

Project No: 311407

Proposed Changes

Prepared for:

Cooks Waste Kare Limited

Raeburn Road South
Ipswich
Suffolk
IP3 0ET

Contents Amendment Record

This report has been issued and amended as follows:

Revision	Description	Date	Signed
1.0	Final	September 2024	Graeme Kennett



Acknowledgement

This report has been prepared for the sole and exclusive use of Cooks Waste Kare Limited (t/a Sun Skips) in accordance with the scope of work presented in Mabbett & Associates Ltd (Mabbett) Letter Agreement (314107/LA/GK), dated 26 October 2023. This report is based on information and data collected by Mabbett. Should any of the information be incorrect, incomplete or subject to change, Mabbett may wish to revise the report accordingly.

This report has been prepared by the following Mabbett personnel:

MABBETT & ASSOCIATES LTD



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Executive Summary

This report describes the proposed changes that are to be implemented at Cooks Waste Kare Limited to ensure compliance with the conditions of the environmental permit as operations are modernised at the site in Ipswich.

The proposed changes are as follows:

- Extension to permit boundary
- Additional EWC codes
- Increase in throughput tonnage

Section 1.0: Introduction

Cooks Waste Kare Limited (t/a Sun Skips), 'the operator'¹, has instructed Mabbett & Associates Ltd to prepare a bespoke permit variation application, under the Environmental Permitting (England and Wales) Regulations 2016 (as amended), for the Household, Commercial and Industrial Waste Transfer Station (HCIWTS) operated by them at:

COOKS WASTE KARE RECYCLING SITE

Raeburn Road South

Ipswich

Suffolk

IP3 0ET

The activity does not fall under a Standard Rules permit due to the site proximity to;

- Stour and Orwell Estuaries² RAMSAR³ site
- Orwell Estuary Site of Special Scientific Interest (SSSI)⁴
- Stour and Orwell Estuaries Special Protection Area (SPA)⁵

This document should be read in conjunction with the rest of this application which also contains:

- Non-Technical Summary
- Application Forms
- Supporting Information
- Operating Techniques Document
- Environmental Risk Assessment.

A more detailed explanation of the activity is provided in the accompanying documents, with information also provided in the application concerning the key technical standards and control measures that will be used at the site to minimise the environmental risks identified in the risk assessment.

The proposed variation will see amendments to:

- Dust and Emissions Management Plan (DEMP)
- Odour Management Plan (OMP)
- Noise Management Plan (NMP)
- Fire Prevention Plan (FPP)

As a substantial proportion of the operation will take place within a building, this will have a corresponding reduction in the level of risk produced by the transfer station.

¹ [Legal operator and competence requirements: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits)

² [untitled \(jncc.gov.uk\)](https://www.jncc.gov.uk/information-and-data/designated-sites)

³ [Designated Sites View \(naturalengland.org.uk\)](https://naturalengland.org.uk/designated-sites-view)

⁴ [SSSI detail \(naturalengland.org.uk\)](https://naturalengland.org.uk/sssi-detail)

⁵ [UK9009121.pdf \(jncc.gov.uk\)](https://www.jncc.gov.uk/information-and-data/designated-sites/uk9009121.pdf)

Section 2.0: Permit Boundary Extension

2.1 The extended boundary

Due to an increase in demand for high quality recycling facilities, it is proposed that the current boundary is extended as shown in the plan below. The facility has drainage infrastructure in place at the site so that all potentially contaminated site drainage is captured and directed to a sealed tank via a sealed system, consisting of concrete impermeable pavement with falls towards the drain channels that captures all liquids.

Figure 2-1: Site plan showing current permit boundary.

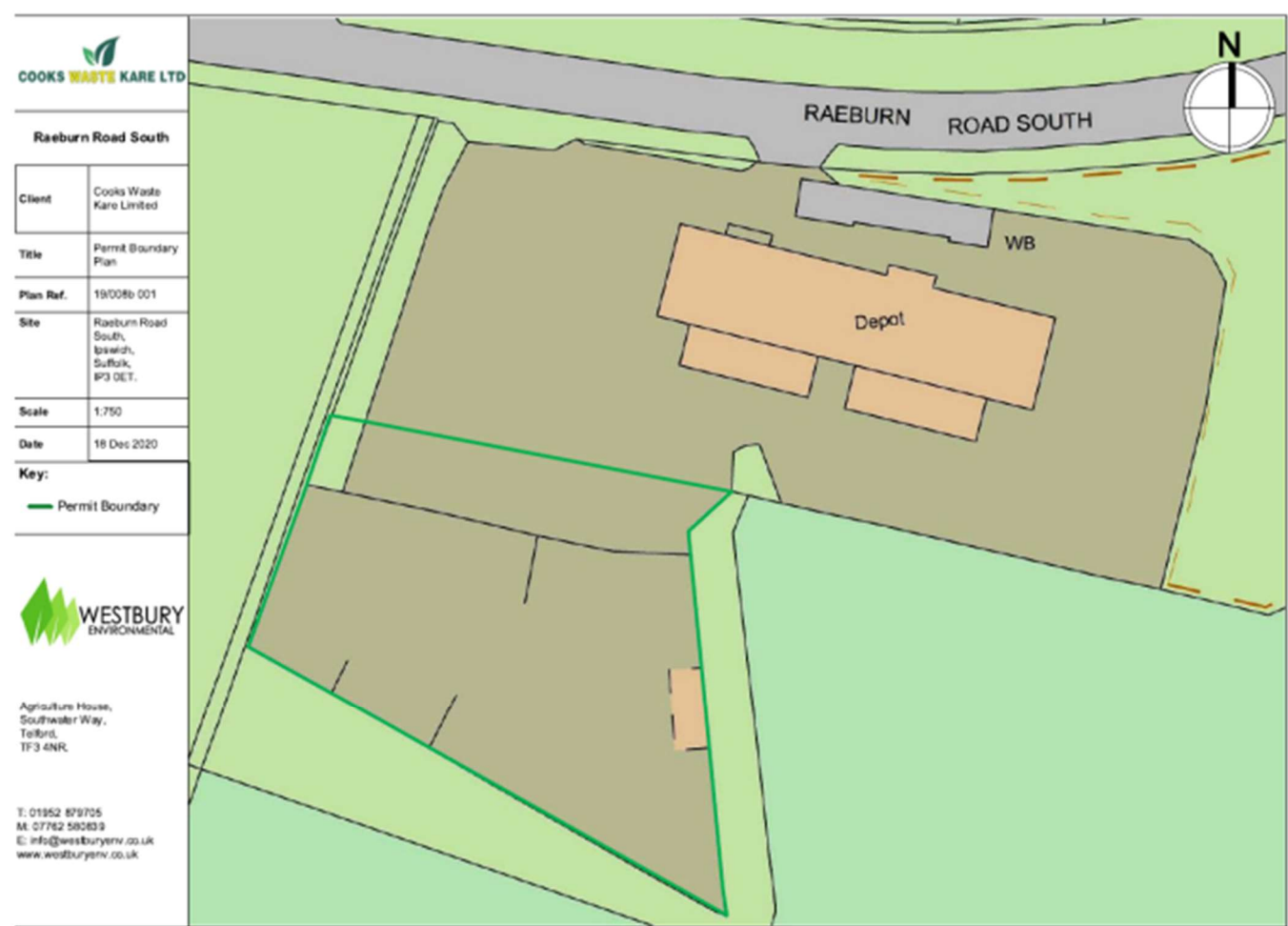
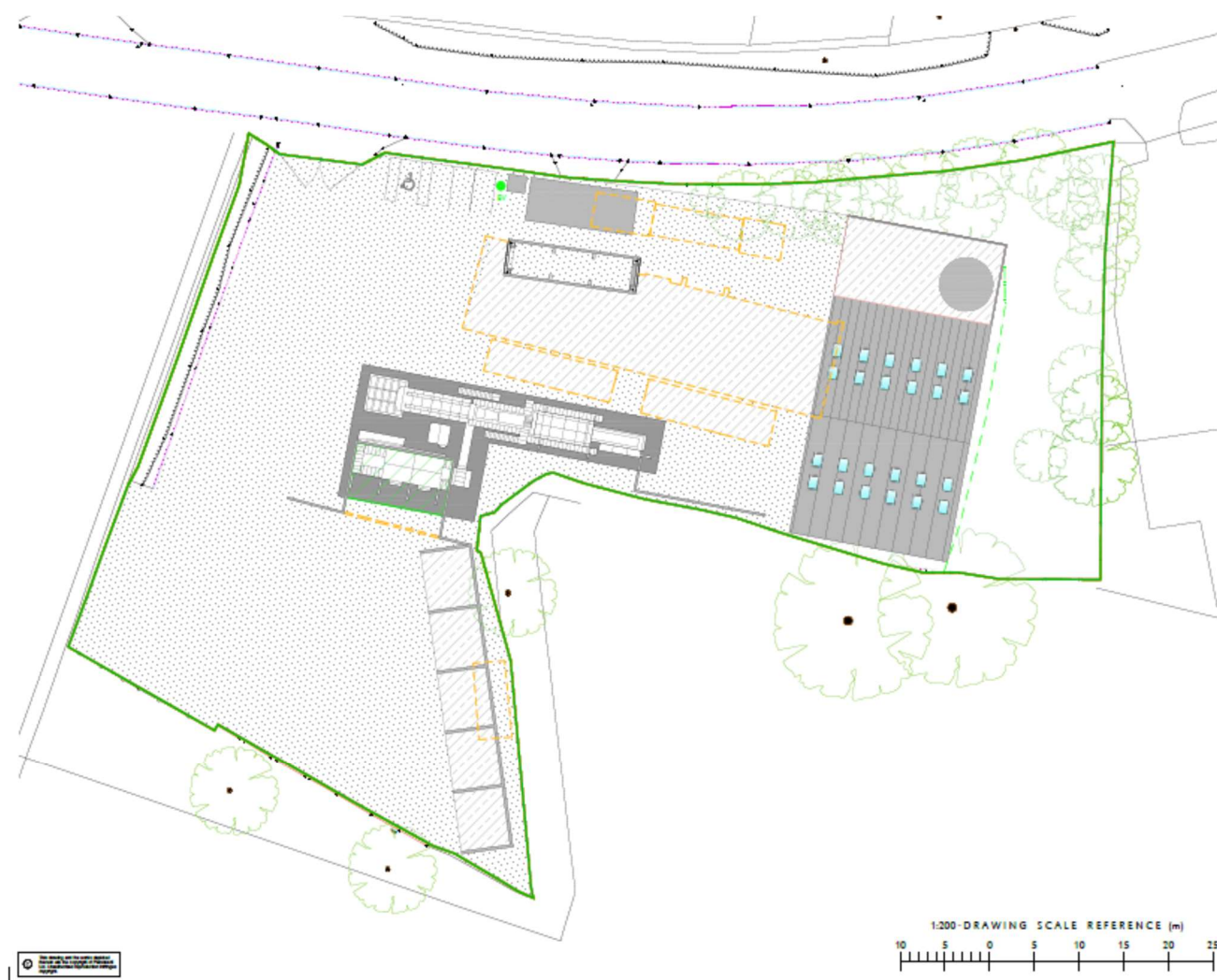


Figure 2-2: Site plan illustrating the extended permit boundary.



Section 3.0: Tonnage Throughput Increase

It is proposed that the annual tonnage throughput is increased to 75,000t/yr. The site infrastructure is able to cope with the increase as it has invested in higher capacity plant to deal with the increase in throughput and reliable, long standing, routes for the outputs are in place so that stockpiles do not remain on site for excessive periods.

Although stockpiles are kept, this is due to the nature of the construction and demolition sector that operates on a 'campaign' basis that often requires tonnages in short spaces of time with very little notice given.

Section 4.0: Proposed Activities

There are no proposed additional activities to be undertaken to the current, although a large proportion of the current activities will now take place within the building.

Section 5.0: Operating Techniques

The site will be operated in accordance with the Operating Techniques document which has been drafted to satisfy the requirements of EA Guidance, and details the following:

- management;
- site operations;
- emissions and monitoring; and
- information.

Operational management procedures will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system and operating techniques document;
- performance against the management system is audited at regular intervals; and
- compliance with the environmental permit.

The risk management and mitigation measures employed at the site and identified in the environmental risk assessment are detailed in the sites operating techniques document.

In summary, the rules and operating procedures employed at the site will ensure the following with respect to the specified waste management activities:

- Unless stated otherwise, all waste will be stored and treated on an impermeable surface equipped with a sealed drainage system.
- Concrete surfacing falls towards drainage channels ensuring that potentially contaminated runoff is contained on site.
- Strict waste acceptance procedures will be implemented to ensure only permitted wastes are accepted on site.
- The site manager will ensure that regular inspections are made of the site. If necessary, remedial measures will be arranged as soon as possible.

Section 6.0: Site Condition Report

The Site Condition Report (SCR), produced as a part of the original permit application process, has been updated to account for this variation application.

The facility will continue to operate with due regard to the conditions of the environmental permit and all relevant environmental legislation to ensure that land and groundwater is protected during the lifetime of the site and that the land is in a satisfactory state when the permit is eventually surrendered.

The possibility of any significant releases to the ground occurring during the lifetime of the permit is limited. Minor spillages, if they occur, are dealt with immediately by trained staff using appropriate spill response procedures. Spill kits are located around the site.