

Summary Table

	Current Standard rules SR2008 No3	Proposed Bespoke Permit
Waste Types	Table 2.2	One additional waste code 19 12 12
Waste activities	Sorting, separation, screening, baling, shredding, crushing and compaction, storage and bulking	No change
Annex I (D codes) and Annex II (R codes) and descriptions	D15, R13, D14, D9, R3, R4, R5	No change
Annual Tonnage	75,000	100,000
Fire Prevention Plan required by Permit	Yes, should a fire occur	Yes, appended to EMS for the revised tonnage and reflecting current guidance
Operating Techniques	Specified waste* shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system. (*specified wastes relate to wastes as listed within the Permit)	No change
Permitted Waste Types Table S2.3	Unless stored or treated outside as specified waste*: a) all bulking, transfer or treatment of waste shall be carried out inside a building; b) all waste shall be stored in a building or within a secure container. c) all waste shall be stored and treated on an impermeable surface with sealed drainage system	Additional d) Green waste, waste wood, and plastics can be stored externally on impermeable surfacing e) Storage of "fines" externally will be on impermeable concrete with contained drainage

The variation to bespoke as noted above is triggered by two factors. Firstly, the Standard Rules Permit limits the site to 75,000 tonnes per year. It is proposed that the site is limited to 100,000 tonnes per year. This equates to an average additional 90 tonnes per operational day, which is well within the normal fluctuation of tonnages handled at the site and therefore will not have any significant impact on the operations and mitigation already in place at the facility.

The existing SR Permit does not limit the amount of waste to be on site at any one time and therefore has a higher risk than the proposals under this bespoke application which will limit various waste streams to specific quantities and storage times as noted in the Fire Prevention Plan. This not only

reduces fire risk, but additionally limits the opportunity for odour to arise from long stored wastes, or for degradation of those wastes occurring which could give rise to potentially polluted liquids.

The site has operated with the current arrangements for external storage of wood, plastics and green waste, as well as the fines from the processing operation for a number of years. Inspections by the EA during this time has not identified any unacceptable impact arising and as noted above, with the limits on quantities and storage times this is reinforced. The only significant change will be that the fines arising from the processing of materials received are now stored on an impermeable surfacing, with contained drainage.

Summary of the Permitted Site Treatment & Transfer Processes

Permitted Processes; the waste management activities taking place at the site are those listed in the Permit namely: sorting, separation, screening, baling, shredding, crushing or compacting of the permitted wastes into different components for (as appropriate) reuse, recycling or recovery. Each of these activities is likely to be put into practice at the site during the currency of the Permit.

Recovered materials that meet an approved standard may be transferred from the site for direct reuse elsewhere; whilst others may be delivered to specialist organisations for further processing before full recovery is achieved (e.g., scrap metals). Non-recoverable residues are transferred to authorised disposal facilities elsewhere.

An additional waste code is proposed to be added, 19 12 12 for material that has been bulked at a transfer station, where it may have had rudimentary treatment. This will to all purposes be simply “skip” waste, but the additional code will ensure it is appropriately coded for receipt at Valley Trading.

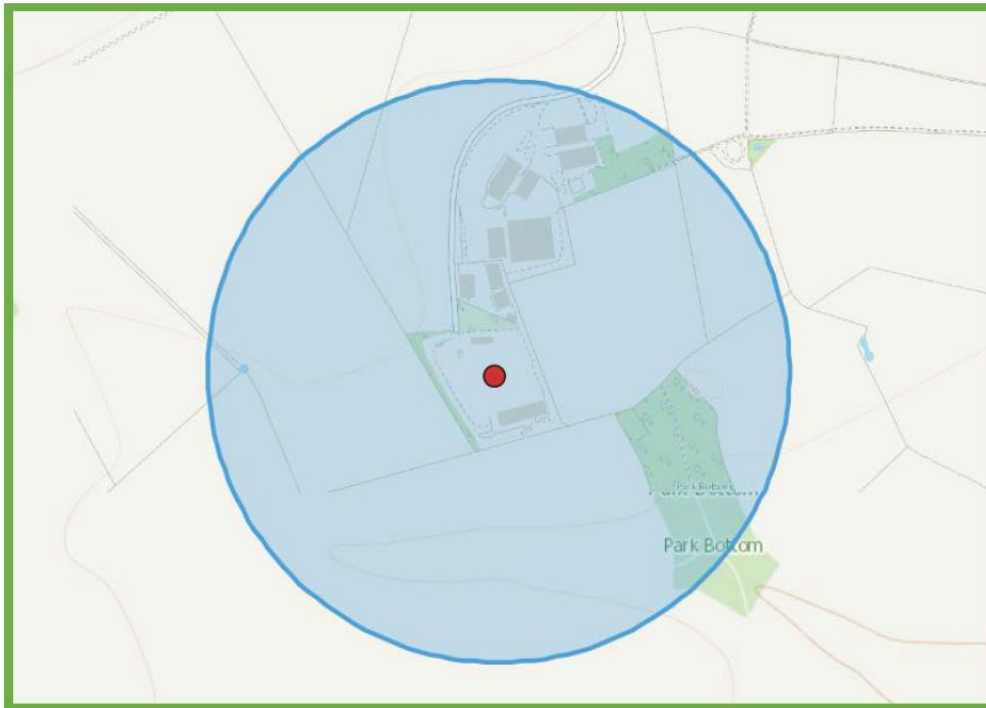
Pre-Application Advice

Pre application advice was sought in relation to this application from SR back to a bespoke Permit (EA ref: EPR/EB3106LX/V002 date: 13/07/2021) confirmed that *If you are applying for a bespoke permit but most of your activities are covered by standard rules, you only need to do a risk assessment for the activities or risks that are not covered by the generic risk assessment for those standard rules.*

The pre-app also provided:

The screen shot below shows the extent of the 500m, mentioned within the guidance on Gov.uk, I did not locate any sensitive receptors within the area shown however please use your local knowledge to

decide if there are any homes, schools, hospitals or nursing homes, food preparation facilities or similar in the vicinity.



Valley Trading can confirm that they are not aware of any sensitive receptors within 500m of the facility.

It should be noted that at the time the pre-application advice was sought there was a consideration to add hazardous waste codes to the bespoke Permit. However, this does not form part of the variation now sought and the elements of the pre-app advice impacted by that proposal have not been addressed.

Environment Management System

The EMS already required for the site has been updated to reflect the proposed variation, although guidance on the applications form (Part C2 Q3d) does not require it to be submitted as no additional waste activity is being applied for, it is provided for information and completeness.

Technical Competence

The requirement for technical competence for the site does not change because of this variation application and as noted above, the current guidance on form C2 Q3 therefore does not require information on the current technical competence to be provided. However, a COTC and continuing competency certificate for Trevor Kent has been included to avoid queries being raised at duly making.

Environmental Risk Assessment

This has been addressed in the ERA accompanying this application but utilising the generic ERA for the appropriate Standard Rules as the pre-app response was not clear how the increased tonnage should be dealt with under ERA, even though as noted it is a relatively small amount daily and within the fluctuations the site normally experiences.

Fire Prevention Plan

A Fire Prevention Plan to the current guidance is provided with this. This has been produced by a consultant experienced in the production of FPPs, in consultation with Valley Trading and brings the understanding of having discussed the EA's requirements on FPPs across operations of many types and scales.

Odour

An odour management plan has not been provided with this variation application. The preapplication advice, whilst directing to the guidance at <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#odour> also noted: *if you feel that an odour management plan is not required and measures contained within a risk assessment will suffice, you must provide a robust justification for not including one in your application when it is submitted.*

The current ERA for SR2015 No6 notes that odour will be controlled, and makes no requirement for an OMP, even though the operations under that SR can be carried out with no restriction on their proximity to a sensitive receptor. They may be within a building, but as noted in the EMS, Valley Trading utilises a building for reception of all non-inert wastes, therefore any potentially odorous wastes will be detected and dealt with within the building in the first instance.

At Babdown Airfield there are no sensitive receptors within 500m, as confirmed in the pre-app search.

The site has no history of odour issues or complaints, and this variation back to a bespoke Permit does not change any of the activities that have been historically undertaken, therefore the variation does not give rise to any increased risk of odour.

The waste types (whilst broad within the Permit are generally "skip waste" do not include any significant number of biodegradable materials that could give rise to odour.

Initial sorting and assessment of wastes is within a building, and anything noted as potential to give rise to odour off site is removed at that time for appropriate management off site.

The wastes which are stored externally are primarily inert materials that do not give rise to odour.

The variation seeks to regularise the external storage of green waste, wood and plastics and does not increase the risk of odour causing impact at sensitive receptors. It has already been occurring without incident or complaint, but the Fire Prevention Plan will now restrict the amounts and the storage times, thereby even further reducing the risk of odour arising.

For the reasons noted above, and based on an assessment of risk and likelihood, rather than simple waste types or proximity it is considered that no OMP is required in relation to the variation sought. However, it is noted that as a bespoke Permit the EA could include a condition like that on the current SR permit which would trigger the need for an OMP should the activities give rise to pollution outside the site due to odour.

Habitats

The pre-app response provided confirmation that, within the distance identified by the EA as suitable, no habitats were identified. The ERA has further expanded this to 1000m, and no habitats have been identified.

Dust and Noise Emissions Plans

A specific dust emissions plan or noise emissions are not included although dust and noise management measures are included in the EMS for the site. These are the measures which have been utilised previously and the site has not given rise to any dust or noise complaints and therefore are deemed to be effective and not a significant risk that would give rise to the requirement for stand alone management plans . Additionally, the site is remotd from any sensitive receptors as noted in the Pre-app response. Current guidance on.gov.uk notes (in relation to dust, but equally applicable to noise): *If your risk assessment shows you have a risk of these types of emissions you may need to provide an emissions management plan when you apply for your permit to demonstrate how you'll control them.*

The risk assessment confirms, in line with the SR risk assessment for the Permit already in place, and as no additional operation likely to give risk to dust or noise will occur because of this variation, the risk of dust or noise emission is low, therefore in line with the SR for the same operations, no specific dust or noise management plans are required.

Forms

The application for variation includes Forms A, C2, C4 and F1 as advised in the pre-app, The pre-app also however later referred to C1 (in relation to COTC), but this application doesn't seek to vary the existing SR conditions or add a new SR, so C1 has not been completed, which accords with the guidance on Form C1 that advised C2 is the appropriate form in that instance.

Site Plan

The site layout plan has been updated to include the information required to support the Fire Prevention Plan. Although the pre-application letter notes a site plan should be submitted, the guidance for Form C2 5a notes that a site plan is only required where the variation sought includes additional land to be included in the Permit. *(If you are adding land as part of your application to vary your permit you must send us a revised site plan)* This is not the case for this variation.

Form C4 3a notes site infrastructure plans, location plans and process flow diagrams should be provided to assist with describing the facility. These are not necessary for the variation sought which is simply the same operations as already Permitted under a Standard Rules, but with a small increase in annual tonnage, and the ability to store (not treat) identified waste types externally to the building, which have been the established practice at the site.