ENVIRONMENTAL PERMIT APPLICATION, V2

for the Physical Treatment of Inert and Non-Hazardous Waste at

Cliff Quay, Cliff Road, The Docks, Ipswich, IP3 0BS

Environmental Permit Application Prepared on Behalf of:
Sewells Reservoir Construction Limited

Report Date:
March 2024

This Report was prepared by PDE Consulting Limited on behalf of Sewells Reservoir Construction Limited

consulting limited
chartered surveyors

6 Forbes Business Centre
Kempson Way
Bury St Edmunds
Suffolk
IP32 7AR

t: 01284 764 085
w: pdeconsulting.co.uk

CONTENTS

TABLES

DRAWINGS

Location Plan	Drawing No. KD.IPSW.1.D.001	Scale 1:5000@A3
Permit Boundary Site Plan	Drawing No. KD.IPSW.1.D.002A	Scale 1:1,250@A3

APPENDICES

1. INTRODUCTION

Background

1.1. PDE Consulting Limited (the 'Agent') has been commissioned by Sewells Reservoir Construction Limited (the 'Operator') to prepare and submit to the Environment Agency (EA) an Environmental Permit application for a new waste facility to be located at Cliff Quay, Cliff Road, The Docks, Ipswich, IP3 0BS (the "Site").

1.2. The permit application is for the storage and physical treatment of inert and non hazardous waste to produce soil, soil substitutes and aggregate.

1.3. A non-technical summary of the application is presented in Appendix 1.

Purpose of this Report

1.4. An Environmental Permit is required, under the Environmental Permitting (England and Wales) Regulations 2016 (EPR), to operate:

- Installations that carry out Schedule 1 activities;
- Specified waste activities; and
- Mobile plant.

1.5. The EPR were made on 11 December 2016 and provide a consolidated system of environmental permitting in England and Wales. They fully replace the Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010/675). The EPR transpose provisions of fifteen Directives which impose obligations required to be delivered through permits or capable of being delivered through permits.

1.6. The Site requires a permit as it comprises a specified waste activity.

Standard and Bespoke Environmental Permits

1.7. There are two different types of Environmental Permit: standard and bespoke. The type of permit required for a particular waste facility depends on the complexity and environmental risk of the proposed operation. Standard rules permits refer to standard rules (pre-requisites and conditions within the permit) that must be met. Most of these rules specify certain environmental results that must be achieved and it is up to the Operator to confirm and demonstrate compliance.

1.8. Currently the EA has developed standard rules permits for a number of different waste operations/ facility types; an Operator may apply for a standard rules permit if the proposed activity meets all the specified requirements. In any other case, a bespoke permit must be applied for.

1.9. The proposed waste operation cannot comply with any of the standard rules permits for transfer and treatment of wastes due to the proximity of a Site of Special Scientific Interest (SSSI) within 500 m of the Site boundary. Therefore, this application is being made for a bespoke permit.

Pre – application Advice

1.10. Basic pre-application advice was requested on 06 January 2023 and the EA responded with basic advice and a habitats and nature conservation screen received on 10 January 2023. After a follow up request the EA provided a list of documents to be submitted with the application and a summary of fees on 20 February 2023. The EA advised that the following information was required to be submitted to support the application:

- A Non-Technical Summary;
- Site plan(s);
- A summary of the Environmental Management System;
- An Environmental Risk Assessment;
- A Technical Description;
- A List of waste codes;
- Evidence of Technical Competence;
- A Site Condition Report;
- A Dust and Emissions Management Plan;
- A Noise Impact Assessment; and
- A Noise Management Plan.

1.11. The pre-application advice is presented in Appendix 2.

Application Forms

1.12. The following completed application forms are presented in Appendix 3:

- Part EPA (About you);
- Part EPB2 (General new bespoke permit);
- Part EPB4 (New bespoke waste operation permit); and
- Part EPF (Opra, charges and declarations).

EPR Charging Scheme

1.13. Current permit application charges are listed in "The Environment Agency (Environmental Permitting and Abstraction Licensing) (England) Charging Scheme 2022".

1.14. In their pre-application response, the EA confirmed that the application fee would be £11,196 which has been provided alongside this application. The fee breakdown is presented in Table 1.

Table 1: Permit Application Fee

Charge Reference	Plan or Assessment	Charge
1.16.12	Baseline application fee for the physical treatment of non-hazardous waste	£7,930
1.19.2	Habitats Assessment	£779
1.19.5	Emissions Management Plan (Dust)	£1241
1.19.7	Noise Management Plan	£1246

2. SITE DETAILS

Site Location and Setting

2.1. The Site is located approximately 3 km south of the centre of Ipswich and some 840 m west of Gainsborough and is centred at National Grid Reference (NGR) TM 16983 41775 as shown on Drawing No. KD.IPSW.1.D.001. The Site is currently used for the processing of marine aggregate. In addition, primary crushed rock is imported to the Site to sell as subbase.

2.2. The Site is located within an industrial estate and is bound on three sides by other industrial uses, with an asphalt plant and associated operations located immediately to the north and east of the Site. The River Orwell bounds the Site to the south west. A pylon is located adjacent to the northern Site boundary.

2.3. Anglian Water Services Ltd operate a composting operation some 100m east of the Site under environmental permit number EPR/SP3194NG/A001.

2.4. The nearest residential dwellings to the Site are located approximately 500 m to the north east of the Site on Pipers Vale Close. A number of industrial sites lie between the Site and Pipers Vale Close. Pipers Vale Close is also neighboured by various commercial/ industrial units along Sandyhill Lane.

Environmental Site Setting

2.5. An Emapsite Groundsure report was purchased on 09 October 2023 which includes Geo Insight, Enviro Insight and historic land use maps to assist with the writing of this report.

Geology and Hydrogeology

2.6. The local geology is mapped as made ground which appears to relate to Cliff Quay Power Station closed landfill site which was an ash disposal area.

2.7. The superficial deposits underlying the Site comprise Tidal Flat Deposits (clay and silt) and the bedrock geology comprises the Culver Chalk formation.

2.8. The Tidal Flat Deposits are classed by the EA as unproductive strata. Unproductive strata are largely unable to provide usable water supplies and are unlikely to have surface water and wetland ecosystems dependent on them. The Chalk is a Principal Aquifer. Principal aquifers provide significant quantities of drinking water, and water for business needs. They may also support rivers, lakes and wetlands.

2.9. The Site falls within a groundwater Source Protection Zone 3 (total catchment).

Hydrology

2.10. There are no surface water bodies on the Site.

2.11. The River Orwell lies approximately 10 m to the south west of the Site boundary.

2.12. The majority of the Site is located in Flood Zone 1 (lowest risk). The western corner of the Site is mapped as Flood Zone 2. Part of the area between the Site and the River Orwell, consistent with

the Flood Zone 2 allocation, benefits from flood defences. The proposed waste treatment and storage areas are outside the area designated as Flood Zone 2.

2.13. There are a number of licensed discharges to the River Orwell within 500 m of the Site. The nearest to the Site is Permit Number. AEETS12128 issued to Ipswich Cliff Quay WRC which authorises a sewage discharge into the River Orwell some 288 m south east of the Site.

2.14. According to the Emapsite report there are no active surface water abstractions within 1 km of the Site.

Air Quality

2.15. According to the Defra website[1] the Site is not located within a current or proposed Air Quality Management Area (AQMA).

Habitats and Designations

2.16. The Site is located adjacent to the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, and the Orwell Estuary Site Of Special Scientific Interest (SSSI).

2.17. It is an estuary comprising extensive mudflats, low cliffs, saltmarsh, and areas of vegetated shingle on the lower river reaches. The site supports internationally and nationally important numbers of numerous species of wintering wildfowl and waders.

2.18. There are no other nationally or internationally designated sites within 1 km of the Site.

Historic Development

2.19. A review of available historic maps from 1880 to 2023 is presented in Table 2 below. The historic maps are appended to the Site Condition Report (SCR) in Appendix 4.

Table 2: Summary of Historic Maps

Date	Land use on the Site	Surrounding Land Use
1880 - 1882	The majority of the Site is in a river channel named Fen Bright.	The surrounding land comprises mud flats. To the east of the Site is some kind of infrastructure (road or track) labelled London's Hard. It runs from the river and approximately 100 m north east of the river it runs from north west to south east. Some 100 m to the north east are sewage tanks and sluices. Across the River Orwell is Riverstead Ooze Mud which is undeveloped.
1898 - 1903	No significant change.	The sewage works has expanded and a small building is shown to the west of the sewage works. Trees have been planted on the north west trending section of track.
1924 - 1928	No significant change.	The small building to the west of the sewage works is now labelled

[1] http://uk-air.defra.gov.uk/aqma/

		Outfall Cottages. A landing stage has been developed from the sewage works.
1938	No significant change.	No significant change.
1950 - 1953	The Site is now shown to comprise land outside of the high water mark and a pier separates the Site from the water. A pylon and electricity cables are now shown on the western side of the Site.	To the north west the Site is bound by a coal yard which has a pump station on the river and various shafts across the Site. Land to the south east of the Site is labelled ash disposal. There is a works building located some 100 m to the north east of the Site which has travelling cranes through the coal yard to a wharf on the river.
1970 - 1972	The Site is marked as an ash disposal area.	The coal yard is now labelled as Cliff Quay Generating Station.
1981-1984	Site no longer marked as an ash disposal area. Site is undeveloped.	A road is shown some 150 m east of the Site which runs between the river and the sewage works.
1986	No significant change.	No significant changes.
1991 - 1994	No significant change.	No significant changes.
2001-2003	No significant change.	Coal yard no longer shown on the adjacent site.
2010	No significant change.	No significant changes.

2.20. Aerial photographs in the Emapsite report shows the Site being used for limited use, mainly vehicle parking in 2016. The 2023 aerial photograph shows the current processing plant used for the non-wastes operation.

3. PROPOSED DEVELOPMENT

Proposed Activities

3.1. It is proposed that incinerator bottom ash (IBA) is imported to the Site via boats, and construction and demolition wastes are imported to the Site by road. IBA will be unloaded via the dock to the north west of the permit boundary. The proposed permit boundary is outlined in green on Drawing No. KD.IPSW.1.D.002A.

3.2. Imported wastes will be treated by sorting, separation, screening, crushing and blending to produce soil, soil substitutes and aggregate. It is proposed that the activities listed in Table 1 are authorised by the permit.

Table 3: Proposed Activities

Description of Activities	Limit of Activities
R13: Storage of wastes pending the operations numbered R3 and R5. R3: Recycling or reclamation of organic substances which are not used as solvents. R5: Recycling or reclamation of other inorganic materials.	Treatment of wastes listed in Table 4 consisting only of sorting, separation, screening, crushing and blending of waste for recovery as a soil, soil substitute or aggregate. Secure storage of wastes listed in Table 4 pending treatment. Storage of wastes listed in Table 4 shall not exceed 40,000 tonnes in total at any one time. No more than 100,000 tonnes of waste shall be treated per year. Treatment of slags and ashes for disposal shall not exceed 50 tonnes per day, or if for a mix of recovery and disposal shall not exceed 75 tonnes per day.

3.3. The following mobile plant will be used on Site for the permitted waste activities:

- FN197 Komatsu WA475-10E0 wheeled loading shovel;
- EC250E Volvo Excavator; and
- Rubblemaster RM70GO! 2.0 crusher with in-built screener.

3.4. The Rubblemaster RM70GO! 2.0 is a flexible crusher with low emissions, low noise and low diesel consumption.

3.5. The proposed waste types for storage and treatment are presented in Table 4. The waste types and descriptions are from standard rules permit SR2010No12 (Treatment of waste to produce soil, soil substitutes and aggregate) with the additions of those hi-lighted in blue in Table 4.

Table 4: Proposed Waste Types

EWC Code	Description	Restrictions
01	**WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS**	
01 04	**Wastes from physical and chemical processing of non-metalliferous minerals**	
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07	
01 04 09	Waste sand and clays	
10	**WASTE FROM THERMAL PROCESSES**	
10 01	**Wastes from power stations and other combustion plants**	
10 01 01	Bottom ash and slag only	
10 01 02	Pulverised fuel ash only	
10 01 05	Gypsum (solid) only	
10 01 07	Gypsum (sludge) only	
10 01 15	Bottom ash and slag only from co-incineration other than those mentioned in 10 01 14	
10 11	**Wastes from manufacture of glass and glass products**	
10 11 12	Clean glass other than those mentioned in 10 11 11	
10 12	**Wastes from manufacture of ceramic goods, bricks, tiles and construction products**	
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)	
10 13	**Wastes from manufacture of cement, lime and plaster products and articles and products made from them**	
10 13 14	Waste concrete only	
15	**WASTE PACKAGING**	
15 01	**Packaging**	
15 01 07	Clean glass only	
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	Clean glass only	
17 03	**Bituminous mixtures, coal tar and tarred products**	
17 03 02	Road base and road planings (other than those containing coal tar) only	
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 06	Dredging spoil other than those mentioned in 17 05 05	
17 05 08	Track ballast other than those mentioned in 17 05 07	
17 08	**Gypsum-based construction material**	
17 08 02	Gypsum only other than that mentioned in 17 08 01	
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPERATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL USE**	
19 01	**Wastes from incineration or pyrolysis of waste**	
19 01 12	Bottom ash and slag other than those mentioned in 19 01 11	incinerator bottom ash
19 08	**Wastes from waste water treatment plants not otherwise specified**	
19 08 02	Washed sewage grit (waste from desanding) free from sewage contamination only	
19 09	**Wastes from the preparation of water intended for human consumption or water for industrial use**	
19 09 02	Sludges from water clarification	
19 12	**Wastes from the mechanical treatment of wastes**	
19 12 05	Clean glass only	
19 12 09	Minerals (for example sand, stones)	
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11.	Waste aggregate generated from the recycling of metals.
19 13	**Wastes from soil and groundwater remediation**	
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01	
19 13 04	Sludges from soil remediation other than those mentioned in 19 13 03	
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPERATELY COLLECTED FRACTIONS**	
20 01	**Separately collected fractions**	
20 01 02	Clean glass only	
20 02	**Garden and park wastes**	
20 02 02	Soil and stones	

3.6. Waste shall only be accepted if:

- It is of a type listed in the permit;
- It conforms to the description in the documentation supplied by the producer and holder through the accompanying waste transfer note;
- Its chemical, physical and biological characteristics make it suitable for its intended treatment;
- Any excavated soil from potentially contaminated sites has been shown by prior chemical analysis and assessment to be suitable for the intended use without significant risk of pollution; and

- It is visually inspected on arrival and before it enters the treatment process to ensure that it complies with these standard rules.

3.7. The waste transfer note will be checked for the correct description of the waste and associated information (e.g. EWC SIC) and the contents of the delivery container validated by an initial visual assessment upon collection from the waste producer and again upon arrival at the facility.

3.8. Any waste that does not comply with the above shall be rejected and shall be;

- Removed from the Site; or
- Moved to a designated quarantine area pending removal.

3.9. Anybody having responsibility for approving waste streams at the Site must have a thorough understanding of the Waste Acceptance Procedure (WAP).

3.10. Waste will either be delivered by the operator's own vehicles or by third party waste contractors. For all waste delivered by the operator's vehicles, the source will be known as each customer will be booked into the database. At the time of ordering a collection, the customer is made aware of the waste that can be collected by the company. All third-party users are made aware of the waste acceptance procedures.

3.11. All waste deliveries will be booked with the Site. As part of the booking procedure, details relating to the source of the waste will be noted. If there is any doubt about the nature of the source, based on the site description, further information will be required including Site Reports and chemical analysis.

3.12. All deliveries will be sheeted until entry to the site and instructed to un-sheet by the Site Foreman.

3.13. A check of the load will be made by the Site staff on arrival and during deposit by the Site foreman and/or plant operative using visual assessment. The contents of the load will be checked against the Waste Transfer Note.

3.14. Site staff will check the environmental permit to validate that the description given is listed on the permit. Once accepted, the driver will be directed to the appropriate reception area depending on the load.

3.15. Loads containing predominantly soils, will be deposited and processed to separate the hardcore from the soil. The hardcore will be deposited into a bay prior to further processing. The soils will be transferred to a separate bay labelled as 6F4. This is a recycled aggregated (0-55mm) used as a fill material. The hardcore will be crushed to produce crushed hardcore.

3.16. Loads containing mainly waste concrete, will be deposited in the raw feed concrete area. Crushing will take place to produce crushed concrete.

3.17. The location of the Rubblemaster RM70GO! 2.0 crusher with in-built screener and the waste storage area are shown on Drawing No. KD.IPSW.1.D.002A.

3.18. The operator shall maintain and implement a system which ensures that a record is made of the quantity, characteristics, date of delivery and, where practicable, origin of any waste that is received for disposal or recovery and of the identity of the producer, or in the case of multiple collection

vehicles, of the collector of such waste. Any information regarded by the operator as commercially confidential shall be clearly identified in the record.

Site Management

3.19. The Operator shall manage and operate the activities:

- In accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- Using sufficient competent persons and resources.

3.20. The Operator will manage the Site in accordance with its own environmental management system (EMS) which includes:

- A series of operating procedures;
- An accident management plan; and
- Reporting forms (e.g. training records for Site staff, complaints record and maintenance record).

3.21. A summary of the EMS is presented in Appendix 5.

3.22. In accordance with the requirements of the permit and the EMS, the Site will be managed such that:

- A business identification board will be prominently displayed at the entrance to the Site, clearly stating the company name, emergency contact details and permit details;
- Minimum personal protective equipment shall be worn in all operational areas. This will include high visibility jacket or waistcoat in traffic areas and steel toe capped boots;
- All contractors visiting the Site will sign in and out of the visitors' book and will be made aware of the Site specific health and safety procedures; and
- All liquids (e.g. fuel and oil for Site vehicles and machinery) shall be provided with secondary containment.

3.23. The operator shall take appropriate measures to ensure that the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities.

Technically Competent Management

3.24. The Operator will comply with the requirements of an approved competence scheme. Relevant WAMITAB certificates and proof of compliance with the Continuing Competence Scheme for the proposed technically competent manager are provided in Appendix 6.

3.25. Any person having duties that are or may be affected by the matters set out in the permit shall have convenient access to a copy kept at or near the place where those duties are carried out.

3.26. A copy of the EMS will be kept on Site.

4. POLLUTION PREVENTION MEASURES

4.1. In accordance with standard permit conditions, emissions of substances not controlled by emission limits shall not cause pollution.

4.2. Due to the non-degradable nature of the proposed waste types, it is considered that they have negligible potential for odorous emissions. They also have negligible potential to attract pests and vermin.

Particulate Matter

4.3. A Dust Emissions Management Plan has been produced to support the application and is presented in in Appendix 7 to this report.

Noise

4.4. A comprehensive Noise Impact Assessment (NIA) has been produced by WBM Acoustic Consultants to support the permit application. The report presents the results of comprehensive baseline surveys undertaken in August 2023.

4.5. The NIA concludes that:

"The comparison of the calculated noise levels arising from the site operations including the recycling facility has been compared to existing background and residual sound levels in the area and it is concluded that there will be no adverse impact arising from the proposals at the nearest residential receptors".

4.6. The NIA is presented in Appendix 8 and a Noise Management Plan is presented in Appendix 9.

Environmental Risk Assessment

4.7. The potential impact of pollution for each aspect of the Site has been considered and tabulated, see Appendix 10 (Environmental Risk Assessment) including:

- Dust;
- Odour;
- Noise;
- Surface Water;
- Groundwater;
- Accidents;
- Unauthorised access; and
- Flooding.

Site Condition Report

4.8. A Site Condition Report (SCR) describes and records the condition of the land and groundwater at a site at particular points in time. It is to enable an operator to demonstrate that they have protected land and groundwater during the lifetime of the site, and that the land is in a satisfactory state when it comes to surrender a permit.

4.9. It is necessary to complete sections 1 to 3 of the EA's template for a SCR[2] and submit it with an application for a new permit.

4.10. The application SCR, which includes historic maps is presented in Appendix 4.

[2] H5: Site condition report – guidance and templates (Version 3.00). Environment Agency, April 2013.

5. INFORMATION

Records

5.1. All records required to be made by the permit shall be:

- Legible;
- Made as soon as reasonably practicable;
- Documented in such a way that where amendments are made, the original record and any changes are all recorded and retrievable; and
- Retained for the minimum period of time stated in the permit.

5.2. The Operator will keep a record of weekly operational hours and Site attendance of technically competent management. It is necessary to record start and finish times of operations and arrival and departure times of the technically competent manager. The records must be available for the EA to inspect on request.

Reporting

5.3. All reports required to comply with the permit will be provided to the EA as required. The records and reports will be retained in accordance with the procedures outlined in the permit.

Notifications

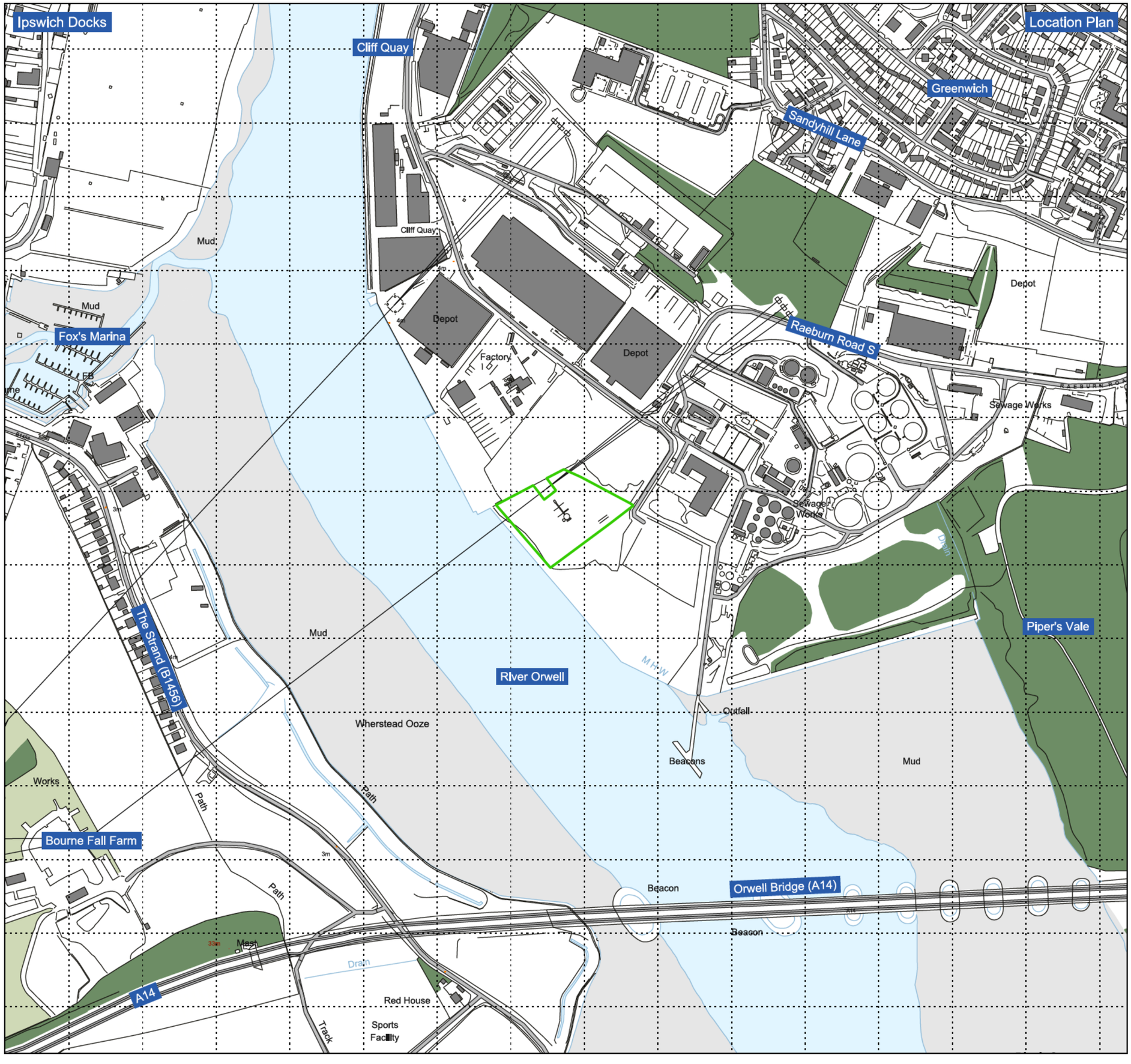
5.4. The Operator shall notify the EA without delay following the detection of:

- Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
- The breach of a limit specified in the permit; or
- Any significant adverse environmental effects.

5.5. Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours. All notifications will be recorded and reported in line with Sections 5.1 and 5.2 above.

DRAWINGS

Location Plan	Drawing No. KD.IPSW.1.D.001	Scale 1:5000@A3
Permit Boundary Site Plan	Drawing No. KD.IPSW.1.D.002A	Scale 1:1.250@A3



Legend

Permit Boundary

consulting limited chartered surveyors

PROJECT
Ipswich Docks

DRAWING TITLE
Location Plan

DATE
August 2023

SCALE
1:5,000 @ A3

DRAWING No.
KD.IPSW.1.D.001

DRAWING STATUS
FINAL

01284 764085 . www.pdeconsulting.co.uk

Legend

- Permit Boundary
- Recyclling Area
- Waste Storage Area

pde. consulting limited chartered surveyors

PROJECT
Ipswich Docks

DRAWING TITLE
Permit Boundary Site Plan

DATE
February 2024

SCALE
1:1,250 @ A3

DRAWING No.
KD.IPSW.1.D.002A

DRAWING STATUS
FINAL

N

01284 764085 . www.pdeconsulting.co.uk

APPENDIX 1

Non -Technical Summary

Non - Technical Summary

Background

PDE Consulting Limited (the 'Agent') has been commissioned by Sewells Reservoir Construction Limited (the 'Operator') to prepare and submit to the Environment Agency (EA) an Environmental Permit application for a new waste facility to be located at Cliff Quay, Cliff Road, The Docks, Ipswich, IP3 0BS (the "Site").

The permit application is for the storage and physical treatment of inert and non-hazardous waste to produce soil, soil substitutes and aggregate.

Site Location and Surroundings

The Site is located approximately 3 km south of the centre of Ipswich and some 840 m west of Gainsborough and is centred at National Grid Reference (NGR) TM 16983 41775. The Site is currently used for the processing of marine aggregate. In addition, primary crushed rock is imported to the Site to sell as subbase.

The Site is located within an industrial estate and is bound on three sides by other industrial uses, with an asphalt plant and associated operations located immediately to the north and east of the Site. The River Orwell bounds the Site to the south west. A pylon is located adjacent to the northern Site boundary.

The nearest residential dwellings to the Site are located approximately 500m to the north east of the site on Pipers Vale Close. A number of industrial sites lie between the Site and Pipers Vale Close. Pipers Vale Close is also neighboured by various commercial / industrial units along Sandyhill Lane.

Environmental Site Setting

The local geology is mapped as made ground which appears to relate to Cliff Quay Power Station closed landfill site which was an ash disposal area.

The superficial deposits underlying the Site comprise Tidal Flat Deposits (unproductive strata) and the bedrock geology comprises the Culver Chalk formation (Principal Aquifer).

The Site falls within a groundwater Source Protection Zone 3 (total catchment).

The majority of the Site is located in Flood Zone 1 (lowest risk). The western corner of the Site is mapped as Flood Zone 2. Part of the area between the Site and the River Orwell, consistent with the Flood Zone 2 allocation, benefits from flood defences.

The Site is located adjacent to the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, and the Orwell Estuary Site Of Special Scientific Interest (SSSI).

According to the Defra website, (http://uk-air.defra.gov.uk/aqma), the Site is not located within a current or proposed Air Quality Management Area (AQMA).

Operational Details

It is proposed that incinerator bottom ash (IBA) is imported to the Site via boats, and construction and demolition wastes are imported to the Site by road. IBA will be unloaded via the dock to the north west of the permit boundary. The proposed permit boundary is outlined in green on Drawing No. KD.IPSW.1.D.002A. Imported wastes will be treated by sorting, separation, screening, crushing and blending.

The following mobile plant will be used on Site for the permitted waste activity only:

- FN197 Komatsu WA475-10E0 wheeled loading shovel;
- EC250E Volvo Excavator; and
- Rubblemaster RM70GO! 2.0 crusher with in-built screener.

The Rubblemaster RM70GO! 2.0 is a flexible crusher with low emissions, low noise and low diesel consumption.

The location of the Rubblemaster RM70GO! 2.0 crusher with in-built screener and the waste storage area are shown on Drawing No. KD.IPSW.1.D.002A.

It is proposed that annual waste throughputs will be limited in the permit to a maximum of 100,000tpa and a maximum of 40,000 tonnes of wastes can be stored at any one time.

Wastes shall only be accepted at the Site if:

- It is of a type listed in the permit;
- It conforms to the description in the documentation supplied by the producer and holder through the accompanying waste transfer note;
- Its chemical, physical and biological characteristics make it suitable for its intended treatment;
- Any excavated soil from potentially contaminated sites has been shown by prior chemical analysis and assessment to be suitable for the intended use without significant risk of pollution; and
- It is visually inspected on arrival and before it enters the treatment process to ensure that it complies with these standard rules.

The waste transfer note will be checked for the correct description of the waste and associated information (e.g. EWC and SIC) and the contents of the delivery container validated by an initial visual assessment upon collection from the waste producer and again upon arrival at the facility.

Any waste that does not comply with the above shall be rejected and shall be;

- Removed from the Site; or
- Moved to a designated quarantine area pending removal.

The operator shall maintain and implement a system which ensures that a record is made of the quantity, characteristics, date of delivery and, where practicable, origin of any waste that is received for disposal or recovery and of the identity of the producer, or in the case of multiple collection vehicles, of the collector of such waste. Any information regarded by the operator as commercially confidential shall be clearly identified in the record.

The Site will be operated in accordance with the Operators own environmental management system which includes a Dust Emissions Management Plan, a Noise Management Plan and an environmental risk assessment.

APPENDIX 2

Pre-application Advice

From:	PreApplication Service
To:	Suzanne Walsh
Subject:	Habitats and Nature Conservation screen for Ipswich Dock - EPR/LB3803MJ/A001
Date:	10 January 2023 11:54:11
Attachments:	image006.png Pre-application Basic Conservation Screening Report and Maps 10012023.pdf Example Dust Emissions Management Plan vr 10.docx Noise Impact Assessment (NIA) pre-app basic advice.docx Noise Management Plan (NMP) Template.docx ODOUR MANAGEMENT PLAN TEMPLATE FINAL V2.docx Waste pre-application basic advice.docx

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Dear Suzanne,

We have received your request for a pre-application heritage and nature conservation screening.

We have attached a screening report and basic advice documents. We recommend that you use all of the available guidance in the attached advice and on our website to help you complete your environmental permit application. If after reading the advice documents and the screening report you still have questions or want to access other pre-application services then you should follow the instructions given towards the end of the basic advice document.

Please note we have screened this application for protected and priority sites, habitats and species for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be required.

The nature and heritage screening we have conducted is subject to change as it is based on data we hold at the time it is generated. We cannot guarantee there will be no changes to our screening data between the date of this screening and the submission of a permit application, which could result in the return of an application or requesting further information.

Kind regards,

James Hutchinson
Pre-application Team

Regulated Industry, NPS Sheffield

Environment Agency | NPS Sheffield, Quadrant 2, 99 Parkway Avenue, Parkway Business Park, Sheffield, S9 4WF

Nature and Heritage Conservation

Screening Report: Bespoke Waste

Reference	**EPR/LB3803MJ/A001**
NGR	**TM 16986 41772**
Buffer (m)	**60**
Date report produced	**10/01/2023**
Number of maps enclosed	**5**

The nature and heritage conservation sites and/or protected species and habitats identified in the table below must be considered in your application.

Nature and heritage conservation sites	Screening distance (m)	Further Information
Special Protection Area (pSPA or SPA)	1000	Joint Nature Conservation Committee
Stour and Orwell Estuaries		
Ramsar	1000	Joint Nature Conservation Committee
Stour and Orwell Estuaries		
Sites of Special Scientific Interest (SSSI)	1000	Natural England
Orwell Estuary		
Local Wildlife Sites (LWS)	200	Appropriate Local Record Centre (LRC)
Pipers Vale		

Protected Species	Screening distance (m)	Further Information
Allis Shad migratory route	up to 500m	Natural England Appropriate Local Record

European Eel migratory route Centre (LRC)

Smelt migratory route

Where protected species are present, a licence may be required from Natural England to handle the species or undertake the proposed works.

The relevant Local Records Centre must be contacted for information on the features within local wildlife sites. A small administration charge may also be incurred for this service.

Please note we have screened this application for protected and priority sites, habitats and species for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be required.

Please note the nature and heritage screening we have conducted as part of this report is subject to change as it is based on data we hold at the time it is generated. We cannot guarantee there will be no changes to our screening data between the date of this report and the submission of the permit application, which could result in the return of an application or requesting further information.

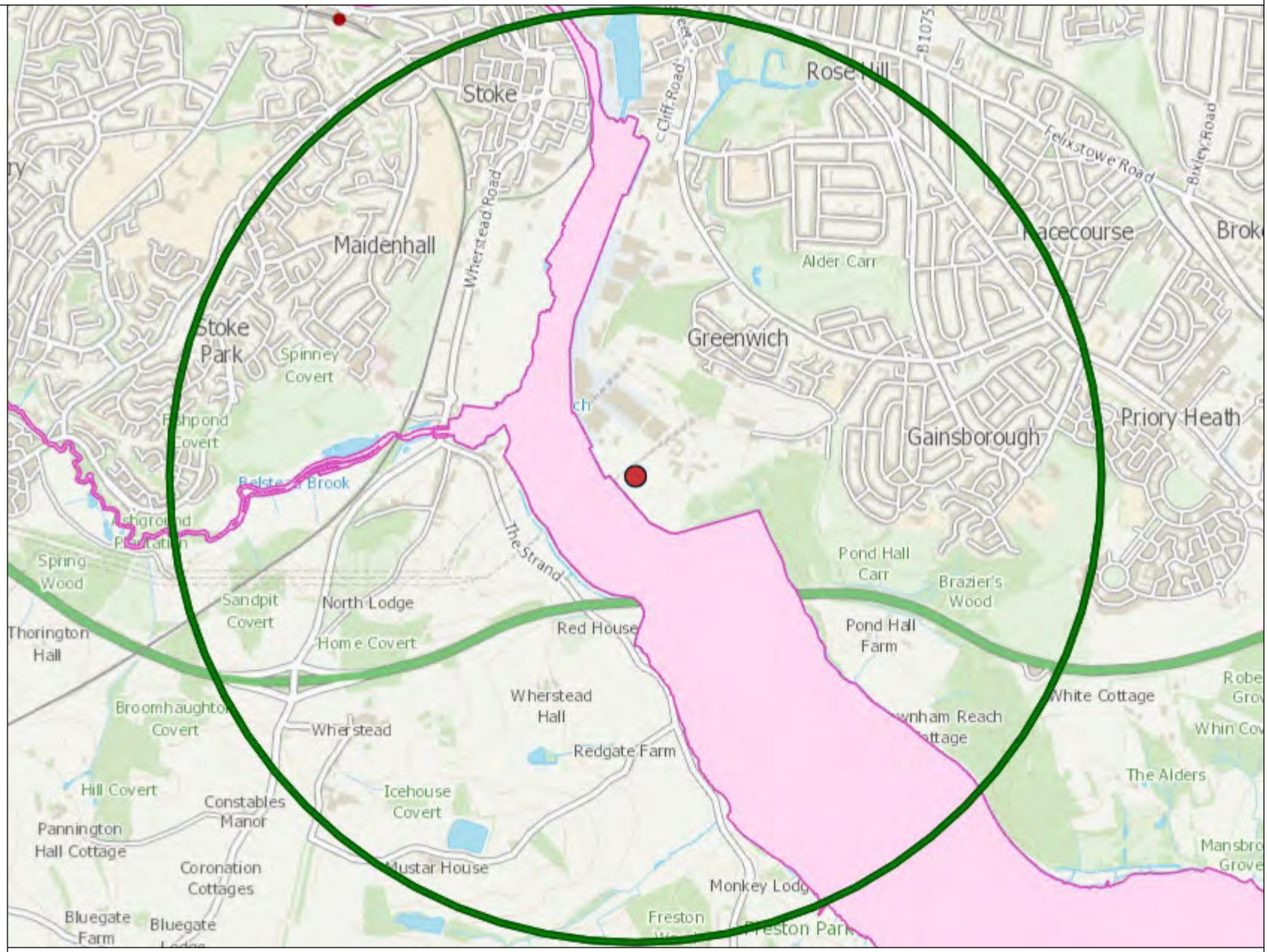
Protected Species

Environment Agency

Legend

Protected species screened for Env Permits - complete set

- Protected species, non fish
- Protected fish
- Protected fish migratory route



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Metres

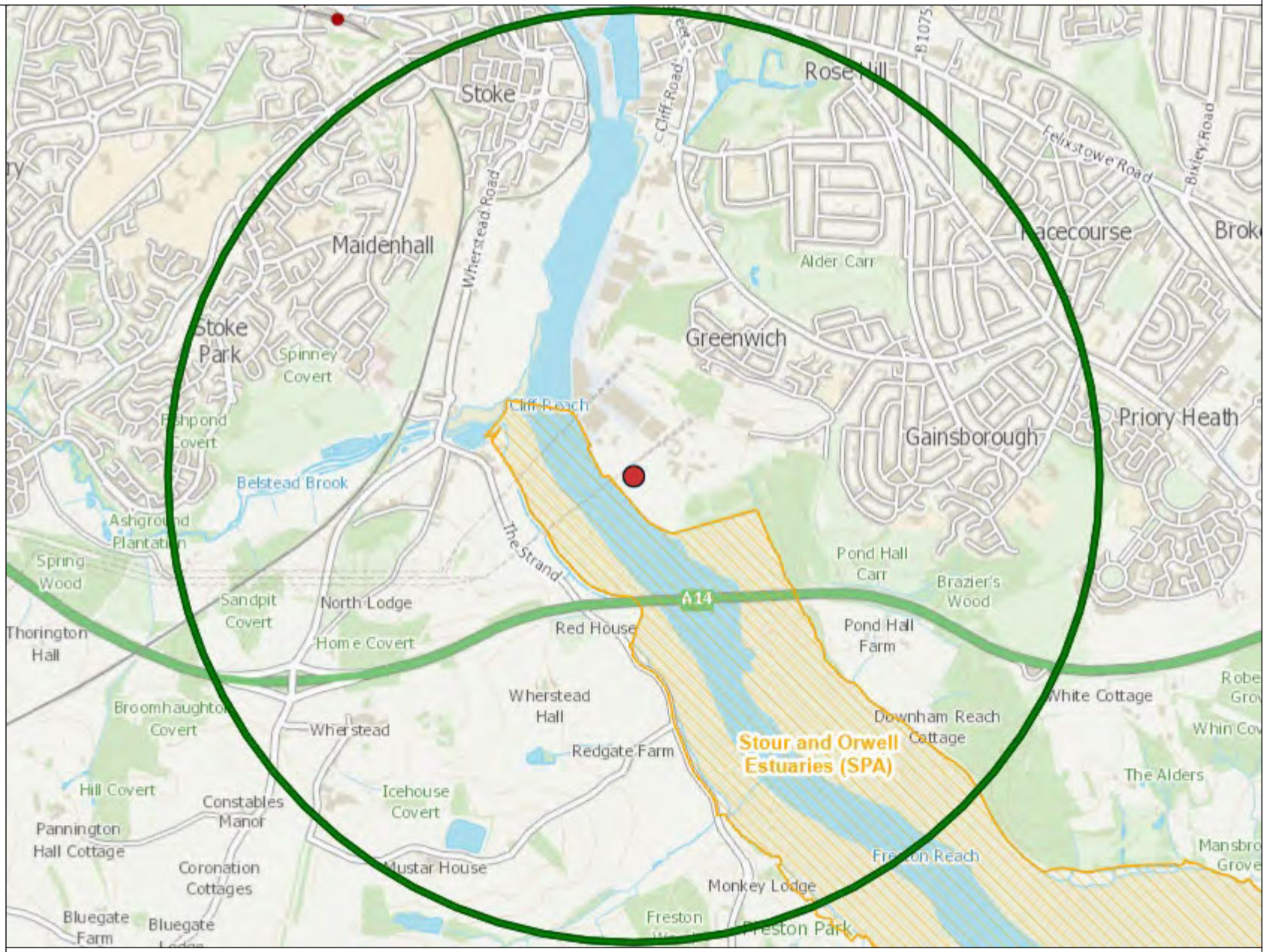
N W E S

Special Protection Areas

Environment Agency

Legend

SPA (England)



1: 25,000

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Metres

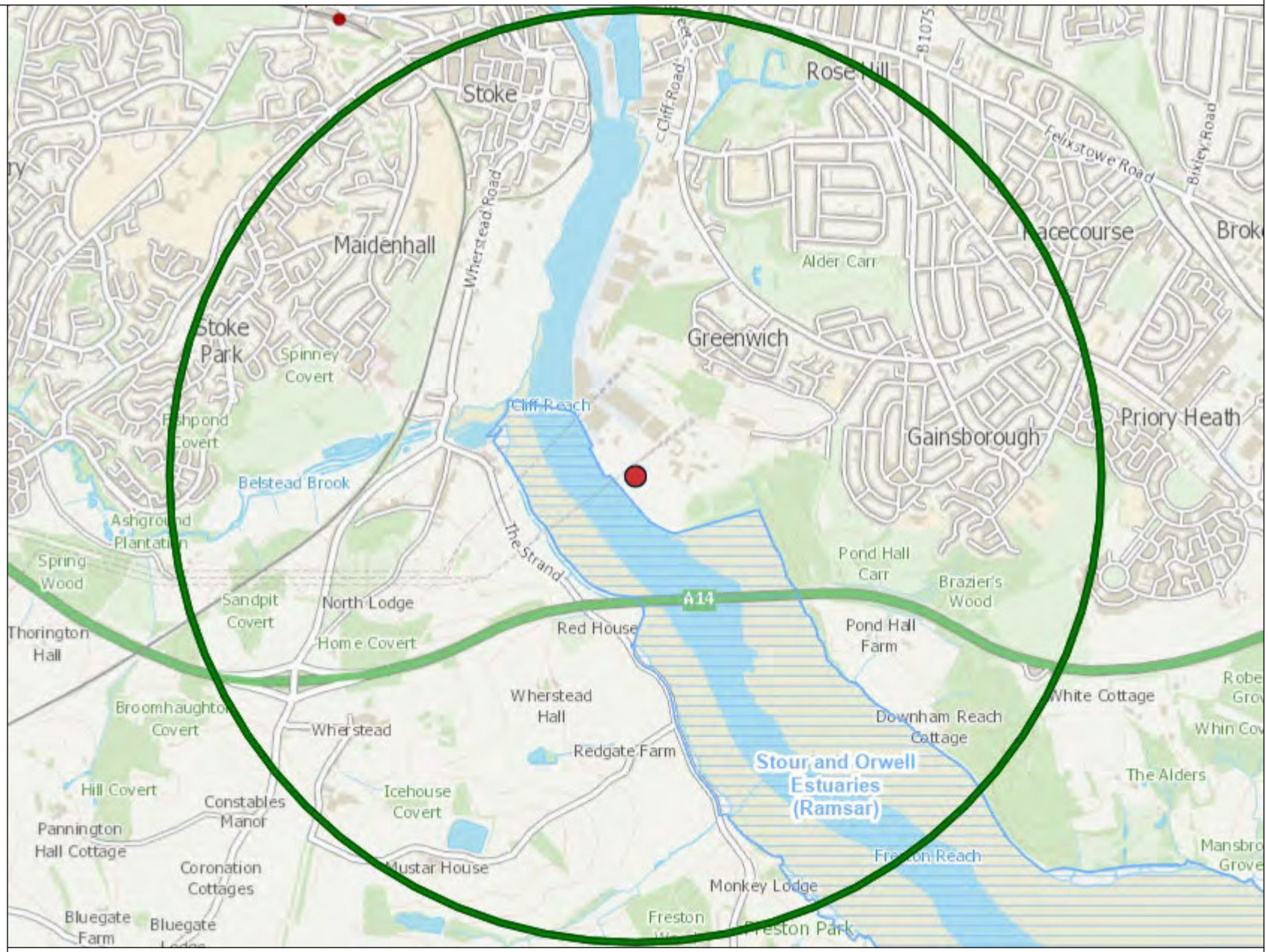
N W E S

Ramsar Sites

Environment Agency

Legend

Ramsar (England)



1: 25,000

0 625

Metres

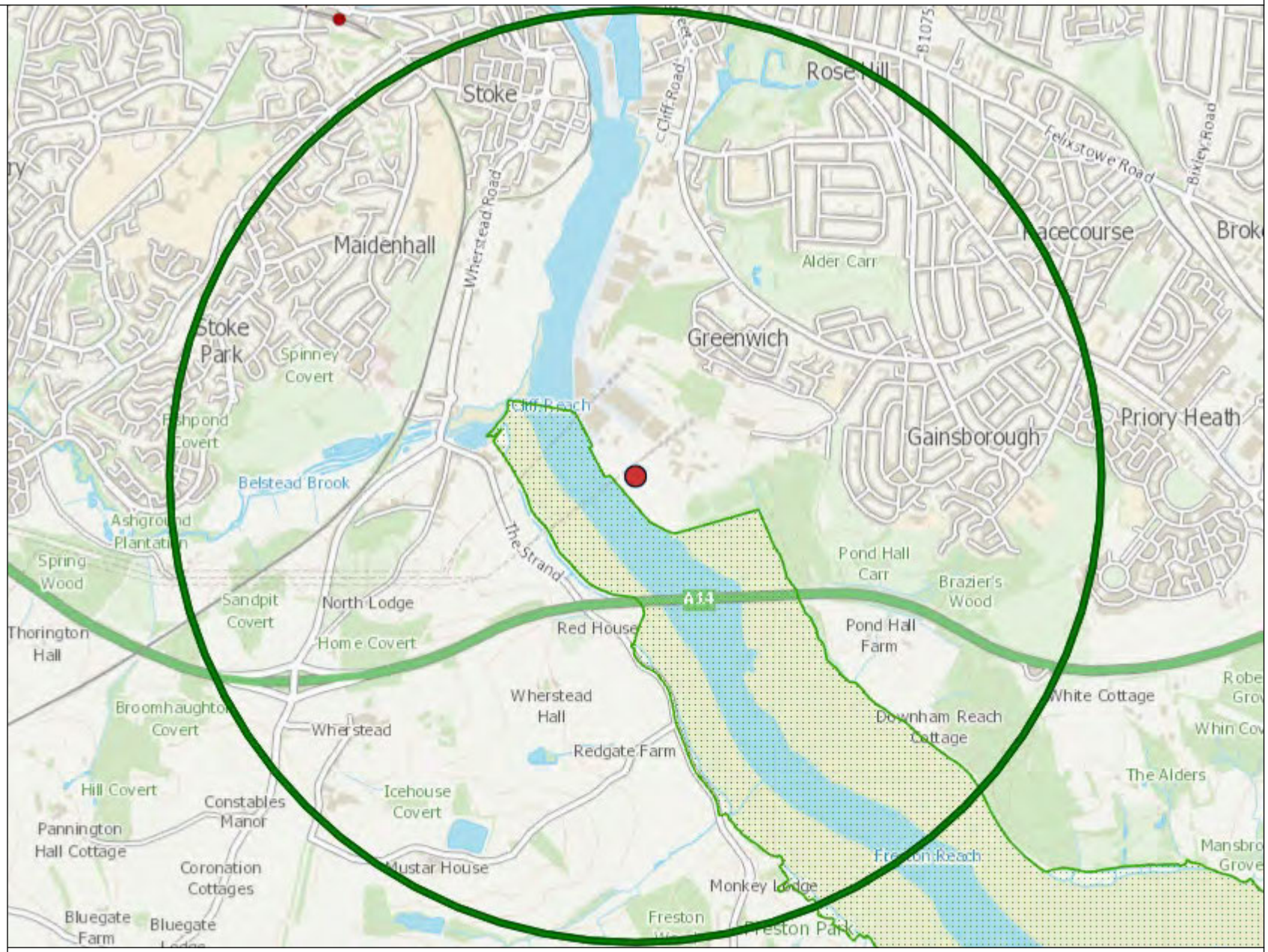
N W E S

Sites of Special Scientific Interest

Environment Agency

Legend

- SSSI (England)
- SSSI (Wales)



1: 25,000

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Metres

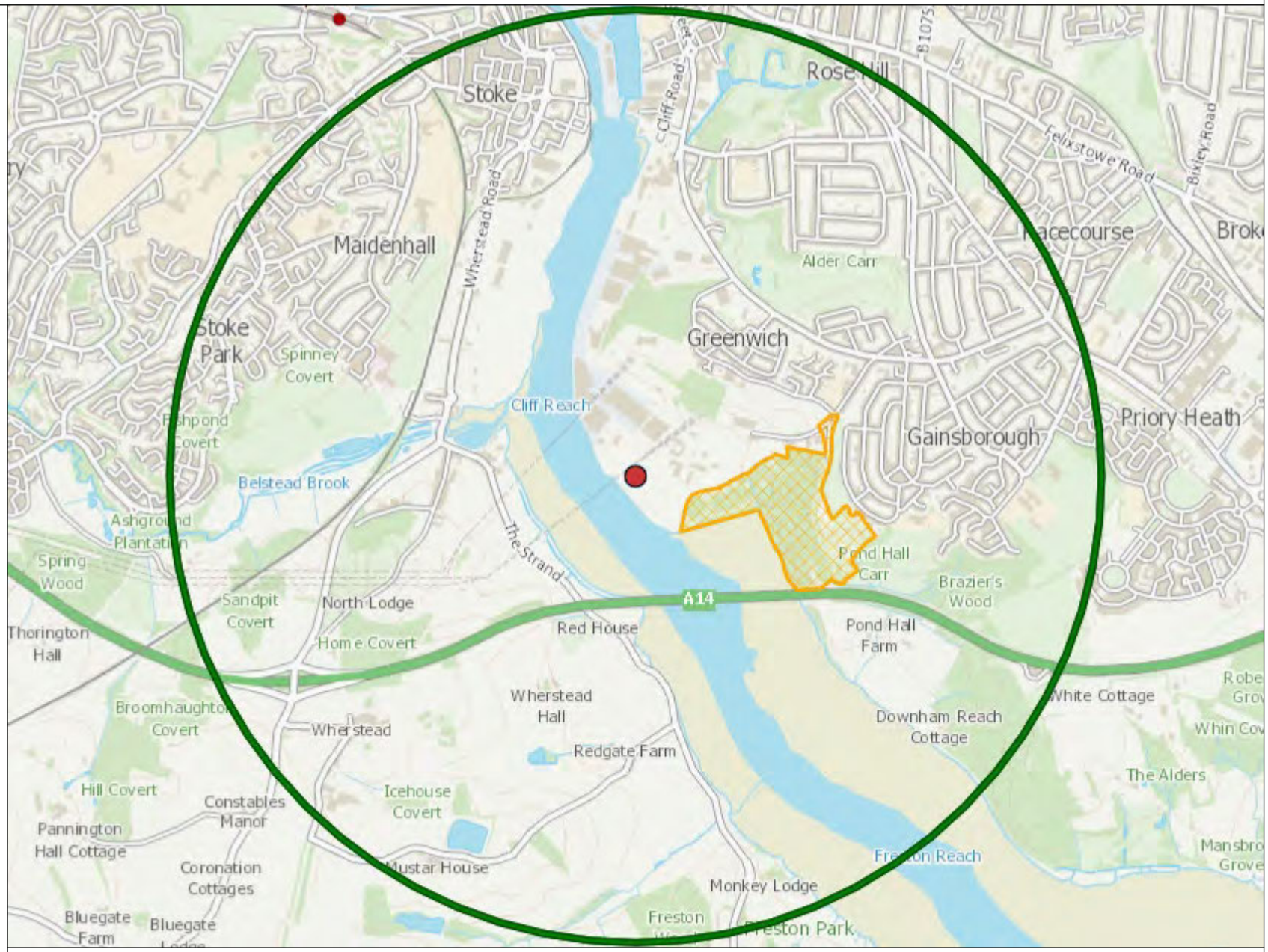
N W E S

Local Wildlife Sites

Environment Agency

Legend

Local Wildlife Sites



1: 25,000

0 625

Metres

N W E S

From:	Mackillop, Michelle
To:	Suzanne Walsh
Subject:	Pre-application advice follow up request: EPR/LB3803MJ/A001- Sewells Reservoir Construction Limited, Ipswich Docks,
Date:	02 February 2023 11:04:20
Attachments:	image006.png

Dear Suzanne,

Pre-application advice follow up request: EPR/LB3803MJ/A001 - Sewells Reservoir Construction Limited, Ipswich Docks, Cliff Road, The Docks, Ipswich, IP3 0BS

Thank you for your follow up email for pre-application advice dated 10/01/2023 and for taking the time to speak to me on 24/01/2023. Within your request for pre-application advice you confirmed that the site want to screen, blend and crush waste to produce aggregates, import IBA (Incinerator Bottom Ash) and bring in construction and demolition wastes. The annual throughput would be 100,000 tonnes and storage would be 40,000 tonnes. In an email dated 01/02/2023 you confirmed that the waste codes for this site would be the same as in SR2010 no.12 (soils and aggregates) but also with the addition of 19 01 11 - incinerator bottom ash - and 19 12 12 - other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – waste aggregate generated from the recycling of metals.

You have already been provided with some basic pre-application advice, including what forms to complete and habitats screening, but in this follow up query you specifically want to know the application fee and reference and the assessments / management plans that would need to be provided with an application.

For this application, you will need to apply for a bespoke permit.

Fees

The total fee for this application will be £11,196.

This is comprised of:

- Baseline fee of £7,930 - activity reference 1.16.12 – physical treatment of non-hazardous wastes.
- Additional charges of:
    - Habitats assessment - £779 – ref 1.19.2
    - Dust and Emissions Management Plan assessment - £1,241 – ref 1.19.5
    - Noise and vibration management plan assessment - £1,246 – ref 1.19.7

Please refer to the Charging Scheme: The Environment Agency (Environmental Permitting and Abstraction Licensing) (England) Charging Scheme 2022 (publishing.service.gov.uk)

If the site is considered a Site of High Public Interest (SHPI) additional fees will apply - see section 2.5 of the Environmental Permitting Charges Guidance Environmental permits: when and how you are charged - GOV.UK (www.gov.uk)

- an application for a SHPI is subject to a newspaper advertising fee of £500
- the number of hours it takes to determine the application will be calculated at £100 per hour (commonly referred to as a 'time and materials' charge). If this is higher than the

standard application fee listed in the Charging Scheme, the additional fee component will be charged – please see section 2.5 of the Environmental Permitting Charges Guidance

Subsistence Fees
The subsistence charge for this is going to be £5,794 – ref 2.16.6 – treatment and transfer of non-hazardous waste – 75,000 tonnes or more.

Please note that a subsistence charge is an annual charge which is based on the type and scale of the activity. Payment of this charge must not be included with payment of an application fee. Subsistence charges are invoiced to operators annually, after a permit is issued. The subsistence charge given above may change if we issue you a permit for an activity of a different type and /or scale to the proposed activity in this pre-application request.

There is also an additional charge of £672 for the first year of the subsistence of the permit.

Supporting documents
As part of the application you would need to provide:

- Non-Technical Summary
- Site plan(s) clearly showing the site boundary, site layout, infrastructure and drainage arrangements
- A summary of the Environmental Management System
- Environmental Risk Assessment
- Technical Description
- List of waste codes
- Evidence of Technical Competence
- Site Condition Report
- Dust and Emissions Management Plan
- Noise and Vibration Management Plan / Noise Impact Assessment - If you are unsure whether you need to produce a NIA or NMP, we can complete a screening check to check if you are likely to need one. The noise screening is available as part of our enhanced service. You should apply for the enhanced service using the online pre-application form.

Additional information and links to our guidance on the above list of supporting documents was provided within the basic pre-application advice that you received on 10/01/2023, along with templates for the dust and emissions management plan (DEMP) and the Noise Management Plan (NMP).

What happens next?
If you submit an environmental permit application then please quote this pre-application reference number: **EPR/LB3803MJ/A001.**
Send your completed application documents via email to: psc@environment-agency.gov.uk

Disclaimer
The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment

Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.
This advice covers waste activities only.
Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

This pre-application request is now closed.
Further enquiries resulting from this response must be logged as a new request using the online form:
https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form
Our basic pre-application service is free and is limited to the information detailed on section 2 of the Environmental permitting charges guidance on gov.uk.
If you need more extensive or technical pre-application advice, you can ask for our enhanced pre-application service. The enhanced pre-application advice is charged at £100 per hour plus VAT. You will need to complete and submit a new online pre-application request to request enhanced pre-application advice.

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If you have any questions please find my contact details below.

Kind Regards,

Michelle

Michelle Mackillop
Permitting Officer (Waste)
Part of Operations – Regulation, Monitoring and Customer
Environment Agency | National Permitting Service, Birmingham

Michelle.Mackillop@environment-agency.gov.uk
Internal: 28337
External: 0208 474 8337

Working days: Tuesday and Thursday
Website: www.gov.uk/environment-agency

APPENDIX 3

EPR 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

SEWELLS RESERVOIR CONSTRUCTION LIMITED

5b Company registration number

02349942

Date of registration (DD/MM/YYYY)

20/02/1989

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: See additional sheet

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

Title (Mr, Mrs, Miss and so on)

First name

Last name

Title (Mr, Mrs, Miss and so on)

First name

Last name

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): Mr

First name: Matthew

Last name: Yeates

Address: Crown Business Centre
Old Ipswich Road
Ardleigh
Colchester

Postcode: CO7 7QR

Contact numbers, including the area code

Phone: 01371 874212

Fax

Mobile

Email: matthew.yeates@srcaggregates.co.uk

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) Miss

First name Suzanne

Last name Walsh

Address PDE Consulting Limited
The Alaska Building
Shrewsbury Business Park
Shrewsbury

Postcode SY2 6LG

Contact numbers, including the area code

Phone

Fax

Mobile 07889 602895

Email suzanne@pdeconsulting.co.uk

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 Matthew

Last name Yeates

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

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 ☐

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 A – About you

Form A: Q5c

Company Name:	Sewells Reservoir Construction Limited
Registration Number:	02349942
Registered Address:	Crown Business Centre Old Ipswich Road Ardleigh Colchester England CO7 7QR

Director Name	Date of Birth
Oliver Rees	[redacted]
David Hunter	
Louise Yeates	
Craig Chaplin	
Thomas Wise	

Application for an environmental permit
Part B2 – General – new bespoke permit

Environment Agency

You will need to use an Adobe Acrobat 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 of the form together with parts A and F1 if you are applying for a new bespoke permit. You also need to fill in part B2.5, B3, B4, B5, B6, or B7 (this depends on what activities you are applying for).

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

Please read through this form and the accompanying Part B2 guidance notes(see **https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102174/Guidance-app-for-an-environmental-permit-part-b2-general-new-bespoke-permit.pdf**).

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

Contents

1 About the permit

1a Discussions before your application

If you have had discussions with us before your application, including having requested to submit your application in stages, give us the permit reference or details on a separate sheet. Tell us below the reference you have given this extra sheet(s).

Permit or document reference

Refer to Appendix 2 of Application Report

1 About the permit, continued

1b Is the permit for a site or for mobile plant?

☐ Mobile plant Now go to **question 1c**

☑ Site Now go to **section 2**

Note: The term 'mobile plant' does not include mobile sheep dipping units.

Mobile plant only

1c Have we told you during pre-application discussions that we believe that a mobile permit is suitable for your activity?

☐ No

☐ Yes

1d Have there been any changes to your proposal since this discussion?

☐ No Now go to **section 3**

☐ Yes You should send us a description of the activity you want to carry out, highlighting the changes you have made since our pre-application discussions

Document reference

Now go to **section 3**

2 About the site (excludes mobile plant)

2a What is the site name, address, postcode and national grid reference?

Site name

Cliff Quay

Address

Cliff Road
The Docks
Ipswich,

Postcode

IP3 0BS

National grid reference for the middle of the site, or for water quality/groundwater activities, the discharge point (for example, ST 12345 67890).

TM 16983 41775

2 About the site (excludes mobile plant), continued

2b What type of regulated facility are you applying for?

Note: if you are applying for more than one regulated facility then go to 2c.

- ☐ Installation
- ☑ Waste operation
- ☐ Mining waste operation
- ☐ Water discharge activity
- ☐ Groundwater activity (point source)
- ☐ Groundwater activity (discharge onto land)

What is the national grid reference for the regulated facility (if only one)?
(**See the guidance notes on part B2**.)

- ☐ As in 2a above
- ☐ Different from that in 2a Please fill in the national grid reference below

National grid reference for the regulated facility

TM 16983 41775

Now go to **question 2d**

2c If you are applying for more than one regulated facility on your site, what are their types and their grid references?

See the guidance notes on part B2.

Regulated facility 1

National grid reference

What is the regulated facility type?

- ☐ Installation
- ☐ Waste operation
- ☐ Mining waste operation
- ☐ Water discharge activity
- ☐ Groundwater activity (point source)
- ☐ Groundwater activity (discharge onto land)

2 About the site (excludes mobile plant), continued

Regulated facility 2

National grid reference

What is the regulated facility type?

- ☐ Installation
- ☐ Waste operation
- ☐ Mining waste operation
- ☐ Water discharge activity
- ☐ Groundwater activity (point source)
- ☐ Groundwater activity (discharge onto land)

Use several copies of this page or separate sheets if you have a long list of regulated facilities. Send them to us with your application form. Tell us below the reference you have given these extra sheets.

Document reference

Now go to **question 2d**

2d Low impact installations (installations only)

Are any of the regulated facilities low impact installations?

- ☑ No
- ☐ Yes If yes, tell us how you meet the conditions for a low impact installation (**see the guidance notes on part B2** – 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

2e Treating batteries

Are you planning to treat batteries? (**See the guidance notes on part B2**.)

- ☑ No
- ☐ Yes Tell us how you will do this, send us a copy of your explanation and tell us below the reference you have given this explanation

Document reference for the explanation

2 About the site (excludes mobile plant), continued

2f Ship recycling

Is your activity covered by the Ship Recycling Regulations 2015? (**See the guidance notes on part B2**.)

☑ 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

2g Multi-operator installation

If the site is a multi-operator site (that is there is more than one operator of the installation) then fill in the table below the application reference for each of the other permits.

Table 1 – Other permit application references

3 Your ability as an operator

If you are only applying for a standalone water discharge or for a groundwater activity, you only have to fill in **question 3d**.

3a Relevant offences

Applies to all except standalone surface water discharges and groundwater discharges (**see the guidance notes on part B2**).

Have you, or any other relevant person, been convicted of any relevant offence? (see https://www.gov.uk/government/publications/relevant-conviction-guidance-for-permit-applications-for-waste-activities-and-installations-only)

☑ No Now go to **question 3b**

☐ Yes Please give details below

3 Your ability as an operator, continued

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/YYYY)

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.

Now go to **question 3b**

Please also complete the details in **Appendix 2**.

3b Technical ability

Relevant waste operations only (see the guidance notes on part B2).

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

Please select one of the following:

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

or

☐ We will have a certified Competence Management System within 12 months and have enclosed evidence of the contract with an accredited certification body

3 Your ability as an operator, continued

CIWM/WAMITAB scheme

Your answers below must relate to the person(s) providing technically competent management when the permitted activities start.

Please select **one** of the following:

- I have enclosed a copy of:

  ☑ the relevant qualification certificate/s

  or

  ☐ evidence of deemed competence

  or

  ☐ 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 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

- ☐ The technically competent manager will complete their qualification within four weeks of starting the permitted activities and I have enclosed evidence of their registration with WAMITAB or their EPOC booking as appropriate

- **For medium- and high-risk tier activities other than landfill**

  ☐ The technically competent manager will complete the qualification within 12 months and I have enclosed evidence of their registration with WAMITAB and, where relevant, EPOC booking. I understand they must complete either four specified units of the relevant qualification or an EPOC within four weeks of the permitted activities commencing

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)

Mr

First name

Craig

Last name

Chaplin

Phone

01371 874212

Mobile

Email

craig.chaplin@srcgroup.co.uk

3 Your ability as an operator, continued

Please provide the environmental permit number/s and site address for all other waste operations, (**see part B2 guidance notes**), 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
EPR/BP3334YQ	SRC Martells Quarry, Slough Lane, Ardleigh, Essex	CO7 7RU
EPR/GB3808FD	Martells Yard, Slough Lane, Ardleigh, Essex	CO7 7RU
EPR/HB3907KS	Dollymans Farm, Doublegate Lane, Rawreth, Wickford	SS11 8UD
EPR/GB3106SE	Crown Quarry, Old Ipswich Road, Ardleigh, Essex	CO7 7QR

Document reference

Now go to **question 3c**

Please also complete the details in **Appendix 2**.

3c Finances

Installations, waste operations and mining waste operations only.

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 (or they) (or any relevant person) 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.

See **Environmental permits privacy notice - GOV.UK (www.gov.uk)** for how we use your personal information to support environmental permitting.

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

n/a

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 (all)

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.

For waste and installation permits only: your management system must also explain your resilience to climate change.

You can find guidance on management systems on our website at **https://www.gov.uk/guidance/develop-a-management-system-environmental-permits**

- ☑ **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)
- ☐ BS EN ISO 14005:2019
- ☐ Green dragon
- ☑ Own management system
- ☐ EMAS Global
- ☐ Other

Please send us a summary of the management system you are using and a copy of your accreditation (if applicable) with your application.

Document reference/s

Refer to Appendix 5 of Application Report

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

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

But not any mobile plant

Clearly mark the site boundary or discharge point, or both. The site plan must be legible at A4 size, drawn to scale and include a scale bar.

5 Supporting information, continued

Also include site drainage plans, site layout plans, and plant design drawings/process flow diagrams (as required). (**See the guidance notes on part B2**.)

Document reference/s of the plans

Refer to Application Report

5b Provide the relevant sections of a site condition/baseline report if this applies

See the guidance notes on part B2

Document reference of the report

Refer to Appendix 4 of Application Report

☐ If you are applying for an installation, tick the box to confirm that you have sent in a baseline report

5c Provide a non-technical summary of your application

See the guidance notes on part B2 for what needs to be included.

Document reference of the summary

Refer to Appendix 1 of Application Report

5d 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

☐ Yes Provide a fire prevention plan (**see the guidance notes on part B2**).

Document reference of the plan

6 Environmental risk assessment

Provide an assessment of the risks each of your proposed regulated facilities poses to the environment. The risk assessment must follow the methodology set out in 'Risk assessments for your environmental permit' at **Risk assessments for your environmental permit – GOV.UK (www.gov.uk)** or an equivalent method.

For air dispersion modelling see: **Environmental permitting: air dispersion modelling reports – GOV.UK (www.gov.uk)**

Document reference(s) for the assessments, including modelling reports and files where applicable

Refer to Appendix 10 of Application Report

7 How to contact us

If you have difficulty using 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**

7 How to contact us, continued

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

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

☐ No

◯ Yes

Amount received (£)

Appendix 1 – Low impact installation checklist

Low impact installation criterion (see the Part B2 guidance notes)	Section of supporting document that shows how your proposed activity meets the LII criterion	Do you meet LII criterion?
A – Management techniques		☐ Yes ☐ No
B – Wastewater		☐ Yes ☐ No
C – Abatement systems/ releases to air		☐ Yes ☐ No
D – Emissions to groundwater		☐ Yes ☐ No
E – Waste production		☐ Yes ☐ No
F – Energy consumption		☐ Yes ☐ No
G – Accident prevention		☐ Yes ☐ No
H – Noise		☐ Yes ☐ No
I – Emissions of polluting substances		☐ Yes ☐ No
J – Odours		☐ Yes ☐ No
K – Compliance history		☐ Yes ☐ No

If you answered 'No' to any of the questions above, your installation cannot be considered as a low impact installation.

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. Continue on a separate sheet if necessary

1. Relevant Offences – date of birth information for relevant persons(s)

Please give us the following details if you have answered 'Yes' to question 3a

Name

Date of birth (DD/MM/YYYY)

2. Technical ability – date of birth information for technically competent manager(s)

Please give us the following details (relevant waste operations only)

Name

Craig Chaplin

Date of birth (DD/MM/YYYY)

Application for an environmental permit
Part B4 – New bespoke waste operation permit

Environment Agency

Fill in this part of the form, together with parts A, B2 and F1, if you are applying for a new bespoke permit for a waste operation. 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.

You can apply online for waste bespoke environmental permits.

Apply online for an environmental permit.

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 for?

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

Fill in a separate table for each waste operation 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 extra sheet.

Document reference

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 for?, 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			
Cliff Quay	Physical treatment of non hazardous waste	R3, R5 and R13		
For all waste operations	Total storage capacity (see note 2)			40,000.00
	Annual throughput (tonnes each year)			100,000.00

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.

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

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: Refer to Application Report

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 Appendix 4 and the guidance notes on part B4)

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 operation.

Table 2 – Emissions

Name of the waste operation	Cliff Quay			
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 B2 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	Cliff Quay	
Description of the waste operation Add extra rows if you need them	Appropriate measure (TGN reference)	Document reference (if appropriate)
Physical treatment of non hazardous waste	Non-hazardous and inert waste:	https://www.gov.uk/guidance
	appropriate measures for permitted	
	facilities	

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: Refer to permit application report

3b General requirements

Fill in a separate table for each waste operation.

Table 3b – General requirements

Name of the waste operation	Cliff Quay
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 Refer to Appendix 7 of Application Report
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 Refer to Appendix 9 of Application Report

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: n/a

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: none

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.

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

£

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 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				

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
1.16.12	Non hazardous treatment	new permit	7930
Total A			7930

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

11,196

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

PSCAPPSEWEL311

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

The applicant

Fee paid

£ 11,196

Date payment sent (DD/MM/YYYY)

03/11/2023

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

Oliver

Last name

Rees

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

Sewells Reservoir Construction

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

Director

Today's date (DD/MM/YYYY)

03/11/2023

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
Form B2, Q1a	Discussions before your application	Refer to Appendix 2 of Application Report
Form B2, Q3d	Management Systems	Refer to Appendix 5 of Application Report
Form B2, Q5a	Provide a plan or plans for the site	Refer to Application Report
Form B2, Q5b	Site Condition Report	Refer to Appendix 4 of Application Report
Form B2, Q5c	Non - Technical Summary	Refer to Appendix 1 of Application Report
Form B2, Q6	Environmental Risk assessment	Refer to Appendix 10 of Application Report
Form B4 Q1	What waste operations are you applying	Refer to Application Report
	to vary?	
Form B4, Table 3a	Technical standards	Refer to Application Report
Form B4, Table 3b	Dust Emissions Management Plan	Refer to Appendix 7 of Application Report
Form B4, Table 3b	Noise Management Plan	Refer to Appendix 9 of Application Report

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

Crystal Mark 19132 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 4

Site Condition Report

1.0 SITE DETAILS	
Name of the applicant	Sewells Reservoir Construction Limited
Activity address	Cliff Quay, Cliff Road, The Docks, Ipswich, IP3 0BS
National grid reference	TM 16983 41775

Document reference and dates for Site Condition Report at permit application and surrender	Site Condition Report for new environmental permit application dated March 2024.

Document references for site plans (including location and boundaries)	Site Location Plan: Drawing No. KD.IPSW.1.D.001 Permit Boundary Plan: Drawing No. KD.IPSW.1.D.002A Both are attached to this SCR.

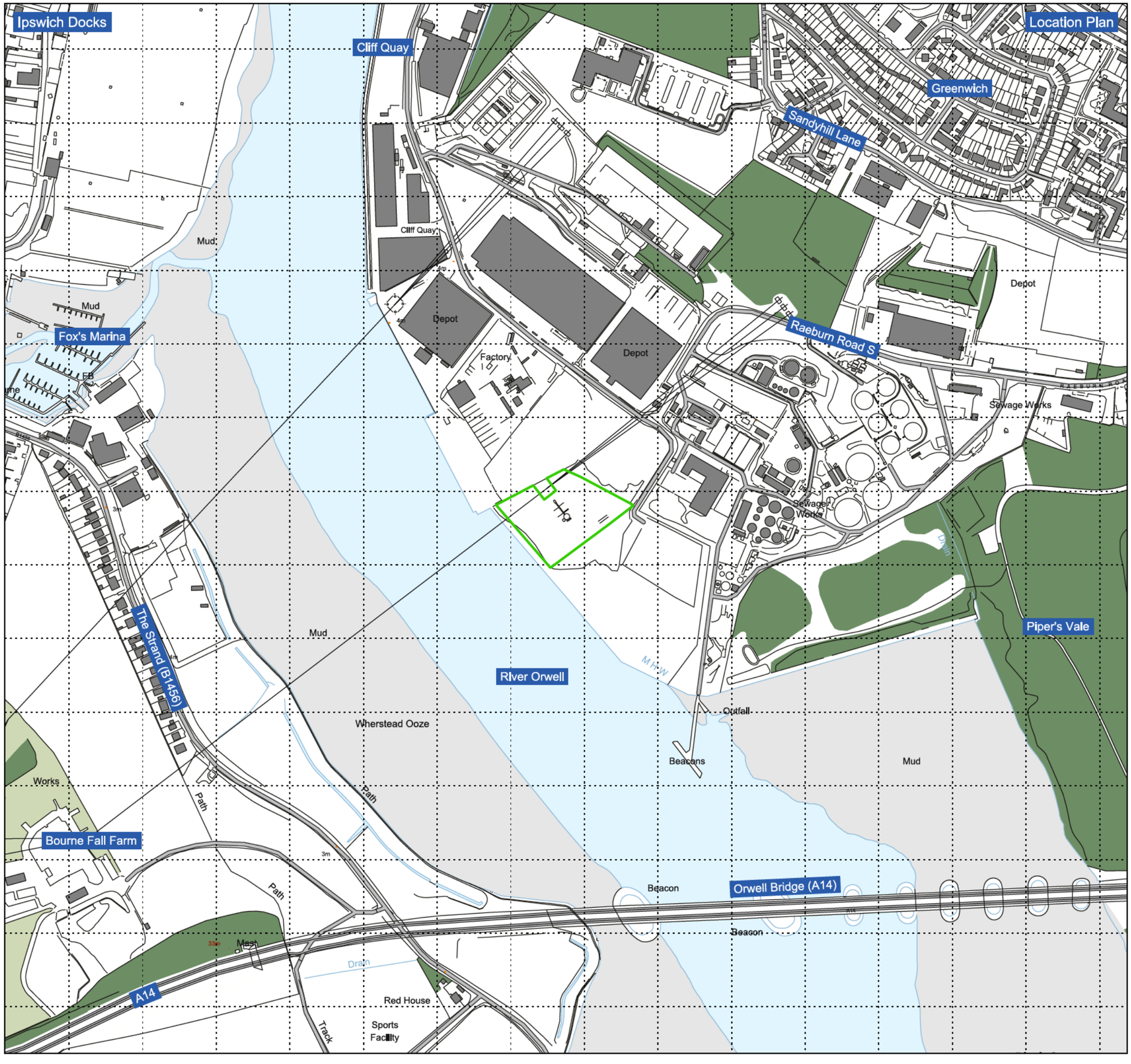
2.0 Condition of the land at permit issue	
Environmental setting including: • Geology • Hydrogeology • Surface waters	The local geology is mapped as made ground which appears to relate to Cliff Quay Power Station closed landfill site which was an ash disposal area (refer to historic maps in Annex 1). The historic maps are summarised in the permit application report. The superficial deposits underlying the Site comprise Tidal Flat Deposits which the Environment Agency (EA) class as unproductive strata. The bedrock geology comprises the Culver Chalk formation which the EA class as a Principal Aquifer. The Site falls within a groundwater Source Protection Zone 3 (total catchment). The majority of the Site is located in Flood Zone 1 (lowest risk). The western corner of the Site is mapped as Flood Zone 2. The Site is located adjacent to the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, and the Orwell Estuary Site Of Special Scientific Interest (SSSI).
Pollution history including:	The majority of the Site is shown in the historic maps in Annex 1 as reclaimed land.

• 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 prevention measures	The site is mapped as a historic landfill that was operated by the Central Electricity Generating Board. The Site was used for the disposal of ash. Aerial photographs show the Site being used for limited use, mainly vehicle parking in 2016. The Site is currently used for the processing of marine aggregate. In addition, primary crushed rock is imported to sell as subbase. The Site is surfaced in hardstanding. According to the Emapsite report (October 2023), there are no records of pollution incidences related to the Site. There are also no records of the discharge of List I or List II substances from the site listed.
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	None other than existing historic landfill.
Baseline soil and groundwater reference data	Not applicable.

3.0 Permitted activities	
Permitted activities	Storage and physical treatment of inert and non- hazardous wastes.
Non-permitted activities undertaken	The Site is currently used for the processing of marine aggregate. In addition, primary crushed rock is imported to sell as subbase.
Document references for: • plan showing activity layout; and • environmental risk assessment.	Refer to environmental permit application dated March 2024.

DRAWINGS

Location Plan	Drawing No. KD.IPSW.1.D.001	Scale 1:5000@A3
Permit Boundary Site Plan	Drawing No. KD.IPSW.1.D.002A	Scale 1:1250@A3



Legend

Permit Boundary

consulting limited chartered surveyors

PROJECT
Ipswich Docks

DRAWING TITLE
Location Plan

DATE
August 2023

SCALE
1:5,000 @ A3

DRAWING No.
KD.IPSW.1.D.001

DRAWING STATUS
FINAL

01284 764085 . www.pdeconsulting.co.uk

Legend

- Permit Boundary
- Recyclling Area
- Waste Storage Area

pde. consulting limited chartered surveyors

PROJECT
Ipswich Docks

DRAWING TITLE
Permit Boundary Site Plan

DATE
February 2024

SCALE
1:1,250 @ A3

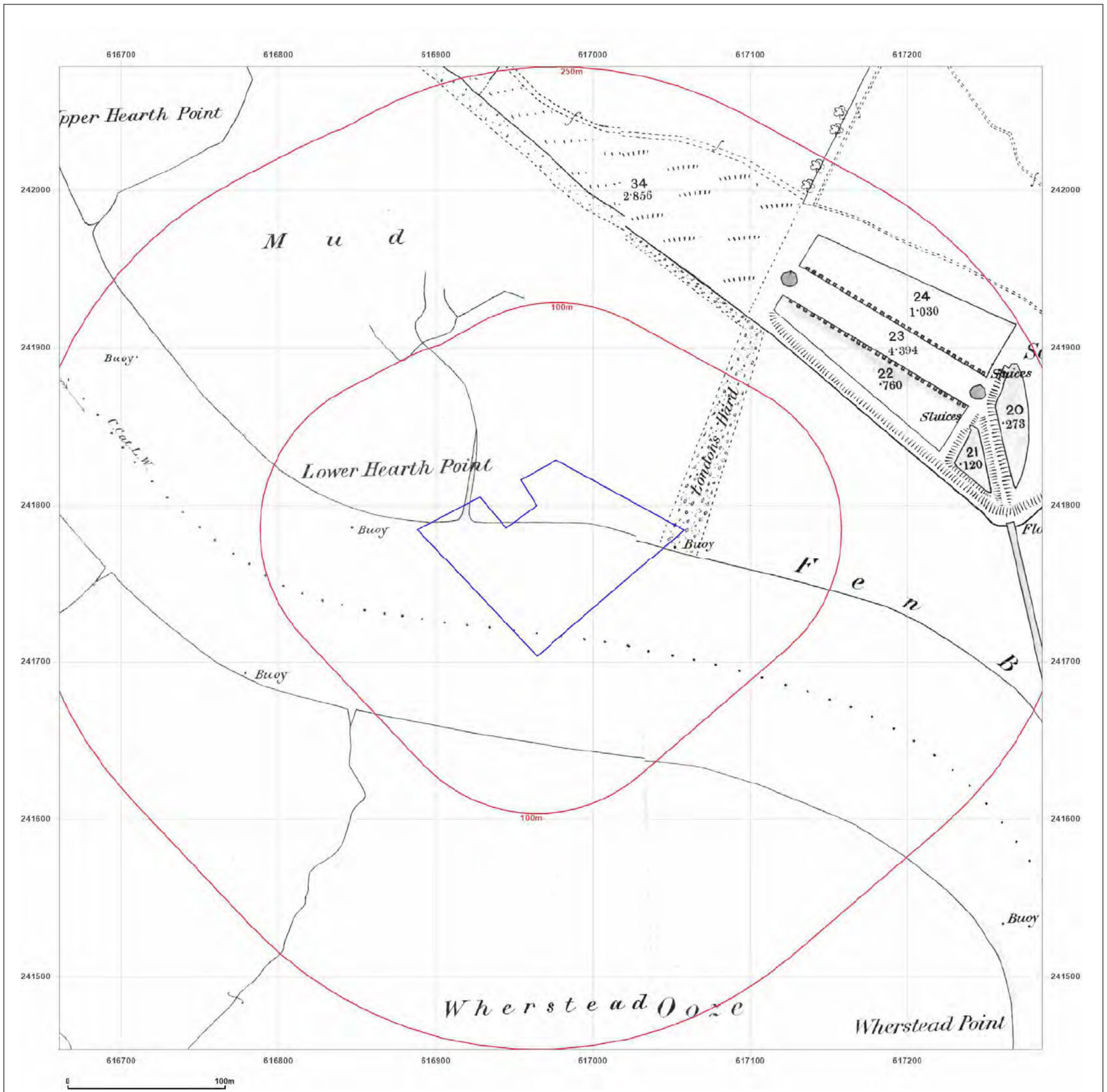
DRAWING No.
KD.IPSW.1.D.002A

DRAWING STATUS
FINAL

N

01284 764085 . www.pdeconsulting.co.uk

Annex 1: Historic Maps



EMAPSITE™

Site Details:

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: County Series
Map date: 1880
Scale: 1:2,500
Printed at: 1:2,500

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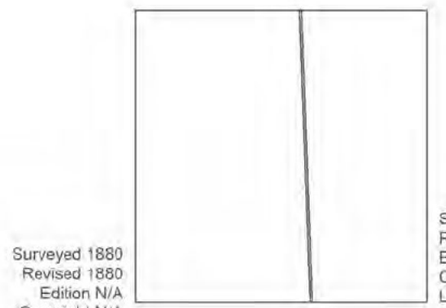

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Production date: 09 October 2023

Map legend available at:
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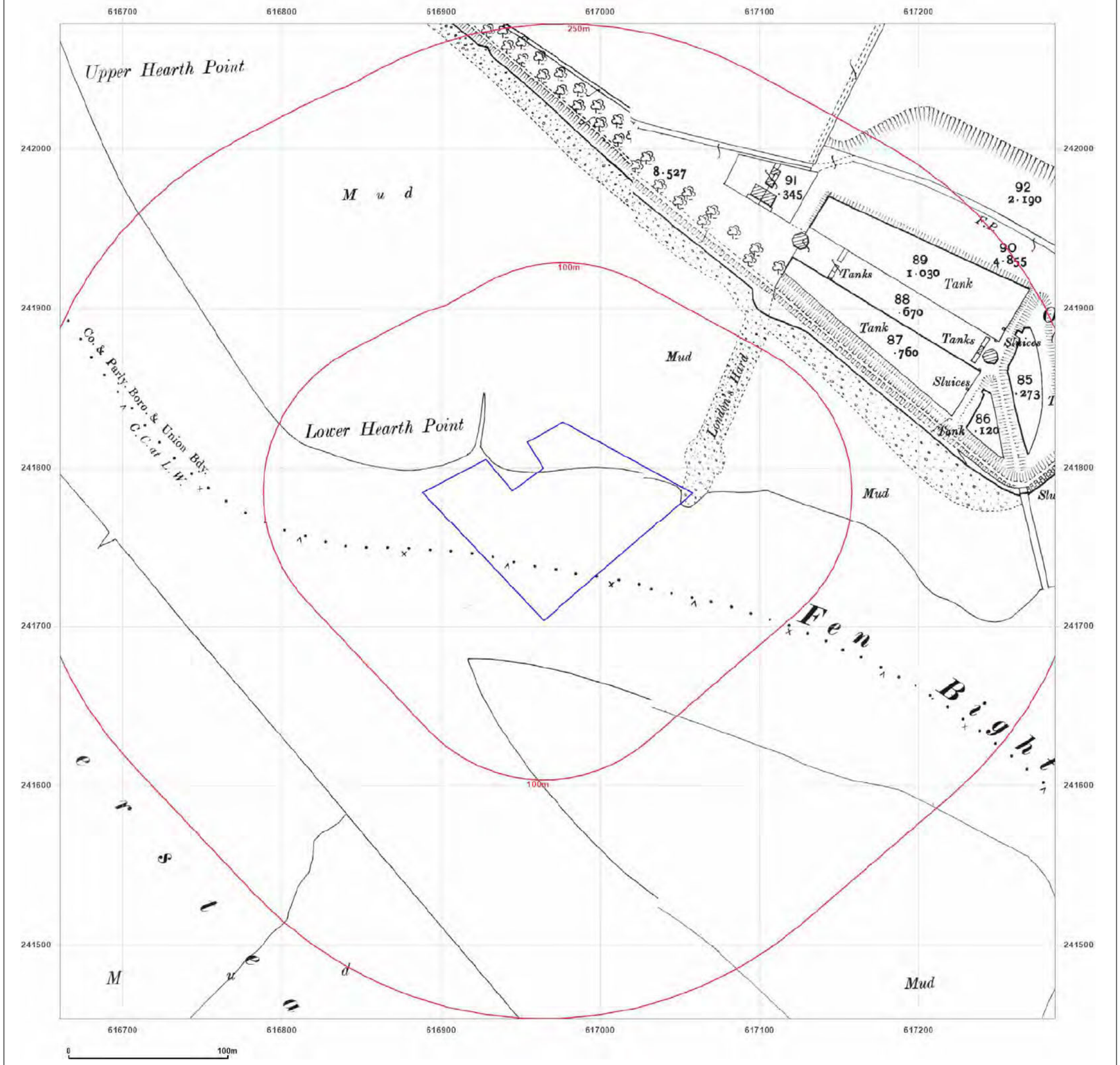

EMAPSITE™

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Grid Ref: 616973, 241766

Map Name: County Series
Map date: 1902
Scale: 1:2,500
Printed at: 1:2,500

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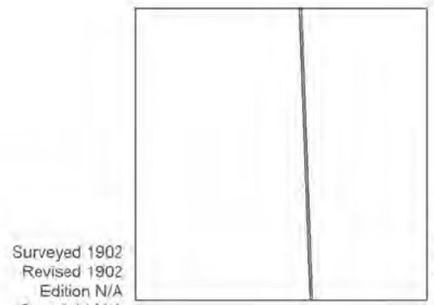

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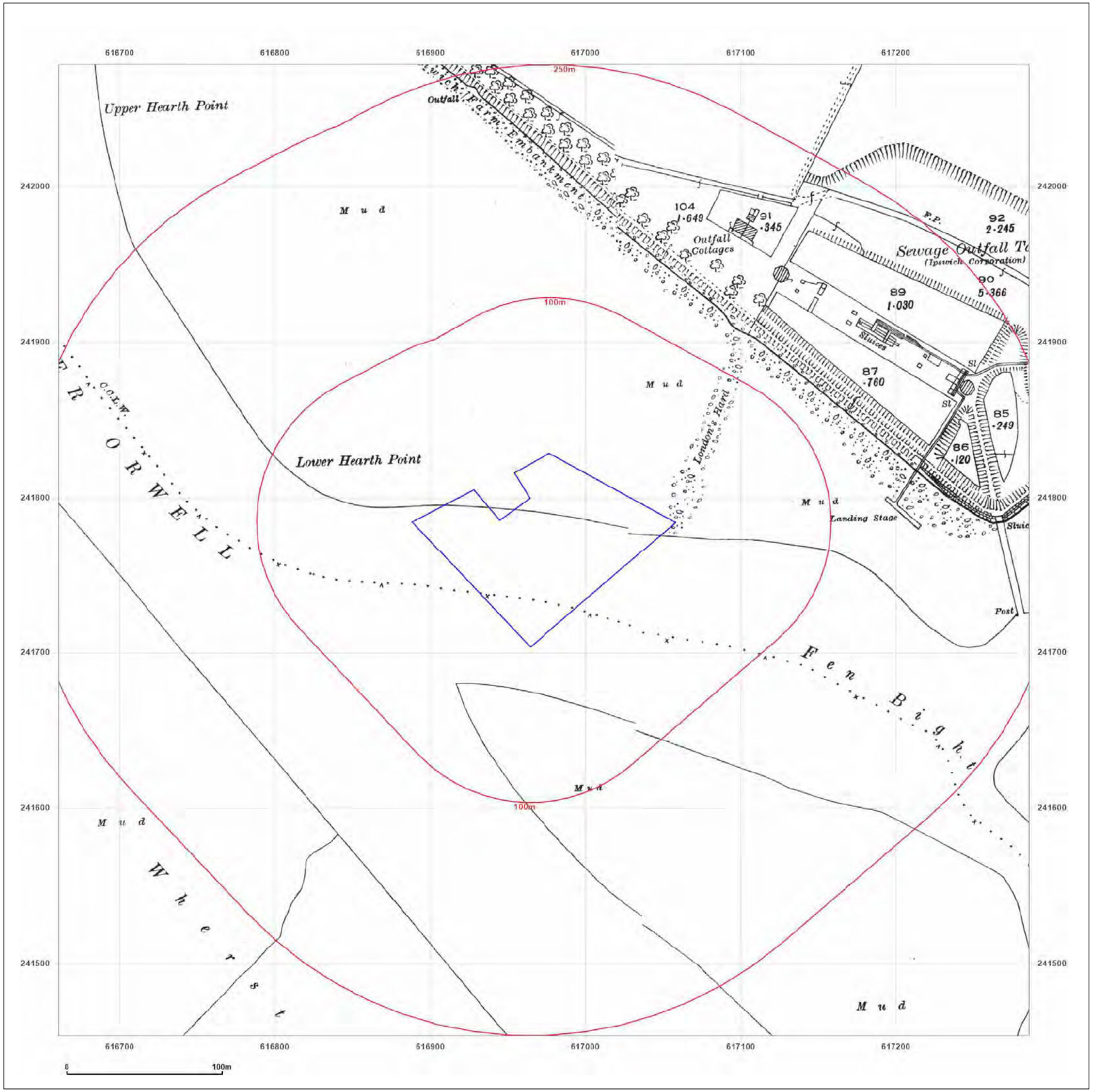

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: County Series
Map date: **1926**
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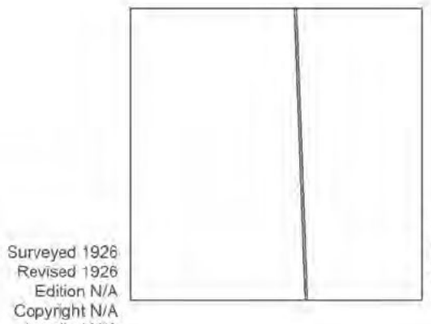

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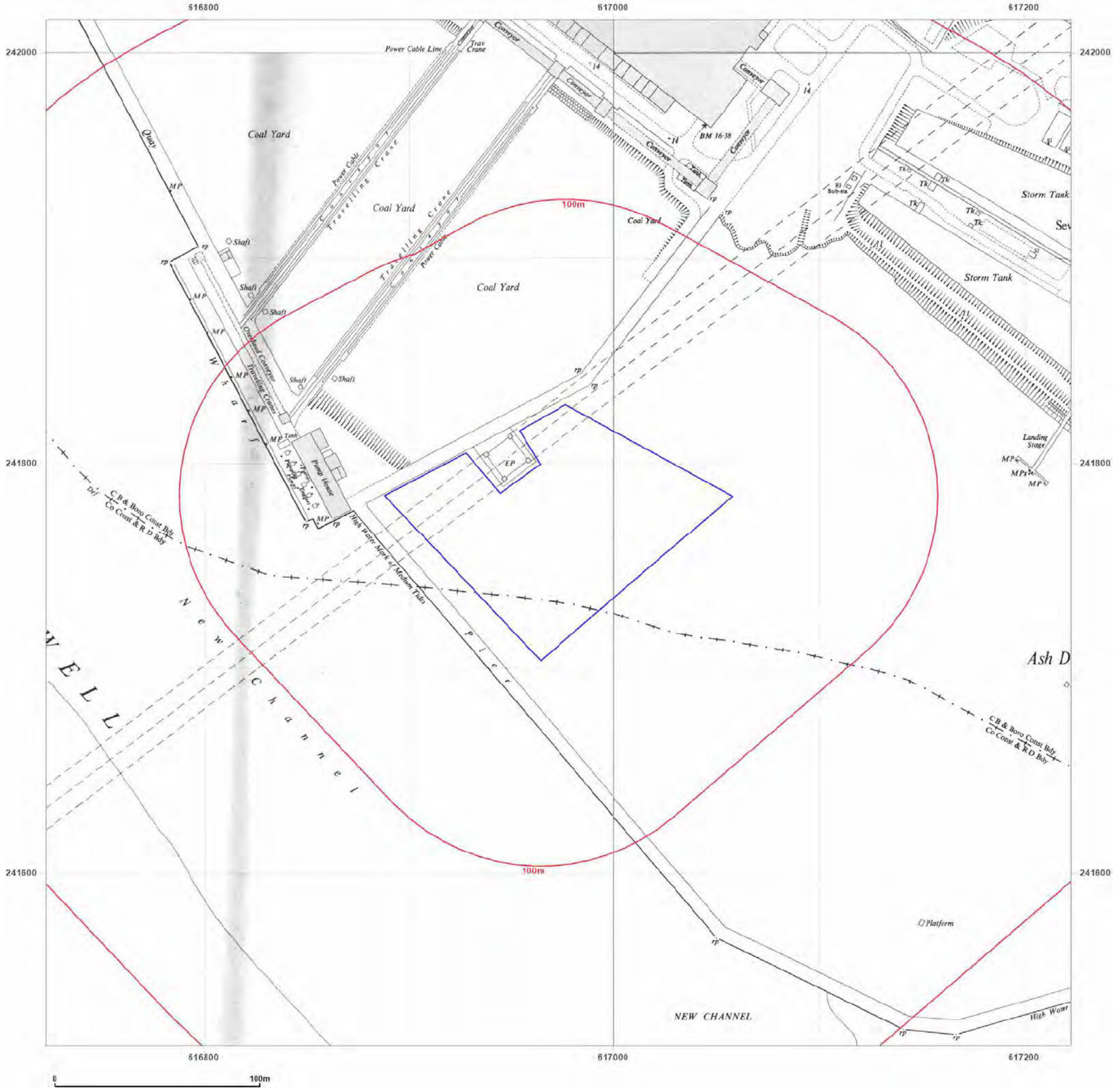

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid
Map date: **1950**
Scale: 1:1,250
Printed at: 1:2,000

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Surveyed 1950
Revised 1950
Edition N/A
Copyright N/A
Levelled 1949

Surveyed 1950
Revised 1950
Edition N/A
Copyright N/A
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Surveyed 1950
Revised 1950
Edition N/A
Copyright N/A
Levelled 1949

Surveyed 1950
Revised 1950
Edition N/A
Copyright N/A
Levelled 1949

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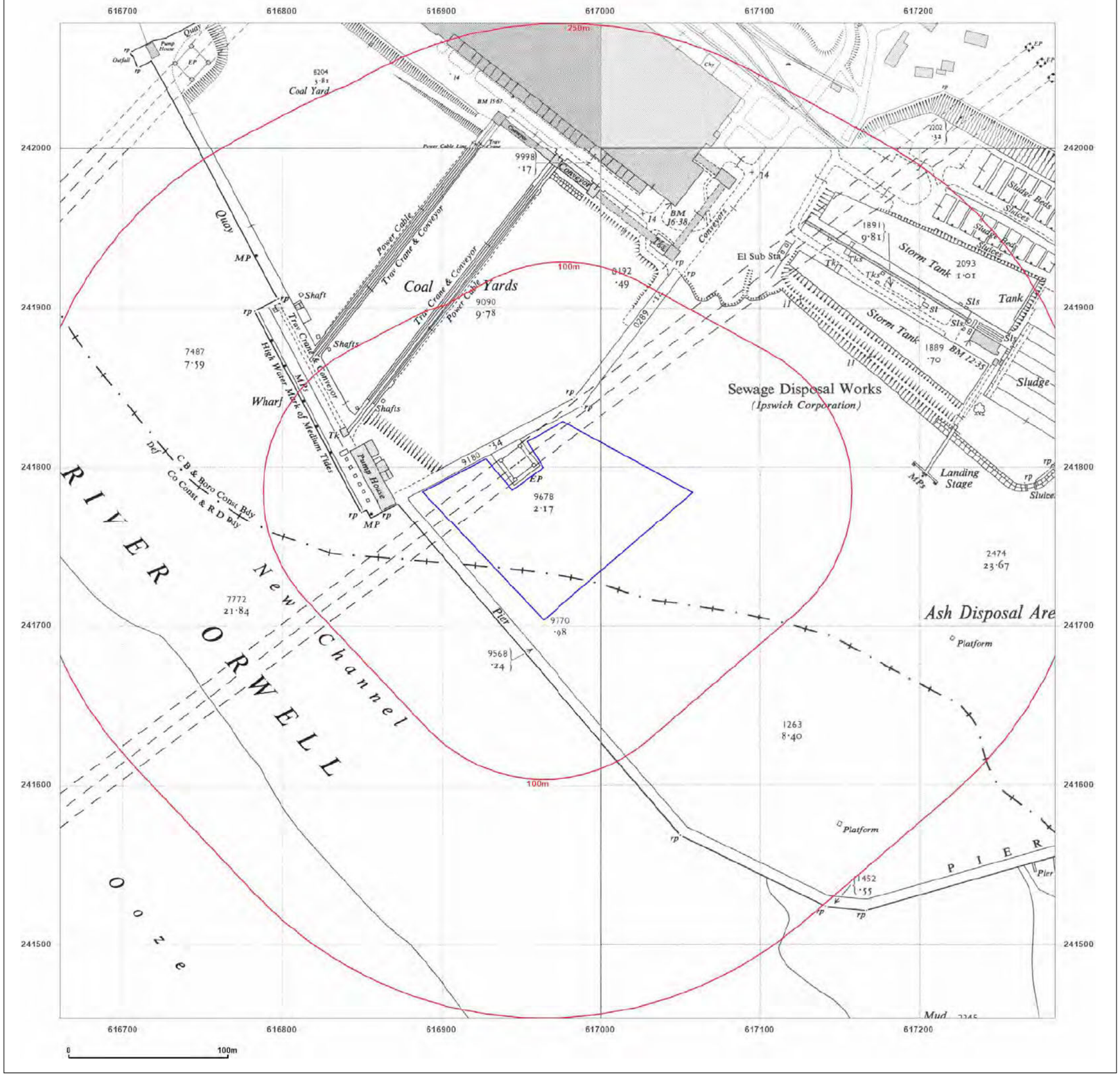

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Grid Ref: 616973, 241766

Map Name: National Grid
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Scale: 1:2,500
Printed at: 1:2,500

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Surveyed 1950
Revised 1950
Edition N/A
Copyright N/A
Levelled 1949

Surveyed 1950
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Edition N/A
Copyright N/A
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Revised 1950
Edition N/A
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Surveyed 1950
Revised 1950
Edition N/A
Copyright N/A
Levelled 1949

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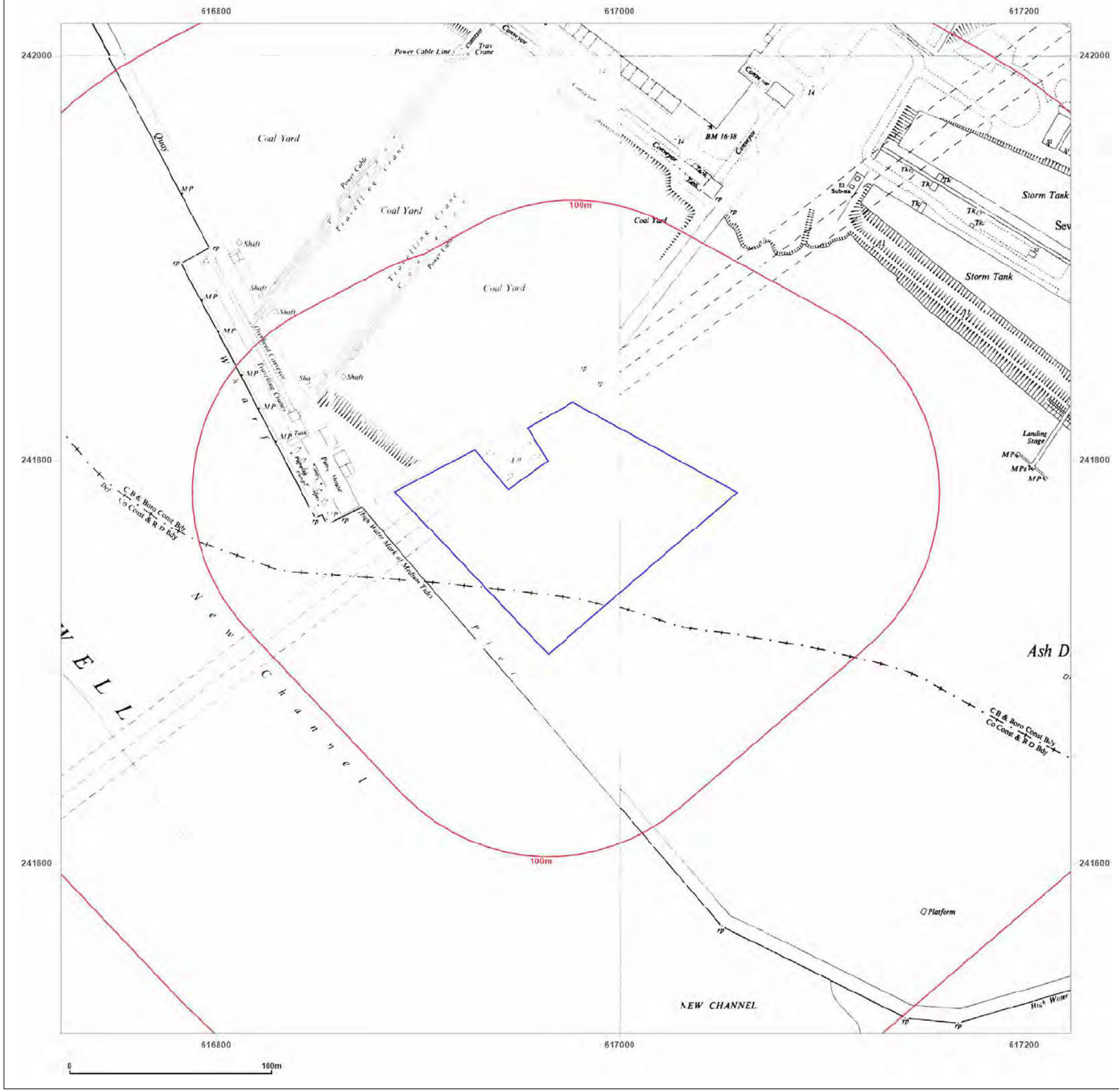

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid
Map date: **1951**
Scale: 1:1,250
Printed at: 1:2,000

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Surveyed N/A
Revised N/A
Edition N/A
Copyright N/A
Levelled N/A

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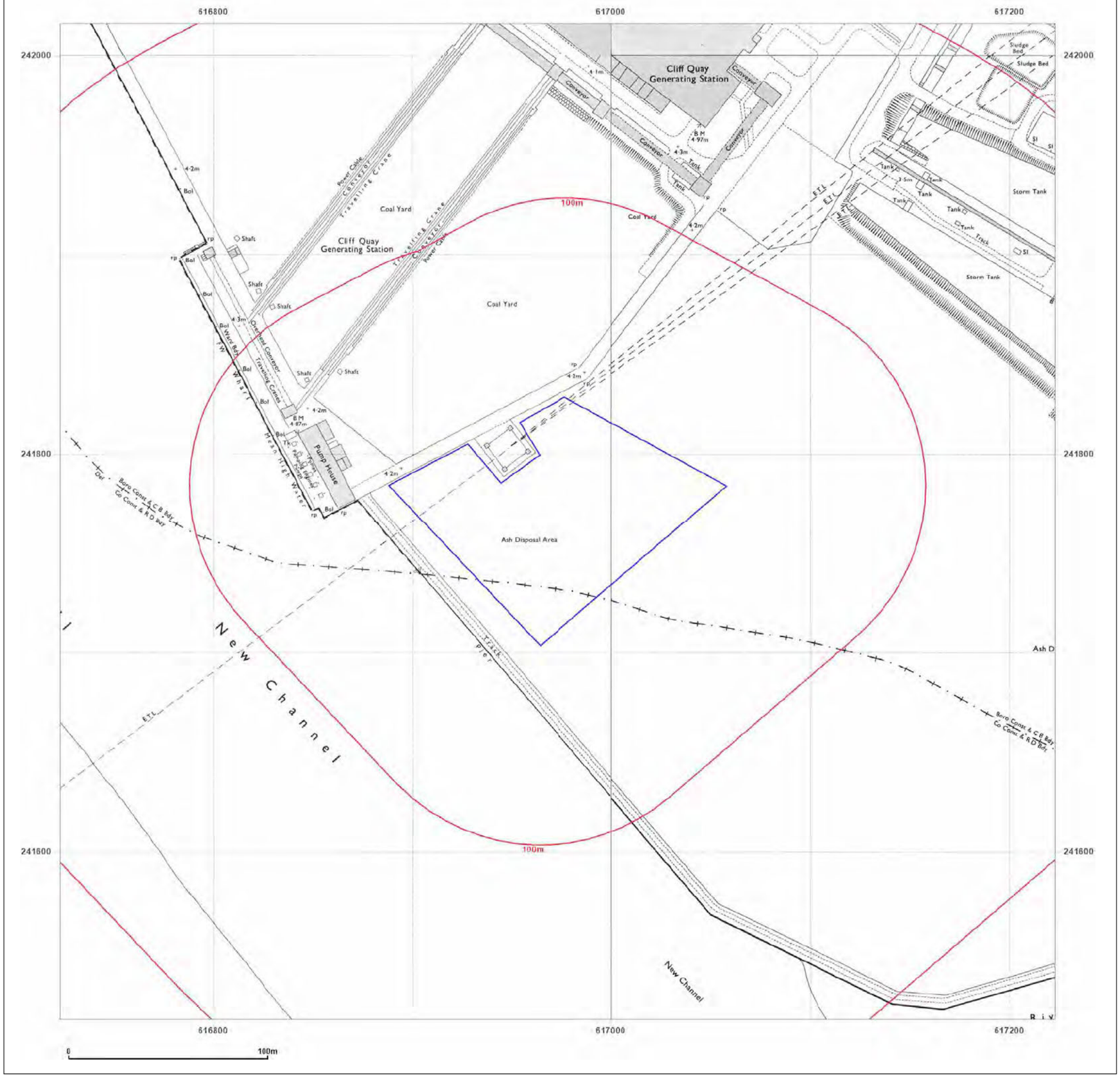

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid

Map date: **1972**

Scale: 1:1,250

Printed at: 1:2,000

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Surveyed 1950
Revised 1971
Edition N/A
Copyright 1972
Levelled 1961

Surveyed 1950
Revised 1971
Edition N/A
Copyright 1972
Levelled 1961

Surveyed 1950
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Copyright 1972
Levelled 1961

Surveyed 1972
Revised 1972
Edition N/A
Copyright 1972
Levelled 1961

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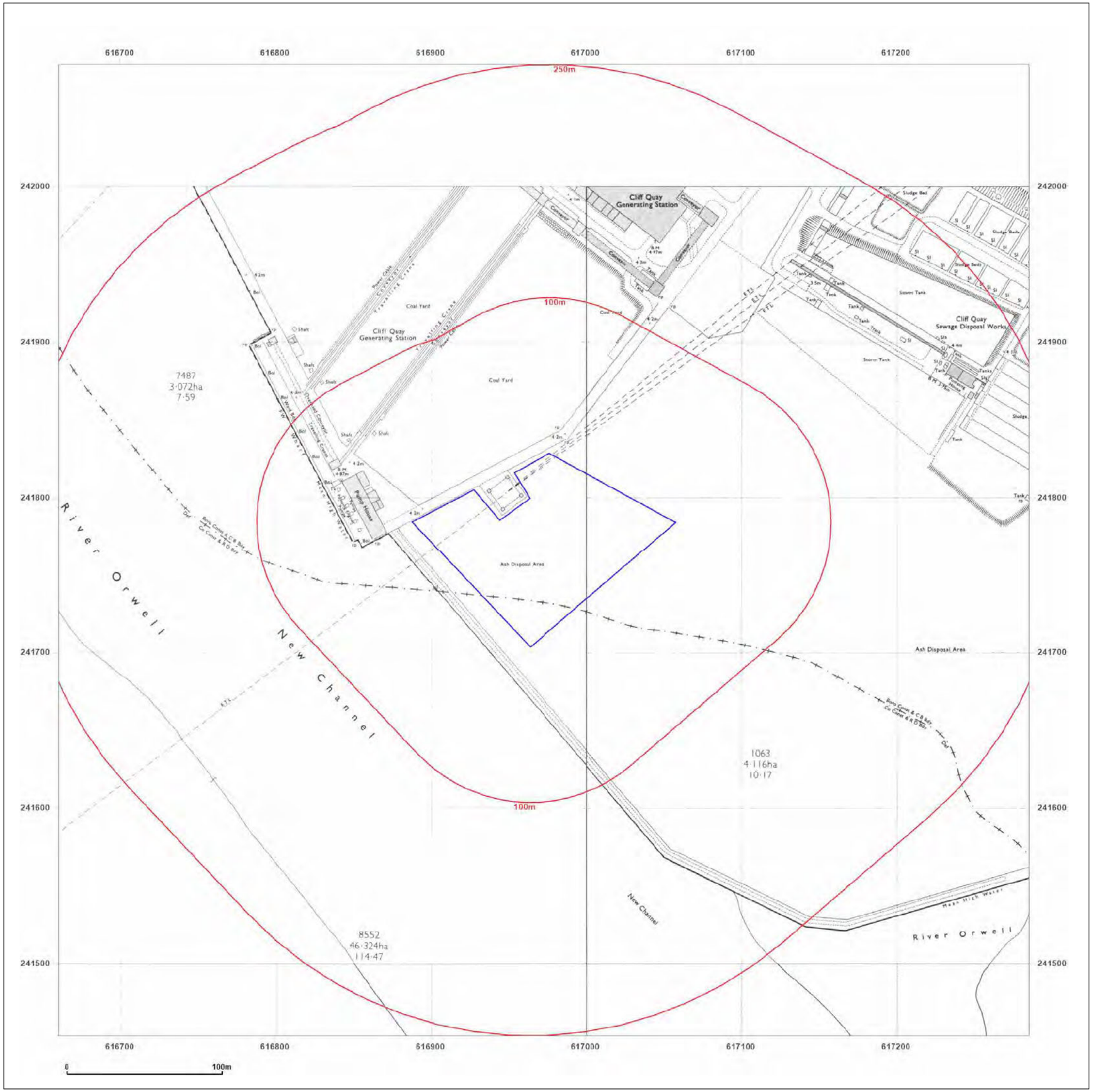

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid

Map date: **1972**

Scale: 1:2,500

Printed at: 1:2,500

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Surveyed 1950
Revised 1972
Edition N/A
Copyright 1973
Levelled 1961

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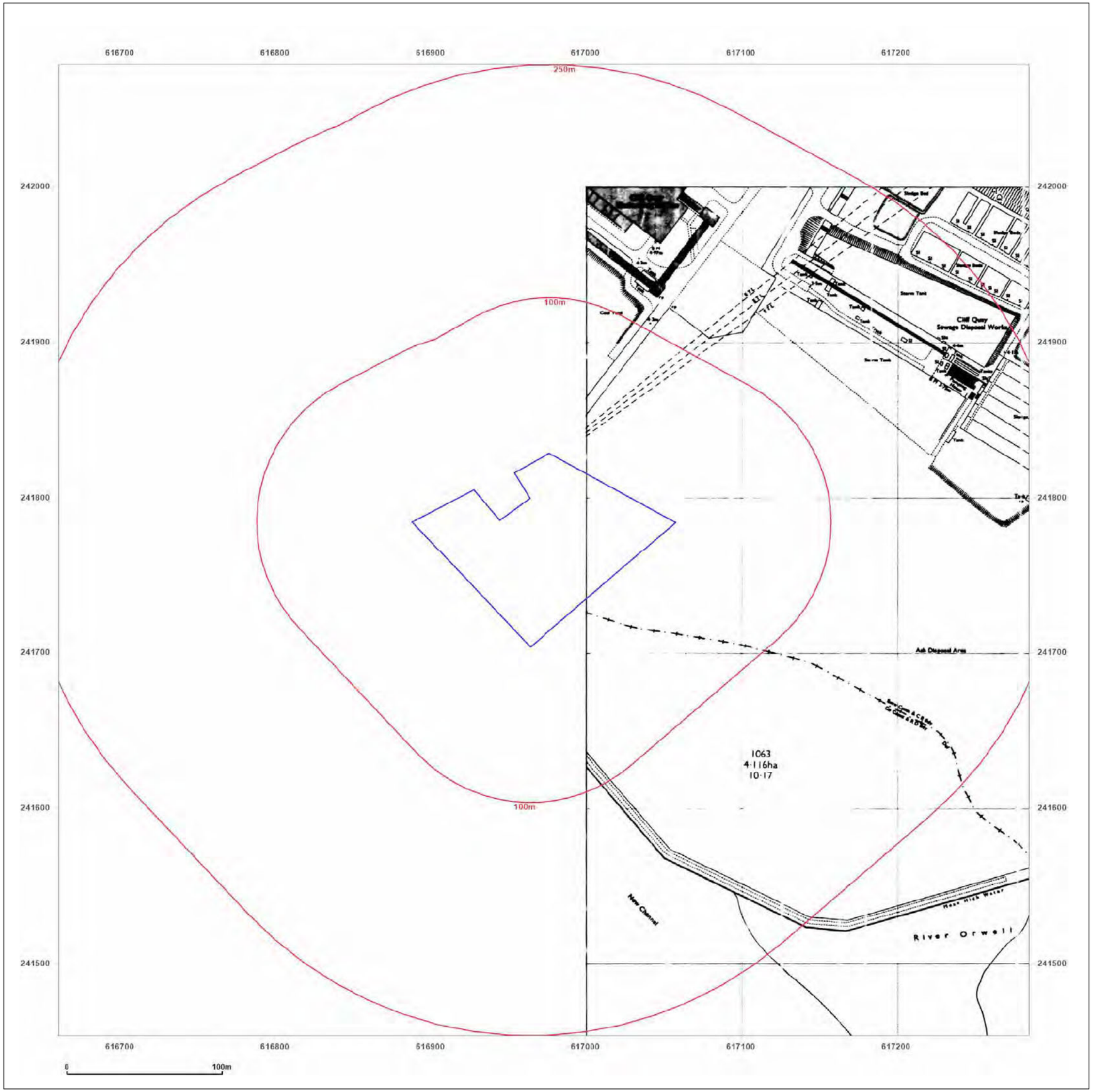

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Site Details:

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid
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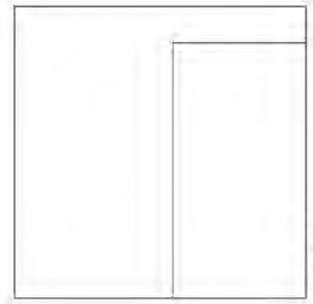

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Production date: 09 October 2023

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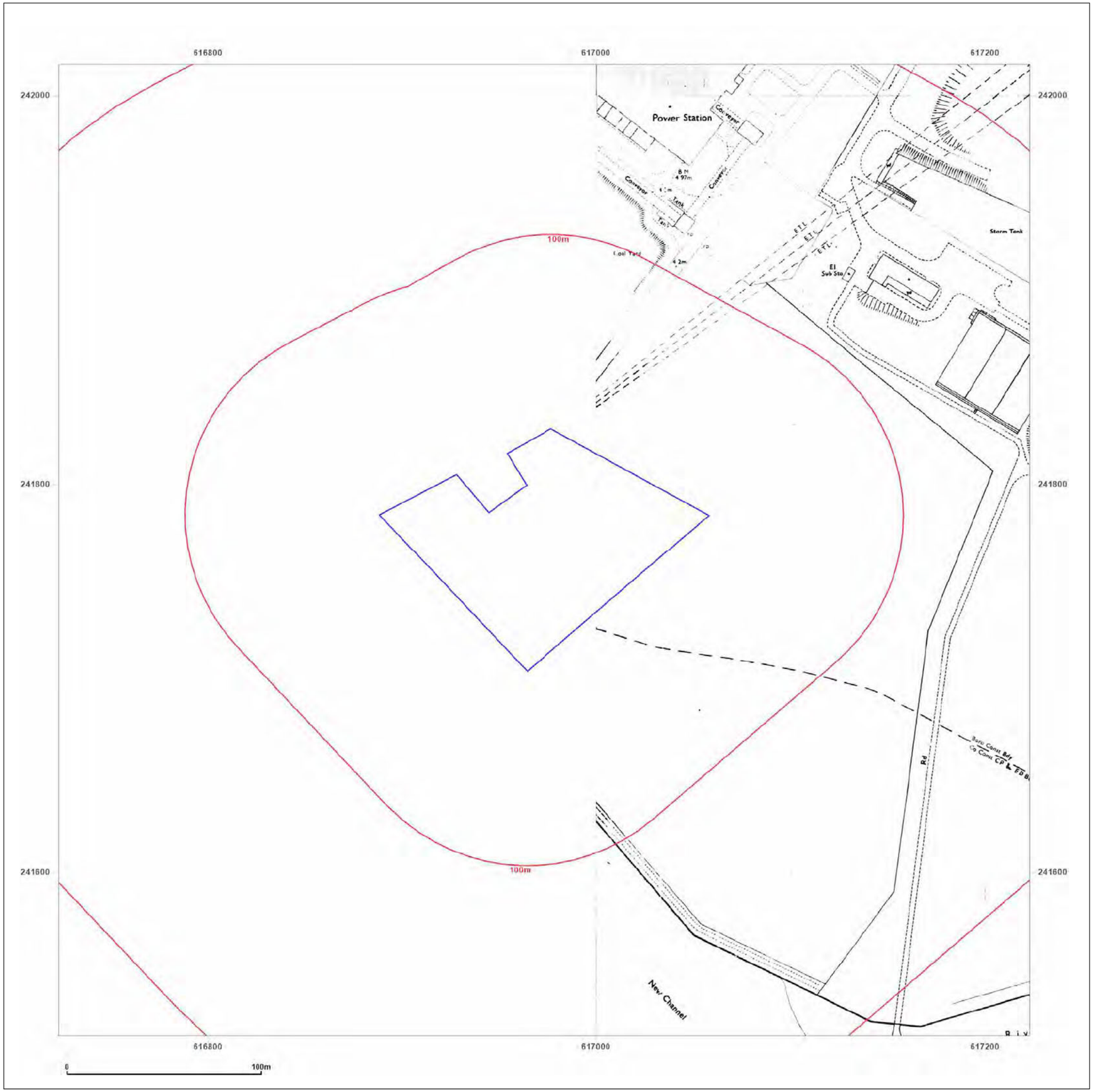

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid
Map date: **1981**
Scale: 1:1,250
Printed at: 1:2,000

N
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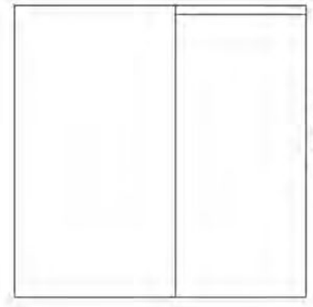
Surveyed N/A
Revised N/A
Edition N/A
Copyright N/A
Levelled N/A



Surveyed N/A
Revised N/A
Edition N/A
Copyright N/A
Levelled N/A

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Production date: 09 October 2023

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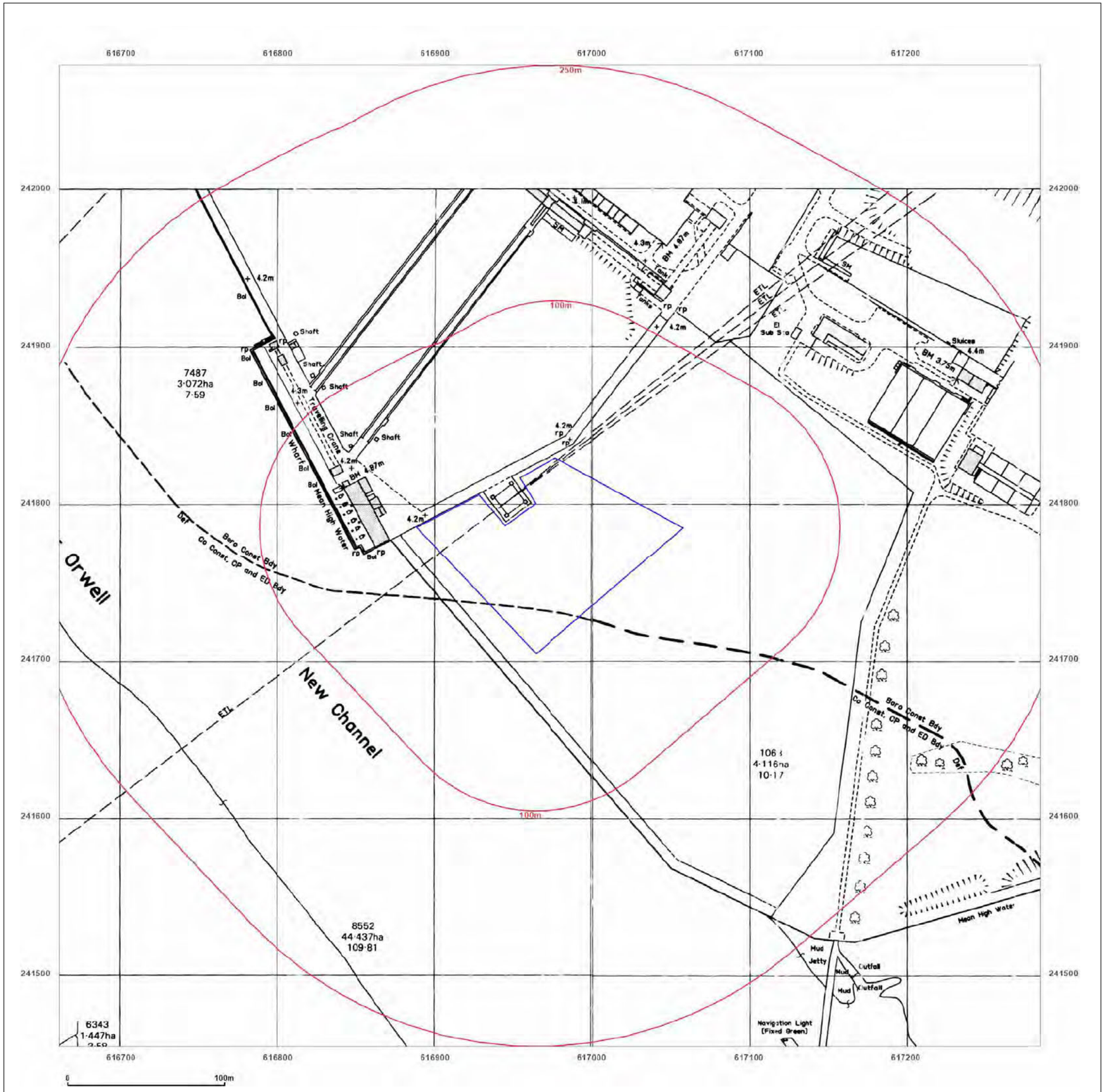

EMAPSITE™

Site Details:

unspecified

Client Ref: EMS_899153_1113301
Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid
Map date: **1986**
Scale: 1:2,500
Printed at: 1:2,500

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Surveyed N/A
Revised N/A
Edition N/A
Copyright N/A
Levelled N/A

Surveyed N/A
Revised N/A
Edition N/A
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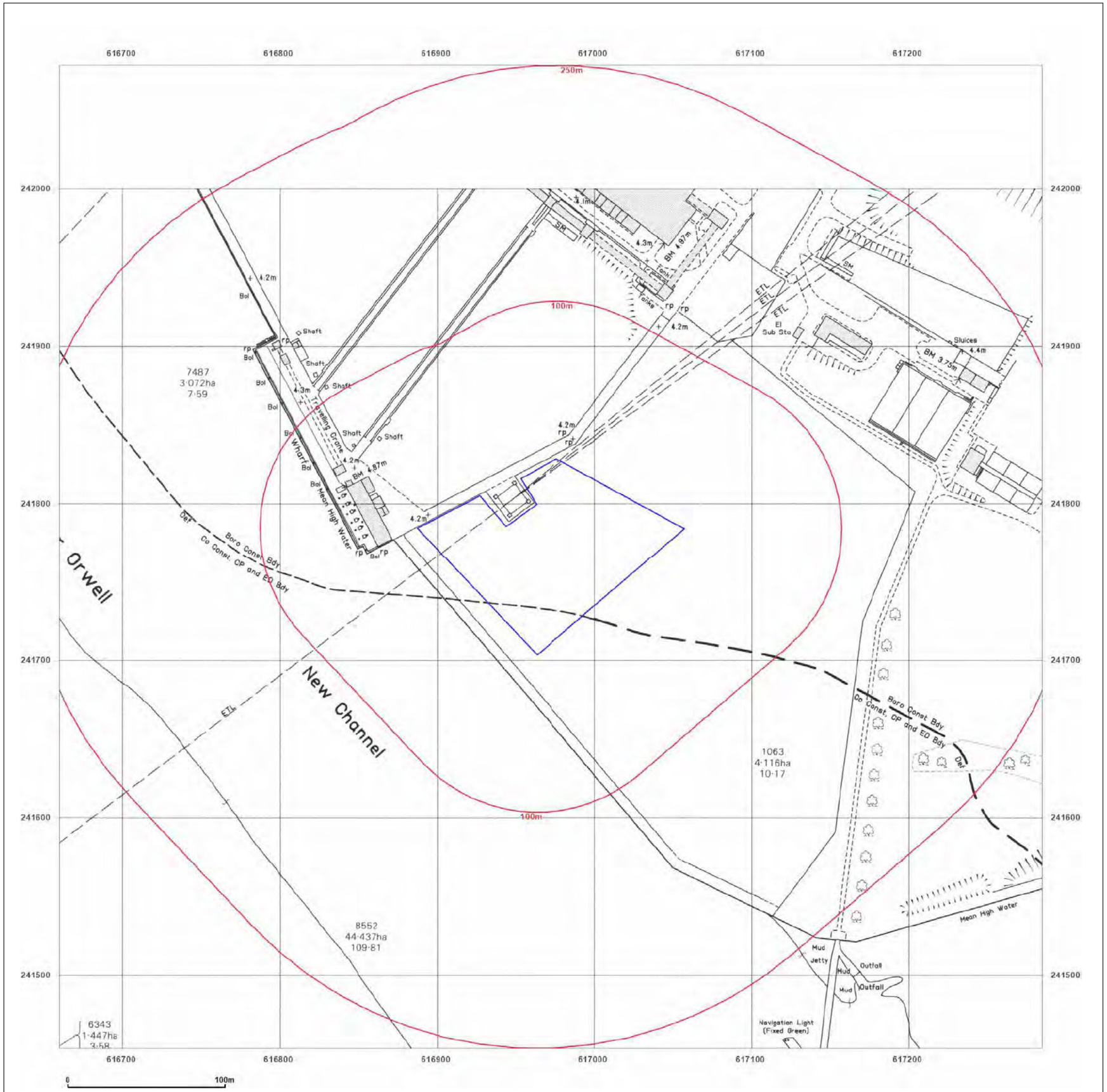

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Map Name: National Grid
Map date: **1986**
Scale: 1:2,500
Printed at: 1:2,500

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Surveyed 1950
Revised 1986
Edition N/A
Copyright 1986
Levelled 1961

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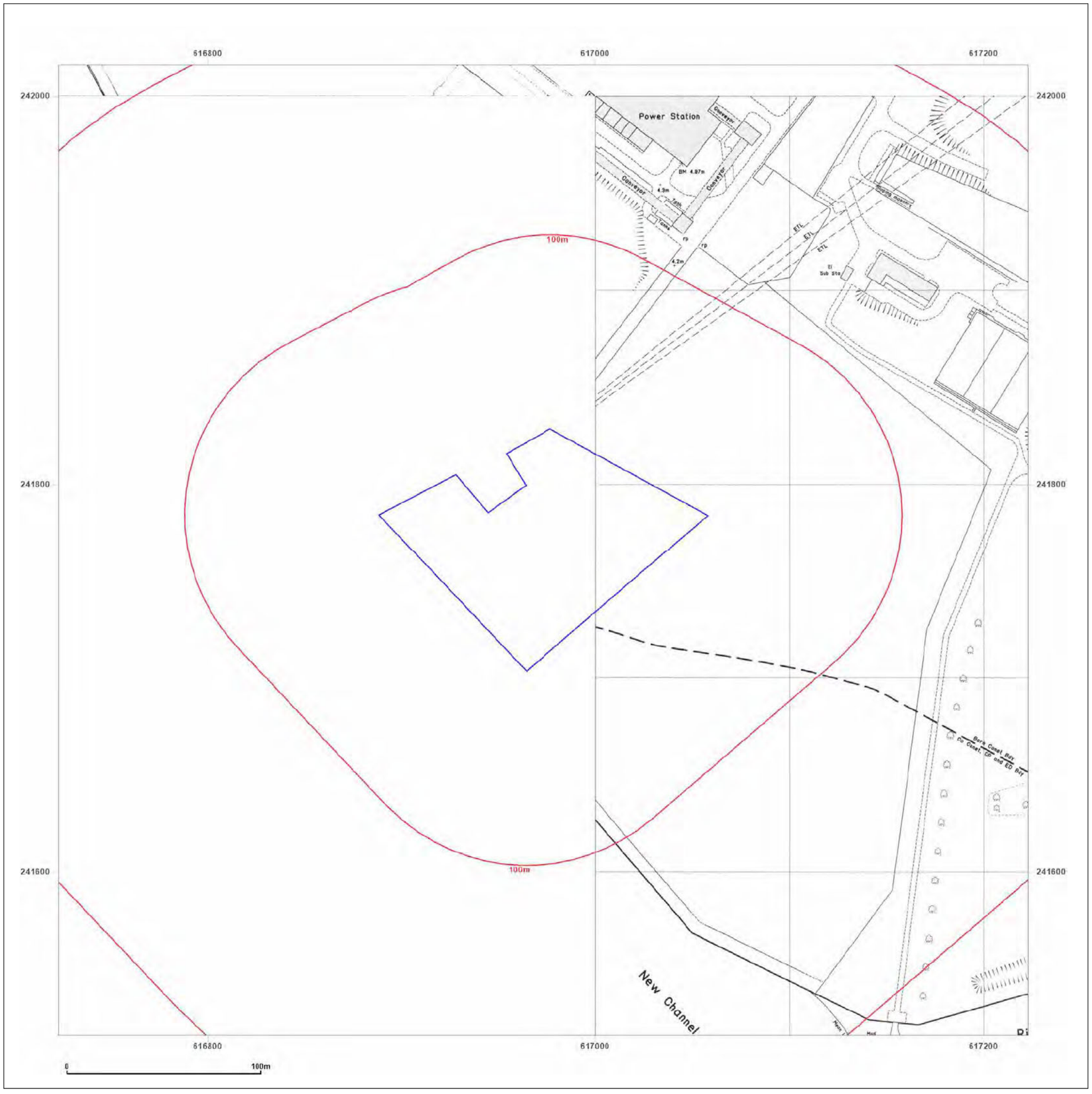

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Grid Ref: 616973, 241766

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Printed at: 1:2,000

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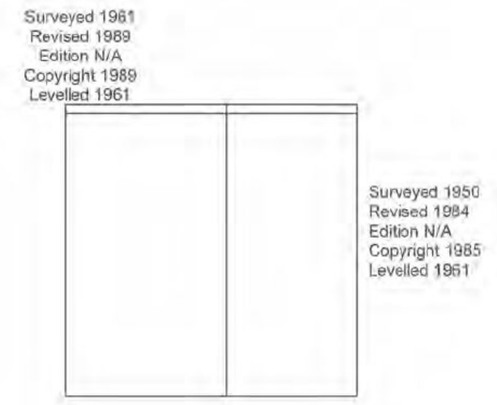

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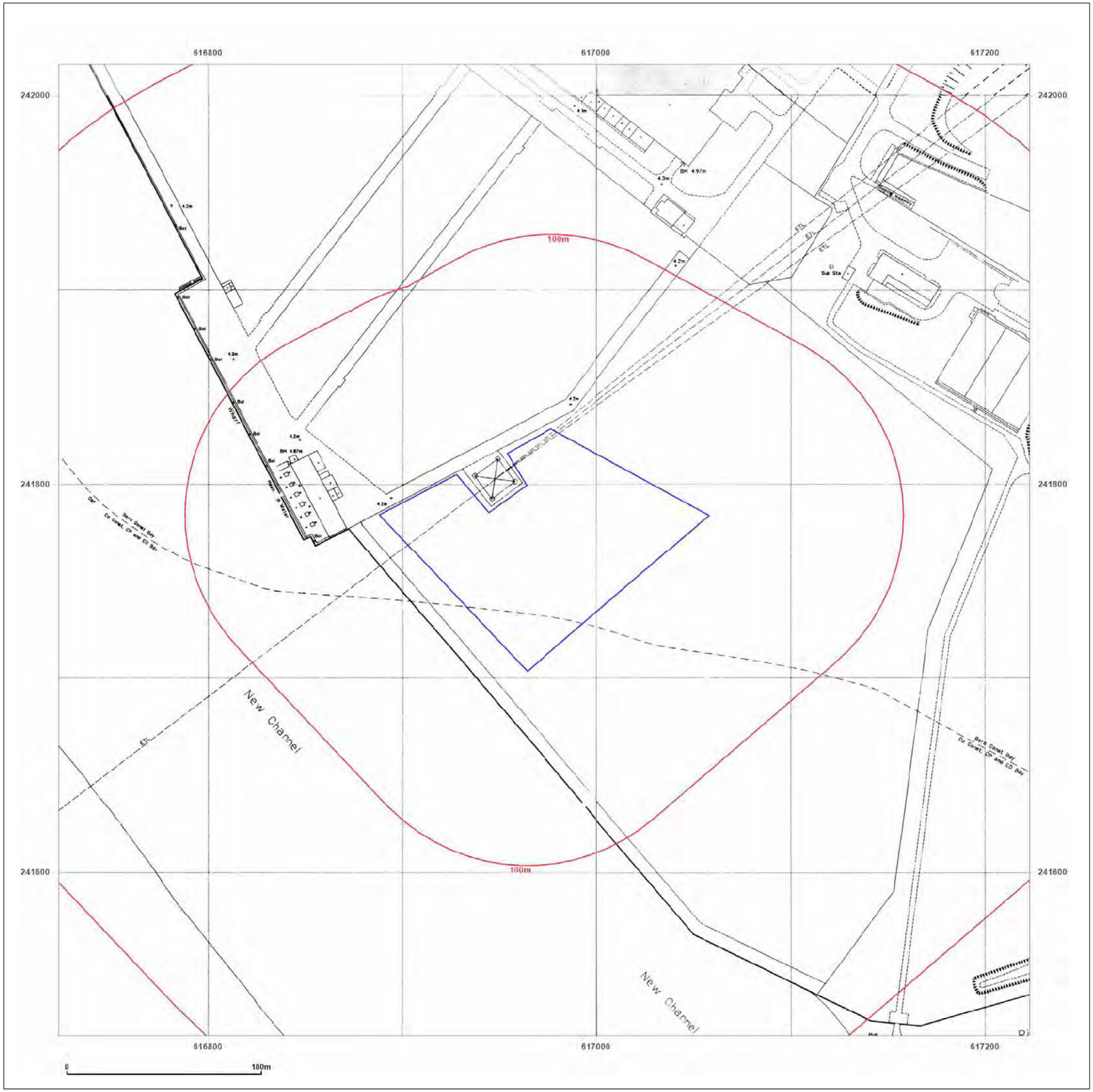

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid

Map date: **1991-1994**

Scale: 1:1,250

Printed at: 1:2,000

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Surveyed 1994
Revised 1994
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1961
Revised 1991
Edition N/A
Copyright 1991
Levelled 1961

Surveyed N/A
Revised N/A
Edition N/A
Copyright 1994
Levelled N/A

Surveyed N/A
Revised N/A
Edition N/A
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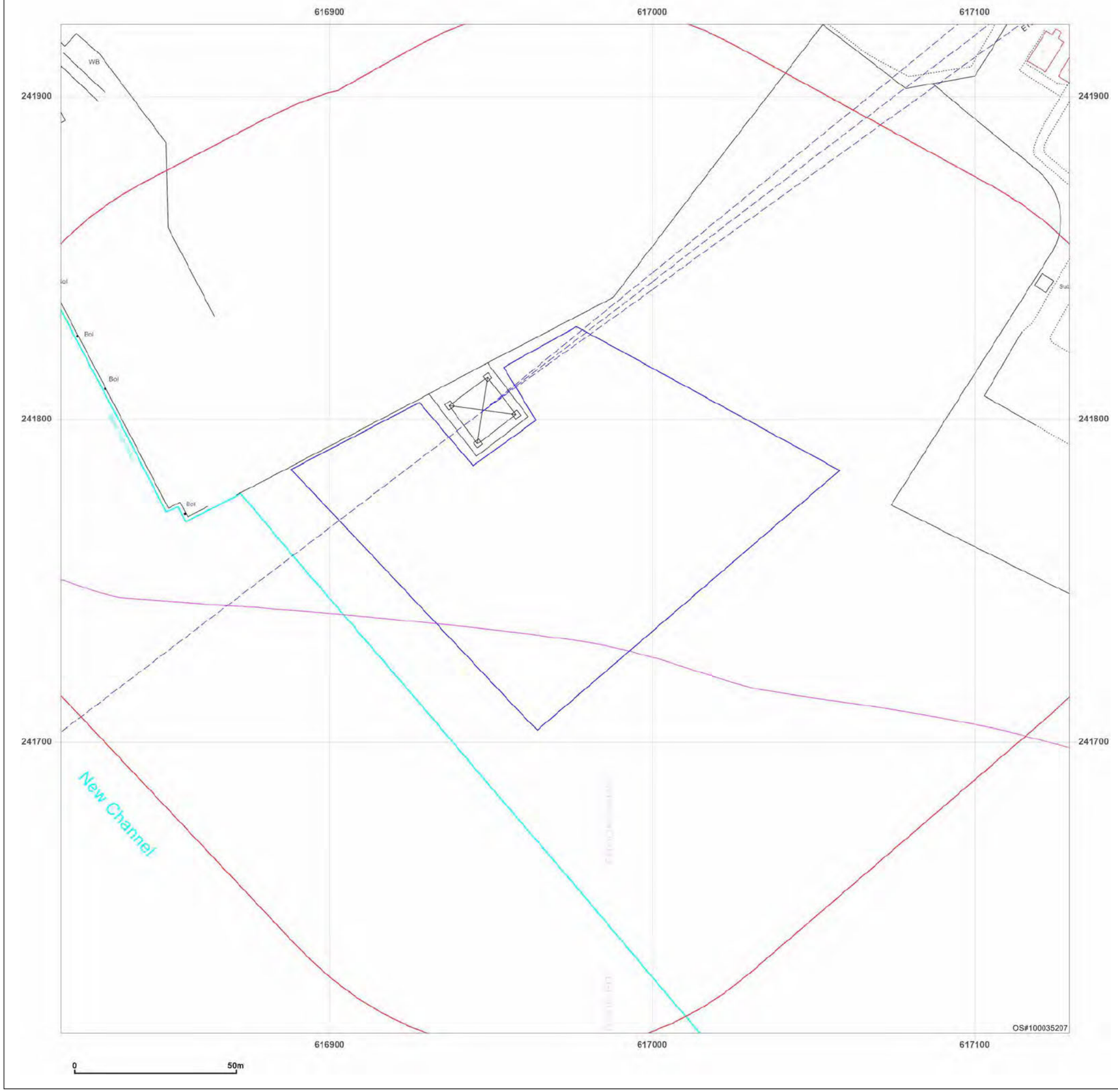

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Map date: 2003
Scale: 1:1,250
Printed at: 1:1,250

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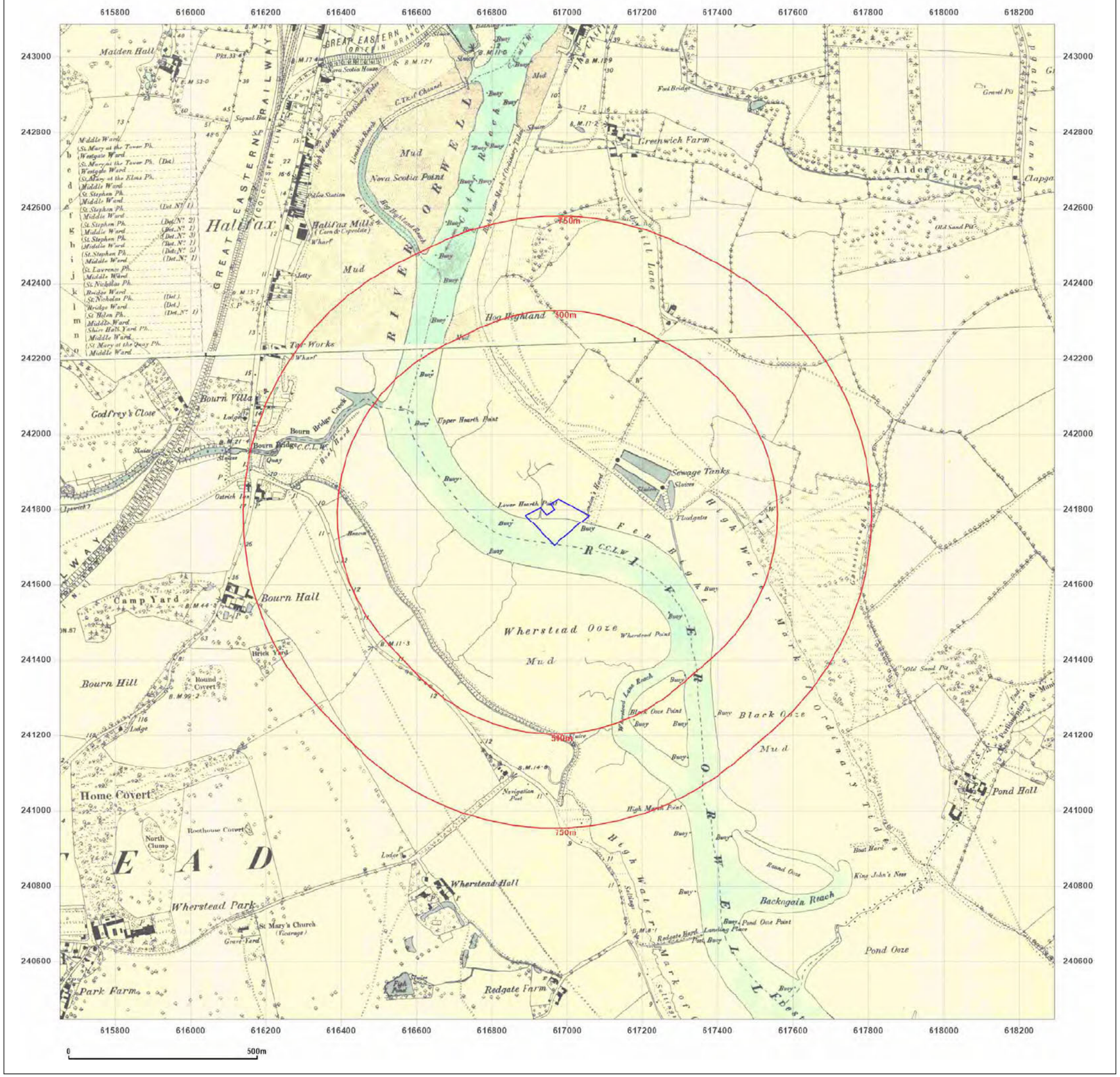

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Site Details:

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: County Series

Map date: **1881-1882**

Scale: 1:10,560

Printed at: 1:10,560

N
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Surveyed 1882
Revised 1882
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1881
Revised 1881
Edition N/A
Copyright N/A
Levelled N/A

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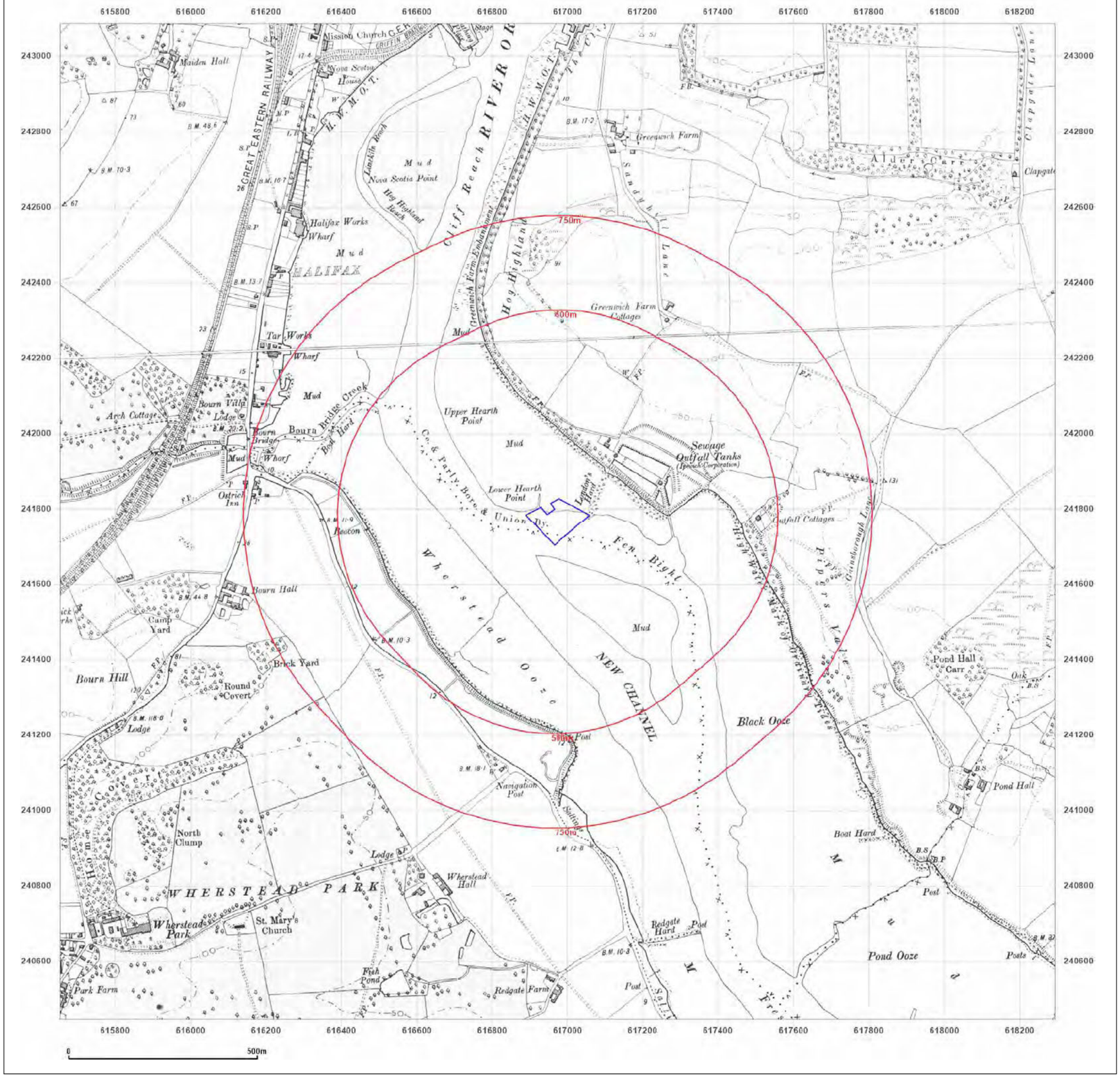

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Site Details:

unspecified

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: County Series

Map date: **1902-1903**

Scale: 1:10,560

Printed at: 1:10,560

N
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Surveyed 1881
Revised 1903
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1880
Revised 1902
Edition N/A
Copyright N/A
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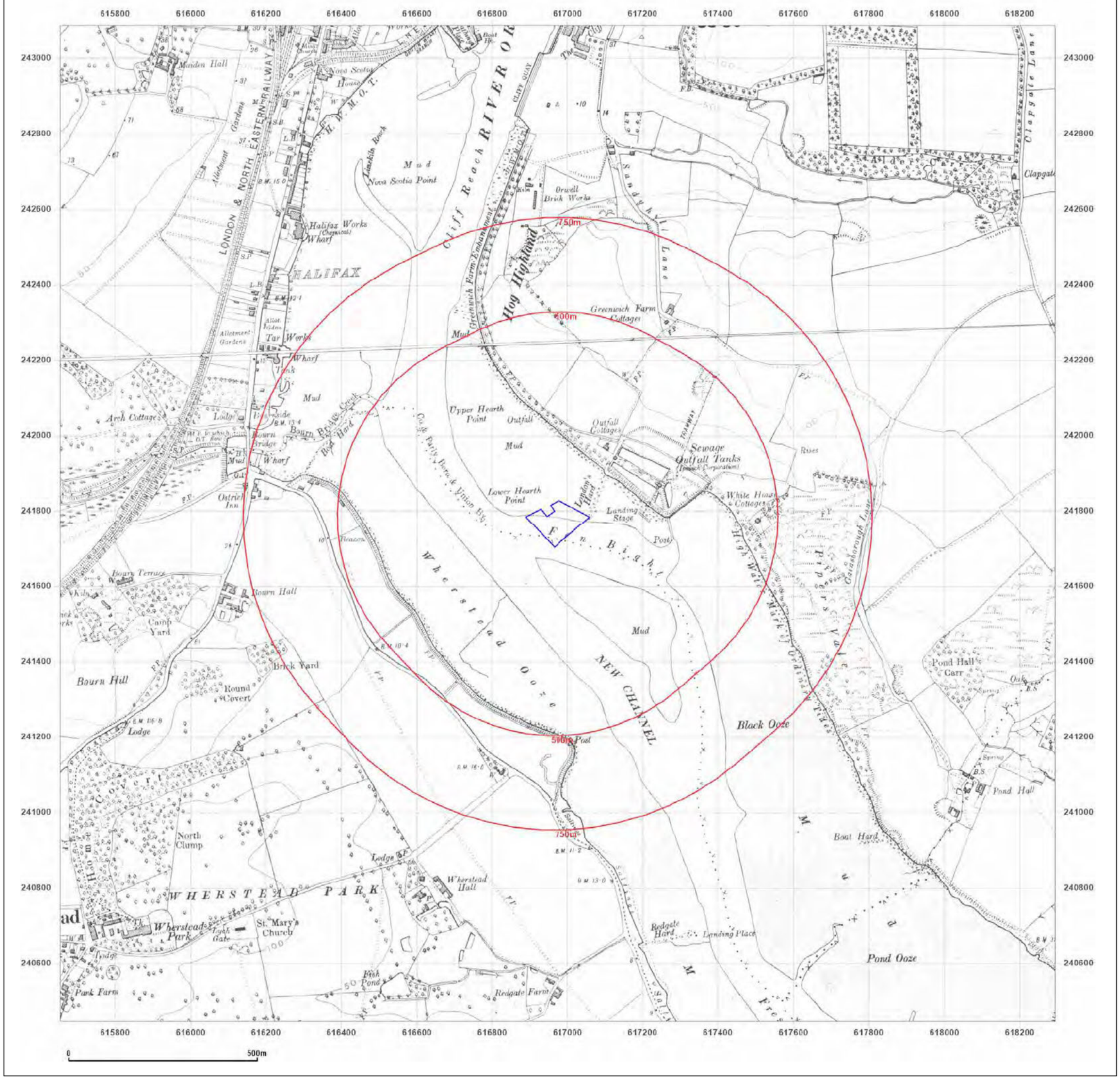

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Site Details:

unspecified

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Grid Ref: 616973, 241766

Map Name: County Series

Map date: **1924-1928**

Scale: 1:10,560

Printed at: 1:10,560

N
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Surveyed 1881
Revised 1928
Edition 1928
Copyright N/A
Levelled N/A

Surveyed 1880
Revised 1924
Edition N/A
Copyright N/A
Levelled N/A

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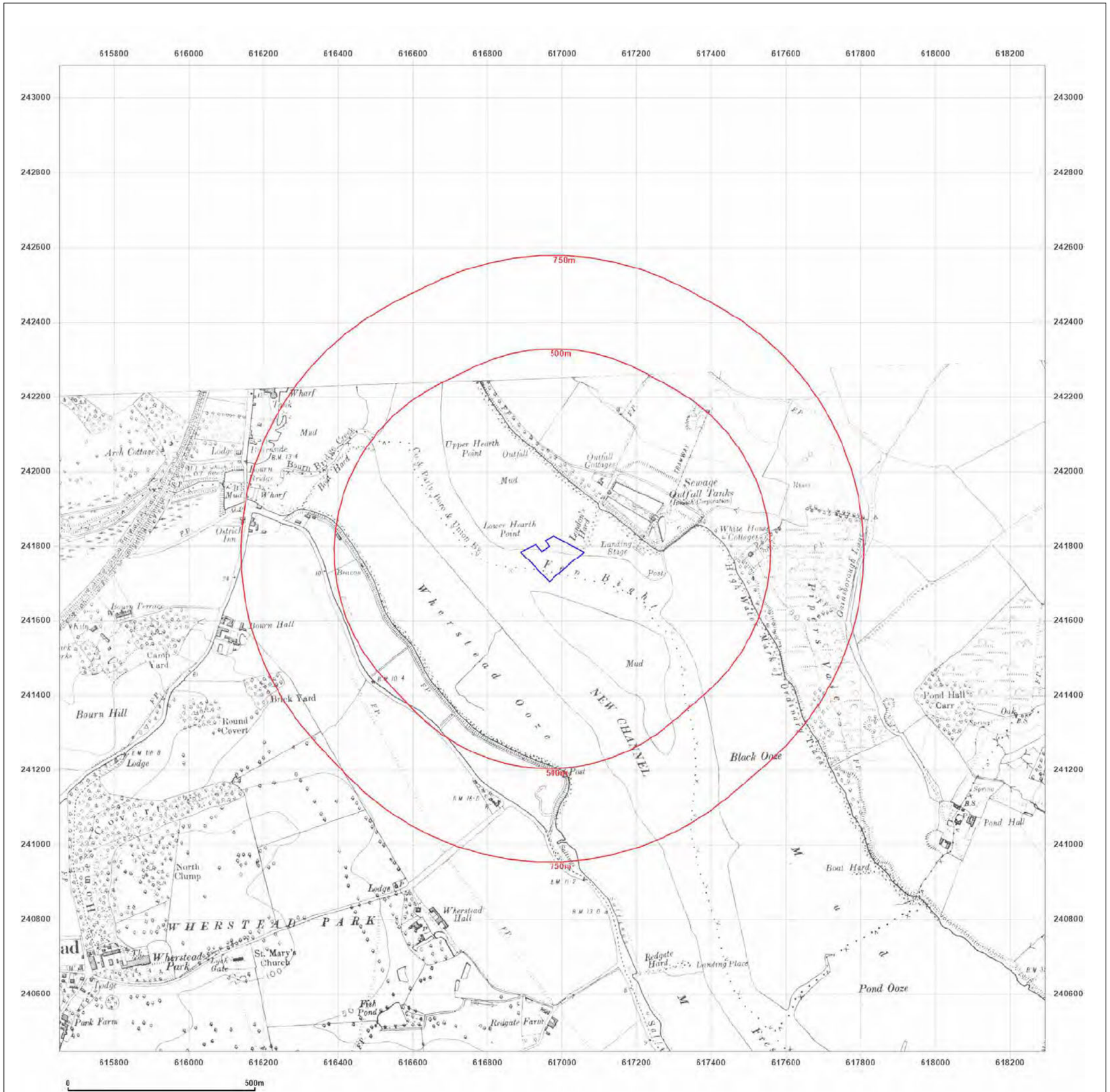

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unspecified

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: County Series

Map date: **1928**

Scale: 1:10,560

Printed at: 1:10,560

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Surveyed 1880
Revised 1928
Edition 1928
Copyright N/A
Levelled N/A

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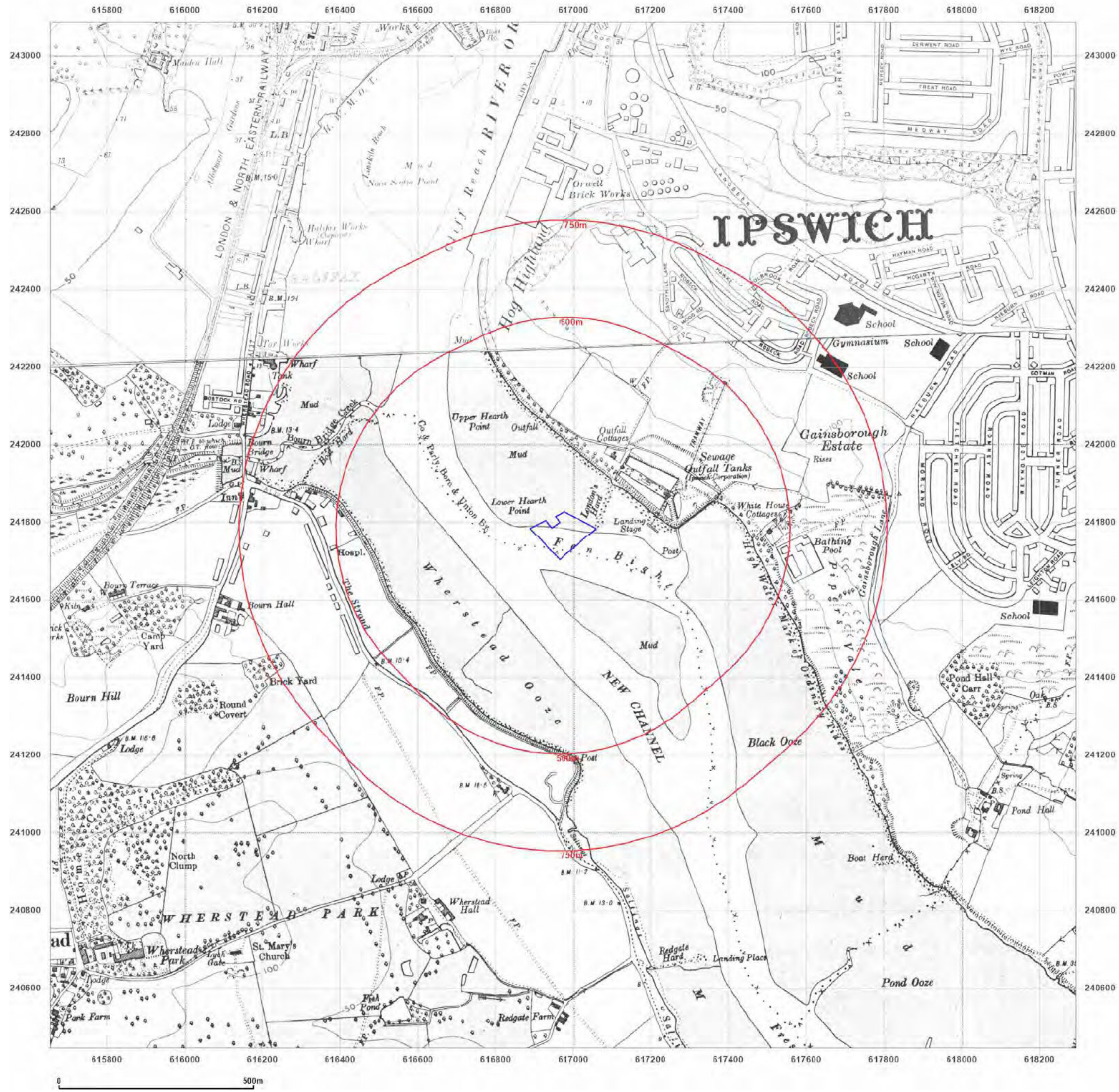

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: County Series

Map date: **1938**

Scale: 1:10,560

Printed at: 1:10,560

N
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Surveyed 1881
Revised 1938
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1880
Revised 1938
Edition N/A
Copyright N/A
Levelled N/A

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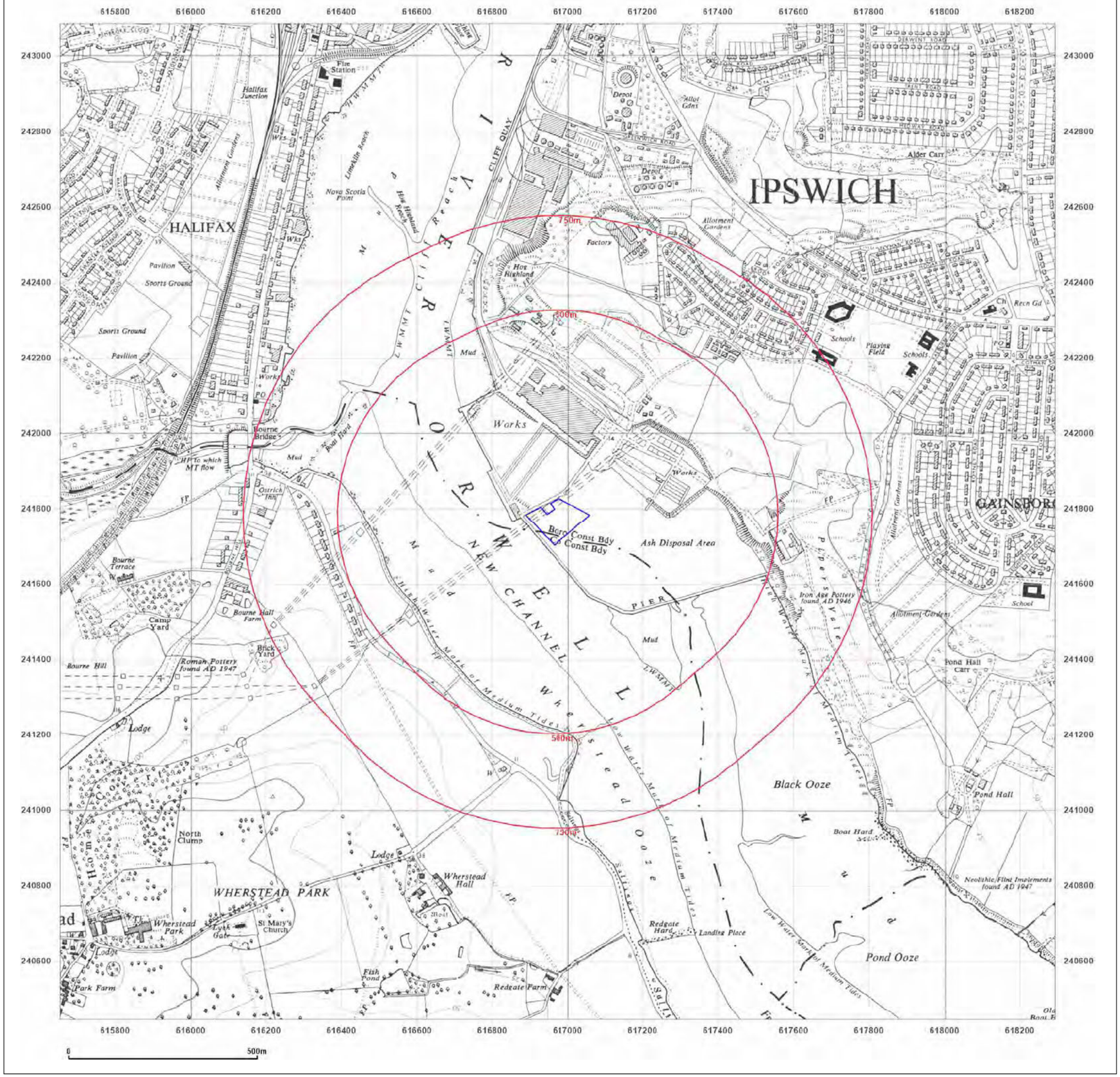

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Map Name: Provisional

Map date: **1953**

Scale: 1:10,560

Printed at: 1:10,560

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Surveyed 1953
Revised 1953
Edition N/A
Copyright N/A
Levelled N/A

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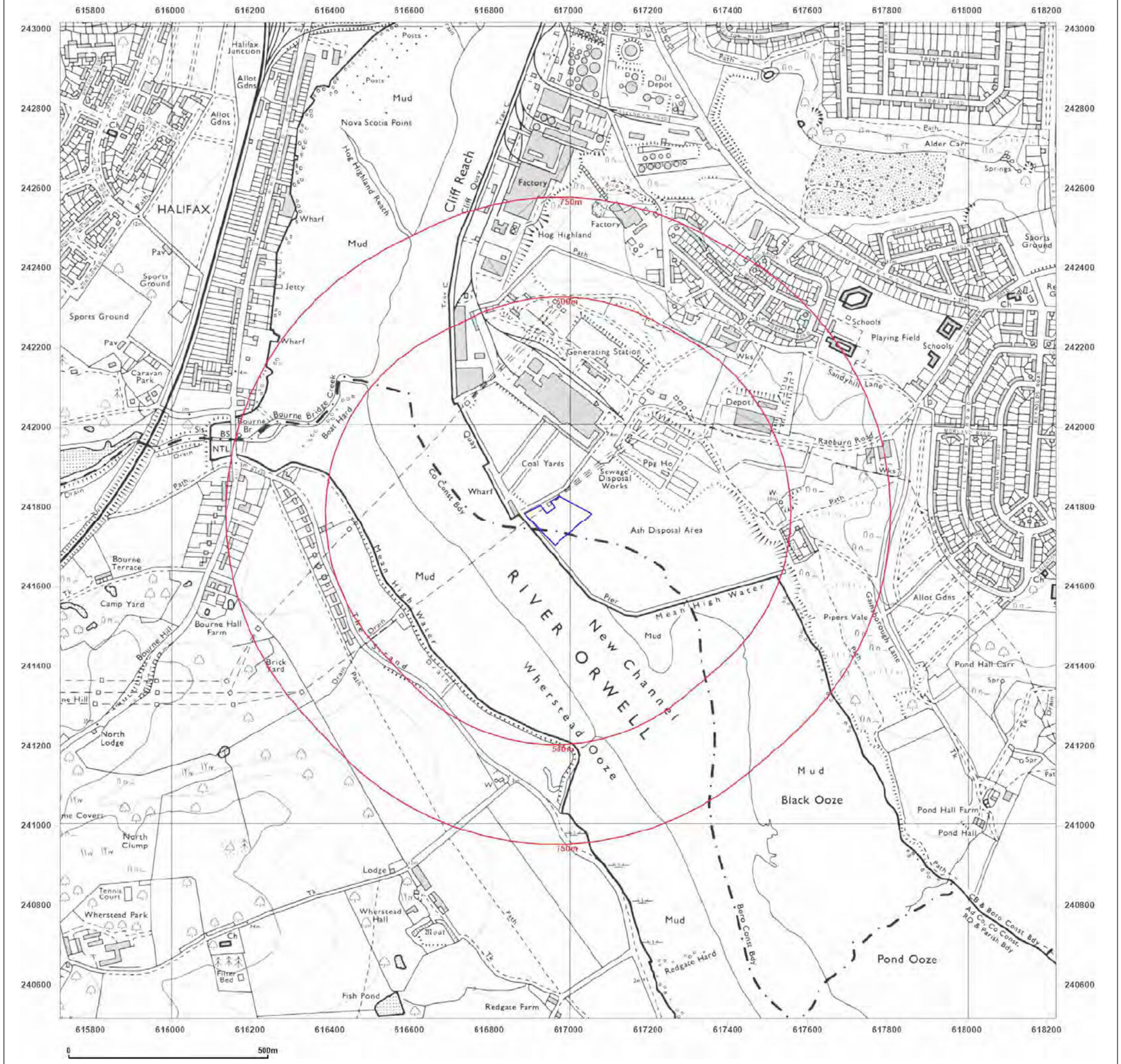

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Site Details:

unspecified

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid

Map date: **1970**

Scale: 1:10,000

Printed at: 1:10,000

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Surveyed 1970
Revised 1970
Edition N/A
Copyright N/A
Levelled N/A

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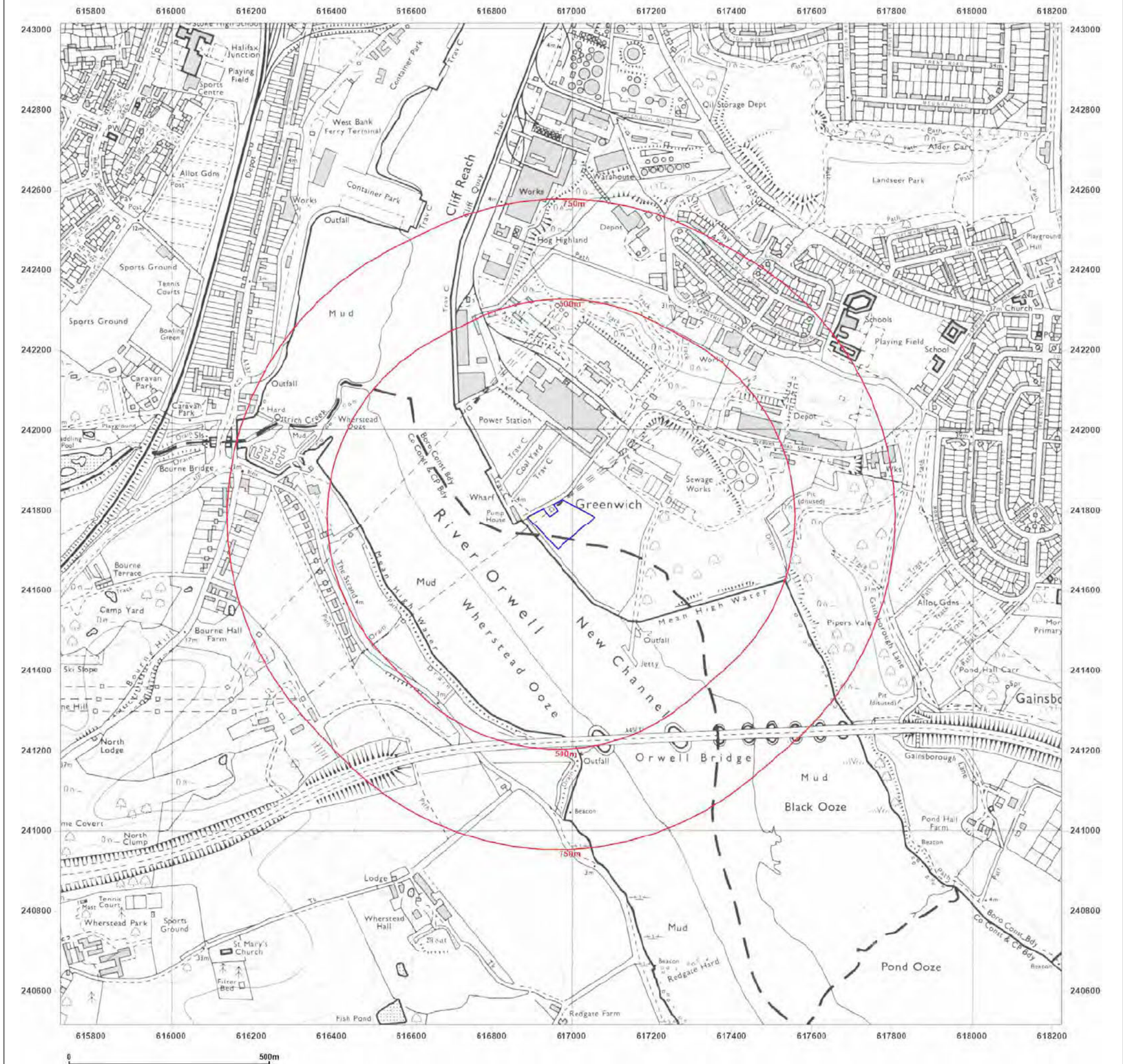

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid
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Scale: 1:10,000
Printed at: 1:10,000

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Surveyed 1984
Revised 1984
Edition N/A
Copyright N/A
Levelled N/A

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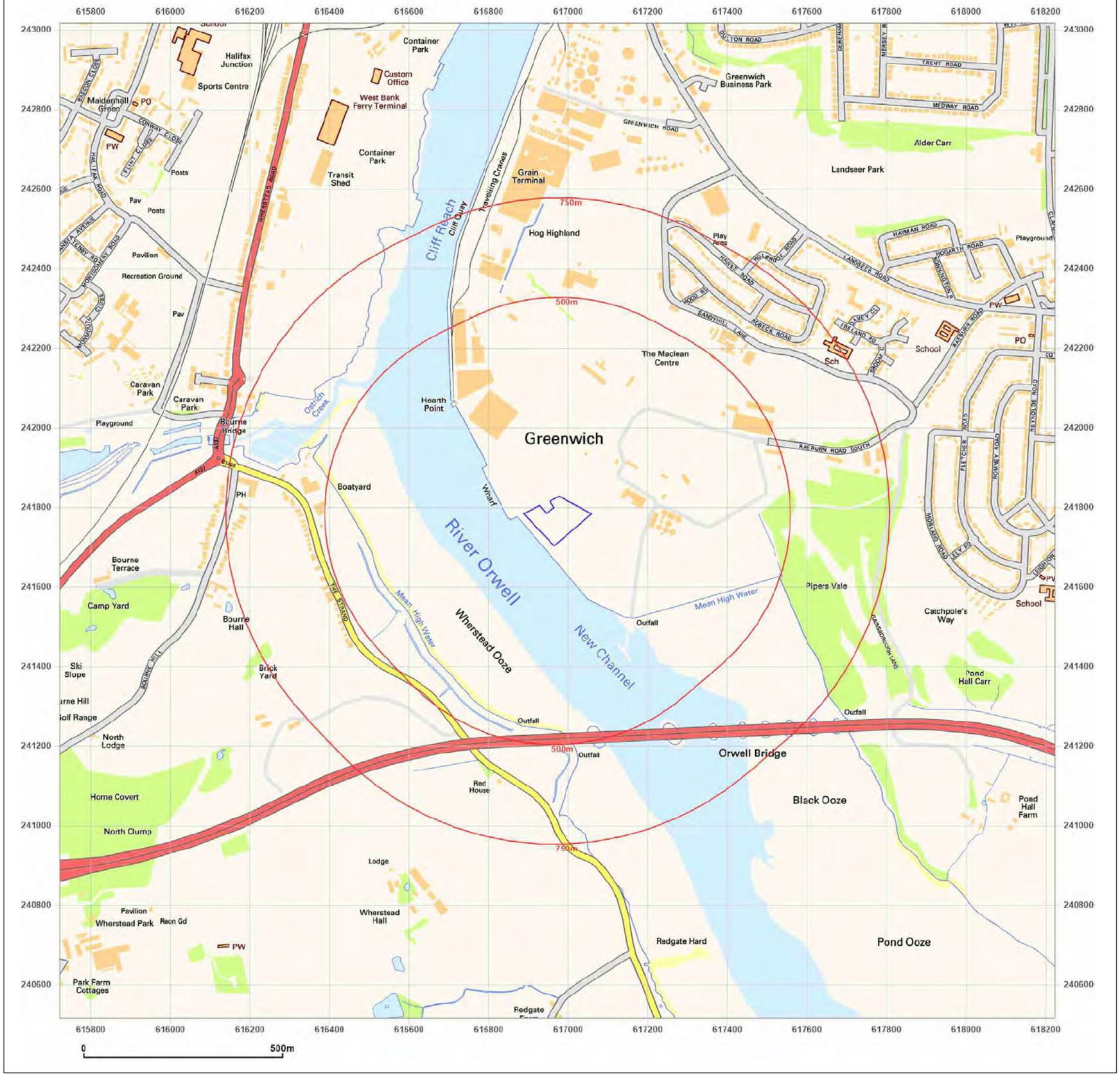

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Grid Ref: 616973, 241766

Map Name: National Grid
Map date: 2001
Scale: 1:10,000
Printed at: 1:10,000

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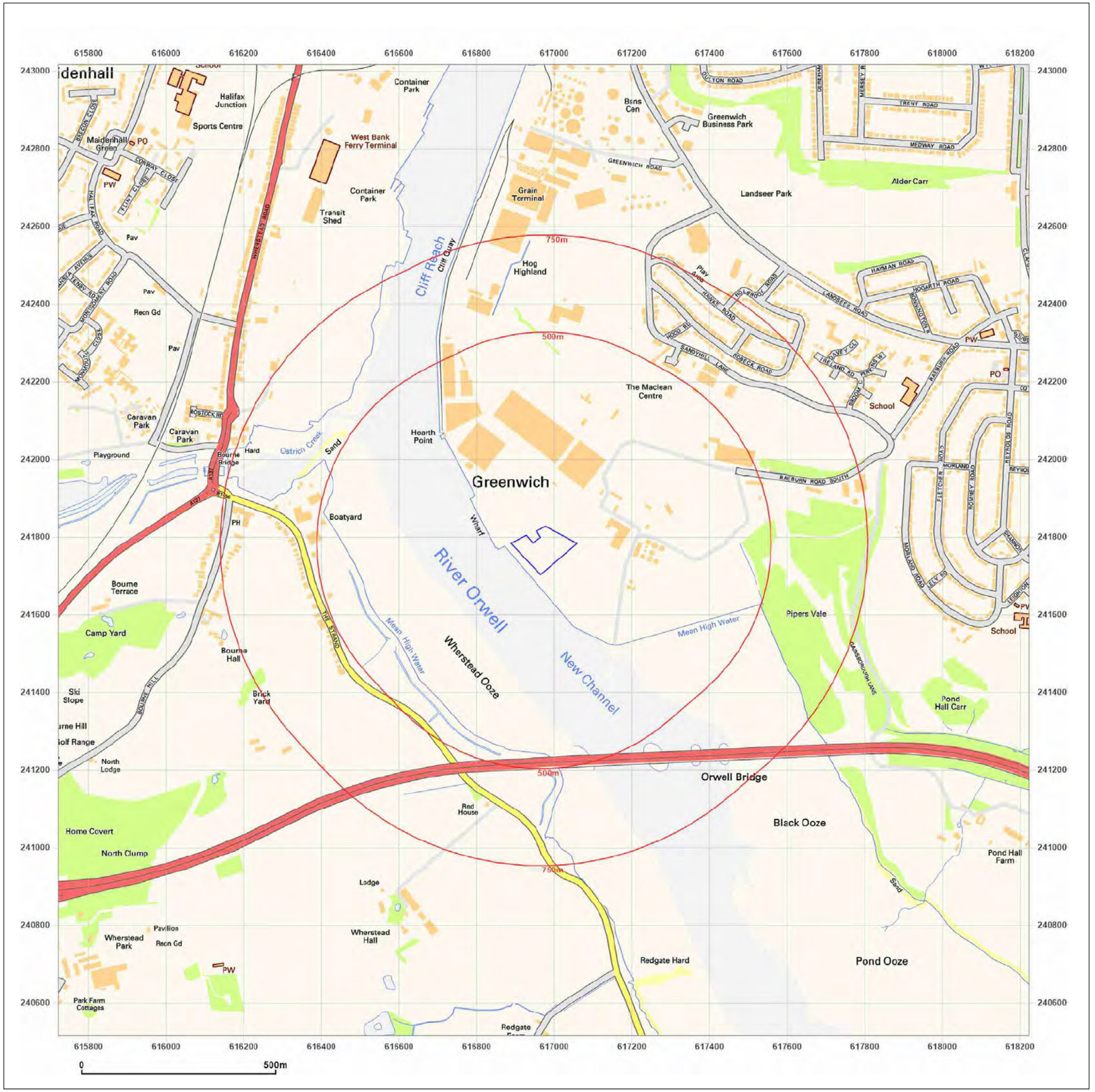

EMAPSITE™

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Grid Ref: 616973, 241766

Map Name: National Grid
Map date: **2010**
Scale: 1:10,000
Printed at: 1:10,000

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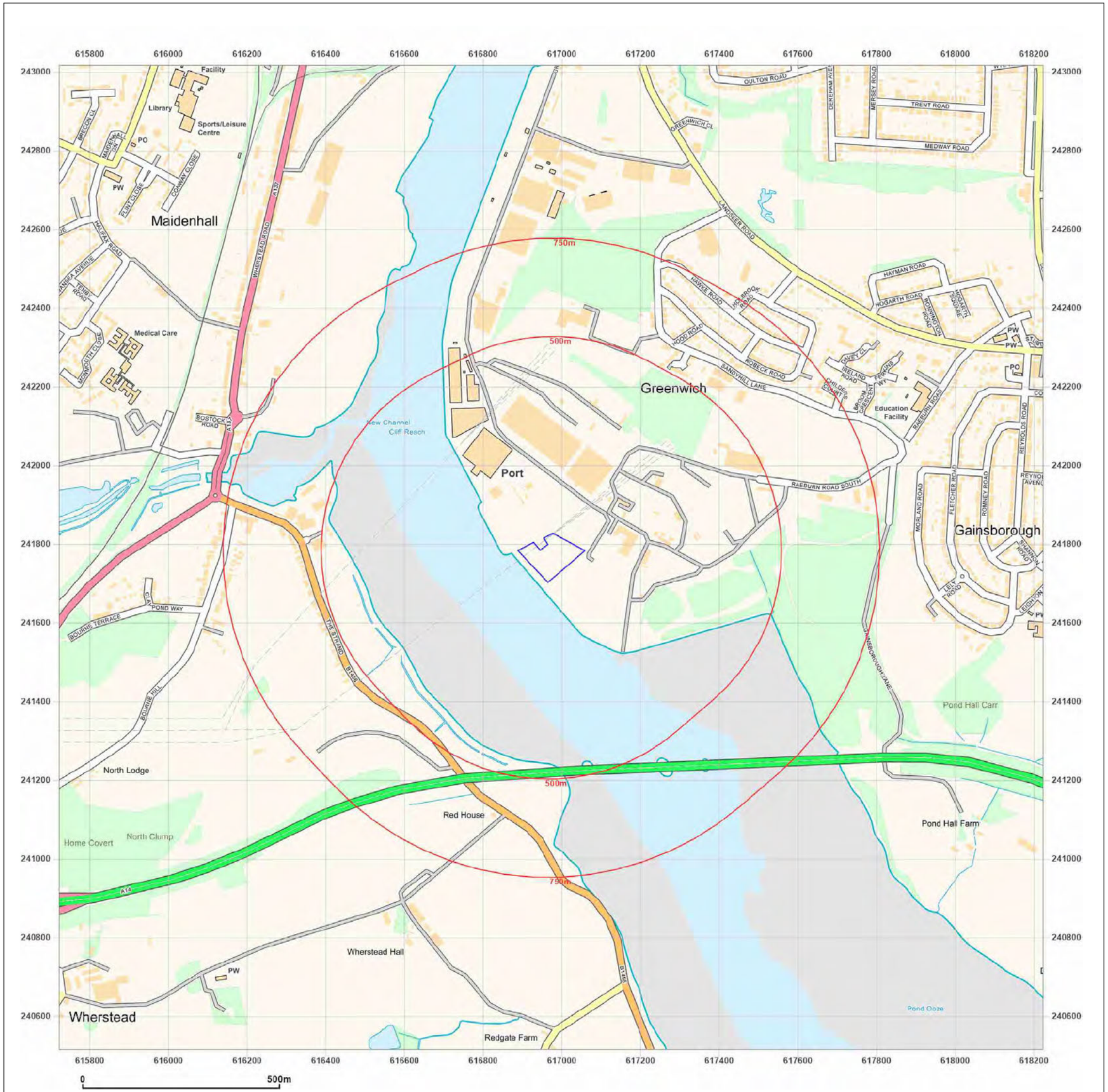

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Report Ref: EMS-899153_1147875
Grid Ref: 616973, 241766

Map Name: National Grid
Map date: 2023
Scale: 1:10,000
Printed at: 1:10,000

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APPENDIX 5

Summary Environmental Management System

DRAFT ENVIRONMENTAL MANAGEMENT SYSTEM

Cliff Quay, Cliff Road, The Docks,
Ipswich, IP3 0BS

Prepared on behalf of:
Sewells Reservoir Construction Limited

Date:
March 2024

This Environmental Management System was prepared by PDE Consulting Limited on behalf of Sewells Reservoir Construction Limited

CONTENTS

TABLES

DRAWINGS

APPENDICES

1. INTRODUCTION

Background

1.1. PDE Consulting Limited (the "Agent") has been commissioned by Sewells Reservoir Construction Limited (SRC) (the "Operator") to produce an Environmental Management System (EMS) for a new waste facility to be located at Cliff Quary, Cliff Road, The Docks, Ipswich, IP3 0BS (the 'Site').

1.2. This draft EMS has been produced to support the permit application and it will be finalised when the permit is issued.

1.3. The permit application is for the storage and physical treatment of inert and non-hazardous waste. Imported wastes will be treated by sorting, separation, screening, crushing and blending to produce soil, soil substitutes and aggregate.

1.4. The Site is located approximately 3 km south of the centre of Ipswich and some 840 m west of Gainsborough and is centred at National Grid Reference (NGR) TM 16983 41775 as shown on Drawing No. KD.IPSW.1.D.001.

1.5. The proposed permit boundary can be seen outlined on Drawing No. KD.IPSW.1.D.002A. A copy of the permit, when it has been issued, will be presented in Appendix 1.

1.6. There are three main commitments for this EMS:

- Prevention of pollution by means of identifying and minimising environmental risk from Site operations;
- Compliance with permitting regulations; and
- Continual environmental improvement.

Review Process

1.7. This EMS needs to be reviewed to ensure that targets are being met, and to take account of any process changes/developments in environmental control or/and changes to the Permit if it is granted. This EMS should be considered as a 'live' document and new procedures shall be added and/or existing procedures amended as necessary as the Site develops.

1.8. It is necessary to review and update this EMS as follows:

- when you make changes to your Site, operations or equipment that affect the activities covered by your permit;
- whenever you apply to change ('vary') your permit;
- after any accident, complaint or breach of your permit; and
- if you encounter a new environmental problem or issue, and have implemented new measures to control it.

1.9. Any revisions or changes will be logged in the revision history table at the beginning of the document.

1.10. The EA may also review your management system and make recommendations for improvements after any accident, permit breach or other incident.

1.11. Adherence to the principles of the EMS should ensure the appropriate protection of the surrounding environment as the works take place as well as continual environmental improvement.

Reference Documents

1.12. This EMS has been prepared in accordance with the environmental management guidance[1] on the EA website (www.gov.uk).

[1] Develop a management system: environmental permits. Published 1 February 2016 and updated 03 April 2023.

2. SITE MANAGEMENT

2.1 The Operator of the Site is: SRC whose registered address is Crown Business Centre, Old Ipswich Road, Ardleigh, Colchester, CO7 7QR.

2.2 The Site address is: Cliff Quay, Cliff Road, The Docks, Ipswich, IP3 0BS.

2.3 The Site will be managed using a sufficient competent person and resources. Certificates for the technically competent manager are presented in Appendix 2.

2.4 A notice will be displayed at or near the Site entrance informing the public of the nature of the Site and who they can contact for further information or who to notify if they have a concern. It needs to be easily readable from outside the Site in daylight hours and must include:

- The Permit holder/Operators name;
- An emergency contact name and the Operator's telephone number;
- A statement that the site is permitted by the EA;
- The permit number;
- The EA national numbers, 03708 506506 (general enquiries) and 0800 807060 (incident hotline).

2.5 The Site perimeter is secured by lockable gates and fencing. The Site will be kept locked and secure when not manned.

2.6 Minimum personal protective equipment shall be worn in all operational areas. This will include high visibility jacket or waistcoat in traffic areas and steel toe capped boots.

2.7 All liquids in containers, whose emissions to water or land could cause pollution, will be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise leakage and spills from the primary container.

2.8 All contractors visiting the Site will sign in and out of the visitors' book and will be made aware of the Site's health and safety procedures.

2.9 All Site staff will be made aware of the waste hierarchy, which is (from most to least favourable option):

- Prevention: preventing and reducing waste generation;
- Reuse and preparation for reuse: giving the products a second life before they become waste;
- Recycle: any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes composting and it does not include incineration;
- Recovery: some waste incineration based on a political non-scientific formula that upgrades the less inefficient incinerators; and
- Disposal: processes to dispose of waste, i.e. landfill, some incineration, etc.

3 OPERATIONS

3.1 The scope of this EMS extends to all operations and documentation concerning the waste operations carried out under the conditions of the permit. The proposed permitted activities are detailed in Table 1 below.

Table 1: Proposed Activities

Description of Activities	Limit of Activities
R13: Storage of wastes pending the operations numbered R3 and R5. R3: recycling or reclamation of organic substances which are not used as solvents. R5: Recycling or reclamation of other inorganic materials.	Treatment of wastes listed in Table 4 consisting only of sorting, separation, screening, crushing and blending of waste for recovery as a soil, soil substitute or aggregate. Secure storage of wastes listed in Table 4 pending treatment. Storage of wastes listed in Table 4 shall not exceed 40,000 tonnes in total at any one time. No more than 100,000 tonnes of waste shall be treated per year. Treatment of slags and ashes for disposal shall not exceed 50 tonnes per day, or if for a mix of recovery and disposal shall not exceed 75 tonnes per day.

3.2 It is proposed that incinerator bottom ash (IBA) is imported to the Site via boats, and construction and demolition wastes are imported to the Site by road. IBA will be unloaded via the dock to the north west of the permit boundary.

3.3 Imported wastes will be treated by sorting, separation, screening, crushing and blending to produce produce soil, soil substitutes and aggregate.

3.4 The proposed mobile plant to be used on Site will comprise:

- FN197 Komatsu WA475-10E0 wheeled loading shovel;
- EC250E Volvo Excavator; and
- Rubblemaster RM70GO! 2.0 crusher with in-built screener.

<u>Outline Waste Acceptance Procedure</u>

3.5 Wastes shall only be accepted at the Site if:

- It is of a type listed in the permit (see Appendix 1);
- It conforms to the description in the documentation supplied by the producer and holder through the accompanying waste transfer note;
- Its chemical, physical and biological characteristics make it suitable for its intended treatment;
- Any excavated soil from potentially contaminated sites has been shown by prior chemical analysis and assessment to be suitable for the intended use without significant risk of pollution; and
- It is visually inspected on arrival and before it enters the treatment process to ensure that it complies with these standard rules.

3.6 The waste transfer note will be checked for the correct description of the waste and associated information (EWC, SIC and similar) and the contents of the delivery container validated by an initial visual assessment upon collection from the waste producer and again upon arrival at the facility.

3.7 Any waste that does not comply with the above shall be rejected and shall be;

- Removed from the Site; or
- Moved to a designated quarantine area pending removal.

3.8 The operator shall maintain and implement a system which ensures that a record is made of the quantity, characteristics, date of delivery and, where practicable, origin of any waste that is received for disposal or recovery and of the identity of the producer, or in the case of multiple collection vehicles, of the collector of such waste. Any information regarded by the operator as commercially confidential shall be clearly identified in the record.

3.9 Anybody having responsibility for approving waste streams at the Site must have a thorough understanding of the Waste Acceptance Procedure (WAP).

Operating Procedures

3.10 The Site operating procedures are presented in Appendix 3. Each of the procedures has been generated with the intention of identifying and minimising the risks of pollution from the operations at the Site.

3.11 The following reporting forms are presented in Appendix 4:

Form A: Environmental Training Record;
Form B: Environmental Training Checklist;
Form C: Accident and incident record form;
Form D: Complaints record form;
Form E: Maintenance record form;

4 ACCIDENT MANAGEMENT PLAN

4.1 An Accident Management Plan (AMP) is maintained and implemented for the waste operations and is presented in Table 2.

4.2 Those accidents identified as part of the assessment are:

- Leaks or spillages e.g. of liquids during refuelling or of material during transfer, sorting or processing of inert waste;
- Failure of plant or equipment - leakages/puncture due to faulty pipe work, valves, over-pressure, blockages, corrosion, severe weather, ground movement and so on;
- Fire;
- Flooding due to ingress of watercourse floodwater, blocked drains, burst water main and use of fire water;
- Failure of services due to failure of supply in water, gas, electricity; and
- Unauthorised entry and tampering or malicious damage to plant and equipment.

4.3 If you need to notify the EA during normal working hours you can contact your local office as follows:

General Enquires Telephone Number: 03708 506 506
Out of Hours 24 hour Incident Hotline: 0800 807060

Table 2: Accident Management Plan

Event	Likelihood of Occurrence	Consequence of Occurrence	Mitigation measures	Actions planned if the event does occur
Flooding	According to the EA Flood Map for Planning, the majority of the Site is located within Flood Zone 1 (lowest risk). The western corner of the Site is mapped as Flood Zone 2. Land within flood zone 1 has a low probability of flooding from rivers and the sea and land within flood zone 2 has a medium probability of flooding from rivers and the sea. Part of the area between the Site and the River Orwell, consistent with the Flood Zone 2 allocation,	Possible loss of containment of stockpiled inert and non-hazardous wastes, and stored treated products. Effects to machinery on Site	Issue with loss of containment rather than effects of the materials. Waste types are non-hazardous and inert so harm is likely to be temporary and reversible.	Recovery of released material where possible. Report any significant effects to the EA.

	benefits from flood defenses. The area designated as Flood Zone 2 is not proposed to be used for the storage and/or treatment of wastes.			
Fires	While there is a risk of fire the event is highly unlikely. The waste types stored on Site are not combustible. The permit does not allow the burning of wastes.	Damage to infrastructure and injury to personnel.	Sources of ignition will be removed from the operational area and there shall be a designated 'No Smoking' zone.	Appropriate fire fighting equipment will be available on Site.
Leaks/ spills	Possible spillage during transfer of wastes.	Contamination of land, drains, groundwater and watercourses.	Inspect and validate all incoming wastes. Only inert and non-hazardous wastes will be accepted.	Material will be returned to the stockpile immediately.
	Possible spillage during delivery of oil or fuel.		Supervise fuel deliveries. Use drip trays and spill materials.	Spill response procedure describes what to do in the event of a spill and where the spill kits are kept.
	Possible spillages during refuelling of plant and equipment.		Plant and equipment will be refuelled in designated areas.	
Failure of Services	Due to failure of supply: water; electricity, gas supply and sewerage system.	Build up of wastes if processing cannot take place.	Provision of standby facilities. Maintenance of up to date plans showing location of utilities.	Inform EA if storage quantities are/ may be breached.
Failure of Containment	Due to land movement, corrosion, impact, etc.	Contamination of land, drains, groundwater and watercourses.	Provision of secondary containment for fuels/ chemicals.	Spill response procedure.
Vandalism/ fly tipping	Unauthorised entry and tampering or malicious damage to plant and equipment, illegal deposit of waste.	Contamination of land, drains, groundwater and watercourses.	Secure perimeter and locked gates.	Spill response procedure. Emergency procedures Security procedure

5 MANAGEMENT AND MONITORING PLANS

Dust Emissions Management Plan

5.1 Appropriate measures to reduce/ control dust from the Site are presented in the approved Dust Emissions Management Plan in Appendix 5.

Noise Management Plan

5.2 Appropriate measures to reduce/ control noise emissions from the operations are presented in the approved Noise Management Plan in Appendix 6.

Pests/ Scavenging Birds

5.3 The risk of scavenging animals, scavenging birds and other pests arising from the site and affecting the surrounding environment is highly unlikely due to the type of waste accepted on the Site.

5.4 Should pests become a problem then specialist contractors will be engaged to address the problem.

Odour

5.5 In the extremely unlikely event that odour emissions become an issue, an odour assessment will be undertaken with a view to developing an odour management plan.

5.6 The risk in relation to odour has been assessed within the Environmental Risk Assessment in Appendix 7.

Environmental Risk Assessment

5.7 EA guidance[1] provides that the risk assessment forms part of the EMS. The environmental risk assessment is presented in Appendix 7.

Site Condition Report

5.8 A Site Condition Report (SCR) describes and records the condition of the land and groundwater at a site at particular points in time. It is to enable an operator to demonstrate that they have protected land and groundwater during the lifetime of the site, and that the land is in a satisfactory state when it comes to surrender a permit.

5.9 It is necessary to complete sections 1 to 3 of the EA's template for a SCR[2] and submit it with an application for a new permit.

5.10 The application SCR, which includes historic maps is presented in Appendix 8.

[2] H5: Site condition report – guidance and templates (Version 3.00). Environment Agency, April 2013.

DRAWINGS

Location Plan	Drawing No. KD.IPSW.1.D.001	Scale 1:5,000@A1
Permit Boundary Site Plan	Drawing No. KD.IPSW.1.D.002A	Scale 1:2,500@A3

APPENDIX 6

Evidence of Technically Competent Management

WAMITAB

Waste Management Industry
Training and Advisory Board

The Chartered Institution
of Wastes Management

Certificate No. OCC3718

Operator Competence Certificate

Qualification Title:

Managing Physical & Chemical Treatment - Hazardous Waste - 4MPTH

This Certificate is awarded to

Craig Chaplin

Awarded: 14/03/2013

Authorised

WAMITAB Chief Executive Officer

CIWM Chief Executive Officer

This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator Competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.

00031479

WAMITAB

Waste Management Industry
Training and Advisory Board

Qualification Title:

WAMITAB Level 4 Diploma in Waste Management Operations : Managing Physical & Chemical Treatment - Hazardous Waste (QCF) - 4MPTH

Qualification Accreditation Number:

600/0331/5

This Certificate is awarded to

Craig Chaplin

Awarded: 14/03/2013

Serial No:21882/4MPTH/1

Authorised

Ray Burberry
Qualifications Manager, WAMITAB

00031350

CIWM

Continuing Competence Certificate

This certificate confirms that

Craig Chaplin

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 29/11/2022

TSH	Transfer - Hazardous Waste
TMH	Treatment - Hazardous Waste
TMNH	Treatment - Non Hazardous Waste

Expiry Date: 29/11/2024

Verification date: 23/11/2022

Authorised:

Professional Services Director

Learner ID: 21882

Certificate No.: 5212421

Date of Issue: 29/11/2022

CIWM Chief Executive Officer

The Chartered Institution of Wastes Management

Scan code on reverse to authenticate that this is a genuine paper

APPENDIX 7

Dust Emissions Management Plan

DUST EMISSIONS MANAGEMENT PLAN

for the Physical Treatment of Inert and Non-Hazardous Waste at

Cliff Quary, Cliff Road, The Docks, Ipswich, IP3 0BS

Report prepared on behalf of:
Sewells Reservoir Construction Limited

Report Date:
March 2024

This Dust Emissions Management Plan was prepared by PDE Consulting Limited on behalf of Sewells Reservoir Construction Limited

consulting limited
chartered surveyors

The Alaska Building
Sitka Drive
Shrewsbury Business Park
Shrewsbury
Shropshire
SY2 6LG.

t: 01743 361918
w: pdeconsulting.co.uk

CONTENTS

FIGURES

TABLES

DRAWINGS

APPENDICES

1. INTRODUCTION

Scope

1.1 This Dust Emissions Management Plan (DEMP) has been prepared by PDE Consulting Limited (the 'Agent') on behalf of Sewells Reservoir Construction Limited (the 'Operator') hereafter referred to as SRC. This report relates to the operation of a proposed new waste facility to be located at Cliff Quay, Cliff Road, The Docks, Ipswich, IP3 0BS (the "Site").

1.2 This DEMP has been produced to support a new environmental permit application for the storage and physical treatment of inert and non-hazardous waste to produce soil, soil substitutes and aggregate.

1.3 The Site is located approximately 3 km south of the centre of Ipswich and some 840 m west of Gainsborough and is centred at National Grid Reference (NGR) TM 16983 41775 as shown on Drawing No. KD.IPSW.1.D.001. The proposed permit boundary is outlined in green on Drawing No. KD.IPSW.1.D.002A. The Site is located within the administrative are of Suffolk County Council.

1.4 The Site is located within an industrial estate and is bound on three sides by other industrial uses, with an asphalt plant and associated operations located immediately to the north and east of the Site. The River Orwell bounds the Site to the south west. A pylon is located adjacent to the northern Site boundary.

1.5 The Site is located adjacent to the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, and the Orwell Estuary Site Of Special Scientific Interest (SSSI).

1.6 The closest residential dwellings to the Site have been identified as Pipers Vale Close and are located approximately 500 m to the north east of the Site.

1.7 The Site is not located within an Air Quality Management Area (AQMA).

1.8 This report has been completed in accordance with the following EA guidance:

- https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit;
- Technical guidance note M17 Monitoring Particulate Matter in Ambient Air around Waste Facilities (Version 2); and
- Example Dust & Particulate Emissions Management Plan (version 10).

Implementing the DEMP

1.9 The Site Manager, reporting to the technically competent manager (TCM), will ensure that the procedures in this DEMP are adhered to.

1.10 The Site Manager will have the authority to modify or stop operations to reduce emissions on a temporary or permanent basis until the risk of emissions has subsided.

1.11 The Site Foreman will ensure that all members of staff are aware of the dust management procedures.

1.12 Staff at all levels will receive the necessary training and instruction in their duties relating to the control of all operations and the potential sources of dust emissions.

1.13 This document will form part of the Site specific Environmental Management System (EMS) for the waste operation which can be found in Appendix 5 of the main report. A copy of the EMS will be kept on Site in the Site office.

Review of the DEMP

1.14 This DEMP will be reviewed as follows:

- When changes are made to your Site, operations or equipment that affect the activities covered by the permit;
- Whenever an application is made to change ('vary') the permit;
- After any accident, complaint or breach of your permit; and
- If a new environmental problem or issue is encountered, and new measures have been implemented to control it.

1.15 Any revisions or changes will be logged in the revision history table at the beginning of the document.

2. OPERATIONS

2.1 It is proposed that incinerator bottom ash (IBA) is imported to the Site via boats, and construction and demolition wastes are imported to the Site by road. IBA will be unloaded via the dock to the north west of the permit boundary. The proposed permit boundary is outlined in green on Drawing No. KD.IPSW.1.D.002A.

2.2 Imported wastes will be treated by sorting, separation, screening, crushing and blending to produce soil, soil substitutes and aggregate. It is proposed that the activities listed in Table 1 are authorised by the permit.

Table 1: Proposed Activities

Description of Activities	Limit of Activities
R13: Storage of wastes pending the operations numbered R3 and R5. R3: recycling or reclamation of organic substances which are not used as solvents. R5: Recycling or reclamation of other inorganic materials.	Treatment of wastes listed in Table 4 consisting only of sorting, separation, screening, crushing and blending of waste for recovery as a soil, soil substitute or aggregate. Secure storage of wastes listed in Table 4 pending treatment. Storage of wastes listed in Table 4 shall not exceed 40,000 tonnes in total at any one time. No more than 100,000 tonnes of waste shall be treated per year. Treatment of slags and ashes for disposal shall not exceed 50 tonnes per day, or if for a mix of recovery and disposal shall not exceed 75 tonnes per day.

2.3 The following mobile plant will be used on Site for the permitted waste activities:

- FN197 Komatsu WA475-10E0 wheeled loading shovel;
- EC250E Volvo Excavator; and
- Rubblemaster RM70GO! 2.0 crusher with in-built screener.

2.4 The Rubblemaster RM70GO! 2.0 is a flexible crusher with low emissions, low noise and low diesel consumption.

2.5 The proposed operating hours for the Site are as follows:

- Monday to Friday 07:00 to 17:00;
- Saturday 07:00 to 12:00; and
- No operating on Sundays or Bank Holidays.

2.6 Saturdays will be used for plant maintenance and house keeping only.

2.7 The proposed waste types for storage and treatment are presented in Table 2. The waste types and descriptions are from standard rules permit SR2010No12 (Treatment of waste to produce soil, soil substitutes and aggregate) with the additions of those hi-lighted in blue in Table 2.

Table 2: Proposed Waste Types

EWC Code	Description	Restrictions
01	**WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS**	
01 04	**Wastes from physical and chemical processing of non-metalliferous minerals**	
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07	
01 04 09	Waste sand and clays	
10	**WASTE FROM THERMAL PROCESSES**	
10 01	**Wastes from power stations and other combustion plants**	
10 01 01	Bottom ash and slag only	
10 01 02	Pulverised fuel ash only	
10 01 05	Gypsum (solid) only	
10 01 07	Gypsum (sludge) only	
10 01 15	Bottom ash and slag only from co-incineration other than those mentioned in 10 01 14	
10 11	**Wastes from manufacture of glass and glass products**	
10 11 12	Clean glass other than those mentioned in 10 11 11	
10 12	**Wastes from manufacture of ceramic goods, bricks, tiles and construction products**	
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)	
10 13	**Wastes from manufacture of cement, lime and plaster products and articles and products made from them**	
10 13 14	Waste concrete only	
15	**WASTE PACKAGING**	
15 01	**Packaging**	
15 01 07	Clean glass only	
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	Clean glass only	
17 03	**Bituminous mixtures, coal tar and tarred products**	
17 03 02	Road base and road planings (other than those containing coal tar) only	
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 06	Dredging spoil other than those mentioned in 17 05 05	
17 05 08	Track ballast other than those mentioned in 17 05 07	
17 08	**Gypsum based construction material**	
17 08 02	Gypsum only other than that mentioned in 17 08 01	
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPERATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL USE**	
19 01	**Wastes from incineration or pyrolysis of waste**	
19 01 12	Bottom ash and slag other than those mentioned in 19 01 11	incinerator bottom ash
19 08	**Wastes from waste water treatment plants not otherwise specified**	
19 08 02	Washed sewage grit (waste from desanding) free from sewage contamination only	
19 09	**Wastes from the preparation of water intended for human consumption or water for industrial use**	
19 09 02	Sludges from water clarification	
19 12	**Wastes from the mechanical treatment of wastes**	
19 12 05	Clean glass only	
19 12 09	Minerals (for example sand, stones)	
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11.	Waste aggregate generated from the recycling of metals.
19 13	**Wastes from soil and groundwater remediation**	
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01	
19 13 04	Sludges from soil remediation other than those mentioned in 19 13 03	
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPERATELY COLLECTED FRACTIONS**	
20 01	**Separately collected fractions**	
20 01 02	Clean glass only	
20 02	**Garden and park wastes**	
20 02 02	Soil and stones	

2.8 Waste will either be delivered by the operator's own vehicles or by third party waste contractors. For all waste delivered by the operator's vehicles, the source will be known as each customer will be booked into the database. At the time of ordering a collection, the customer is made aware of the waste that can be collected by the company. All third-party users are made aware of the waste acceptance procedures.

2.9 All waste deliveries will be booked with the Site. As part of the booking procedure, details relating to the source of the waste will be noted. If there is any doubt about the nature of the source, based on the site description, further information will be required including Site Reports and chemical analysis.

2.10 All deliveries will be sheeted until entry to the site and instructed to un-sheet by the Site Foreman.

2.11 A check of the load will be made by the Site staff on arrival and during deposit by the Site foreman and/or plant operator by visual assessment. The contents of the load will be checked against the Waste Transfer Note.

2.12 Site staff will check the environmental permit to validate that the description given is listed on the permit. Once accepted, the driver will be directed to the appropriate reception area depending on the load.

2.13 Loads containing predominantly soils, will be deposited and processed to separate the hardcore from the soil. The hardcore will be deposited into a bay prior to further processing. The soils will be transferred to a separate bay labelled as 6F4. This is a recycled aggregated (0-55mm) used as a fill material. The hardcore will be crushed to produce crushed hardcore.

2.14 Loads containing mainly waste concrete, will be deposited in the raw feed concrete area. Crushing will take place to produce crushed concrete.

2.15 The location of the Rubblemaster RM70GO! 2.0 crusher with in-built screener and the waste storage area are shown on Drawing No. KD.IPSW.1.D.002A.

2.16 Identified sources for potential fugitive dust emissions from the Site should no mitigation techniques be implemented are:

- Vehicles entering and/ or leaving the Site with mud on wheels, and tracking dust on to or off the site;
- Vehicles and plant moving around the Site kicking up dust;
- Road vehicles tipping waste;
- Movement of waste materials around the Site;
- Treatment of waste by crushing and screening, including wastes dropping from conveyors into stockpiles;
- Waste stockpiles;
- All Site surfaces; and
- Particulate emissions from the exhaust of vehicles/plant/machinery on Site.

3. LOCALITY AND POTENTIAL SENSITIVE RECEPTORS

Meteorology

3.1 Unlike many other atmospheric pollutants, the generation of fugitive dust is particularly dependent upon weather conditions and the nature of the operations.

3.2 The prevailing meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more Site specific, microclimatic conditions. The most significant meteorological factor is the predominant wind direction and wind speeds. Consequently data has been collected regarding the predominant wind speeds and directions appropriate to the Site.

Local Wind Speeds and Directions

3.3 Wind speed and direction data have been obtained from the Wattisham observing station for the period 2008 to 2017. Wattisham airfield observing station is located approximately 11 miles north west of the Site and has the facility to calculate both wind speed and wind direction.

3.4 The location and measurements taken at the station are appropriate for characterisation of the wind climate at the Site. Wind speed and direction data from the observing station are presented in the wind rose in Figure 1.

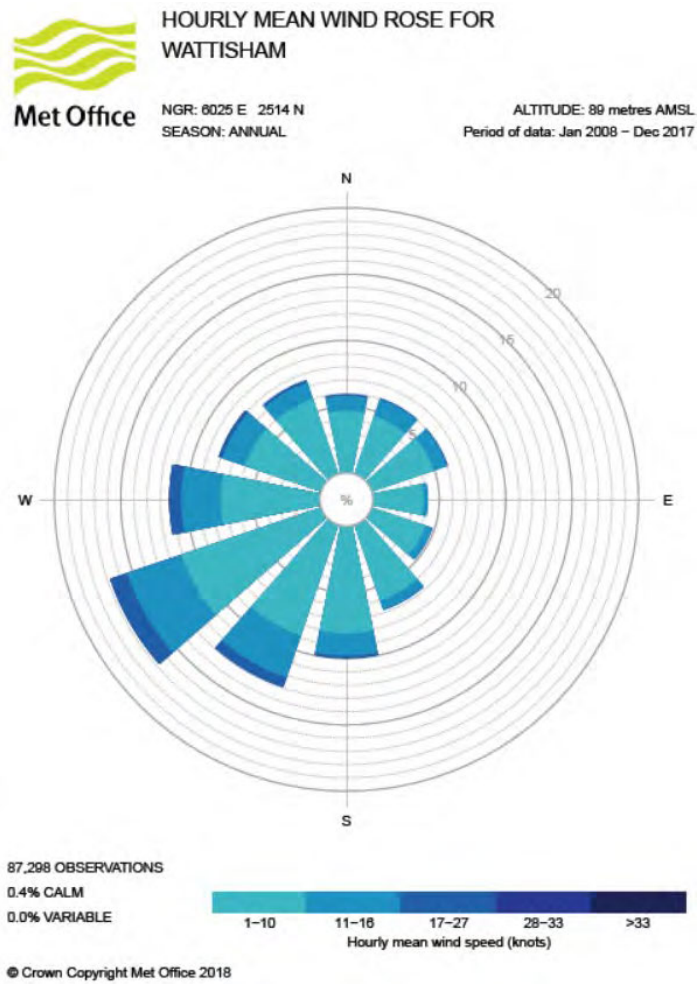
3.5 The predominant wind hails from the south western quarter. It is calculated that the wind originating from the south west (WSW and SSW) accounts for approximately 29% of all wind.

3.6 According to the Beaufort wind force scale[1], winds exceeding 13mph (classified as moderate breeze) are taken to be capable of entraining dust from surfaces. Wind speeds exceeding 13mph occur 32% of the time. Winds from the west south-west are most prevalent, blowing 17% of the time, with winds exceeding 13mph for 7% of that time.

3.7 The distance from the source to the receptor location plays an important role in the potential impact experienced as airborne dust, dust deposition rates; detection concentrations fall off rapidly with increasing distance from the source. The very largest dust particles usually only travel 10 m to 20 m before being deposited and the vast majority of dust is deposited within 100 m of the source.

[1] https://www.rmets.org/resource/beaufort-scale

Figure 1: Hourly Mean Wind Rose, Wattisham, Suffolk 2008-2017



Potential Sensitive Receptors

3.8 Sensitive receptors include, but are not limited to, environmental habitat site, hospitals, schools, protected species sites, childcare facilities, elderly housing and convalescent facilities. These are areas where the occupants are more susceptible to the adverse effects of exposure to high levels of dust and particulates.

3.9 It is also necessary to consider clean industry and manufacturing processes such as, but not limited to, powder coaters and paint shops, offices, diesel generators, busy roads, power stations, food manufacturing and food outlets, agricultural land, the location of solar panels or air conditioning systems in the near vicinity, and areas of car parking.

3.10 Potentially sensitive receptors identified within 500 m of the Site are listed in Table 3 below and shown on Figure 2.

Table 3: Potential Sensitive Receptor Locations

Ref No.	Land use	Description	Direction from Proposed Permit Boundary	Distance from Proposed Permit Boundary (m)
1	River Orwell Ramsar/SSSI/SPA	Watercourse and habitat site	South West	10
2	Pipers Vale Local Nature Reserve	Local Nature Reserve	East	402
3	Pipers Vale Close	Residential Properties	North East	500

3.11 The Site is bound on three sides by other industrial users which are not considered to be sensitive to dust.

3.12 The River Orwell which lies 10 m to the south west of the Site is an SPA, Ramsar site and a SSSI. It is an estuary comprising extensive mudflats, low cliffs, saltmarsh, and areas of vegetated shingle on the lower river reaches. The Site supports internationally and nationally important numbers of numerous species of wintering wildfowl and waders. Whilst the permit boundary is 10 m from the river, the crusher is set back some 40 m from the river. The River Orwell is not located downwind of the prevailing wind direction and the proposed mitigation measures should ensure that there will be no impact of the river.

3.13 Pipers Vale Local Nature Reserve lies 402 m from the Site and is an area of ecologically sensitive scrub, heathland and alder carr/ deciduous woodland.

3.14 The closest properties on Pipers Vale Close are located approximately 500 m from the Site. A number of industrial sites lie between the Site and Pipers Vale Close. Pipers Vale Close is also neighboured by various commercial/ industrial units along Sandyhill Lane.

3.15 Due to the distances from the Site and the proposed mitigation measures it is not considered that the identified potential sensitive receptors are at risk from dust emissions from the Site.

Figure 2: Sensitive Receptor Location Plan

Other Dust/Particulate Emitting Operators

3.16 Other potentially dusty operations located within 500 m of the Site are listed in Table 4.

Table 4: Other Dust Emitting Operators

Company	Type of Business	Potential Source of Emissions	Distance from Permit Boundary (m)	Direction
Tarmac	Industrial	Operation of Asphalt Plant	0	North and East
Anglian Water Services	Waste Management	Composting Facility	100	East

3.17 As well as the potential sources of emissions described above, vehicle movements associated with the operations of these business, and others in the industrial estate, are likely to produce fugitive emissions from vehicle movements and point source emissions from exhausts.

4. MITIGATION AND MONITORING

Mitigation Measures

4.1 Table 5 provides details of mitigation measures to be employed at the Site in accordance with the EA Dust and Particulate Emission Management Plan template (Version 10).

4.2 The mitigation measures proposed include preventative and remedial measures forming the Site-specific contingency plan to be utilised during dry conditions which will break the potential source-pathway-receptor linkages identified at the Site.

Table 5: Summary of Mitigation Measures

Abatement Measure	Description / Effect	Use on Site
Hardstanding of unmade ground	The site surfacing is a concrete access road into the site, with a short concrete road and ramps on and off the weighbridge. The rest of the site is hardstanding made up of the natural aggregate which has been processed on site. This will reduce the amount of dust generated at ground level by vehicles and site activities.	There is a concrete access road into the Site. The waste storage and processing area is comprised of hardstanding. These areas will be regularly cleaned to prevent the tracking of mud outside of the permit boundary. The Site surfacing allows easy cleaning and prevents wind-whipping. There are regular inspections and maintenance of surfaced areas.
Appropriate sizing of operations (waste throughput, vehicle size, operational hours)	Managing the amount of activity on site as well as associated traffic movements will result in reduced emissions and reduced re-suspension of particulates from a site.	The operation has been sized appropriately, with particular regard to dust, noise and vehicle movements. Annual throughputs will be limited to 100,000 tonnes per annum. Operating hours will be limited to those referenced in Section 2.6
Site / process layout in relation to receptors	Locating particulate emitting activities at a greater distance from receptors may reduce receptor exposure.	Working plans have been designed to minimise double handling of material on Site. Incoming wastes will be placed in stockpiles and only moved when they are transferred to the treatment plant.
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	All vehicles delivering wastes to the Site or transferring materials from Site will be sheeted.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on site.	Reducing vehicle movements and idling will reduce emissions from vehicles.	All vehicles. Enforcement of a 10mph speed limit on Site will reduce re-suspension of particulates by vehicle wheels.
Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds.	In the unlikely event that the height of stockpiles is found to be the source of dust emissions, the materials will be dampened and the stockpiles may be reduced in height.

	Reducing storage volumes should reduce the surface area over which particulates can be mobilised.	The maximum amount of waste to be stored on Site at any one time will be 40,000 tonnes. Drop heights from the 360 excavator onto the plant will be limited to 1 m or less at all times to minimise airborne emissions.
Ceasing operation during high winds and/or prevailing wind direction where dust emissions can be seen leaving the site boundary.	Mobilisation of dust and particulates is likely to be greater during periods of strong winds or exceptionally dry conditions and hence ceasing operation at these times may reduce peak pollution events.	To be assessed following daily checks for dust generation within the Site boundary by the Operator. If dust is being generated by vehicle movements or treatment activities, the Dust Action Plan in Section 4.4 of this report will be implemented. Additional mitigation such as further dampening of stockpiles, reducing stockpile heights and on Site sweeping will be employed. Waste operations may be reduced or ceased to prevent off Site emissions.
All site vehicles will be maintained in accordance with the manufacturer's instructions.	To ensure optimum operation conditions. Plant and vehicles will be regularly serviced and equipped with effective exhausts to minimise exhaust emissions.	All vehicles.
Remedial Measures		
An adequate supply of water for spray equipment is maintained to ensure that the rate of application would be sufficient for the purpose of dampening ground surfaces and stockpiles.	To minimise fugitive emissions on internal haul roads and access roads. To prevent the re-suspension of dust from un-paved areas, by the action of moving vehicles. To minimise fugitive emissions from deposited wastes.	In accordance with relevant EA guidance, surfaces will be dampened as required and without saturating, so as to prevent off site dust emissions. Stockpiled materials will be dampened if required, during dry conditions and within operational hours, to prevent wind whipping and dust entrainment within the Site boundary. Appropriate measures to control dust emissions may involve using a water bowser and/ or misting cannons. The Site has a mains water supply which will be used for dust suppression purposes.
Use crushing and screening plant within their design capacity and maintaining good standards of all plant and equipment.	To minimise dust emissions during the mineral processing process.	All relevant plant.
Road sweepers	Road sweeping vehicles damp down dusts whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside.	Vehicles will not track mud outside of the permit boundary. A road sweeper is to be employed as necessary in order to prevent mud on the access road and public highway.
Good Site Management	Record all dust and air quality complaints, identify cause(s),	All staff.

	take appropriate measures to reduce emissions in a timely manner, and record the measures taken.	
Staff training	Provide training to the site personnel on dust mitigation. Training should also cover 'emergency preparedness plans' to react quickly in case of any failure of the planned dust mitigation.	All staff.
Communication	Maintain good communication to help alleviate anxieties between the Operator and the surrounding communities.	All staff.

Dust Monitoring

4.3 Visual inspections of the following will be undertaken by the Site Manager or his nominee during each working day as set out in Table 6.

Table 6: Dust Monitoring

Location	Frequency	What are you looking for?	Actions
Site boundaries	Daily	Check for fugitive dust emissions across boundary.	See Dust Action Plan (DAP) below.
Whole Site	Daily	Check it is clear of mud and debris, is action required? Check for wind whipping of stockpiles or surfaces, do they require damping down?	Call road sweeper. Use bowser or misting canons to dampen down.
Site entrance	Daily	Check it is clear of mud and debris, is action required?	Call road sweeper
Access Road	Daily	Check it is clear of mud and debris, is action required?	Call road sweeper

Contingency Plan

4.4 Adverse weather conditions that could cause dust emissions from the Site, such as prolonged dry periods, would be managed via the mitigation measures in Table 5, the Dust Action Plan in Section 4.8 and the complaints procedure in Sections 4.9 to 4.11.

4.5 The routine mitigation measures in Table 5 already include cleaning the Site with a road sweeper and the application of water to surfaces and stockpiles to suppress nuisance dust. The Site has a mains water supply which will be used for dust suppression purposes. Adequate water will be available if additional water is required for dust suppression in the future.

4.6 In Table 6, daily dust monitoring is proposed at Site boundaries, the site entrance, the whole Site including the stockpile and processing area and the access road.

4.7 In periods of prolonged dry weather dust monitoring will be increased and it may be necessary to wet surfaces and stockpiles and clean the Site on a more regular basis. The proposed dust management measures in this DEMP will continue to be effective .

Dust Action Plan

4.8 In the event that any dust or particulates arising from the Site are released outside the Site boundary in such quantities or concentrations that they are likely to cause pollution of the environment or harm to human health, the actions specified below will be implemented:

- The Site manager or his nominee will be informed immediately;
- The source will be identified and damped down;
- If the source is a particular waste stream, consideration will be given to suspending acceptance of that waste until appropriate measures are in place to control the release of nuisance emissions from the waste; and
- If deemed necessary, the Site Manager will instruct the suspension of any operation causing visible dust emissions until such time as the situation has been resolved.

Following a Complaint

4.9 Following receipt of a complaint regarding dust, all dusty operations may be ceased, and the following actions should be taken:

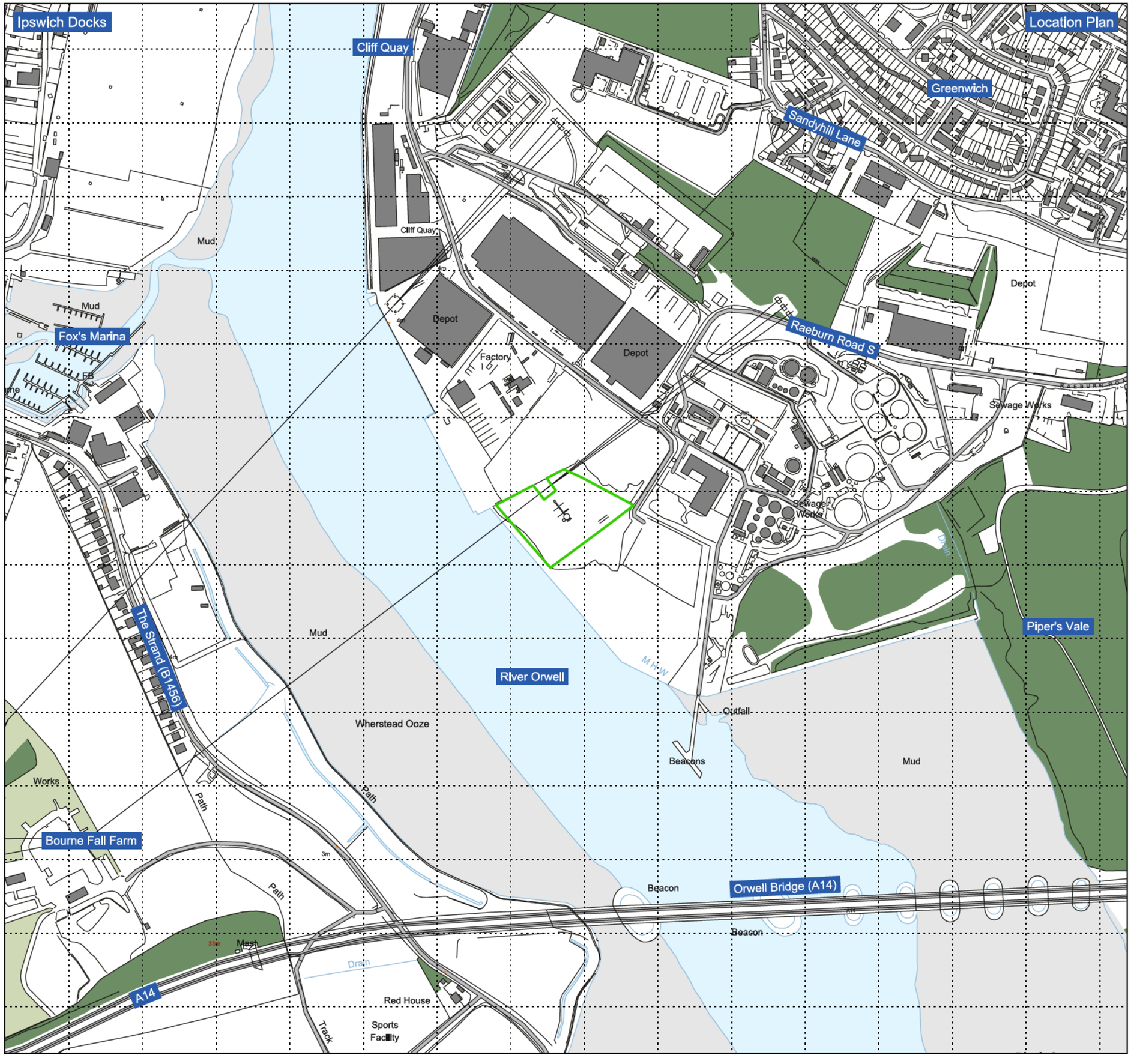
- The complaint must be investigated fully and the source of the dust identified;
- Following identification of the dust source, suitable remediation measures will be employed as detailed above;
- Once the dust source has been identified and mitigated, operations can be resumed;
- If the identified source of dust is deemed to require more thorough investigation or remediation i.e. the source of the dust is not immediately apparent, then dusty operations will be suspended until such a time as it has been identified;
- A record of the complaint together with the remediation actions and a completed Incident Report form will be kept on Site and will be available for review at any time should senior management, Local Council or EA request them.

4.10 In accordance with standard permit conditions, the EA shall be notified without delay following the detection of any significant adverse environmental effects.

4.11 All dust complaints will be discussed with senior management and appropriate actions taken to make any necessary improvements.

DRAWINGS

Location Plan	Drawing No. KD.IPSW.1.D.001	Scale 1:5,000@A3
Permit Boundary Site Plan	Drawing No. KD.IPSW.1.D.002A	Scale 1:1,250@A3



Legend

Permit Boundary

consulting limited chartered surveyors

PROJECT
Ipswich Docks

DRAWING TITLE
Location Plan

DATE
August 2023

SCALE
1:5,000 @ A3

DRAWING No.
KD.IPSW.1.D.001

DRAWING STATUS
FINAL

01284 764085 . www.pdeconsulting.co.uk

Legend

- Permit Boundary
- Recyclling Area
- Waste Storage Area

pde. consulting limited chartered surveyors

PROJECT
Ipswich Docks

DRAWING TITLE
Permit Boundary Site Plan

DATE
February 2024

SCALE
1:1,250 @ A3

DRAWING No.
KD.IPSW.1.D.002A

DRAWING STATUS
FINAL

N

01284 764085 . www.pdeconsulting.co.uk

APPENDIX 1

Accident / Incident Report Form

Accident (and Incident) Record

Record of accidents, other incidents or near misses

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any **significant pollution** or **environmental damage** to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? If so what?	
If there was, then you must take steps to prevent further damage and notify the Environment Agency on 0800 807060 and any other relevant regulators ASAP. Have you done so? Yes / No	Who did you phone? At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No What date did you contact?
Please print your name and sign	

Continue on a separate sheet if you do not have enough room.
Keep the completed form in the file to discuss with your auditors or regulators when they visit.

APPENDIX 2

Dust Complaint Form

DUST COMPLAINT FORM

Customer Name:	**Address:**
Customer Contact:	
Tel. No.:	

Complaint Ref. No.	**Date:**

Complaint Details & Root Cause
Signed: ..... **Date**

Investigation Details:

Investigation by: _____ **Position:** _____

Times Start: _____ **Finish:** _____

Weather Conditions:_____

Environment Agency Feedback:
Public Recommendation / Feedback

APPENDIX 8

Noise Impact Assessment

Walker Beak Mason Limited
01604 771101 | hq@wbm.co.uk | www.wbm.co.uk

ACOUSTIC CONSULTANTS

Ref **5393**

For **SRC**
c/o PDE Consulting Limited
The Alaska Building
Sitka Drive
Shrewsbury Business Park
Shrewsbury
SY2 6LG

SRC Ipswich Docks
Application for the Construction and Operation of a Construction, Demolition & Excavation Waste Recycling Facility
BS 4142 Noise Assessment

Date 16 October 2023

Author Dr Robert Storey

WBM is the trading name of Walker Beak Mason Limited
Company Number: 13449333 | Registered in England & Wales
Registered Office: Steepleton Lodge Barn, Long Lane, East Haddon, Northamptonshire, NN6 8DU

ANC ACOUSTICS & NOISE CONSULTANTS

The Authors

Robert Storey BEng PhD MIOA (Senior Consultant) obtained his degree in Mining Engineering from the University of Leeds in 1993 before going on to complete a PhD in "The Acoustic Response of Structures to Blast Induced Ground Vibration" in 1998. He joined WBM in 2007 after working in acoustic consultancy and environmental health since 1999. Robert is involved mainly in environmental noise, working on mineral extraction, waste and industrial projects, including surveys, routine noise monitoring and assessments. He is experienced in noise modelling using SoundPLAN for transportation, industrial and environmental sources.

Sarah Large MA (Cantab) MSc Dip (IoA) MIOA (Senior Consultant) obtained a degree in music from Cambridge University in 2007. She has worked in acoustic consultancy since 2009, completing the Institute of Acoustics Diploma in Acoustics and Noise Control in 2010 and a Master of Science degree in Environmental Acoustics from South Bank University in 2012. Sarah has extensive experience in environmental acoustics including noise modelling, noise monitoring and assessments. Sarah joined WBM in 2021 and is working on architectural and environmental acoustic projects including mineral sites.

WBM

WBM (the trading name of Walker Beak Mason Limited) is an established independent acoustic consultancy specialising in architectural & building acoustics, environmental noise, planning issues and expert work. WBM is a member of the Association of Noise Consultants and is also a Corporate Member of the Institute of Environmental Management & Assessment. The consultants are members of the Institute of Acoustics.

Document Control

Revision	Description	Date	Prepared by	Checked by
-	Draft	11/10/2023	R Storey	S Large
1	Final	16/10/2023	R Storey	S Walsh

ACOUSTIC CONSULTANTS

Contents

1 Introduction

SRC are submitting an application to the Environment Agency (EA) for a permit to import and recycle incinerator bottom ash (IBA) and construction and demolition waste on their site at Ipswich Docks in Suffolk.

This report sets out the calculated noise levels arising from the proposed operation, for use in a BS 4142:2014+A1:2019 assessment at the nearest dwellings to the site.

The calculated noise levels are compared with representative background sound levels at the nearest dwellings to the site. These have been determined from attended noise surveys undertaken by WBM in August 2023 with measurements at the nearest dwellings when the existing operations on the site were not taking place.

This comparison of the calculated noise levels arising from the site operations including the proposed recycling operations with the background sound levels established in August 2023 forms the basis for the BS 4142:2014+A1:2019 assessment method for the nearest dwellings to the site.

To aid comprehension, a glossary of acoustic terms is presented in Appendix A .

Site plans showing the site layout and the proposed location of the recycling operations are presented in Appendix B.

The survey locations used by WBM for the attended sample measurements in August 2023 are shown on a site plan in Appendix C.

The details of the noise surveys conducted by WBM in August 2023 are provided in Appendix D with the full results in Appendix E.

The assumptions included in the creation of the SoundPLAN noise model for the calculations are detailed in Appendix F.

SoundPLAN noise calculation plots presenting the calculated noise levels from the proposed operations on the site are presented in Appendix G.

The full breakdown of the BS 4142 assessment is included as Appendix H.

2 Environment Agency Permit and Requirements

SRC are submitting an application to the Environment Agency (EA) for a permit to import and recycle construction, demolition and excavation waste on their site at Ipswich Docks in Suffolk.

For this application the Environment Agency require a noise impact assessment (NIA) to be conducted in line with the requirements of BS4142: 2014 + A1:2019.

The information that must be submitted to the Environment Agency in a noise impact assessment that uses computer modelling or spreadsheet calculations is provided in GOV.UK Guidance "*Noise impact assessments involving calculations or modelling*" and "*Guidance – Noise and vibration management: environmental permits*". The information requested in the document "*Noise impact assessments involving calculations or modelling*" is summarised in Appendix F.

The Environment Agency generally require the overall site noise and BS 4142:2014+A1:2019 Rating Level to be no more than 5 dB above the representative background sound level, although this is dependent on context. Additional guidance on the use of BS 4142:2014+A1:2019 when applying for a permit is provided in the Environment Agency "*Method implementation document (MID) for BS 4142*" dated 27 March 2023.

The methods outlined in BS 4142:2014+A1:2019 are appropriate for the noise assessment of the proposed operations including HGV movements within the site. The assessment does not cover noise from HGV movements outside the application/site boundary, which is also outside of the scope of BS 4142:2014+A1:2019.

3 British Standard 4142: 2014+A1:2019

British Standard (BS) 4142:2014+A1:2019 "*Methods for rating and assessing industrial and commercial sound*" describes methods for assessing the likely effects of sound of an industrial and/or commercial nature on residential properties. It includes the assessment of sound from industrial and manufacturing processes, M&E plant and equipment, loading and unloading of goods and materials, and mobile plant/vehicles on the site. It can be used to assess sound from proposed, new, modified or additional industrial / commercial sources, at existing or new premises used for residential purposes.

The standard describes methods to measure and determine ambient, background and residual sound levels, and the rating levels of industrial / commercial sound.

BS 4142:2014+A1:2019 is not intended to be used for the derivation or assessment of internal sound levels, or for the assessment of non-industrial / commercial sources such as recreational activities, motorsport, music and entertainment, shooting grounds, construction and demolition, domestic animals, people, and public address systems for speech.

Ambient sound is defined in BS 4142: 2014+A1:2019 as "*totally encompassing sound in a given situation at a given time, usually composed of sound from many sources near and far*". It comprises the residual sound and the specific sound when present.

Residual sound is defined in BS 4142: 2014+A1:2019 as "*ambient sound remaining at the assessment location when the specific sound source is suppressed to such a degree that it does not contribute to the ambient sound*".

The background sound level is the $L_{A90,\,T}$ of the residual sound level, and is the underlying level of sound. Measurements of background sound level should be undertaken at the assessment location where possible or at a comparable location.

The measurement time interval should be sufficient to obtain a representative value (normally not less than 15 minutes) and the monitoring duration should reflect the range of background sound levels across the assessment period. The background sound level used for the assessment should be representative of the period being assessed.

The specific sound level is the $L_{Aeq,Tr}$ of the sound source being assessed over the reference time interval, T_r. BS 4142:2014+A1:2019 advises that T_r should be 1 hour during the day and 15 minutes at night.

The rating level is the specific sound level plus any adjustment for the characteristics of the sound (tone, impulse, intermittent or other acoustic feature).

The standard describes subjective and objective methods to establish the appropriate adjustment. The adjustments for the different features and assessment methods are summarised in the table below.

Acoustic Feature	**Adjustment for Acoustic Feature**		
	Subjective Methods	**Objective Methods**	
Tonality	+2 dB if just perceptible +4 dB if clearly perceptible +6 dB if highly perceptible	Third Octave Analysis	Narrow Band Analysis
		+6 dB if tones identified	Sliding scale of 0 to +6 dB depending on audibility of tone
Impulsivity	+3 dB if just perceptible +6 dB if clearly perceptible +9 dB if highly perceptible	Sliding scale of 0 to +9 dB depending on prominence of impulsive sound	
Intermittency	+ 3 dB if intermittency is readily distinctive	n/a	
Other	+ 3 dB if neither tonal nor impulsive, but otherwise readily distinctive	n/a	

Where tonal and impulsive characteristics are present in the specific sound within the same reference period then these two corrections can both be taken into account. If one feature is dominant, it might be appropriate to apply a single correction. The rating level is equal to the specific sound level if there are no features present.

The level of impact is assessed by comparing the rating level of the specific sound source with the background sound level. Other factors that may require consideration include the absolute level of sound, the character and level of the residual sound compared to the specific sound, and the sensitivity of the receptor and scope for mitigation.

When the rating level is above the background sound level, a difference of around +5 dB is likely to indicate an adverse impact and a difference of around +10 dB or more is likely to indicate a significant adverse impact, depending on the context.

The lower the rating level with respect to the background sound level, the less likely it is that the specific sound source will have an adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.

4 Description of Site and Noise Climate

The site is located in the south east of the Port of Ipswich (Cliff Quay).The site is bounded by the River Orwell to the west / south west and south. To the north west, north, north east and east of the site are commercial / industrial / minerals sites, with Tarmac located directly to the north and Anglian Water to the east. Approximately 550-600m to the south of the site is the A14 and A14 Orwell Bridge.

The site currently includes a processing plant, crusher and various items of mobile plant including loading shovels, dozers and dump trucks. Access to the site is gained along the main port road and from the north of the site.

The nearest residential dwellings to the site are located approximately 550m to the north east of the site on Pipers Vale Close. A number of industrial sites lie between the SRC site and Pipers Vale Close. Pipers Vale Close is also neighboured by various commercial / industrial units along Sandyhill Lane.

The next nearest residential dwellings to the SRC site are located on The Strand, approximately 620m to the west / south west of the site with the River Orwell inbetween. These dwellings are located approximately 320m from the A14 / A14 Orwell Bridge.

The Gainsborough residential area of Ipswich lies to the east of the site, with the nearest housing approximately 900-950m from the site. Pipers Vale nature reserve lies between the SRC site and the dwellings, which are around 350-550m from the A14 / A14 Orwell Bridge.

This BS 4142:2014+A1:2019 assessment concentrates on the nearest residential properties to the site described above, but the SoundPLAN noise maps include a visual representation of the calculated site noise levels across the wider area in the vicinity of the site.

The proposed site layout showing the permit application area for the proposed operations on site as well as a wider plan showing the locations of the nearest dwellings are shown on the plans in Appendices B and C.

The residential locations selected for site noise calculations in the BS 4142:2014+A1:2019 assessment are:

BS4142 Assessment Position	Location Description	Baseline Survey Location Reference	OS Grid Reference
A	54 The Strand	1	E: 616466, N: 241461
B	Morland Road	2	E: 617889, N: 241835
C	16 Pipers Vale Close	3	E: 617260, N: 242250

These locations were chosen for the purposes of this assessment as they are the closest residential properties to the site and were representative of where baseline noise measurements were undertaken by WBM in August 2023.

The survey locations used by WBM in August 2023 are shown on the site plan in Appendix C.

Based on the noted observations made during the baseline noise surveys, the daytime noise levels in the area are generally controlled by road traffic from local roads and the A14 / A14 Orwell Bridge. At some locations (namely Pipers Vale Close) other nearby sources of commercial / industrial noise were also clearly audible. Other sources of noise in the area included occasional aircraft movements, birdsong, local activity and breeze in trees.

The proposed operating hours of the site are as follows:

- Mondays - Fridays 07.00–17.00; and
- Saturdays 07:00 to 12:00.

For this reason with regard to BS 4142:2014+A1:2019, the assessment period is therefore 1 hour for daytime (07:00 to 23:00 hours) with no requirement for a night-time assessment.

5 Summary of Background Sound Level Data

<u>WBM Noise Surveys (August 2023):</u>

In August 2023, manned environmental noise measurements were taken at:

Location 1: The Strand;
Location 2: Morland Road; and
Location 3: Pipers Vale Close.

Baseline noise surveys were undertaken during the daytime on Friday 25 August 2023 and Wednesday 30 August 2023. Measurements of the existing plant items normally used on the site were also undertaken on Friday 25 August 2023 and Wednesday 27 September 2023.

The details of these surveys are presented in Appendix D with the full results in Appendix E.

During the baseline noise surveys, all fixed plant operation was ceased at the site. The exception to this was the last two measurements on Friday 25 August 2023 and the first measurement on Wednesday 30 August 2023. On Friday 25 August the processing plant started up half way through the measurement period at Pipers Vale Close and noise from the plant was at the border of audibility. During the final measurement at The Strand noise from the SRC site was inaudible. Similarly, during the first measurement at Pipers Vale Close on Wednesday 30 August 2023 the processing plant was shutting down; however, noise from the SRC site was not audible. As the fixed plant was not operating or was not audible or not operating for a sufficient period to influence the background sound level ($L_{A90,T}$) the baseline noise levels measured in August 2023 can be considered uninfluenced by site noise and suitable for use in the BS4142 assessment.

During the manned daytime noise surveys in August 2023, the noise climate was primarily affected by local and distant road traffic noise.

Representative Ambient / Residual and Background Sound Levels:

The following table presents representative daytime ambient / residual ($L_{Aeq,T}$) and background ($L_{A90,T}$) sound levels at the three residential assessment locations based on the data obtained by WBM in August 2023. As the fixed plant at the site was not operating during the survey, for the purposes of a BS4142 assessment the residual sound level and the ambient sound level measured during the surveys are the same.

The presented levels are based on the average sound levels from the daytime baseline surveys as representative of the working hours proposed for the operations on site.

Daytime (07:00 – 17:00) **Position**	**Representative Ambient / Residual Sound Level dB $L_{Aeq,T}$**	**Representative Background Sound Level dB $L_{A90,T}$ (range)**
1. The Strand	57	52 (51-54)
2. Morland Road	54	51 (47-53)
3. Pipers Vale Close	47	44 (42-45)

The details of the surveys are presented in Appendix D with the full results in Appendix E.

6 Calculation of Site Noise Levels

Noise calculations of the proposed site operations were undertaken using SoundPLAN noise mapping software.

A digital ground model (DGM) was created using local ground heights to cover the area including both the site and the nearest residential properties to the north east, east and south west of the site.

The following scenarios were modelled:

- All existing and proposed daytime operations (07:00 to 17:00 hours); and
- Proposed recycling operations alone (07:00 to 17:00 hours).

Proposed Recycling Operations

The calculations were undertaken as a worst case scenario with the operation of the excavator and the crusher/screen as taking place for 100% of the assessment period, the use of the loading shovel for the recycling operations input as being for 33% of the assessment period.

It is expected that there would be up to 6 HGVs per hour visiting the site during the daytime for delivery of raw material and export of processed material associated with the proposed recycling operations, so HGV movements have been included as 6 one-way movements per hour.

Existing Site Operations

The existing plant on site has been included in the site noise calculations assuming that the various elements of the wash plant (generator, main plant and hopper/material onto stockpile) is operating for 100% of the assessment period, with use of the loading shovel for 66% of the time split evenly (33% each) at the bays and the hopper.

HGV movements associated with the existing plant are included as 6 one-way movements per hour, based on current figures.

The modelling of the existing plant is based on noise data taken on site on Friday 25 August 2023 and Wednesday 27 September 2023.

The calculations assume that the calculation area is 100% hard ground.

The calculations also include existing buildings on and off site which provide some barrier attenuation.

Details of sound power level data and assumptions used for the SoundPLAN noise model are presented in Appendix F.

The SoundPLAN daytime noise contour plots for the proposed site operations (both with and without the existing site operations) covering the assessment area are presented in Appendix G.

7 Comparison of Calculated Site Noise with Existing Noise Levels

An assessment has been undertaken in accordance with BS 4142:2014+A1:2019 “Methods for Rating and assessing industrial and commercial sound” for the nearest dwellings to the existing and proposed operations on the site as presented above.

For the BS 4142:2014+A1:2019 assessment, the three receiver locations representative of the nearest residential properties to the site have been used for site noise calculations.

A plan showing the site layout/location which includes the nearest residential properties/areas is presented in Appendix B. The residential locations used for the noise surveys are also shown in Appendix C.

A comparison of the calculated noise levels at the three selected residential assessment locations closest to the site with the representative daytime background and residual sound levels at those locations is as follows.

Receiver Location Daytime (07:00-17:00)	Calculated Site Noise Level dB $L_{Aeq,1\ hour}$	Representative Background Sound Level dB $L_{A90,15\ min}$	Average Residual Sound Level dB $L_{Aeq,15\ min}$
A 54 The Strand	52	52	57
B. Morland Road	46	51	54
C 16 Pipers Vale Close	48	44	47

As can be seen from the table, the calculated site noise levels from the proposed recycling operations and the existing operations are 5dB below the background sound level at Morland Road, equal to the background sound level at The Strand and 4dB above the background sound level at Pipers Vale Close.

If the proposed recycling operations are considered in isolation (i.e. not including the ongoing operation of the wash plant and associated activity), the comparison of the calculated noise levels at the three selected residential assessment locations closest to the site with the representative daytime background and residual sound levels at those locations is as follows.

Receiver Location Daytime (07:00-17:00)	Calculated Site Noise Level dB $L_{Aeq,1\ hour}$	Representative Background Sound Level dB $L_{A90,15\ min}$	Average Residual Sound Level dB $L_{Aeq,15\ min}$
A 54 The Strand	49	52	57
B. Morland Road	43	51	54
C 16 Pipers Vale Close	44	44	47

As can be seen from the table, the calculated site noise level from the proposed recycling operations are equal to or below the representative background sound level at all three assessment locations.

8 BS 4142: 2014+A1:2019 Assessment

The information to be reported, as specified in Section 12 of BS 4142:2014+A1:2019, is set out in full in Appendix H (where relevant) and the findings are summarised on the following pages.

For the BS4142 assessment, when the rating level is above the background sound level, a difference of around +5 dB is likely to indicate an adverse impact and a difference of around +10 dB or more is likely to indicate a significant adverse impact, depending on the context.

The lower the rating level with respect to the background sound level, the less likely it is that the specific sound source will have an adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.

Considering the nature of the operations particularly in the context of the existing ambient and background sound environment in the area during the daytime and the level of the calculated site noise levels at the dwellings, one would not expect any acoustic features of the noise to be readily distinguishable at the dwellings and an acoustic feature correction would not be appropriate.

However, during the survey on 25 August 2023 material falling from a hopper at the northern end of the processing plant on to a metal shoot was just audible at the Pipers Vale Close monitoring location. Following discussions with the site, a rubber lining was added to the shoot and this has removed part of the higher frequency noise as confirmed with measurements on site on Wednesday 27 September 2023. Additional work could be undertaken to mitigate this aspect of the noise from the processing plant, if necessary, at a later stage for example following any feedback from residents at Pipers Vale Close. However, it is noted that the processing plant is an existing source at the site (it is not part of the proposed recycling works subject to the EA permit) and to date WBM and SRC are unaware of any noise complaints.

Elimination of this part of the processing plant noise would mean that there is no adjustment necessary in the BS4142 assessment for the character of the noise. However, to present a worst case scenario and to cover an element of uncertainty, in this assessment the Rating Level has been assumed to be 0dB to +3dB higher than the Specific Sound Level to allow for a possible ‘other character’ acoustic feature correction.

Normal Daytime (07:00-17:00) Operations:

The overall calculated daytime site noise levels are no more than the representative background sound levels at The Strand, below the representative background sound levels by 5 dB(A) at Morland Road and above the representative background sound level by 4dB(A) at Pipers Vale Close.

The difference between the rating levels and the representative daytime background sound levels presented are below the level that indicates an adverse impact (depending on context) in BS4142: 2014 + A1: 2019 at the three residential locations considered.

The overall calculated site noise levels are below the representative residual sound levels by 5dB(A) at The Strand and by 8dB(A) at Morland Road. The overall calculated site noise levels are above the representative residual sound levels by 1dB(A) at Pipers Vale Close.

The average baseline residual levels at these locations were between 47 and 57 dB $L_{Aeq,T}$ in August 2023.

The daytime noise climate at these dwellings will continue to be controlled by distant and local road traffic, local activity and other industrial/commercial noise.

Uncertainty

There is some uncertainty regarding the character of the processing plant noise at Pipers Vale Close. Works have been undertaken on site to mitigate the noise from a hopper / conveyor at the northern end of the processing plant. However, taking an absolute worst case approach to the assessment and to include for uncertainty with the processing plant noise, calculated daytime site noise levels at Pipers Vale Close could be up to 7dB(A) above the background sound level including for a +3dB(A) acoustic feature correction. This is above the point at which adverse impact might be expected to arise, depending on the context but remains below the point at which a significant adverse impact could be expected to arise (also depending on the context). Context is an important consideration for this site and is discussed below.

Context

In context, the operation will be taking place on an existing site in an area that has a significant amount of existing commercial / industrial activity and transportation noise. The noise from the proposed daytime recycling operations is unlikely to be readily distinctive from the existing industrial/commercial noise in the area. This is supported by the calculated noise levels from the proposed recycling operations alone, which show that the site noise levels from the proposed recycling operations are equal to or below the representative background sound level at all three assessment locations.

It is also noted that the only aspect of the assessment considered likely to draw an acoustic feature correction is from the existing processing plant. This is an existing source at the site and WBM / SRC are unaware of any complaints from the operation of the site to date. This is a positive indication that there is not a current problem arising from the operation of the processing plant, including any audible acoustic features at Pipers Vale Close.

Understanding the context of the site and locality and the existing operations on the SRC site, the proposed recycling operations do not introduce a new type of noise or novel acoustic character to the area. As such, perception of the noise by local residents would not be expected to provoke the same reaction as if this were a new source in an area otherwise devoid of such noise sources and noise characteristics.

For the reasons listed above, whilst inclusion of a +3dB character feature correction within the uncertainty calculations initially indicates an adverse noise impact, with the consideration of context it is expected that impact at Pipers Vale Close will remain below adverse impact as indicated by the initial assessment of impact without inclusion of an acoustic feature correction.

The daytime soundscape for the nearest dwellings to the site will continue to be affected by distant and local road traffic noise, other industrial/commercial activity and local activity.

It is expected that, at worst, the site will be audible at times, but is unlikely to be readily identifiable/distinguishable most of the time during the daytime at the nearest dwellings.

The context has been considered in more detail and found not to change the outcome of the assessment as presented in Appendix H, Section q.

9 Cumulative Impact of Proposals

The site is located in an area that is predominantly commercial/industrial with residential areas to the north-east beyond other commercial/industrial premises and the nearest other noise generating industrial/commercial premises are those immediately adjacent to the site to the east, north-west and north/north-east as well as over the River Orwell to the west and south-west.

During the baseline daytime noise surveys in August 2023, the activities on the neighbouring sites were audible on a few occasions and based on the calculated site noise levels, the proposed operations on the site are unlikely to have a noticeable impact on the cumulative noise levels from other existing premises in the area.

The nature and character of the site operations is similar to other existing commercial and industrial premises operating in the area. As such there is unlikely to be any change in the character of the area caused by the proposals and therefore no concern for cumulative noise impact in terms of additional noise character introduced by the site operations.

10 Summary and Conclusions

SRC are submitting an application to the Environment Agency (EA) for a permit to import and recycle IBA and construction and demolition waste on their site at Ipswich Docks in Suffolk.

This report sets out the calculated noise levels arising from the site including the proposed recycling operations, for use in a BS 4142:2014+A1:2019 assessment at the nearest dwellings to the site.

The calculated noise levels are compared with representative background sound levels at the nearest dwellings to the site. These have been determined from attended noise surveys undertaken by WBM in August 2023 when the existing site operations were not taking place.

This comparison of the calculated noise levels arising from the site operations including the proposed recycling operations with the background sound levels established in August 2023 forms the basis for the BS 4142:2014+A1:2019 assessment method for the nearest dwellings to the site.

<u>The Strand</u>

The calculations demonstrate a rating level of 52 dB $L_{Ar,\ Tr}$ at the dwellings on The Strand which is no more than the representative background sound level of 52 dB $L_{A90,\ T}$ in that area. The representative residual sound level at the dwellings on The Strand is 57 dB $L_{Aeq,T}$.

The conclusion of the assessment for the dwellings on The Strand is that the proposed site operations have been demonstrated to be of no adverse impact at that location during the normal daytime operating hours of the site.

Morland Road

The calculations demonstrate a rating level of 46 dB $L_{Ar, Tr}$ at the closest dwellings on Morland Road which is 5 dB(A) below the representative background sound level of 51 dB $L_{A90, T}$ in that area. The representative residual sound level at the dwellings on Morland Road is 54 dB $L_{Aeq,T}$.

The conclusion of the assessment for the closest dwellings on Morland Road is that the proposed site operations have been demonstrated to be of no adverse impact at that location during the normal daytime operating hours of the site.

Pipers Vale Close

The calculations demonstrate a rating level of 48 dB $L_{Ar, Tr}$ at the dwellings on Pipers Vale Close which is 4 dB(A) above the representative background sound level of 44 dB $L_{A90, T}$ at those properties. Taking an absolute worst case approach to the assessment and to include for uncertainty with the nature of the processing plant noise, the rating level at Pipers Vale Close could be up to of 51 dB $L_{Ar, Tr}$ which is 7dB(A) above the background sound level including for a +3dB(A) acoustic feature correction.

The representative residual sound level at the dwellings on Pipers Vale Close is 47 dB $L_{Aeq,T}$.

With the consideration of context it is expected that impact at Pipers Vale Close will remain below adverse impact, as indicated by the initial assessment of impact without inclusion of an acoustic feature correction.

The conclusion of the assessment for the dwellings on Pipers Vale Close is that the proposed site operations have been demonstrated to be below the level indicating an adverse impact at that location during the normal daytime operating hours of the site.

Overall Summary

It is expected that the site will be just audible or mainly inaudible at all the receiver locations during the normal daytime operating hours of the site.

The daytime soundscape for the three receiver locations considered will continue to be affected by distant and local road traffic noise, local activity and other industrial/commercial noise.

The comparison of the calculated noise levels arising from the site operations including the recycling facility has been compared to existing background and residual sound levels in the area and it is concluded that there will be no adverse impact arising from the proposals at the nearest residential receptors.

The context has been considered and found not to change the outcome of the assessment.

Dr Robert Storey
BEng PhD MIOA
Senior Consultant

Sarah Large
MA (Cantab) MSc Dip (IoA) MIOA
Senior Consultant

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Appendix A – Glossary of Acoustic Terms

General Noise and Acoustics

The following section describes some of the parameters that are used to quantify noise.

Decibels dB

Noise levels are measured in decibels. The decibel is the logarithmic ratio of the sound pressure to a reference pressure ($2x10^{-5}$ Pascals). The decibel scale gives a reasonable approximation to the human perception of relative loudness. In terms of human hearing, audible sounds range from the threshold of hearing (0 dB) to the threshold of pain (140 dB).

A-weighted Decibels dB(A)

The 'A'-weighting filter emulates human hearing response for low levels of sound. The filter network is incorporated electronically into sound level meters. Sound pressure levels measured using an 'A'-weighting filter have units of dB(A) which is a single figure value to represent the overall noise level for the entire frequency range.

A change of 3 dB(A) is the smallest change in noise level that is perceptible under normal listening conditions. A change of 10 dB(A) corresponds to a doubling or halving of loudness of the sound. The background noise level in a quiet bedroom may be around 20 –30 dB(A); normal speech conversation around 60 dB(A) at 1 m; noise from a very busy road around 70-80 dB(A) at 10m; the level near a pneumatic drill around 100 dB(A).

Façade Noise Level

Façade noise measurements are those undertaken near to reflective surfaces such as walls, usually at a distance of 1m from the surface. Façade noise levels at 1m from a reflective surface are normally around 3 dB greater than those obtained under freefield conditions.

Freefield Noise Level

Freefield noise measurements are those undertaken away from any reflective surfaces other than the ground.

Frequency Hz

The frequency of a noise is the number of pressure variations per second, and relates to the "pitch" of the sound. Hertz (Hz) is the unit of frequency and is the same as cycles per second. Normal, healthy human hearing can detect sounds from around 20 Hz to 20 kHz.

Octave and Third-Octave Bands

Two frequencies are said to be an octave apart if the frequency of one is twice the frequency of the other. The octave bandwidth increases as the centre frequency increases. Each bandwidth is 70% of the band centre frequency.

Two frequencies are said to be a third-octave apart if the frequency of one is 1.26 times the other. The third octave bandwidth is 23% of the band centre frequency.

There are recognised octave band and third octave band centre frequencies. The octave or third-octave band sound pressure level is determined from the energy of the sound which falls within the boundaries of that particular octave of third octave band.

Appendix A (continued)

Equivalent Continuous Sound Pressure Level $L_{Aeq,T}$

The 'A'-weighted equivalent continuous sound pressure level $L_{Aeq,T}$, is a notional steady level which has the same acoustic energy as the actual fluctuating noise over the same time period T. The $L_{Aeq,T}$ unit is dominated by higher noise levels, for example, the $L_{Aeq,T}$ average of two equal time periods at, for example, 70 dB(A) and 50 dB(A) is not 60 dB(A) but 67 dB(A).

The $L_{Aeq,}$ is the chosen unit of BS 7445-1:2003 "Description and Measurement of Environmental noise".

Maximum Sound Pressure Level L_{Amax}

The L_{Amax} value describes the overall maximum 'A'-weighted sound pressure level over the measurement interval. Maximum levels are measured with either a fast or slow time weighted, denoted as $L_{Amax,f}$ or $L_{Amax,s}$ respectively.

Rating Level (BS 4142) $L_{Ar,T}$

With regard to BS 4142, the rating level is the specific sound plus any adjustment for the characteristics of the sound.

Residual Sound (BS 4142)

With regard to BS 4142, the residual sound is the ambient sound remaining at the assessment location when the specific source is suppressed to such a degree that it does not contribute to the ambient sound.

Specific Sound Level (BS 4142) $L_{Aeq,T}$

With regard to BS 4142,the specific sound level is the sound pressure level (in terms of $L_{Aeq,T}$) produced by the specific sound source at the assessment location.

Statistical Parameters L_N

In order to cover the time variability aspects, noise can be analysed into various statistical parameters, i.e. the sound level which is exceeded for N% of the time. The most commonly used are the $L_{A01,T}$, $L_{A10,T}$ and the $L_{A90,T}$.

$L_{A01,T}$ is the 'A'-weighted level exceeded for 1% of the time interval T and is often used to gives an indication of the upper maximum level of a fluctuating noise signal.

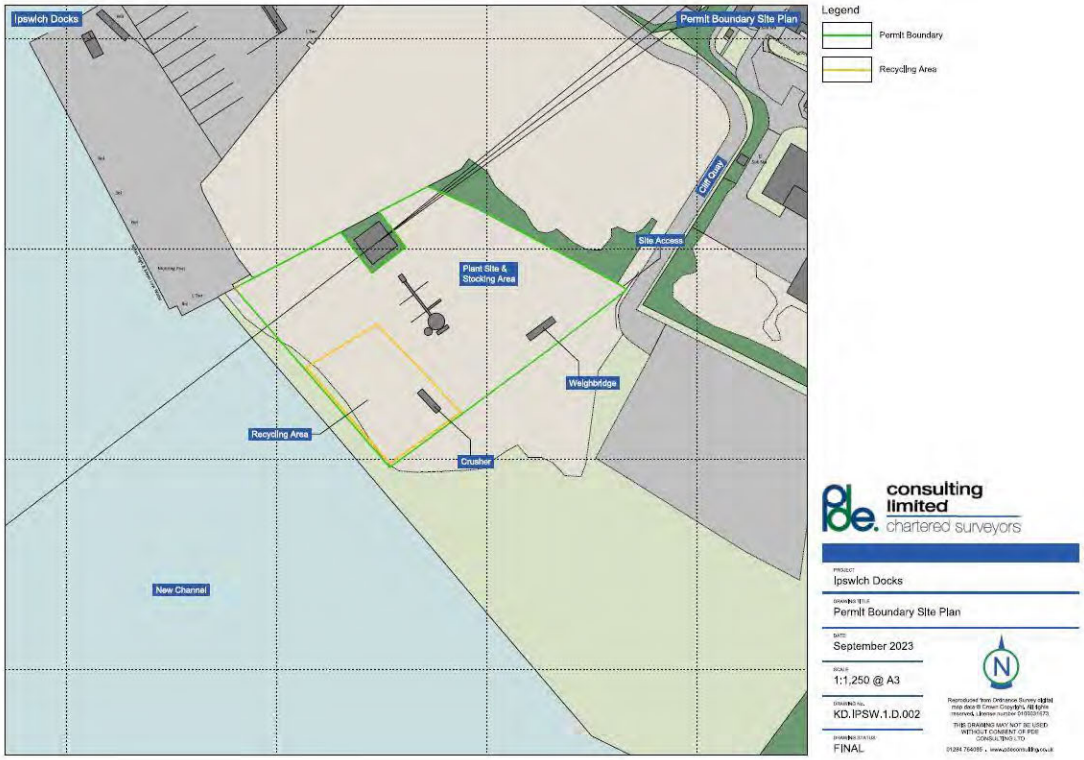
$L_{A10,T}$ is the 'A'-weighted level exceeded for 10% of the time interval T and is often used to describe road traffic noise. It gives an indication of the upper level of a fluctuating noise signal. For high volumes of continuous traffic, the $L_{A10,T}$ unit is typically 2–3 dB(A) above the $L_{Aeq,T}$ value over the same period.

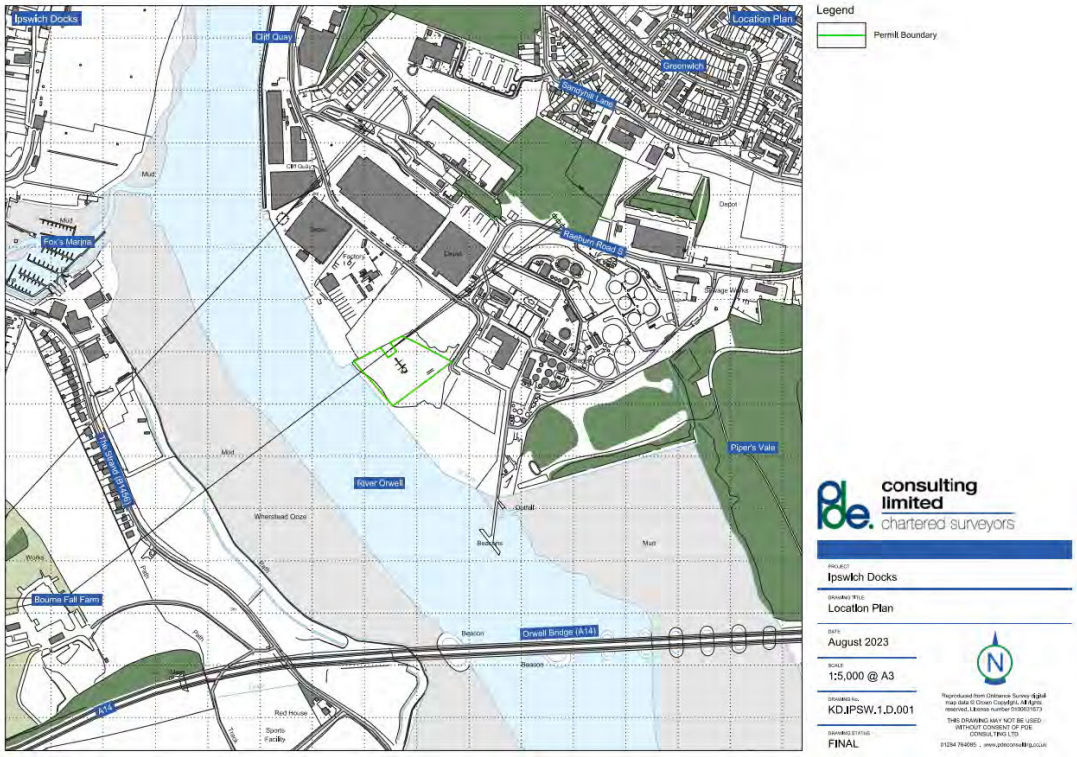
$L_{A90,T}$ is the 'A'-weighted level exceeded for 90% of the time interval T, and is often used to describe the underlying background noise level.

With regard to BS 4142, the $L_{A90,T}$ of the residual sound is used to describe the background sound level.

Appendix B – Plans Showing Proposed Site Layout

Site Layout Including Proposed Recycling Operations:





Appendix C – WBM Noise Survey Locations

Location		Description (free field positions)
1	The Strand	Free field location on access track to the south of 54 The Strand, approximately 20-25m from the road.
2	Morland Road	Free field location along public footpath to the rear of gardens for 72-78 Morland Road.
3	Pipers Vale Close	Free field location at the end of the driveway for 16 Pipers Vale Close.

Appendix D – Survey Details (August / September2023)

Dates and Locations of Manned Sample Surveys

10:30 – 15:30, Friday 25 August 2023; and

10:15 - 13:45, Wednesday 30 August 2023.

At Locations 1, 2 and 3 as shown in the plan and described in Appendix C

10:50 – 11:05, Wednesday 27 September 2023 (on site only)

Surveys carried out by

Sarah Large (Friday 25 August and Wednesday 30 August 2023)

Robert Storey (Wednesday 27 September 2023)

Weather Conditions

Date	Conditions
Friday 25 August 2023	Dry, sunny / cloudy (30% cloud), light breeze from W, 0-1m/s. 18-19°C.
Wednesday 30 August 2023	Dry, sunny / cloudy (30% cloud), light breeze from W, 0-2m/s. 16-18°C.
Wednesday 27 September 2023	Dry, light cloud (30% cloud), virtually still, ~20°C

Instrumentation used (Serial Number)

Instrumentation	Date
Norsonic 140 Sound Level Meter (1403138)	Friday 25 August and Wednesday 30 August 2023
Norsonic 1251 Calibrator (31991)	
Norsonic 140 Sound Level Meter (1404819)	Wednesday 27 September 2023
Norsonic 1251 Calibrator (33321)	

Calibration

The sensitivity of the meter was verified on site immediately before and after the surveys. The measured calibration levels were as follows:

Survey Date	Start Cal	Mid Cal	End Cal
10:30 – 15:30, Friday 25 August 2023	113.7 dB(A)	113.7 dB(A)	113.5 dB(A)
10:15 - 13:45, Wednesday 30 August 2023	113.7 dB(A)	N/A	113.5 dB(A)
10:50 – 11:05, Wednesday 27 September 2023	113.7 dB(A)	N/A	113.7 dB(A)

The meter and calibrator were tested monthly against Norsonic Calibrators, type 1253 (serial number 22906) and type 1256 (serial number 125626100) both with UKAS approved laboratory certificate of calibration. In addition, the meter and calibrator undergo traceable calibration at an external laboratory every two years.

Appendix D (continued)

Survey Details

On Friday 25 August and Wednesday 20 August 2023 attended sample measurements of 15 minute duration were taken at three locations representative of the nearest residential dwellings to the site. The microphone of the meter, positioned on a tripod, was at a height of between 1.2 and 1.5 metres above local ground level, with a windshield used throughout.

Additionally, on Friday 25 August attended sample measurements of variable duration were taken at locations around the processing plant on site. As plant noise was steady and continuous with minimal variation in noise level, a short sample was representative. The microphone of the meter, positioned on a tripod, was at a height of between 1.2 and 1.5 metres above local ground level, with a windshield used throughout.

On Wednesday 27 September 2023 attended sample measurements of variable duration were taken at locations around the processing plant on site following works undertaken to the processing plant hopper / conveyor. As plant noise was steady and continuous with minimal variation in noise level, a short sample was representative. The microphone of the meter, positioned on a tripod, was at a height of between 1.2 and 1.5 metres above local ground level, with a windshield used throughout.

Appendix E – Sample Survey Results

Friday 25 August 2023 – Plant Noise Measurements

Start Time	Duration T (mm:ss)	Results dB				Comments / Observations
		$L_{Aeq,T}$	$L_{Amax,f}$	$L_{A10,T}$	$L_{A90,T}$	
10:38	00:18	72	73	73	72	Crusher at ≈10-15m no material running through
10:55	00:43	80	83	81	77	Processing plant E at ≈16m start up only
10:56	00:31	80	87	82	79	Processing plant E at ≈16m start up only
10:57	00:50	83	90	86	80	Processing plant E at ≈16m
10:58	00:16	83	86	84	82	Processing plant E at ≈16m
10:58	00:29	79	82	80	79	Processing plant E at ≈16m
11:00	00:15	68	70	69	67	Processing plant SE at ≈12m
11:01	00:06	68	71	69	67	Processing plant SE at ≈22m
11:01	00:14	67	71	69	66	Processing plant SE at ≈22m
11:02	00:16	63	65	63	62	Processing plant SW at ≈28m
11:03	00:16	66	71	66	65	Processing plant SW at ≈18m
11:04	00:20	77	78	78	77	Processing plant W at ≈12m
11:05	00:30	70	75	71	70	Processing plant W at ≈32m
11:06	00:16	70	75	72	68	Processing plant and loading shovel in distance
11:06	01:03	68	69	68	67	Processing plant W at ≈35m
11:09	00:21	66	67	67	66	Processing plant SW at ≈34m
11:11	00:32	62	64	63	62	Processing plant SW at ≈34m
11:13	00:33	73	80	75	70	Processing plant NE at ≈39m some van engine noise
11:14	00:31	72	79	74	68	Processing plant NE at ≈39m
11:15	00:45	76	83	78	73	Processing plant NE at ≈25m

Appendix E (continued)

Friday 25 August 2023 – Community Baseline Measurements

Location	Start Time	Results dB (T = 15 minutes)				Comments / Observations
		$L_{Aeq,T}$	$L_{Amax,f}$	$L_{A10,T}$	$L_{A90,T}$	
Loc 3 Pipers Vale Close	11:41	45	62	47	42	Distant road traffic noise. Distant aircraft. Birdsong. Tonal alarms sporadically and white noise reverse alarms from adjacent commercial sites. Light aircraft. Activity at nearby dwelling.
Loc 2 Morland Road	12:16	51	60	54	47	Distant road traffic noise. Distant aircraft. Insects. Dog barking. Impact noise / DIY at nearby dwelling.
Loc 2 Morland Road	12:31	54	61	55	52	Distant road traffic noise. Distant aircraft. Insects. Birdsong. Dogs barking. Helicopter in distance.
Loc 1 The Strand	13:07	56	75	59	51	Constant road traffic noise from The Strand and A14 bridge. Birdsong.
Loc 1 The Strand	13:23	57	79	59	52	Constant road traffic noise from The Strand and A14 bridge. Birdsong. Light aircraft.
Loc 2 Morland Road	13:53	55	63	57	53	Distant road traffic noise. Emergency sirens. Birdsong. Insects. Light aircraft. Dog barking.
Loc 3 Pipers Vale Close	14:15	47	63	49	43	Distant road traffic noise. Light aircraft. Wind in trees (gusts up to 4-5m/s). White noise reverse alarms and horn beep at nearby commercial sites.
Loc 3 Pipers Vale Close	14:31	46	60	47	44	Distant road traffic noise. Clatters, tonal and white noise reverse alarms at nearby commercial sites. Breeze in trees. Birdsong. Distant aircraft. 14:42 can just hear rock impact noises possibly from processing plant starting up, border of audibility.
Loc 1 The Strand	15:03	58	68	60	54	Road traffic noise on The Strand and A14 bridge. Distant aircraft. Birdsong. SRC site not audible.

Appendix E (continued)

Wednesday 30 August 2023 – Community Baseline Measurements

Location	Start Time	Results dB (T = 15 minutes)				Comments / Observations
		$L_{Aeq,T}$	$L_{Amax,f}$	$L_{A10,T}$	$L_{A90,T}$	
Loc 3 Pipers Vale Close	10:18	48	62	50	45	Distant road traffic noise. Light aircraft. Distant plant and machinery noise including white noise and tonal alarms all from direction of commercial / docks. Noisy vehicle / plant noise (road cleaner / blower) intermittent. Gulls. Breeze in trees.
Loc 3 Pipers Vale Close	10:33	47	60	48	44	Distant road traffic noise. Gulls. Plant noise, white noise reverse alarms, horn beeps from nearby commercial sites. Breeze in trees. Distant aircraft.
Loc 2 Morland Road	10:57	55	67	57	53	Constant road traffic noise. Dog barking. Distant white noise reverse alarms. Birdsong.
Loc 2 Morland Road	11:12	55	67	57	53	Constant road traffic noise. Birdsong. Insects. Distant aircraft. Emergency sirens. Breeze in trees / grass. Metals recycling noise from S / SW. Light aircraft.
Loc 1 The Strand	11:45	57	73	60	51	Constant road traffic noise from The Strand / A14 bridge. Birdsong. Breeze in trees. Light aircraft.
Loc 3 Pipers Vale Close	12:13	46	60	47	44	Distant road traffic noise. Distant aircraft. Breeze in trees. Distant plant noise at commercial sites / docks.
Loc 2 Morland Road	12:40	54	65	55	51	Distant road traffic noise. Dog barking. Distant aircraft. Insects.
Loc 1 The Strand	13:14	56	71	59	52	Constant road traffic noise from The Strand / A14 bridge. Birdsong.
Loc 1 The Strand	13:29	56	67	59	52	Constant road traffic noise from The Strand / A14 bridge. Birdsong.

Appendix E (continued)

Wednesday 27 September 2023 – Plant Noise Measurements

Start Time	Duration T (mm:ss)	Results dB				Comments / Observations
		$L_{Aeq,T}$	$L_{Amax,f}$	$L_{A10,T}$	$L_{A90,T}$	
10:52	00:39	73	82	78	66	Processing plant SE at ≈22m with loading shovel
10:53	00:30	67	68	67	66	Processing plant SE at ≈22m
10:54	00:29	72	73	72	72	Processing plant SE at ≈12m
10:55	00:29	72	73	72	72	Processing plant SE at ≈12m
10:56	00:25	76	78	77	76	Processing plant SW at ≈18m (loading shovel at hopper)
10:57	00:34	77	78	77	76	Processing plant SW at ≈18m (loading shovel at hopper)
10:58	00:29	79	83	80	78	Processing plant E at ≈16m (stone into hopper)
10:59	00:29	79	82	80	77	Processing plant E at ≈16m (stone into hopper)
11:00	00:45	84	87	85	83	Processing plant E at ≈16m
11:01	00:28	83	87	84	82	Processing plant E at ≈16m
11:02	00:27	83	89	84	82	Processing plant E at ≈16m
11:03	00:26	83	88	85	82	Processing plant E at ≈16m

Appendix F - SoundPLAN Noise Mapping Assumptions

Calculations were undertaken using SoundPLAN 8.2 (updated 20 June 2023)

Noise calculations were made on a 1 metre grid at a calculation height of 1.5 metres above local ground level to represent ground floor level.

The calculations assume 100% hard ground across the calculation area.

Barrier attenuation is included in the calculations due to that afforded by the existing and proposed buildings/structures on and in the vicinity of the site.

Sound Power Level data has been included based on details/data provided by the operator and data contained within the WBM plant noise database of previous measurements of similar plant items/activities to those to be on site.

A summary of the data input into the SoundPLAN calculations is presented in the following table.

Plant Item	Sound Power Level dB L_{WA}	Source Height (m)	On time	OS Grid Reference
Recycling Operation				
Excavator	104	3.5	100%	E: 616943 N: 241736
Crusher/Screener	109	3	100%	E: 616945 N: 241738
Loading Shovel	107	2.5	33% at recycling plant	E: 616949 N: 241735
HGV Movements for Recycling Operations				
HGVs within site	104 (15 kph)	2	6 per hour (daytime) (6 one-way movements)	N/A

The Sound Power Levels used for the Excavator, Crusher/Screener and the Loading Shovel are based on manufacturers' data.

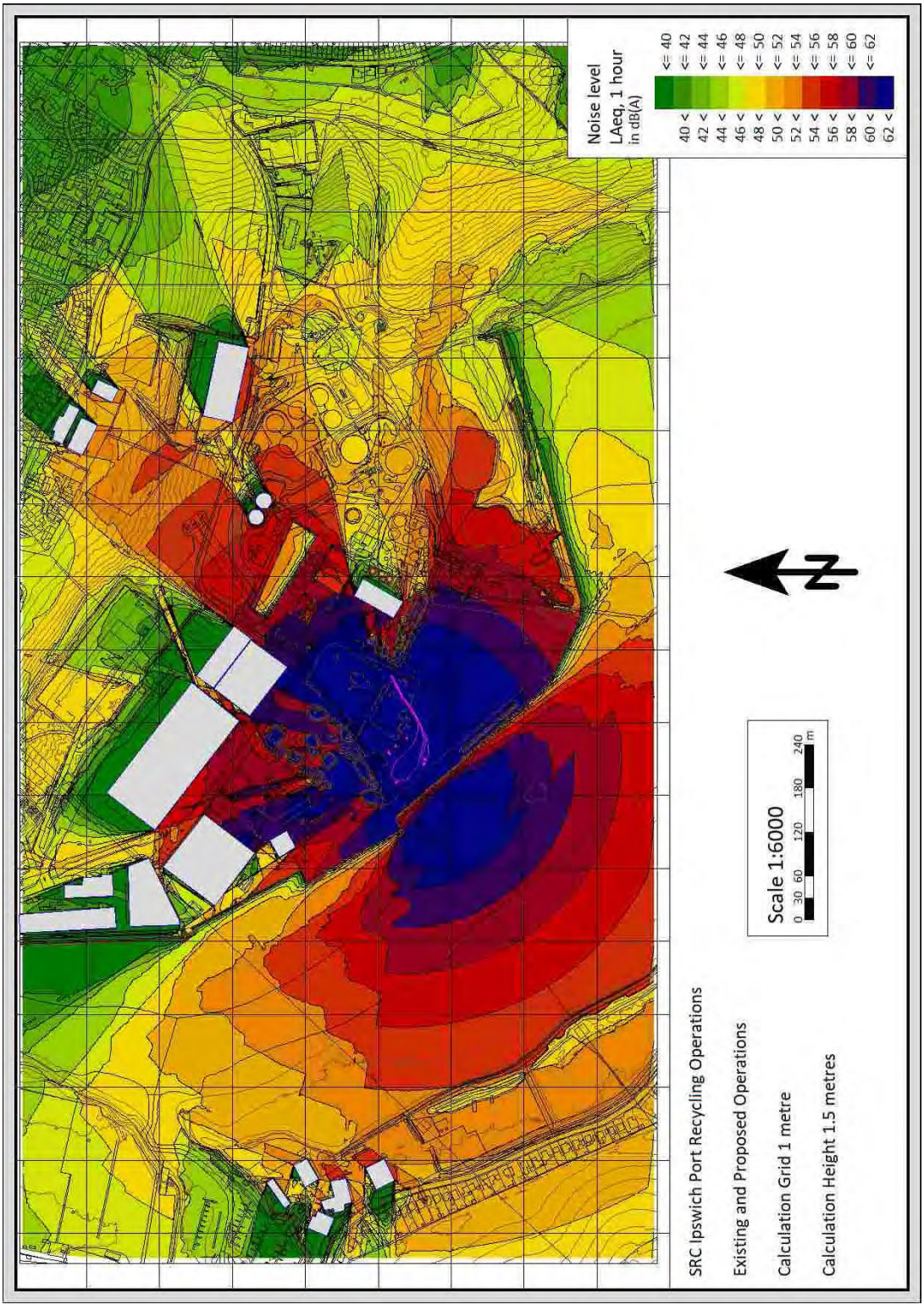
The Crusher/Screen dimensions are 13 m (L), 3.1 m (W) and 4 m (H) – a source height of 3 m was used to represent the level of the main noise source.

Appendix G (continued)

Plant Item	Sound Power Level dB L_{WA}	Source Height (m)	On time	OS Grid Reference
Existing Operations				
Vibrating Feed Hopper depositing onto stockpile	112	2	100%	E: 616960 N: 241786
Loading Shovel	107	2	33% at stockpiles 33% at hopper	E: 616917 N: 241775 (at stockpiles) E: 616957 N: 241785 (at hopper)
Processing Plant (main body	107	3.5	100%	E: 616967 N: 241776
Generator	101	1	100%	E: 616979 N: 241762
HGV Movements for Existing Operations				
HGVs within site	100 (15 kph)	2	6 per hour (daytime) (6 one-way movements)	N/A

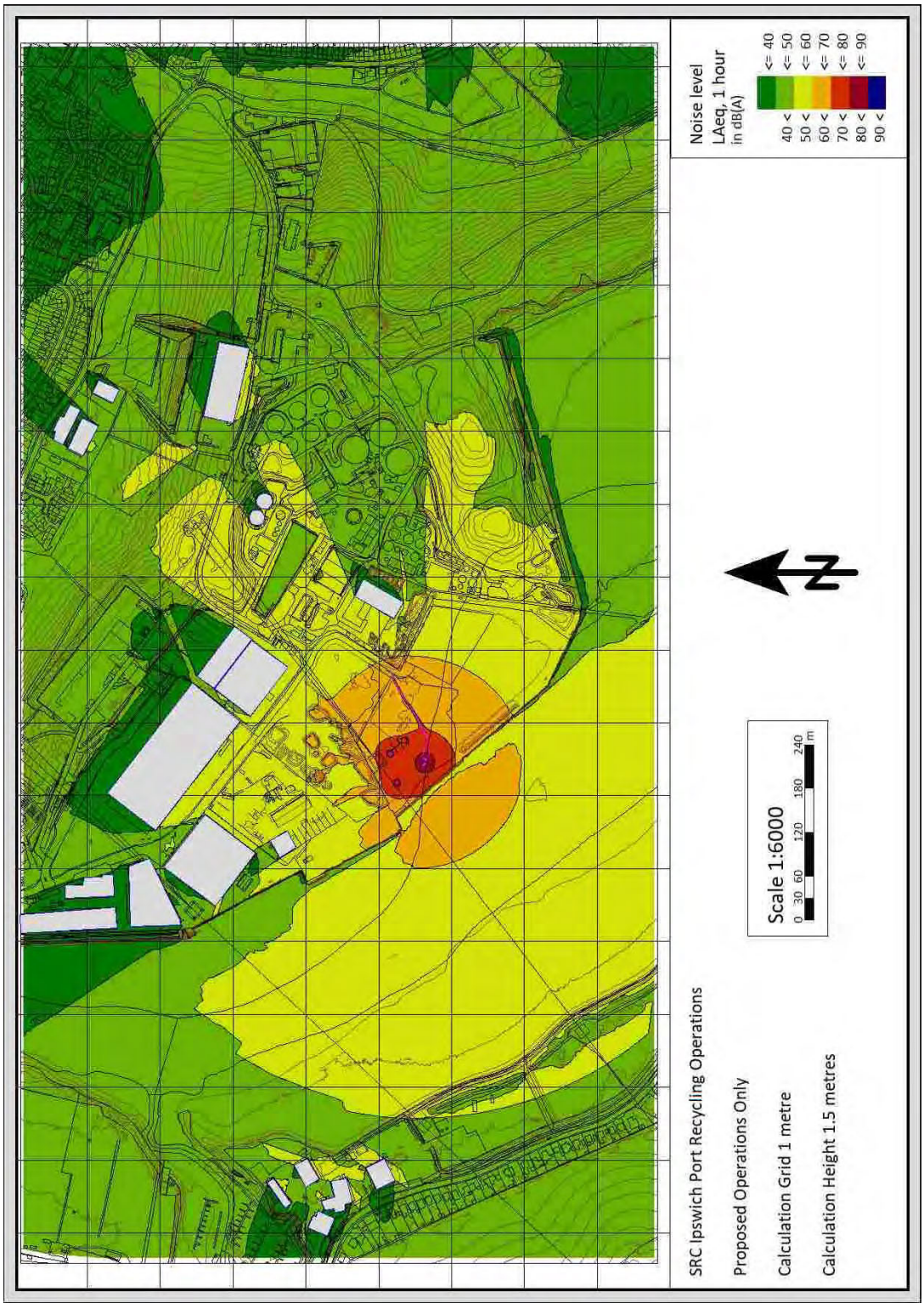
Appendix G – SoundPLAN Noise Plots

All Site Operations (07:00-17:00):



Appendix G (continued)

Recycling Operations (07:00-17:00):



Appendix H – BS4142 : 2014 + A1: 2019 Assessment

(a) Statement of Qualifications

See details about The Author on page 2 of this report.

(b) Source Being Assessed

1) Description of the main sound sources and of the specific sound

The sources under investigation are the importation/crushing/screening/storage/export of construction, demolition and excavation waste as well as HGV movements around the site. The main noise sources are listed in Appendix G and would give rise to the specific sound levels at the off-site receiver locations.

2) Hours of operation

The normal hours of operation are Mondays - Fridays 07.00–17.00 and 07:00 to 12:00 Saturdays.

3) Mode of operation (e.g. continuous, twice a day, only in hot weather)

The operations will only take place during the hours stipulated above.

4) Statement of operational rates of the main sound sources (e.g. maximum load setting, 50% max rate, low load setting)

The measurements and assessment have been based on a "*maximum load setting*" i.e. with the excavator and crusher/screener operating simultaneously for the entire assessment period of one hour.

The use of the loading shovel is evenly split (33% each) between the recycling operation and for the existing operations at the stockpile areas and the hopper for the processing plant.

HGV movements are input as being 6 one-way movements per hour for the proposed operations and 6 one-way movements for the existing operations.

The calculated site noise levels are therefore likely to be an overestimate.

The existing processing plant operation is modelled based on measurements around the plant (generator, main plant and hopper/material falling onto stockpiles) and includes the loading shovel use as split evenly (33% each) between the stockpiles and the hopper for the existing operation and the proposed recycling plant.

5) Description of premises in which the main sound sources are situated (if applicable).

The site is open with the main processing plant located in the centre of the site and the crusher located to the south / south west of the processing plant and site. Vehicles access the site from the north / north west of the site via the weighbridge. A site plan is provided in Appendix B.

Appendix H (continued)

(c) Subjective Impressions

1) Dominance or audibility of the specific sound

At Location 1 (The Strand) and Location 2 (Morlands Road) there is significant road traffic noise from local roads and the A14 / A14 Orwell Bridge. Given the separation distances involved between the SRC site and these dwellings it is expected that the specific sound will be inaudible and largely masked by other environmental noise.

At Location 3 (Pipers Vale Close) during the survey on 25 August 2023 material falling from a hopper at the northern end of the processing plant on to a metal shoot was just audible at the Pipers Vale Close monitoring location. Following discussions with the site, a rubber lining was added to the shoot and this has removed part of the higher frequency noise as confirmed with measurements on site on Wednesday 27 September 2023. A character correction has been considered in this assessment to account for the noise, despite it being only just audible. It is also noted that there were other sources of commercial / industrial noise (not from the SRC site) audible at the Pipers Vale Close location including reverse alarms, material movement and plant noise. As such whilst noise from the SRC site may be just audible it is unlikely to stand out as particularly noticeable or distinctive given the existing character of the area.

2) Main sources contributing to the residual sound.

The daytime noise climate in the area during the surveys undertaken by WBM in August 2023 was affected primarily by road traffic noise, with other industrial/commercial activity, and occasional aircraft audible at times.

(d) The Existing Context and Sensitivity of Receptor

The noise climate during the daytime at the chosen assessment locations is characterised primarily by local and distant (A14) road traffic noise. The site is located within the Port of Ipswich and the area in general is a mixed commercial / industrial and residential use. There are numerous other commercial / industrial sites neighbouring residential dwellings in the locality. With regard to sensitivity, the receptor locations are residential properties and are therefore considered to be of “High” sensitivity. Whilst the receptors are all considered to be of high sensitivity, the context of the site and surroundings indicates that residents in this type of area would expect some audibility of noise from industrial and commercial operations. Other sources of noise in the area included occasional aircraft, birdsong and breeze in the trees.

(e) Measurement Locations and Justification

Measurement locations, their distance from the specific sound source, the topography of the intervening ground and any reflecting surface other than the ground, including a photograph, or a dimensioned sketch with a north marker. A justification for the choice of measurement locations should also be included.

The measurement locations used for the consideration of the baseline noise data were near to existing residential properties to the south west, north east and east of the site. The data were used to determine the acoustic environment and to measure residual (ambient) and background sound levels in the vicinity of the dwellings.

The receptor locations selected for this assessment are representative of the closest residential areas to the site.

Appendix H (continued)

(f) Sound Measuring Systems, Including Calibrator / Pistonphone

1) Type

See Appendix D

2) Manufacturer

See Appendix D

3) Serial number

See Appendix D

4) Details of the latest verification test including dates

See Appendix D

(g) Operational Test

1) *Reference level(s) of calibrator, multi-function calibrator or pistonphone;*
See Appendix D

2) *Meter reading(s) before and after measurements with calibrator, multi-function calibrator or pistonphone applied.*
See Appendix D

(h) Weather Conditions

1) Wind speed(s) and direction(s)

See Appendix D.

2) Presence of conditions likely to lead to temperature inversion (e.g. calm nights with little cloud cover) None.

3) Precipitation None

4) Fog None.

5) Wet ground None.

6) Frozen ground or snow coverage None.

7) Temperature: See Appendix D.

8) Cloud Cover See Appendix D

(i) Date(s) and Time(s) of Measurements

See Appendix D

(j) Measurement Time Intervals

15 minutes

(k) Reference Time Interval(s)

The reference time interval is 1 hour for the daytime assessment between 07:00 and 23:00 hours.

Appendix H (continued)

(I) Specific Sound Level

1) Measured sound level(s)

The specific sound level for the proposed new operations could not be measured at the assessment locations but has been determined from calculation based on sound level data provided by the manufacturers, plant noise measurements on site and data contained within the WBM plant noise database.

2) Residual sound level(s) and method of determination

The representative residual sound levels were determined from the attended noise surveys at Locations 1 (A), 2 (B), and 3 (C). The measurements were undertaken in August 2023.

The representative daytime residual noise levels were as follows:

A. : The Strand	57 dB $L_{Aeq,15\ min,\ free\ field}$
B. : Morland Road	54 dB $L_{Aeq,15\ min,\ free\ field}$
C. : Pipers Vale Close	47 dB $L_{Aeq,15\ min,\ free\ field}$

3) Ambient sound level(s) and method of determination

As measurements were undertaken without the fixed plant operating at the site, the ambient sound level is the same as the residual sound level. The representative residual and ambient sound levels were determined from the attended noise surveys at Locations 1 (A), 2 (B) and 3 (C). The measurements were undertaken in August 2023.

The representative daytime ambient noise levels were as follows:

A. : The Strand	57 dB $L_{Aeq,15\ min,\ free\ field}$
B. : Morland Road	54 dB $L_{Aeq,15\ min,\ free\ field}$
C. : Pipers Vale Close	47 dB $L_{Aeq,15\ min,\ free\ field}$

Appendix H (continued)

For the daytime sample measurements at the attended survey locations the following "Comments" were made:

Location 1 – The Strand	Constant road traffic noise from The Strand / A14 bridge. Birdsong.
Location 2 – Morlands Road	Distant road traffic noise. Dog barking. Distant aircraft. Insects.
Location 3 – Pipers Vale Close	Distant road traffic noise. Commercial / industrial noise including plant noise, white noise reverse alarms, horn beeps and material movement. Breeze in trees. Distant aircraft. Birdsong.

4) Specific sound level(s) and method of determination

The specific sound levels for the three assessment locations have been determined from calculation (see Sections 6 and 7 of this report) as follows:

Daytime (07:00 to 17:00):

52 dB $L_{Aeq,1\ hour,\ free\ field}$ for 54 The Strand;

46 dB $L_{Aeq,1\ hour,\ free\ field}$ for Morland Road; and

48 dB $L_{Aeq,1\ hour,\ free\ field}$ for 16 Pipers Vale Close.

5) Justification of methods

Calculation was used as the proposed new site is not yet fully operational and therefore cannot be measured at the nearest dwellings.

6) Details of any corrections applied

See the Potential Impact of Uncertainty section (q) at the end of this appendix.

(m) Background Sound Level(s)

Background sound level(s) and measurement time interval(s) and, in the case of measurements taken at an equivalent location, the reasons for presuming it to be equivalent.

The 15-minute attended sample measurements undertaken in August 2023 at the residential survey locations gave a range of daytime background sound levels of:

A. 54 The Strand — 51 to 54 dB $L_{A90,15\ min,\ free\ field}$;

B. Morland Road — 47 to 53 dB $L_{A90,15\ min,\ free\ field}$;

C. 16 Pipers Vale Close — 42 to 45 dB $L_{A90,15\ min,\ free\ field}$.

The 15-minute attended sample measurements undertaken in August 2023 at the residential survey locations gave representative daytime background sound levels of:

A. 54 The Strand — 52 dB $L_{A90,15\ min,\ free\ field}$;

B. Morland Road — 51 dB $L_{A90,15\ min,\ free\ field}$;

C. 16 Pipers Vale Close — 44 dB $L_{A90,15\ min,\ free\ field}$.

Appendix H (continued)

(n) Rating Level(s)

1) Specific sound level(s)

The specific sound level(s) stated earlier are:

Daytime (07:00 to 17:00):

52 dB $L_{Aeq,1\ hour,\ free\ field}$ for 54 The Strand;

46 dB $L_{Aeq,1\ hour,\ free\ field}$ for Morland Road; and

48 dB $L_{Aeq,1\ hour,\ free\ field}$ for 16 Pipers Vale Close.

2) Any acoustic features of the specific sound

The potential adjustments for the different features and assessment methods are summarised in the table in Section 3 of this report. During the survey on 25 August 2023 material falling from a hopper at the northern end of the processing plant on to a metal shoot was just audible at the Pipers Vale Close monitoring location. Following discussions with the site, a rubber lining was added to the shoot and this has removed part of the higher frequency noise as confirmed with measurements on site on Wednesday 27 September 2023. Additional work could be undertaken to mitigate this aspect of the noise from the processing plant, if necessary, at a later stage for example following any feedback from residents at Pipers Vale Close. However, it is noted that the processing plant is an existing source at the site (it is not part of the proposed recycling works subject to the EA permit) and to date WBM and SRC are unaware of any noise complaints.

Elimination of this part of the processing plant noise would mean that there is no adjustment necessary in the BS4142 assessment for the character of the noise. However, to present a worst case scenario and to cover an element of uncertainty, in this assessment the Rating Level has been assumed to be 0dB to +3dB higher than the Specific Sound Level to allow for a possible 'other character' acoustic feature correction.

3) Rating level(s)

The rating levels for daytime are therefore 0dB to +3 dB above the specific noise levels stated above for 16 Pipers Vale Close and 0dB above the specific noise levels at 54 The Strand and Morland Road. This results in the following rating levels determined in accordance with BS 4142:2014+A1:2019:

Daytime (07:00-17:00):

52 dB $L_{Aeq,1\ hour,\ free\ field}$ for 54 The Strand;

46 dB $L_{Aeq,1\ hour,\ free\ field}$ for Morland Road; and

48 dB $L_{Aeq,1\ hour,\ free\ field}$ for 16 Pipers Vale Close

Appendix H (continued)

(o) Excess of the level(s) over background sound level(s)

Excess of the rating level(s) over the measured background sound level(s) and the initial estimate of the impacts

The rating levels, the background sound levels and the excess of the rating levels over the representative background sound levels for the operating hours of the site are presented in the following table:

Receiver Location Daytime (07:00-17:00)	**Rating Level dB $L_{Ar,\,Tr}$**	**Representative Background Sound Level dB $L_{A90,15\ min}$**	**Excess of Rating Level over Background Sound Level**
54 The Strand	52	52	0
Morland Road	46	51	-5
16 Pipers Vale Close	48 to 51	44	+4 to +7

When the rating level is above the background sound level, a difference of around +5 dB is likely to indicate an adverse impact and a difference of around +10 dB or more is likely to indicate a significant adverse impact, depending on the context.

The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.

(p) Conclusions of the assessment after taking context into account

Location A. 56 The Strand:

The calculations demonstrate a rating level of 52 dB $L_{Ar,\,Tr}$ at 54 The Strand which is no more than the representative background sound level of 52 dB $L_{A90,\,T}$. The representative residual sound level at The Strand is 57 dB $L_{Aeq,T}$.

The conclusion is that the assessment indicates no adverse impact at The Strand during the proposed daytime operating hours for the recycling operation.

In context, the operation will be taking place on an existing site in an area that has a significant amount of existing transportation noise and industrial activity and the noise from the proposed daytime recycling operations is unlikely to be readily distinctive from the existing transportation and industrial/commercial noise in the area.

The daytime soundscape for the dwellings on The Strand will continue to be affected by distant and local road traffic noise, other industrial/commercial activity and local activity.

It is expected that the site could be just audible at times, but is unlikely to be readily identifiable/distinguishable at this location most of the time during the daytime.

Appendix H (continued)

Location B. Morland Road:

The calculations demonstrate a rating level of 46 dB $L_{Ar,\,Tr}$ at Morland Road which is 5 dB(A) below the representative background sound level of 51 dB $L_{A90,\,T}$. The representative residual sound level at the dwellings on Morland Road is 54 dB $L_{Aeq,T}$.

The conclusion is that the assessment indicates no adverse impact at the dwellings on Morland Road during the proposed daytime operating hours for the recycling operation.

In context, the operation will be taking place on an existing site in an area that has a significant amount of existing transportation noise and the noise from the proposed daytime recycling operations is unlikely to be readily distinctive from the existing transportation noise in the area.

The daytime soundscape for the dwellings on Morland Road will continue to be affected by distant and local road traffic noise and local activity.

It is expected that the site will be inaudible at this location most of the time during the daytime.

Location C. 16 Pipers Vale Close:

The calculations demonstrate a rating level of 48 dB $L_{Ar,\,Tr}$ at the dwellings on Pipers Vale Close which is 4 dB(A) above the representative background sound level of 44 dB $L_{A90,\,T}$. The representative residual sound level at the dwellings on Pipers Vale Close is 47 dB $L_{Aeq,T}$. Taking an absolute worst case approach to the assessment and to include for uncertainty with the processing plant noise, calculated daytime site noise levels at Pipers Vale Close could be up to 7dB(A) above the background sound level including for a +3dB(A) acoustic feature correction. This is above the point at which adverse impact might be expected to arise, depending on the context but remains below the point at which a significant adverse impact could be expected to arise (also depending on the context). Context is an important consideration for this site and is discussed below.

The operation will be taking place on an existing site in an area that has a significant amount of existing commercial / industrial activity and transportation noise. The noise from the proposed daytime recycling operations is unlikely to be readily distinctive from the existing industrial/commercial noise in the area. This is supported by the calculated noise levels from the proposed recycling operations alone, which show that the site noise levels from the proposed recycling operations are equal to or below the representative background sound level at all three assessment locations.

The only aspect of the assessment considered likely to draw an acoustic feature correction is from the existing processing plant. This is an existing source at the site and WBM / SRC are unaware of any complaints regarding the operation of the site to date. This is a positive indication that there is not a current problem arising from the operation of the processing plant, including any audible acoustic features at Pipers Vale Close.

Considering the context of the site and locality and the existing operations on the SRC site, the proposed recycling operations do not introduce a new type of noise or novel acoustic character to the area and as such, perception of the noise by local residents would not be expected to provoke the same reaction as if this were a new source in an area otherwise devoid of such noise sources and noise characteristics.

Appendix H (continued)

For the reasons listed above, whilst inclusion of a +3dB character feature correction within the uncertainty calculations initially indicates an adverse noise impact, with the consideration of context it is expected that impact at Pipers Vale Close will remain below adverse impact as indicated by the initial assessment of impact without inclusion of an acoustic feature correction.

The conclusion is that the assessment is below the level indicating an adverse impact at the dwellings on Pipers Vale Close during the proposed daytime operating hours for the recycling operation.

In context, the operation will be taking place on an industrial estate in an area in which transportation noise and noise from other industrial / commercial activity is the main controlling noise source. The noise from the proposed daytime recycling operations is unlikely to be readily distinctive from the existing noise levels in this area.

The daytime soundscape for the dwellings on Pipers Vale Close will continue to be affected by distant and local road traffic noise, other industrial/commercial activity and local activity.

It is expected that the site could be audible at times, but is unlikely to be readily identifiable/distinguishable at this location most of the time during the daytime.

(q) The potential impact of uncertainty

Section 10 of BS 4142:2014+A1:2019 states: "*Consider the level of uncertainty in the data and associated calculations. Where the level of uncertainty could affect the conclusion, take reasonably practicable steps to reduce the level of uncertainty. Report the level and potential effects of uncertainty*."

One of the largest levels of uncertainty is whether the proposed activity gives rise to the calculated noise level at the receiver locations considered.

The measurements and assessment have been based on a realistic worst case scenario during the proposed daytime operations.

The calculations and assessment have been based on a "*maximum load setting*" i.e. with the excavator and crusher/screener operating continuously and simultaneously for the entire assessment period and is therefore likely to be an overestimate.

The use of the loading shovel is evenly split (33% each) between the recycling plant and the existing operations at the stockpiles in the material management areas and the hopper for the processing plant.

The modelled scenario is therefore very much a worst case for when all plant is operating.

The model allows for a worst case scenario to provide a more robust assessment, but such as scenario is unlikely to occur as modelled in practice.

Appendix H (continued)

HGV movements have been included as being 6 per hour (daytime) to account for the normal expected rate of HGVs currently entering and leaving the site (as per the normal hourly HGV movements associated with that operation) with an additional 6 HGVs per hour entering/leaving the recycling plant for the proposed recycling operations. The Sound Power Level used for HGV movements within the site is based on movements at 15 kilometres per hour.

As stated above, for the majority of the time, the scenario as modelled will not occur because there will be some variability in the site operations and all mobile plant and machinery may not operate simultaneously for the proportion of the time used in the model.

Should it be considered that an acoustic feature correction is necessary for the nearest dwellings to the site on Pipers Vale Close where some noise from the material moving from the hopper to the stockpile at the existing processing plant was audible during the baseline noise surveys, it would not be related to tonality, impulsivity or intermittency and would mostly appropriately be considered as 'other acoustic feature'.

The addition of a +3dB acoustic feature correction at the receptor on Pipers Vale Close would result in differences between the Rating Levels and the Representative Background Sound Levels (+7dB(A)) that would indicate a potential adverse impact at the dwellings on Pipers Vale Close, but not a significant adverse impact (depending on context).

If one considers the proposed operations in isolation, calculated site noise levels are no more than the representative background sound level at Pipers Vale Close and there would be no requirement for an acoustic feature correction as that consideration is only related to the existing operations on site which are not the subject of the permit.

In the context of the existing sound environment and industrial/commercial noise in the area, it is considered that there would be no adverse impact at Pipers Vale Close.

The site noise calculations do not include any allowance for air absorption but this is unlikely to have any significant outcome on the calculated sites noise levels and conclusions on impact.

APPENDIX 9

Noise Management Plan

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NOISE MANAGEMENT PLAN

for the Physical Treatment of Inert
and Non-Hazardous Waste at

Cliff Quay, Cliff Road, The Docks,
Ipswich, IP3 0BS

Report prepared on behalf of:
Sewells Reservoir Construction Limited

RICS

Report Date:
November 2023

This Noise Management Plan was prepared by PDE Consulting Limited on behalf of Sewells Reservoir Construction Limited

CONTENTS

TABLES

DRAWINGS

APPENDICES

1. INTRODUCTION

Background

1.1 This Noise Management Plan (NMP) has been prepared by PDE Consulting Limited (the 'Agent') on behalf of Sewells Reservoir Construction Limited (the 'Operator'), hereafter referred to as SRC, for the operation of a proposed new waste facility to be located at Cliff Quay, Cliff Road, The Docks, Ipswich, IP3 0BS (the "Site").

1.2 This NMP is has been produced to support a new environmental permit application for the storage and physical treatment of inert and non-hazardous waste.

1.3 The Site is located approximately 3 km south of the centre of Ipswich and some 840 m west of Gainsborough and is centred at National Grid Reference (NGR) TM 16983 41775 as shown on Drawing No. KD.IPSW.1.D.001. The proposed permit boundary is outlined in green on Drawing No. KD.IPSW.1.D.002.

1.4 The Site is located within an industrial estate and is bound on three sides by other industrial uses, with an asphalt plant and associated operations located immediately to the north and east of the Site. The River Orwell bounds the Site to the south west. A pylon is located adjacent to the northern Site boundary.

1.5 The closest residential receptor to the Site has been identified as Pipers Vale Close, which is located approximately 500 m to the north east of the permit boundary.

Regulatory Requirements

1.6 The standard noise condition for environmental permits requires that:

1.8 "*Emissions from the activities shall be free from noise at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable, to minimise, the noise and vibration*."

1.7 This condition requires an operator to take appropriate measures to prevent or minimise noise. The measures required need to be what are reasonable, good practice and balances the costs and benefits to prevent or minimise noise.

1.8 Guidance on the Environment Agency (EA) website (www.gov.uk) states that the following measures must be considered to prevent and minimise noise emissions:

- Factor noise levels in to your plant design, and your plans for maintaining and operating your plant;
- Position noisy operations (that increase the noise in any area above background noise) away from delivery or vehicle routes;
- Use noise reduction equipment like balancing fans and fixing loose covers on noisy operations;

- Isolate noisy operations through measures like acoustic enclosures, silencers, closed doors and walls;
- Avoid noisy work during evenings and weekends;
- Switch off your entire plant, or specific vehicles, ventilation units and equipment, when they're not in use;
- Tell the EA and neighbours about any temporary work alterations that could cause significant noise; and
- Don't carry out such work on weekends or evenings after 5pm.

1.9 The same guidance also states that if complaints are received, noise levels must be monitored at different locations and times on Site to identify the problem and/or stop that activity until sufficient mitigation measures have been developed.

1.10 This NMP has been produced in accordance with EA guidance document Integrated Pollution Prevention and Control (IPPC), Horizontal Guidance note for Noise, Part 2 - Noise Assessment and Control (version 3, June 2004).

1.11 The guidance describes the hierarchy for the control of noise emissions as follows:

- Prevent generation of noise at source by good design and maintenance.
- Minimise or contain noise at source by observing good operational techniques and management practice.
- Use physical barriers or enclosures to prevent transmission to other media.
- Increase the distance between the source and receiver.
- Sympathetic timing and control of unavoidably noisy operations.

1.12 A NMP must be written explaining how noise will be prevented and minimised and state if it is likely that noise will cause nuisance beyond the Site boundary.

1.13 The aim of this NMP is to:

- Ensure compliance with the mitigation measures proposed in section 4 of this report;
- Formalise actions to be taken in the event of a noise complaint;
- Ensure any noise complaints are dealt with effectively and a record maintained;
- Investigate noise complaints and implement measures to prevent further occurrences; and
- Inform continuing improvements to noise control and site management and update the NMP reflecting such improvements.

1.14 This document will form part of the Site specific Environmental Management System (EMS) for the waste operation. A copy of the EMS will be kept on Site.

1.15 Staff at all levels will receive the necessary training and instruction in their duties relating to the control of all operations and the potential sources of noise emissions.

2. OPERATIONS

Proposed Development

2.1 It is proposed that incinerator bottom ash (IBA) is imported to the Site via boats, and construction and demolition wastes are imported to the Site by road. IBA will be unloaded via the dock to the north west of the permit boundary.

2.2 Imported wastes will be treated by sorting, separation, screening, crushing and blending to produce aggregate.

2.3 The following mobile plant which will be used on Site for the permitted waste activity is as follows:

- FN197 Komatsu WA475-10E0 wheeled loading shovel;
- EC250E Volvo Excavator; and
- Rubblemaster RM70GO! 2.0 crusher with in-built screener.

2.4 The Rubblemaster RM70GO! 2.0 is a flexible crusher with low emissions, low noise and low diesel consumption.

2.5 Waste throughputs will be limits to 100,000 tonnes per annum. No more than 40,000 tonnes of wastes will be stored on Site at any one time. .

2.6 The proposed operating hours for the Site are as follows:

- Monday to Friday 07:00 to 17:00
- Saturday 07:00 to 12:00
- No operating on Sundays or Bank Holidays.

Conclusions of the Noise Impact Assessment

2.7 A comprehensive Noise Impact Assessment has been produced by WBM Acoustic Consultants to support the permit application. The report presents the results of comprehensive baseline surveys undertaken in August 2023.

2.8 The NIA concludes that:

"The comparison of the calculated noise levels arising from the site operations including the recycling facility has been compared to existing background and residual sound levels in the area and it is concluded that there will be no adverse impact arising from the proposals at the nearest residential receptors".

3. SENSITIVE RECEPTORS

3.1 Much of the Site is bounded by Tarmac Ipswich Asphalt Plant to the north and east and the River Orwell to the south west.

3.2 Potentially noise sensitive receptors within 500m of the Site are presented in Table 1 below.

Table 1: Sensitive Receptor Locations

Land use	Description	Direction from Proposed Permit Boundary	Distance from Proposed Permit Boundary (m)
River Orwell Ramsar/SSI/SPA	Watercourse and habitat site	South and West	10
Pipers Vale Local Nature Reserve	Local Nature Reserve	East	402
Pipers Vale Close	Residential Properties	North East	500

3.3 The River Orwell which lies 10 m to the south west of the Site is an SPA, Ramsar site and a SSSI. It is an estuary comprising extensive mudflats, low cliffs, saltmarsh, and areas of vegetated shingle on the lower river reaches. The site supports internationally and nationally important numbers of various species of wintering wildfowl and waders. The Site is within Ipswich Docks which is a significant development along the River Orwell, the Site is comparatively small within this setting and is highly unlikely to cause an adverse impact to the River Orwell. Furthermore, whilst the permit boundary is 10 m from the river, the crusher is located some 40 m from the river. The River Orwell is not located downwind of the prevailing wind direction and the proposed mitigation measures should ensure that there will be no impact of the river.

3.4 Pipers Vale Local Nature Reserve (LNR) lies 402m from the Permit Boundary and is an area of ecologically sensitive scrub, heathland and alder carr/deciduous woodland. Due to the nature of the receptor and proximity of this receptor to the Site in combination with the mitigation measures listed in Section 4 it is highly unlike that the proposed waste operation will present a risk to Pipers Vale LNR.

3.5 The closest properties on Pipers Vale Close are located approximately 500 m from the Site. A number of industrial sites lie between the Site and Pipers Vale Close. Pipers Vale Close is also neighboured by various commercial / industrial units along Sandyhill Lane. The NIA concluded that there will be no adverse impact arising from the proposals at the nearest residential receptors.

4. MITIGATION MEASURES

4.1 The following measures will be employed to mitigate against potential noise emissions from the activities:

- Site operating plans have been designed to minimise materials handling and vehicle movements;
- Switching off plant and vehicles when not in use – no idling policy;
- All Site vehicles will be maintained in accordance with the manufacturer's instructions;
- Maintaining equipment specifically to reduce noise levels, for example fixing loose covers;
- Enclosure or abatement, for example acoustic enclosures, silencers;
- Timing – only undertaking waste operations during the times specified in Section 2.6;
- The employment of reduced drop heights;
- Reducing or stopping activities that are causing the noise until either the circumstances have changed or other appropriate measures have been put in place to allow the operations to re-commence without significant noise;
- Site speed limit, 'no idling' policy and minimisation of vehicle movements on site; and
- Ensure regular maintenance of the access roads to repair 'pot holes' which serves to significantly reduce noise generated from empty vehicles

4.2 The in-built design features to reduce noise emissions, additional mitigation measures highlighted above all and the findings from the NIA demonstrate that noise emissions from the Site are acceptable.

4.3 Furthermore, the above measures are considered reasonable, good practice and balance the costs and benefits to prevent and minimise noise.

Noise Action Plan

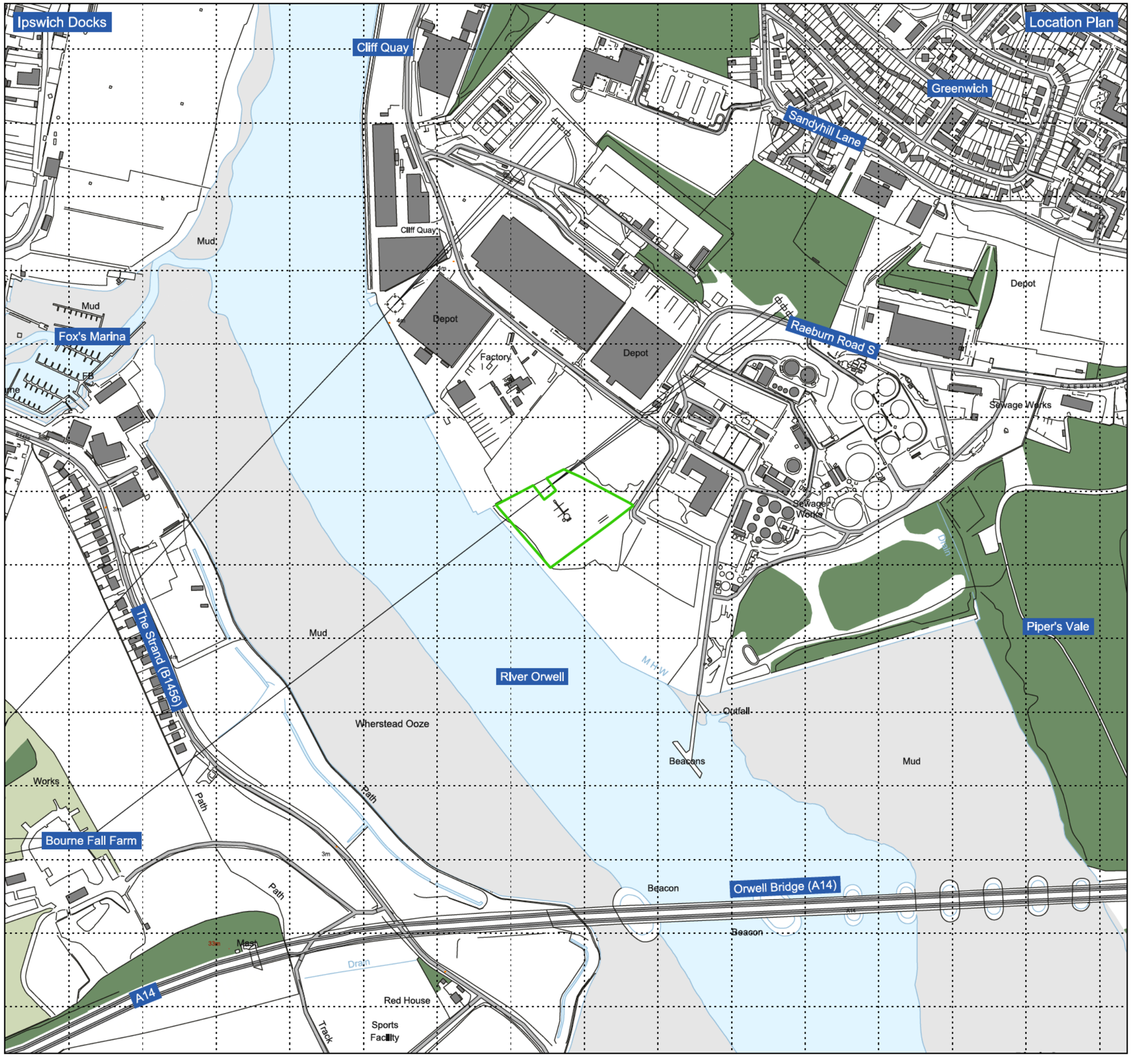
4.4 In the unlikely event of a noise complaint, the following action plan will be followed:

- The complaint must be investigated fully and the source of the noise identified;
- Identified source(s) of the noise relating to the complaint will be ceased and/or additional mitigation provided;
- The Accident and Incident Record (Appendix 1 of this NMP) should be completed. Upon completion, this procedure ensures that the root cause has been identified; consideration has been given to prevent recurrence of root cause, the EA is notified if pollution has been caused and a written record exists;
- Once the source has been identified, mitigated and recorded operations can be resumed;
- A record of the complaint together with the remediation actions and a completed Incident Report form will be kept on Site;
- A review of the Site specific mitigation measures detailed above will be undertaken.

4.5 Any noise complaints will be thoroughly investigated and noise complaint form (see Appendix 2) will be completed.

DRAWINGS

Location Plan	Drawing No. KD.IPSW.1.D.001	Scale 1:5,000@A3
Permit Boundary Site Plan	Drawing No. KD.IPSW.1.D.002	Scale 1:1,250@A3



Legend

Permit Boundary

consulting limited chartered surveyors

PROJECT
Ipswich Docks

DRAWING TITLE
Location Plan

DATE
August 2023

SCALE
1:5,000 @ A3

DRAWING No.
KD.IPSW.1.D.001

DRAWING STATUS
FINAL

01284 764085 . www.pdeconsulting.co.uk

Legend

- Permit Boundary
- Recyclng Area

pde. consulting limited chartered surveyors

PROJECT
Ipswich Docks

DRAWING TITLE
Permit Boundary Site Plan

DATE
September 2023

SCALE
1:1,250 @ A3

DRAWING No.
KD.IPSW.1.D.002

DRAWING STATUS
FINAL

N

01284 764085 . www.pdeconsulting.co.uk

APPENDIX 1

Accident / Incident Record Form

Accident (and Incident) Record

Record of accidents, other incidents or near misses

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any **significant pollution** or **environmental damage** to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? If so what?	
If there was, then you must take steps to prevent further damage and notify the Environment Agency on 0800 807060 and any other relevant regulators ASAP. Have you done so? Yes / No	Who did you phone? At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No What date did you contact?
Please print your name and sign	

Continue on a separate sheet if you do not have enough room.
Keep the completed form in the file to discuss with your auditors or regulators when they visit.

APPENDIX 2

Noise Complaint Form

COMPLAINT FORM

Customer Name:	**Address:**
Customer Contact:	
Tel. No.:	

Complaint Ref. No.	**Time and Date:**

Complaint Description of Noise (hiss/hum/rumble/continuous/intermittent)
Any other previous known complaints relating to installation (all aspects, not just noise)
Potential noise sources that could give rise to the complaint
Action Taken
Signed: ..... **Date:** .....

Investigation Details:

Investigation by: **Position:** _____

Times **Start:** **Finish:** _____

Weather Conditions:-

Environment Agency Feedback:
Public Recommendation / Feedback

APPENDIX 10

Environmental Risk Assessment

Ipswich Docks Environmental Risk Assessment, March 2024.

Data and information				Judgement				Action (by permitting)	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).**
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	High	Medium	**High**	Permitted waste types are inert and non hazardous and do not include dusts, powders or loose fibres and have a low potential to produce bioaerosols, but the treatment activities will produce particulate matter so a high magnitude risk is estimated. The permitted level of throughput and potential size of the facility means there is potential for exposure if anyone is living or working close to the site (apart from the operator and employees). There is potential for increased dust generation from permitted activities during prolonged dry periods e.g. summer months.	The Site is located in an industrial area and the nearest residential receptors are located 500 m away. The Site is not located within an Air Quality Management Zone. As the application is for a bespoke permit, a Dust Emissions Management Plan (PDE Consulting Ltd, March 2024) has been produced.	Low
Local human population	As above	Nuisance - dust on cars, clothing etc.	Air transport then deposition	High	Low	**Medium**	As above. Local residents often sensitive to dust. Residential receptors are largely absent.	As above	Low
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Low	**Low**	Local residents often sensitive to litter, however permitted waste types have a very low litter potential. Residential receptors are largely absent.	As above. Appropriate measures include clearing litter arising from the activities from affected areas outside the site.	Very low
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Medium	Medium	**Medium**	Road safety, local residents often sensitive to mud on roads. The roads close to the site are unlikely to be used by local residents.	As above. Appropriate measures include clearing waste, litter and mud arising from the activities from affected areas outside the site.	Low
Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Low	**Low**	Local residents often sensitive to odour, however permitted waste types have a low odour potential and receptors are largely absent.	Standard permit conditions require that emissions shall be free from odour. If an issue is identified an odour management plan may be requested by the Environment Agency (EA).	Very low

Data and information				Judgement				Action (by permitting)	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).**
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Medium	Medium	**Medium**	Local residents often sensitive to noise and vibration, however the nearest residential dwellings to the site are 500 m away.	A Noise Impact Assessment (NIA) (WBM Acoustic Consultants, October 2023) and a Noise Management Plan (PDE Consulting Ltd, November 2023) have been produced. The NIA concludes that: "*there will be no adverse impact arising from the proposals at the nearest residential receptors*".	Low
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	**Low**	Permitted wastes unlikely to attract scavenging animals and birds.	The EA can request an emissions management plan in the unlikely event that an isssue develops.	Very low
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	**Low**	Permitted waste types unlikely to attract pests.	As above	Very low
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Low	Low	**Low**	Permitted waste types are inert and non hazardous so any waste washed off site will add to the volume of the local post-flood clean up workload, rather than the hazard. The majority of the Site is located in Flood Zone 1 (lowest risk). The western corner of the Site is mapped as Flood Zone 2. Part of the area between the Site and the River Orwell, consistent with the Flood Zone 2 allocation, benefits from flood defences. The area designated as Flood Zone 2 is not proposed to be used for the storage and/or treatment of wastes.	Standard permit conditions require a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances (will include flood risk management).	Very low

Data and information				Judgement				Action (by permitting)	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).**
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Medium	Low	**Low**	Permitted waste types are inert and non hazardous therefore only a low magnitude risk is estimated	Activities shall be managed and operated in accordance with a management system which includes site security measures to prevent unauthorised access).	Low
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, fire fighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	Low	**Low**	Permitted waste types do not include any flammable materials therefore a low magnitude risk is estimated.	Standard permit conditions require a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances (will include fire and spillages).	Low
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or fire fighters. Pollution of water or land.	As above.	Medium	Low	**Low**	As above.	As above (excluding comments on access to waste). Permitted activities do not include the burning of waste.	Low
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Low	Low	**Low**	Permitted waste types do not include sludges or liquids so only a medium magnitude risk is estimated. No point source emissions to water are permitted.	Liquids, such as fuels, shall be provided with secondary containment. Wastes from potentially contaminated sites require analysis.	Very low
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Low	Low	**Low**	Waste types are non-hazardous and inert so harm is likely to be temporary and reversible.	As above	Very low

Data and information				Judgement				Action (by permitting)	
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Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Low	Low	**Low**	Watercourse must have medium / high flow for abstraction to be permitted, which will dilute contaminated run-off.	According to the Emapsite report there are no active surface water abstractions within 1 km of the Site.	Very low

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What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this contact?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).**
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Low	Low	**Low**	Permitted wastes unlikely to contaminate groundwater.	The site is underlain by Made Ground and then Tidal Flat Deposits which are classed by the EA as unproductive strata.	Very low
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastro-intestinal illness.	Direct contact or ingestion	Low	Medium	**Low**	Unlikely to occur, but might restrict recreational use.	The EA can request an emissions management plan in the unlikely event that an isssue develops.	Very low
Protected sites - European sites and SSSIs	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Medium	Medium	**Medium**	Waste operations may cause harm to and deterioration of nature conservation sites. The site is located adjacent to the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, and the Orwell Estuary Site Of Special Scientific Interest (SSSI).	Due to the size of the operation and the nature of the proposed waste types, it is considered that the risks are low from toxic contamination and nutrient enrichment. There will be no emissions beyond the site boundary therefore the risk of smothering and disturbance is low. The proposed waste types will not attract scavenging birds, animals or other pest therefore there is a low risk of increased predation.	Low