
NON-TECHNICAL SUMMARY

Introduction

This document and associated appendices form the application to vary an Environmental Permit (EP) EPR/NP3699ZH under the Environmental Permitting Regulations 2016 (as amended)¹. The application is made by Ellete Waste Limited which is the legal entity that will be responsible for operating the waste facility.

The facility is located at the former Mearclough House, Mearclough Road, Sowerby Bridge, Halifax, HX6 3LF.

Permit EPR/NP3699ZH includes for the operation of a household, commercial and industrial waste transfer station (WTS), without treatment, with a capacity of 5,000 tonnes of non-hazardous waste per year. This variation seeks to make the following changes to the permit:

- an increase the permitted capacity of waste that can be accepted to 35,000 tonnes per year. No more than 280 tonnes per day will be accepted at the facility. The amount of waste which can be stored at any one time will increase from 200m³ to 300m³. The permit boundary will also not change as a result of the proposed changes,
- mechanical treatment activities which include sorting by use of a rotary screener (trommel),
- new waste codes for non-hazardous metal shredder residues, known as fragmentisation fluff, or frag fluff, to be accepted under non-hazardous EWC codes 19 10 04 and 19 10 06 and 19 12 12 for waste from mechanical treatment of wastes,
- the sorting by hand and by mechanical means of fragmentisation fluff waste to separate plastic and metal from the waste.
- removal of waste transfer station activities, the facility will become a waste treatment facility (WTF) which stores and treatments non-hazardous wastes.

The proposed environmental risks associated with the above changes have been assessed. There are no process emissions to land, air, water or sewer from the facility and this is remaining unchanged with the variation application. The results of the environmental risk assessment (ERA) are presented in Appendix C and show that the risk of odour, noise and vibration, fugitive emissions, and accidents range from 'not significant' to 'low'.

Site Location

The site is located off Mearclough Road with the River Calder, an industrial area, Wakefield Road (A6026) and residential properties to the north. To the east of the site are Milner Royd nature reserve, Rochdale Canal and Copley Valley Green Corridor local wildlife sites to the east. A railway line running from Sowerby Station, west of the site, runs south of the site, beyond which are a few residential properties at Tall Trees Farm, Fall Lane. To the west lies woodland, beyond this are industrial units and sports facilities on Holmes Road.

The site is not located in a DEFRA Air Quality Management Area (AQMA). The nearest AQMA is adjacent to West Mills, West Street, Sowerby Bridge and extending along Town Hall Street and Wharf Street and ending in Upper Bolton Brow on Pye Nest Road and on Wakefield Road in Bolton Brow in Sowerby Bridge, approximately 140 m from the proposed facility. This area, according to Calderdale Metropolitan Borough Council (CMBC), has been designated under Section 83 Environment Act 1995 due in part to a known exceedance of the annual mean air quality objective for nitrogen dioxide (NO₂) as specified in the Air Quality Regulations 2000. It was also in part due to modelled evidence of a likely exceedance of that value.

¹ <https://www.legislation.gov.uk/uksi/2016/1154/contents/made>

Operations

The site is currently a permitted waste operation, and the proposed changes will not alter this. The proposed activities are below the thresholds of installation activities within Part 2 of Schedule 1 and so the activities will remain as a waste operation. The main activity undertaken at the site will be the storage and treatment of non-hazardous wastes; D15 (storage pending any of the operations numbered D1 to D14) and R13 (storage of waste pending any of the operations numbered R1 to R12). Waste streams will mainly be sourced from skips provided to local business and households which are collected by Ellete Waste controlled vehicles.

Waste accepted at the site for treatment is tipped within the reception area inside the waste treatment building. Both tipping, treatment and some storage will be taking place inside the WTF building. The external yard is used for the storage of treated wastes or wastes that may not require treatment i.e. a full load of inserts.

Treatment activities are carried out by a trommel followed by a manual picking station. Segregated recyclables will be placed into dedicated skips located either within the building or within skips in the external yard.

Incoming skip waste and fragmentiser fluff waste will then be sorted separate to each other, by hand and by mechanical means to separate plastic and metal from the waste. The sorted metals and plastics are separately combined with other metal and plastic wastes and placed in the respective containers for transfer off site.

Residual waste will be stored within the building in a 40yard Ro-Ro skip. Residual fragmentation fluff will also be stored within this skip. Please note that if fragmentation fluff is to be treated, this skip will be emptied prior to provide storage.

Bulked up waste will be sent onwards to waste recycling facilities for recovery.

Management of Activities

An approved Working Plan is in place for the facility and EWL will operate in accordance with that. EWL are developing an environmental management system (EMS) which will be in place prior to the permit being issued. The EMS will include those documented systems required by the Environmental Permit to identify and minimise risks of pollution including those from operations, maintenance, accidents, incidents and non-conformances; site closure and risks drawn to the attention of the operator as a result of complaint. It will also document how EWL will ensure the facility is managed using sufficient competent persons and resources and to the requirements of relevant Environment Agency guidance documents;

- Non-hazardous and inert waste: appropriate measures for permitted facilities².
- Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste³. Although the facility is below the threshold of EPR Schedule 1 Part A activities.

The EMS will 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;
- Performance against the management system is audited at regular intervals; and
- The environmental permit is complied with.

A fire prevention plan (FPP) has been produced as part of this variation application and is in Appendix F. The FPP sets out the current measures that are in place at the site, and addresses the proposed changes, to

² [Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities)

³ [Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste](#)

minimise the risk of a fire starting and to ensure that should a fire occur appropriate measures are in place so that it is identified and managed effectively. The FPP will be incorporated within the EMS for the WTF.

The management system will be reviewed at least once every four years or sooner where there is a significant change to the activities, or in the event of recommendations arising from investigations of accidents, incidents, emergencies or other non-compliances.

Energy Efficiency

Where relevant, operating procedures will include details of techniques to promote efficient operation. Maintenance and housekeeping measures will be developed as part of the preventative maintenance system. This will include details of the measures specifically aimed at maintaining the efficiency of the facility during its operational life.

During the operational life of the facility, energy use will be monitored and recorded. Periodically, usage will be reviewed to identify areas for improvement and ensure that any abnormal increase in energy use is investigated and appropriate action taken to resolve the issue. Any areas where improvements are identified will be incorporated within the energy efficiency plan for the site. This plan will be incorporated within the EMS to ensure that it is regularly reviewed and maintained up to date with future technology developments.

Raw Materials, Water and Waste

The main raw materials for the waste operations will be diesel fuel for plant and machinery. Potable water will also be used for dampening the external surfaces during dry and dusty periods.

Emissions to Air

There are no point source emissions to air.

Emissions to Surface Water

There are no point source emissions to waters.

Emissions to Sewer, Effluent Treatment Plants or Other Transfers off Site

Site surface water flows to a silt trap and oil separator before discharging into the foul sewer in Mearclough Road. The drainage gullies serving the external waste bays flow to a silt trap before discharging via the same point as the surface water.

This discharge is authorised by the sewerage undertaker and is not regulated by the environmental permit.

Emissions to Land

There are no point source emissions to land.

Fugitive Emissions

Fugitive emissions are assessed in the environmental risk assessment in Appendix C. This details the potential emissions and management controls in place. The management systems in place at the facility to ensure that the risk from fugitive emissions is minimised, for example through regular inspection of waste storage areas, volumes of waste and correct management of the facility.

The ERA details the potential emissions and management controls in place. The risk from fugitive emissions is considered to be “low” to “very low”. A dust management plan has been produced for the site and can be found in Appendix I of this application.

Odour

The Environmental Risk Assessment in Appendix C has identified the risk of odour release from the operation as low.

Noise and Vibration

The risk of noise impacts from the updated operations has been assessed within the Noise Impact Assessment.

The results of the noise impact assessment for the Ellete Waste facility indicate that the predicted specific sound levels during daytime operations are only slightly above the representative background sound levels at the nearest noise sensitive receptors (NSRs), suggesting a low impact depending on context.

The assessment demonstrates that the proposed operation of the Ellete Waste facility is unlikely to result in adverse impacts on residential amenity, with no significant adverse effects anticipated.

Contextual factors, including the existing noise environment and characteristics of the proposed operations, have been considered, confirming that the noise from the facility will likely be indistinguishable from ambient noise levels, thus further reducing the likelihood of an adverse noise impact occurring.

Noise emissions from the Ellete Waste facility are not expected to reach levels that would cause reasonable annoyance, ensuring a high level of protection for the environment and surrounding community.

This has concluded that the risk to local receptors is not significant. Noise emissions from the facility would not be of a magnitude sufficient to give reasonable cause for annoyance, and a high general level of protection of the environment as a whole is provided. The overall risk has been assessed as “low impact”. The Noise Impact Assessment has been placed in Appendix E.