workings. DoE, October 1995.

Figure 1 indicates that the prevailing wind direction is from the southwest, with winds from the northwest sector occurring less frequently and winds from the south, north and east being relatively infrequent.

On this basis, **locations from the southwest to north east sectors have the highest potential for impacts** from any dust emissions originating from the site.

The point at which dust is raised is considered to be winds speeds exceeding 11 knots. As show in Figure 1, the average wind speeds range between 5-10 knots.

1.4.2 Rainfall Data

Relevant rainfall data applicable to the site has been obtained from the Met Office website[2] of UK mapped climate averages for 1991-2020. The average annual rainfall >1mm/day for the area of the site is 115 days per year, comprising approximately 30% of the year. It is therefore considered that on those days the natural suppression afforded by the rain would eliminate all sources of dust across the site.

Rainfall is typically lower in the summer months, combined with higher temperatures to increase the drying time of material. The potential for dust generation and subsequent transfer of airborne dust emissions beyond the site boundary is therefore higher during the summer months.

1.5 Air Quality Management Area (AQMA)

The closest AQMA is located approximately 2.2km northwest of the site's boundary. The AQMA (Ref: Colchester Borough Council – Brook Street) is designated for nitrogen dioxide (NO_2).

Based on the distance, direction and classification of the AQMAs, site operations at the Site are deemed to have no impact on the AQMAs and as such, are not considered further within this document.

Within the surrounding site locale, there are no other sources that have the potential to release dust emissions.

[2] http://www.metoffice.gov.uk/public/weather/climate accessed August 2024

2.0 Operations at Haven Road

2.1 Overview of Site Operations

The site is currently operated by Silverton Aggregates Limited and treats up to 75,000 tonnes per annum (tpa) of a range of waste management, construction, demolition and excavation waste materials to produce recovered secondary aggregates.

In addition, this variation seeks to allow the acceptance of Incinerator Bottom Ash Aggregate (IBAA) for storage, treatment and transfer.

The site layout is illustrated on Drawing 01. The environmental site setting is illustrated on Drawing 02 and Drawing 03.

The waste list is shown in Table 2-1 below.

Table 2-1 Waste Types for Acceptance

Waste Code	Description
10	WASTE FROM THERMAL PROCESSES
10 01	Wastes from power stations and other combustion plants (except 19)
10 01 01	Bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	Wood, glass and plastic
17 02 02	Glass
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 05	Soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 05 08	Track ballast other than those mentioned in 17 05 07
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – for the acceptance of Incinerator Bottom Ash (IBAA)

Waste Code	Description
20	MUNCIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	Garden and park wastes (including cemetery waste)
20 02 02	Soil and stones

Table 2-2 details the waste installation and operations carried out on site.

Table 2-2 Description of Waste Installation and Operation

Activity Reference	EP Regulations Reference	Activity Description	Limits of Activity
Installation			
AR1	Section 5.4, Part A (1) (b) (iii)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving… (iii) treatment of slags and ashes.	Waste will be accepted and stored on an impermeable surface with sealed drainage. Up to 2,000 tonnes of IBAA will be stored at any one time.
Waste Operation			
AR2	Inert and excavation waste transfer station with treatment	D15: Storage pending, on this site any of the category "D" operations authorised under this column, or elsewhere than on this site, any of the operations listed in Part III of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced). R13: Storage of waste consisting of materials intended for submission, on this site to any of the category "R" operations authorised under this column, or elsewhere than on this site, to any of the operations listed in Part IV of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced). D14: Repackaging of waste prior to waste being submitted on this site to any of the category "D" operations authorised under this column, or elsewhere than on this site, by means of any of the operations listed in Part III of Schedule 4 of the 1994 Regulations.	Inert wastes must be kept on hard standing or on impermeable pavement with sealed drainage.

Activity Reference	EP Regulations Reference	Activity Description	Limits of Activity
		D9: Physico-chemical treatment of waste not listed elsewhere in this table which results in final compounds or mixtures which are disposed of on this site by means of any of the category "D" operations authorised under this column, or elsewhere than on this site, by means of any of the operations listed in Part III of Schedule 4 of the 1994 Regulations. R3: Recycling or reclamation of organic substances which are not used as solvents. R4: Recycling or reclamation of metals and metal compounds. R5: Recycling or reclamation of other inorganic materials.	Treatment consisting only of manual sorting, separation, screening, or crushing of waste into different components for disposal, (no more than 50 tonnes per day) or recovery. Inert wastes must be treated on hard standing or on impermeable pavement with sealed drainage.

2.2 Process Description

Only scheduled waste delivery vehicles are allowed access. It is likely that the majority of vehicles entering the site will be owned by Silverton, with only a small number of 3rd party loads accepted. Site operations are carried out as follows, and should be read in conjunction with Drawing 01:

- Vehicles enter the site to the north of the facility.
- On delivery to the site, vehicles are checked at the weighbridge by the Technically Competent Manager (TCM) (WAMITAB holder) or another competent person in their absence[3].
- The vehicles driver is advised on where to offload in the 'waste storage and treatment area', the location of which is illustrated on Drawing 01.
- For the delivery of IBAA, drivers will be directed, via the one way transport system, to the dedicated storage bay located in the north west corner of the site.
- Materials are held for varying lengths of time dependant on the waste type and weather conditions. Once treated, all non waste material is transferred to the 'non waste product storage' area located along the eastern side shall be stored on a clean, dry surface, away from incoming stored material to avoid re-contamination.
- Screening process:
    - Once materials have been screened, they are to be transferred to the appropriate screened stockpile/bay.

[3] If loads are non-conforming, the vehicle will be refused entry and turned away at the gate.

- Any concrete or similar material or inert material only fit for landfill is moved to the appropriate bay.
- As the need arises the screening medium is changed to suit the conditions i.e. dry and or the products to be screened i.e. C&D or soils.
- The various products created from the screening operation are stored in the finished product bays according to their specification.
- Any inert materials rejected from the screening process which are not suitable for resale are to be moved to the appropriate stockpile/bay for eventual re-loading.

- Finished products for sale and inert materials not suitable for recycling are loaded onto vehicles by a loading shovel, weighed at the weighbridge and the load sheeted before leaving the site.

2.3 Mobile Plant and Equipment

Nitrogen Dioxide isa by-product of internal combustion engines and the Site will use items of plant with internal combustion engines.

The following table lists the mobile plant and equipment used on site;

Mobile Plant
Wheel loading shovel
Wheel loading shovel
Excavator
Excavator
Concrete crusher (mobile)
Screener
Screener

3.0 Dust and Particulate (PM10) Management

This section presents a review of the potential risk of dust effects and has been completed in order to inform the selection of appropriate dust control techniques to mitigate against the release of dust emissions.

3.1 Potential Dust Sources

The storage, handling and processing of aggregate waste materials at the Haven Road Recycling Facility has the potential to generate dust and can be divided into the following activities:

- Site surfacing;
- Preparation and stockpiles;
- Handling of materials;
- On-site transportation;
- Campaign crushing of oversize material;
- Storage of products / residual wastes following processing; and
- Export of products and residual wastes off site.

Table 3-1 below details the designing dust control measures:

Table 3-1 Designed in Dust Control Measures

Activity	Designed in Dust Control Measures
Management Procedures	The TCM, or her nominee, will exercise day to day control on site at all times. They will have particular responsibility for ensuring full compliance with the conditions attached to the permit. They will assume control either personally or by delegation to suitably trained and responsible staff of: • Vehicle movements; • All loading, tipping and materials handling operations; • Operation of dust suppression measures; and • Inspection, cleaning and maintenance of all plant and equipment.
	Strict waste pre-acceptance and acceptance procedures, included as Appendix E, will ensure that loads consisting solely or mainly of dusty wastes are not accepted on site.
	All staff receive necessary training and instruction in their duties relating to the control of all operations and the potential sources of dust emissions. Particular emphasis is given to dealing with plant malfunctions and abnormal conditions. Site staff must inform the manager whenever visible dust emissions are observed or appear likely to occur, as a result of any site operation.
	If at any time dust emissions are detected by the site staff or any complaints relating to dust are received, the incident is recorded in the Site Diary, and immediate action taken to identify the cause of the problem.
	If a dust associated problem is related to a specific source of waste, then action will immediately be taken to suppress any aerial emissions by damping down using the hose on site.
Complaints Procedure	A complaints procedure is in place to ensure that any perceived nuisance being caused to local residents is dealt with effectively. A register of complaints is kept on site to record all concerns made either directly to the Site Manager or via the regulatory authorities.

Activity	Designed in Dust Control Measures
	Each complaint is investigated. The Site Supervisor will report the findings and the action taken to the Site Manager. The EA will be advised in writing within two weeks of any dust complaint together with the findings of the investigation and any corrective action taken.
Transportation of Materials	Internal haulage restricted to clearly delineated routes, on compacted hardstanding a low level. The site is level across the entire facility.
	Site surfacing will be inspected daily, maintained in good condition and kept free from mud by regular sweeping.
	All equipment will have upward discharge exhaust systems, thereby eliminating surface disturbance.
	Hoses are located on site within the main building to supress dust emissions of a particularly dusty day/load.
	All site vehicles will be maintained in accordance with the manufacturer's specification.
	All waste delivery vehicles are checked for loose debris. Sprays are located at the entrance of the site by the weighbridge.
	Site haulage speeds are restricted to 5mph to minimise dust entrainment. Appropriate instruction is issued to all vehicle drivers. No idling of vehicles will occur on site.
	The TCM is responsible for checking the situation regarding dust on a regular basis throughout working hours, and for ensuring that mitigation measures are employed as necessary.
Material Handling	The crusher has its own integrated suppression system and is used when required.
	In unusually dry / windy conditions site activities will be suspended if it appears likely that dust may be carried towards sensitive receptors.

The activities on site that have the greatest potential for dust emissions have been identified as material loading, crushing and unloading waste storage operations.

3.2 Control of Dust Emissions

3.3 Overview

Silverton Aggregates recognises the potential for the site to generate dust emissions and is committed to operating the site in accordance with industry best practice. The implementation of industry best practice measures to control and mitigate the generation and transportation of dust can ensure that dust is adequately controlled.

The dust control measures contained within this DEMP have been defined based on the findings of the IAQM dust impact assessment and regulatory guidance as follows:

- IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning (2016);
- Mineral Industry Research Organisation (MIRO) Good practice guide: control and measurement of nuisance dust and PM_{10} from the extractive industries (AEA, 2011);
- Technical Guidance to the National Planning Policy Framework (Department for Communities and Local Government, 2012);

- Process Guidance Note 3/16 (04) Statutory guidance for mobile crushing and screening (Defra, 2012); and
- Local Air Quality Management (LAQM.TG(16)) (Defra, 2016).

The key method for controlling dust emissions is through good site design, management practices and subsequent good housekeeping, i.e. avoidance of dust generation.

3.4 Vehicle Cleaning

Silverton Aggregates does not consider that a wheel wash will be required at the facility, however, automatic sprays will be used on vehicles on exit if required after checks have been made. Every vehicle exiting the site will be visually inspected for any mud or debris before the hose is used by the TCM or supervisor. The majority of vehicles delivering material to site will be owned and managed by Silverton Aggregates where responsibility of ensuring their vehicle is clean and debris free is with the driver.

3.5 Drainage System

The bay storing IBAA will have a separate drainage system, with all runoff flowing to a sump, which will fully contain all IBAA contaminated runoff using Legioblock walls at a height of 3.2m.

The rest of the site has no formal drainage system; however, the site is fully bunded around its boundary with compacted hardcore, sealing any clean surface water runoff from migrating outside of the permit boundary.

3.6 Dust Control Measures

Dust control measures that will be employed at the site as part of routine planning and operations are detailed below in Table 3-1, Table 3-2 and Table 3-3.

Table 3-2 General Site Control Measures

Activity	Control Measures
Design and location of dust-generating activities	Dust-generating activities are, where possible, located where maximum protection can be obtained from topography or other sheltering features.
Equipment and Vehicles	The site has been designed to minimise haul route distances and to locate haul routes away from receptors.
Good housekeeping	A consistent regular housekeeping regime is in place to ensure the site is regularly cleaned, checked and issues remedied to prevent and remove dust and particulate build up. A Housekeeping Schedule included as Appendix 04 of this DEMP ensures that all areas of the site are checked daily to ensure they are clean and suitable for use. If an issue is detected during the daily checks action will be taken as soon as practicable with provisions made for road sweepers and other cleaning equipment if necessary. The yard will be swept as required to prevent dust emissions and additional sweeping of impermeable areas will be undertaken if necessary. The site will be kept free of significant quantities of mud and debris. This is described in the EMS.
Site Boundary	The site benefits from a 2m high security perimeter fence and 2m high metal security gates.
Communication	Good communication is maintained to prevent anxieties between the operator and the surrounding communities. Regular, accessible liaison arrangements are implemented in order to provide information as freely as possible.
Training	All staff receive necessary training and instruction in their duties relating to the control of all operations and the potential sources of dust emissions. Particular emphasis is given to dealing with plant malfunctions and abnormal conditions. Site staff must inform

Activity	Control Measures
	the manager whenever visible dust emissions are observed or appear likely to occur, as a result of any site operation. Training on dust mitigation is provided to site personnel. Training will also cover 'emergency preparedness plans' to react quickly in case of any failure of the planned dust mitigation.
Monitoring	See Section 4.3
Management	Strict waste pre acceptance and acceptance procedures will ensure that loads consisting solely or mainly of dusty wastes are not accepted on site. The weighbridge officer will ensure each vehicle arriving on site is accompanied by a completed waste transfer note which contains the quantity, EWC waste code/s, origin of the waste, identity of the producer of the waste, the date the waste arrives on site and the date the waste was first produced. All waste brought to site will be inspected in accordance with the waste acceptance procedures included in Appendix 5 of this DEMP. This includes ensuring all vehicles report to the site entrance where the load is visually inspected and wastes are only accepted if the description in the documentation is in accordance with the environmental permit and consistent with the description provided and wastes undergo further visual inspection during deposition within the relevant reception area. If waste is non-compliant or the accompanying documentation is unsatisfactory the waste will be refused. Waste is not accepted unless the site is adequately resourced to receive the waste. A record is kept of all deliveries and refusals. All dust and air quality complaints are recorded. The cause will be identified, and appropriate measures taken. See Section 5.0.All dust and air quality complaints are recorded. The cause will be identified, and appropriate measures taken. See Section 5.0.

Table 3-3 Activity Specific Preventative Dust Control Measures

Activity	Management Actions and Preventative Dust Control Technique	Trigger for Implementation
Handling & storage	Drop heights are minimised. Vehicles are not to be overloaded. Stockpiles are in clearly designated areas to prevent vehicle tracking over the base. Water from a hose will be used to dampen down stockpiles if needed during periods of dry/windy weather to minimize fugitive dust source potential and to prevent materials from becoming friable. Waste is managed to prevent the double handling of material. Material stored in bays will be kept 0.5m below the top of the bay wall.	Control techniques will be implemented during all periods when the site is operational.
	Handling activities are avoided during dry and windy conditions.	Daily monitoring to assist with this decision.
	Stored aggregates are not allowed to dry out and are dampened down with the water cannon.	Control techniques are implemented during all periods when the site is operational.
Treatment activities including soil washing and crushing	The following measures are effective in minimising dust emissions during treatment processes: • Plant and equipment are used within its design capacity; • Plant and equipment are located away from the site boundary and sensitive receptors;	Control techniques are implemented during all periods when the site is operational.

Activity	Management Actions and Preventative Dust Control Technique	Trigger for Implementation
	• Good standards of plant and equipment are maintained; • Drop heights are minimised; • Crushing is undertaken only when a stockpile has been created. Built-in water suppression system within the mobile crusher will be used (suppression system is separate and not impacted by other activities that require water on site); • The hoses will be utilised for high dust risk activities related to the screening and crushing of material including: o Movement of material; o Stockpiles of material awaiting treatment particularly with high risk materials like concrete; and o Stockpiles of crushed/screened material. • Any spillages are cleaned up immediately following the relevant procedures within the wider EMS	
Transport – internal movements	All vehicles arriving to and leaving site are sheeted. All vehicles leaving the site will be check for loose debris and hosed if necessary. All vehicles adhere to the site speed limit of 5mph. No idling of vehicles will occur on site. Impermeable concrete surfaces are swept when required. The site is connected to the mains water supply, allowing for effective dust mitigation using the hoses to dampen site surfacing. Movement of traffic around site is minimised where possible. Abrupt changes in direction are avoided. Vehicles are evenly loaded to avoid spillages. The sweeper is used on the road as required.	Control techniques are implemented during all periods when the site is operational.
Transport – access road	All surfacing is impermeable. Vehicles entering and leaving site are covered to prevent escape of materials during transport. The road sweeper is used on the road as required.	Control techniques are implemented during all periods when the site is operational.

Table 3-4 Activity Specific Remedial Dust Control Measures

Activity	Management Actions and Remedial Dust Control Technique	Trigger for Implementation
Material handling & storage	Use of hoses within the main building to dampen down stockpiles and operational areas.	Visible dust plumes. Limited by the availability and quantity of water given the measure can be water intensive.
	Additional dampening of material whilst screening and crushing process being undertaken. The hoses can be utilised in addition to the integrated suppression within the crusher.	Visible dust plumes.

Activity	Management Actions and Remedial Dust Control Technique	Trigger for Implementation
Transport – internal movements	Additional on-site sweeping of the impermeable concreted areas of the site. Use of hoses to dampen down haul roads and large surface areas.	If large quantities of debris and dust has accumulated on haul roads/access roads. Material to be damped down first before sweeping. Not to be undertaken during dry, windy conditions as may resuspend the dust.
Transport – access road	Increase frequency of use of the sweeper to remove any material tracked out from the site.	Visible track out on the access road.

The remedial dust control measures outlined above would be undertaken until the dust emissions were contained within the site boundary and significantly reduced. The decision would be at the discretion of the Site Manager.

4.0 Particulate Matter Monitoring

4.1.1 Meteorological Conditions

On operational days, weather forecasts on the Met Office website are monitored daily to predict weather conditions such as prolonged dry, hot spells or significantly strong winds which may generate elevated levels of dust for which additional dust control would need to be planned / prepared.

Wind direction and wind speed are recorded daily within the Site Log Book or using the example record sheet in Appendix 01. This information is beneficial when dust events / complaints are reviewed retrospectively, and the source of dust is trying to be identified.

4.1.2 Visual Dust Monitoring

The site undertakes regular visual monitoring to ensure that dust control techniques in operation are being carried out effectively. The location of the points are illustrated on Drawing 002. The objective of the visual monitoring is to anticipate whether dust is being transported off-site in quantities sufficient to cause a nuisance at off-site receptor locations. Visual monitoring undertaken on a regular basis allows immediate action to be instigated.

Visual monitoring of dust is undertaken by the Site Supervisor on a minimum of a daily basis. Responsibilities can either be delegated to various Site Operatives to carry out visual observations of their working areas during normal operations or be delegated to a single Site Operative to perform a daily visual check of key areas.

The areas that require consideration for inclusion within the visual observations are as follows:

- Perimeter of the site;
- Material storage areas;
- Truck movements on internal areas; and
- Export of materials off site.

The results of all visual observations, along with any remedial actions implemented will be recorded. Any personnel who undertake visual dust monitoring will have received appropriate training, guidance and instruction on how to carry out the task in line with the requirements of this DEMP.

Based upon the size of the Site, it is considered viable for daily monitoring to include a walkover of the entire perimeter (permit boundary) as the routine. If this is not possible, a minimum of 8 perimeter locations shall be assessed, including a minimum of one per boundary (i.e. northern / western / southern / eastern). The location of the monitoring points will be determined based upon the wind direction and the location of dust generating activities being undertaken on Site / off Site at the time. The visual dust monitoring points are illustrated on Drawing 002.

Results of the visual observations will be recorded in the Site Log book which is kept in the site office (an example Pro-Forma is included within Appendix 02). The following details are noted:

- Weather conditions (rainfall, wind speed, wind direction);
- Current site activities;
- Identification of any visible dust emissions travelling beyond the site boundary; and
- Details of any remedial action undertaken as a result.

The frequency of visual monitoring will be increased to twice daily observations in the following scenarios:

- Particularly dusty conditions are detected on site by operational staff;
- Dust emissions are evident near the boundary during an activity; or
- In response to a complaint being received by the site or the EA – in this situation off site monitoring will also be carried out at appropriate locations.

The results of the visual dust monitoring will be monitored by the Site management. Where it is identified that significant dust levels are present on-site, or dust is visible beyond the Site boundary, Site management will ensure that the appropriate mitigation measures are adopted in response. In the event that visual dust monitoring identifies dust being transported beyond the Site boundary and mitigation measures fail to resolve the issue, all dust generating activities will cease until the source of the dust has been identified and steps taken to prevent the off-site emissions.

In the event that continuous offsite dust emissions are detected (i.e. more than 2 days in a row) alongside complaints being received by members of the public, correspondence with EA will be undertaken to discuss subsequent steps.

It is not proposed to undertake any visual dust monitoring outside of the operational hours of the Site. Operations during the day which can potentially cause dust, such as unloading and loading material, does not occur during out of hours. Material is stored in bays to prevent wind whipping and stockpiles are kept to a minimum. Material accepted on site is not dusty in nature (aggregate) and so unlikely to create dust emissions. However, if monitoring was specifically required outside of the operational hours, a third-party monitoring company could be commissioned to undertake monitoring.

5.0 Site Management

This section details the responsibilities of management within the DEMP, as annotated in Figure 5-1.

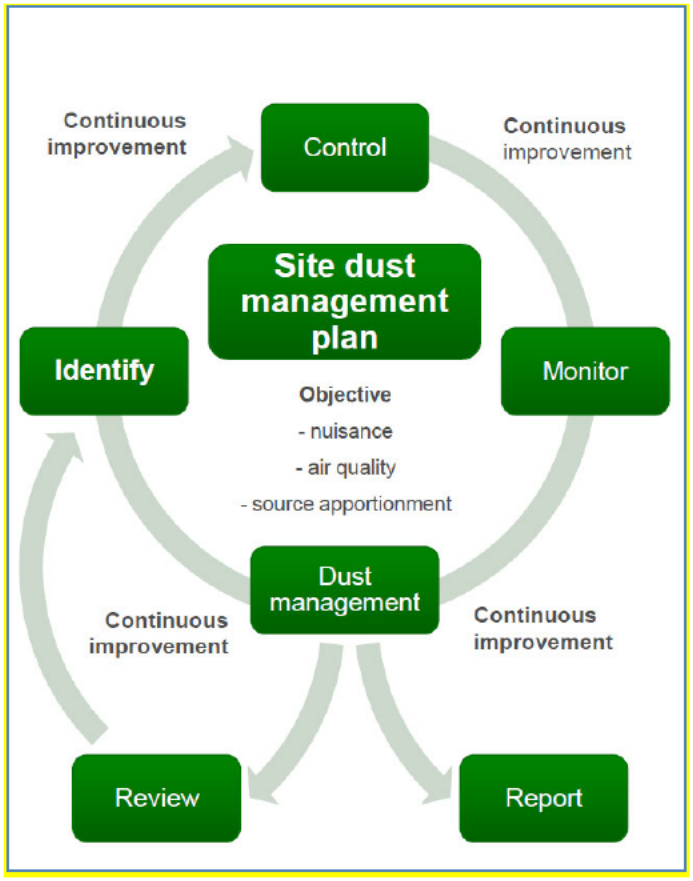


Figure 5-1 Dust Management Plan Process[4]

5.1 Responsibilities

There will be a trained Site Supervisor on site during working hours responsible for dust management and visual observations. The Site Supervisor will be responsible for ensuring effective dust control is achieved by good operational practises, including:

- Identifying and monitoring the intensity of activities with a high potential for dust generation;
- Monitoring weather conditions during periods of such activity;
- Planning and preparing for the implementation of contingency measures;
- Responding to potential and actual dust monitoring issues; and
- Ceasing operations if significant off-site impacts cannot be avoided.

[4] Reproduced from - Report to The Mineral Industry Research Organisation (MIRO), *Good practice guide: control and measurement of nuisance dust and PM_{10} from the extractive industries* AEAT/ENV/R3140 Issue 1 (February 2011)

Responsibilities will be allocated to specific personnel to ensure dust generation is avoided or effectively controlled, as presented in Table 5-1.

Table 5-1 Dust Management Responsibilities

Actions	Responsibility
Monitoring weather forecasts and current wind directions on site	Site Supervisor
Routine visual observation monitoring	Site Supervisor
Coordination of application of water dust suppression	Site Supervisor
Completion of dust event forms	Site Supervisor
Activation of contingency action plans	Site Supervisor
Liaison with public and regulator	Site Supervisor
Coordinating reviews and updates of DEMP	Site Supervisor

5.2 Training

All personnel on site understand their responsibility to ensure the generation of dust is avoided, minimised and controlled. Each employee is aware of the importance of effective dust control and the most effective measures available to minimise such emissions from the various activities. Such training is provided as part of the induction process for all new employees.

Specific training is provided to:

- Operatives in use of the water suppression techniques; and
- All site personnel on the importance of reporting potential / actual dust emissions or the malfunctioning of dust control to the appropriate person.

Training also covers 'emergency preparation plans' to ensure rapid reactions to any failure of dust control.

5.3 Incident Reporting

Incidents of high dust levels will be reported to the Site Manager and recorded in the Site Log Book. Any incidents that have created significant dust issues off site will be reported to the EA as appropriate.

5.4 Dust Complaint Procedure

Complaints may be notified by a member of the public either directly to the site management or indirectly through the regulator. Complaints received directly by the site management will be recorded in the Site Log Book and reported to the regulator. The following details shall be recorded:

- Date, time and name of complainant including contact details (if provided);
- Nature of complaints;
- Locality of complaint;
- Summary of resulting investigations and actions taken; and

- Date at which the complainant was updated with the outcome / remedial actions undertaken, if required.

The objective of this response to complaints received is to investigate the incident and review the site practises and dust controls in place at the time of the event to allow for additional controls to be put in place, thus preventing a repeat of the incident. If necessary, the complainant(s) and the regulator would be informed of the findings of the investigation and any actions subsequently taken.

Investigations will include, but not be limited to the following:

- Visit by a member of Site Management to location of complainant to verify the issue (if complaint is made after the event this may not be possible);
- A review of site activities in operation at the time of the incident;
- A review of the dust monitoring results for the period of the incident, if applicable;
- For recurring events, the frequency of visual monitoring should be increased to a twice daily basis;
- A review of control measures and dust suppression in place at the time of the incident (i.e. application of water, frequency of road sweeper on internal haulage routes, drop heights during transfer);
- A review of the meteorological conditions at the time of the incident (i.e. recorded wind direction and wind speed recorded in the Site Log Book); and
- Reporting of findings (either in Appendix 03 pro-forma or in Site Log Book).

All complaints will be acknowledged within 2 working days.

The escalation procedures if subsequent dust complaints are received are as follows:

- Initial Complaint - Initial/first time contact received – complaint investigated, and contingency actions taken by site management.
- Complaint level 1 - An interaction that has not been resolved to the satisfaction of the complainant or where frequent contact has been received from the public via the Regulators. Complaints investigated by Senior Management Team and remedial actions taken. **Decisions will be made as to whether site operations will need to be temporarily stopped if the source of the dust emission cannot be found**.
- Complaint level 2 - Unresolved complaint level 1 – this may involve support from Environmental Consultants to review, investigate, determine required actions and respond to the complaint.

5.5 Liaison with Community and Regulators

The Site Manager (or nominated representative) will act as liaison with the regulator and local community for issues relating to dust emissions off-site. Maintaining good communications with the local community will help prevent anxieties occurring.

The nominated representative will respond promptly to all complaints by undertaking an investigation into the dust event, including weather conditions, operations on Site and mitigation measures in place at the time of the complaint. If appropriate, key issues will be communicated, including but not limited to the following:

- Presentation of the monitoring scheme and the latest dust monitoring results;
- Update on the working scheme of the site and when / where future operations will be;

- Summary of the dust controls on site and any updates / improvements undertaken/planned;
- Provision of a contact for the site should any issues arise between the meetings; and
- Observe and alleviate any anxieties or complaints member of the public have experienced.

Liaison with local residents and business can be undertaken through posts on Silverton Aggregates' website / community council / local social media channels as appropriate. Silverton Aggregates will also liaise with local residents and businesses directly if required.

5.6 Record Keeping

Silverton Aggregates keep records of all dust monitoring, dust contingency actions, investigations and complaints on site for a minimum period of 2 years; these will be made available to the regulator for examination on request.

5.7 DEMP Update and Review

This DEMP is an active, controlled document which forms part of the site management documentation. It shall be reviewed on an annual basis, as a minimum by Senior Site Management. Given that the document is a point of reference for daily operations, it shall be updated as required should any of the following situations occur:

- Significant changes are made to the plant or operational practises;
- The regulator specifically requests for the DEMP to be updated; or
- Following investigations into dust control, additional measures are adopted that are not contained within the document.

On review of site operations and the effectiveness of the DEMP, Senior Management are required to make any changes deemed appropriate to ensure dust emissions are kept to a minimum

6.0 Contingency Action Plan

A contingency action plan has been defined to react to situations whereby visual monitoring of dust indicates that a potential dust source is not being mitigated effectively, appropriate control measures are not in place or that an adverse impact has / may occur.

This includes incidents or accidents which would result in the loss of control of potential dust sources and have the potential to cause an unacceptable impact on the environment. The contingency action plan therefore includes both pro-active and re-active actions to events.

Contingency measures have been identified for the following scenarios, as presented in Table 6-1.

- Observed change in wind direction towards nearby receptors during activities close to site boundary;
- Visual monitoring records visible dust plumes across the site boundary in the direction / proximity to the off-site receptors.
- Malfunction in water suppression techniques rendering them in-effective;
- Malfunction of road sweeper rendering it in-effective;
- Receipt of a particularly dusty load;
- Complaints received from members of the public or neighbouring businesses, verified by visual monitoring on site; and
- Prolonged periods of hot weather, resulting in very dry ground and limited supply of water.

Table 6-1 Contingency Plans

Events and Contingency Plans	
Event	**Change in wind direction (moderate-high winds above 11 knots (13 mph)) towards off-site receptors**
Contingency Actions	The frequency of visual monitoring will increase to twice daily which will incorporate walkovers along boundary in question. Additional dust suppression will be hired on high risk activities including existing management methods such as reduction in drop heights or cessation of material handling / transfer. In the event dust is visually observed to be crossing the boundary with additional dust suppression in place, any activities will be relocated or ceased until more effective mitigation is in place.
Comment	The weather forecasts will be monitored. The Site Manager will be informed of actions taken and the event will be recorded in Site Log Book.

Events and Contingency Plans	
Event	**Visual monitoring records dust plumes across site boundary in direction of offsite receptors**
	The frequency of visual monitoring will increase to a minimum of twice daily, which will incorporate a walkover along the boundary in question. Wind direction will be determined. The likely dust source will be determined, and additional dust suppression will be implemented e.g. Increased frequency of water suppression on internal haul roads and commence water suppression on material using water bowser and hose. If additional dust suppression not effective, activity operations will be relocated or ceased until dust can be satisfactorily controlled.
Comment	Water supply will be available for high-risk activities. The Site Manager will be informed of actions taken and the event will be recorded in Site Log Book.
Event	**Malfunction of water suppression techniques, rendering them ineffective**
Contingency Actions	Additional mobile dust suppression sprays will be hired in from a local hire company. Repairs will be undertaken using on-site spares if possible, or a technician will be called to repair at earliest opportunity. Manual methods will be undertaken to clean down vehicles. The frequency of visual monitoring will increase to twice daily, which will incorporate a walkover of the all the boundaries. Manual water techniques will be available on site and at the location of the dust source.
Comment	Essential spares will be retained on site. The Site Manager will be informed of actions taken and the event will be recorded in Site Log Book.
Event	**Malfunction of road sweeper rendering it in-effective**
Contingency Actions	A local hire company will be contacted to provide a temporary road sweeper.
Comment	The Site Manager will be informed of actions taken and the event will be recorded in Site Log Book.
Event	**Receipt of a particularly dusty load**
Contingency Actions	Management will be notified, and receipt records will be updated. Loads will be investigated to ascertain whether they can be received without causing dust emissions to leave site. The Site Manager will review whether the use of additional mitigation e.g. use of water cannon during unloading for all loads will sufficiently reduce the risk of dust generation. Ultimately, if waste cannot be received without dust emissions causing an unacceptable impact, then the load will be rejected in accordance with the WAP.
Comment	Details will be recorded in Site Log Book.
Event	**Complaints received from members of the public or neighbouring businesses, verified by visual monitoring on site**
Contingency Actions	Management will be notified. Complaint reporting and investigation procedure will be undertaken, and appropriate contingency measures will be undertaken as detailed above.

Events and Contingency Plans	
	The frequency of visual monitoring will increase to twice daily and will focus on boundary locations in proximity to the location of complainants. If required, correspond with the EA to discuss the requirement of quantitative dust monitoring. Complaint escalation procedure: • Initial Complaint - Initial/first time contact received – complaint investigated, and contingency actions taken by site management. • Complaint level 1 - An interaction that has not been resolved to the satisfaction of the complainant or where frequent contact has been received from the public via the Regulators. Complaints investigated by senior management team and remedial actions taken. • Complaint level 2 - Unresolved complaint level 1 – this may involve support from Environmental Consultants to review, investigate, determined required actions and respond to the complaint.
Comment	DEMP may require updating on basis of results of investigations.
Event	**Prolonged periods of hot weather, resulting in very dry ground and limited supply of water**
Contingency Actions	Water suppressant techniques to be prioritised for operational activities. Road sweeping to be undertaken if large material accumulating on access road. However, be mindful this may resuspend the dust therefore not to be undertaken in windy conditions. If water supply on site has significantly reduced, consider importing water onto site (via emergency water suppliers such as Water Direct). If an emergency source of water cannot be found, operations will be ceased on site until another available source can be found. Increase daily monitoring to twice daily and if dust is being released in significant quantities likely to cause impact then cease activities. The Site Manager would visually assess the dust emissions each day and would use their observations to make this judgement.
Comment	Inform Site Manager of any actions taken and record in Site Log Book.
Event	Power failure
	The site only uses mobile plant to operate. If there was a power failure it would have no impact on operations.

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Appendix A Example Meteorological Condition Record Sheet

Example Meteorological Condition Record Sheet

Date	Initials of Author	Predominant Wind Direction	Wind Speed (Beaufort scale)	Rainfall	Areas of Working	Additional Comments (On- and Off-site)
11/02/17 *Example*	*AB*	*W- NW*	*1-2* *Light air – light breeze*	*Dry*	*Topsoil Stripping*	*Agricultural operations in field adjacent to Site active with visible dust emissions*

Beaufort Scale Definitions:

0 – Calm
1 – Light air
2 – Light breeze
3 – Gentle breeze
4 – Moderate breeze
5 – Fresh breeze
6 – Strong breeze
7 – Near gale
8 – Gale
9 – Strong gale
10–Storm

Appendix B Example Dust Event Form

Example Dust Event Form

Visual Monitoring and Dust Event Form	
Name of Author	
Description of Event[(a)]	
Date / Time / Period	
Activities taking place during time / period of event:	
Dust control employed at the time of the event:	
Summary of weather conditions leading up to and during the event:	
Details of Corrective Action:	
Notes:	

(a) E.g. complaint registered (name and address) or visible dust seen crossing site boundary during routine visual monitoring

Appendix C Dust Complaint Form

Dust Complaint Form

Customer Details	
Customer Name	
Address Postcode	
Customer Contact Details	
Telephone	
Email	
Date	
Complaint Ref Number	
Complaint Details	

Investigation Details	
Investigation carried out by	
Position	
Date & time investigation carried out	
Weather conditions	
Wind direction and speed	
Investigation findings	
Feedback given to EA and/or local authority	
Date feedback given	
Feedback given to public	
Date feedback given	

Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	

Does the dust management plan need to be updated -	
Date that the dust management plan was updated -	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	

A D Housekeeping Schedule

Housekeeping Checklist and Daily Site Monitoring

Date: _____ Assessor: _____

Inspection Areas	Compliant		Comments
	Yes	No	
Waste piles and operational areas			
Only permitted wastes accepted			
Waste bays/ containers are filled to permitted levels			
Surface drainage- integrity of drains			
Fire Extinguishers- in place			
Dust emissions			
Site floor swept (daily)			
Yard and drainage			
Incoming waste storage area			
General site tidiness/ litter			
Lighting			
Safety Notices			
Availability of site machinery/operatives			
Use and availability of PPE			
PPE provision			
Weighbridge facilities			
Weighbridge maintenance records			
First Aid boxes			
Accident book review			
Surface drainage			
Chemicals/oils stored on site- integrity and bunding			
Spill kits			
Surface drainage- integrity of drains			
Interceptor- integrity			
Internal roads- integrity of surfacing/ potholes/ mud/litter			
Wider site			
Access road- integrity of surfacing/ potholes/ mud/litter			
Site Signage- clearly visible			
Site Gates/Barriers- integrity and damage			
Safety Notices			
Boundary Fencing- integrity and damage			

Site Main Identity Board-clearly visible/ no damage			
Visitors on site (signed in and are accompanied)			
Complaints			
Regulatory communications			
Dust emission			
Noise levels			

Ap te Acceptance Procedure

Making Sustainability Happen

1.0 Waste pre-acceptance, acceptance and tracking

1.1 Waste Pre-Acceptance

The waste pre-acceptance procedures follow a risk-based approach considering:

- The source and nature of the waste;
- Potential risks to process safety, occupational safety and the environment (for example from odour and other emissions); and
- Knowledge about the previous waste holder(s).

The objective of the waste pre-acceptance procedure is to evaluate customer information at the enquiry stage to determine whether the waste could be accepted at the site.

The waste producer/holder will be required to send the necessary waste characterisation information to Silverton Aggregates in advance of delivery of waste materials to the site.

This information enables Silverton Aggregates to determine whether the waste stream can be accepted at the site.

No waste will be accepted at the site unless the necessary characterisation information has been received in advance and approved for receipt.

Both new and existing customers will be required to provide characterisation information for each new waste stream.

The waste producer/holder must provide the following waste characterisation information for each new waste stream proposed for treatment at the facility. The description must include the following:

- Waste source and origin;
- The process producing the waste (including a description of the process, its SIC code and characteristics of the waste types used to comprise the batch of material);
- The waste treatment applied;
- The appearance of the waste (including smell, colour, consistency and physical form); and
- Analysis and determination of waste code in accordance with WM3.

An assessment of the reliability of the information received by Silverton Aggregates including:

- Ensuring all waste analysis certificates are complete, and analysis has been carried out for all relevant parameters;
- Analysis has been carried out by well-known and reputable laboratories which hold suitable quality accreditation and have used relevant test methods;
- Ensuring that the analytical information is provided in secure PDF format;
- Undertaking a visit to the waste producer’s site; and
- Ensuring that data is current and relates to the waste proposed for delivery to the site.

1.2 Waste Acceptance

The site will implement waste acceptance procedures (WAP) to check that the characteristics of the waste received matches the information provided during waste pre-acceptance. This will ensure the waste is as expected and that it can be accepted at the site.

The procedure will follow a risk-based approach considering:

- The source, nature and age of the waste;
- Potential risks to process safety, occupational safety and the environment;
- The potential for self-heating; and
- Knowledge about the previous waste holder(s).

All vehicles bringing waste material to the site will report to the weighbridge or site office. All wastes will undergo a visual inspection during deposition to confirm its description and composition against the relevant accompanying documentation.

Waste will only be stored and treated at the site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the description provided.

Should the wastes be found not to conform during the visual inspection, then the details will be recorded, and the waste will be removed to the designated quarantine area as appropriate.

Records of non-compliant waste received at the site will include details on:

- The quantity;
- Characteristics;
- Origin;
- Delivery date and time; and
- The identity of the producer and carrier.

Waste will not be accepted unless the site is adequately resourced to receive the waste.

The quantity of waste accepted and despatched from the facility will be calculated by recording the volume of waste entering the site and the application of standard EA conversion factors as appropriate or via a weighbridge.

A record will be kept in the site diary of all rejected wastes. In the event of non-conformance, the waste producer and the EA will be notified.

1.3 Load Inspection and Waste Control

All vehicles bringing waste material to the site will report to the weighbridge where the load will be visually inspected, where possible, to confirm its description and composition against the relevant accompanying documentation. All wastes will undergo a further visual inspection during deposition.

Waste will only be accepted at the site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the description provided.

Should the wastes be found not to conform during the initial visual inspection, then the details will be recorded, and the vehicle turned away. If wastes have already been discharged and are deemed not to conform or otherwise not be permitted, then the waste will be:

- Reloaded on to the delivery vehicle; or
- Removed to a designated quarantine area as appropriate.

Records of non-compliant waste received at the site will include details on:

- The quantity;
- Characteristics;
- Origin;
- Delivery date and time; and
- The identity of the producer and carrier.

Waste will not be accepted unless the site is adequately resourced to receive the waste.

A record will be kept in the Site Diary of all rejected wastes. In the event of non-conformance, the waste producer and the EA will be notified.

1.4 Quarantine Procedure

The quarantine and rejection procedures will ensure that all non-confirming waste is removed from the site and that the waste producer and carrier are informed so that appropriate action can be taken to prevent recurrence.

Non-conforming waste will be identified by either Site Manager or TCM at the operational area. Non-conforming waste will be identified by visual and olfactory means.

If unauthorised waste is identified it will be moved to a temporary quarantine storage area, before being exported from the site.

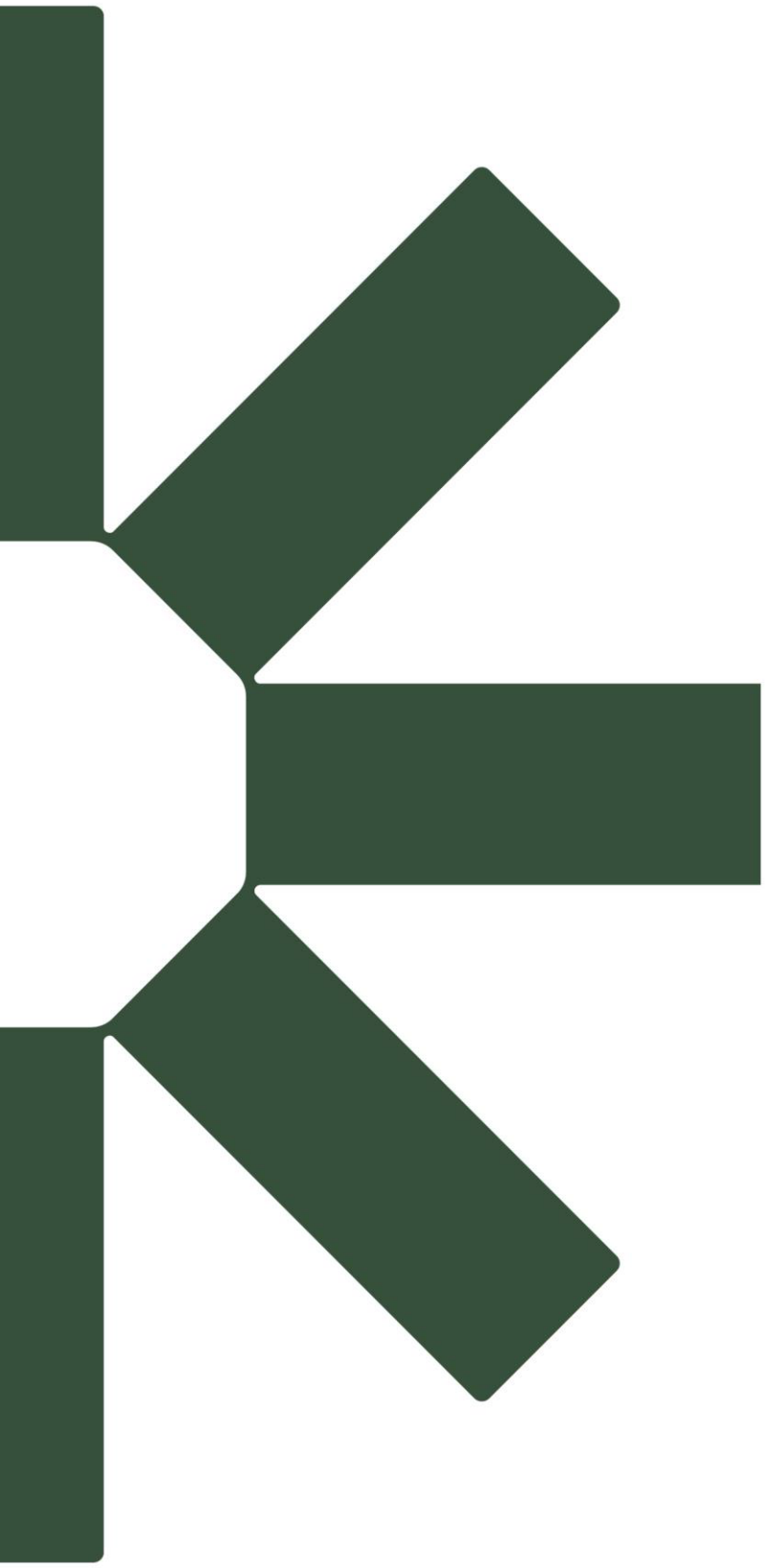
1.5 Means of Measurement (Tracking)

The quantity of waste accepted and despatched from the facility will be measured via the weighbridge.

A register of the quantities and characteristics of waste accepted at the site will be maintained on a computerised database.

The database will include the following details:

- Date of delivery;
- Waste quantity;
- Waste description and classification code; and
- Waste producer and/or carrier.



Making Sustainability Happen