

Project No: 311465

## Environment Management System Summary

Prepared for:

### Brockley Wood Ventures Ltd

Copdock Enterprise Park  
Old London Road  
Copdock, Suffolk  
England  
IP8 4JW

#### Contents Amendment Record

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## Acknowledgement

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This report has been prepared for the sole and exclusive use of Brockley Wood Ventures Ltd (BWV) in accordance with the scope of work presented in Mabbett & Associates Ltd (Mabbett) Letter Agreement (311465/LA/GK), dated 02 June 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:

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## **Section 1.0: Introduction**

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Brockley Wood Ventures Ltd, 'the operator', has instructed Mabbett & Associates Ltd to prepare a bespoke permit application, under the Environmental Permitting (England and Wales) Regulations 2016 (as amended), for the proposed Inert Waste Treatment & Transfer Station at;

**LAND AT BROCKLEY WOOD,**

Belstead

Suffolk

IP8 4JW

This Environment Management System (EMS) Summary is a high-level document which describes the requirements and processes of the full Environmental Management System to be in place at the time of permit issue.

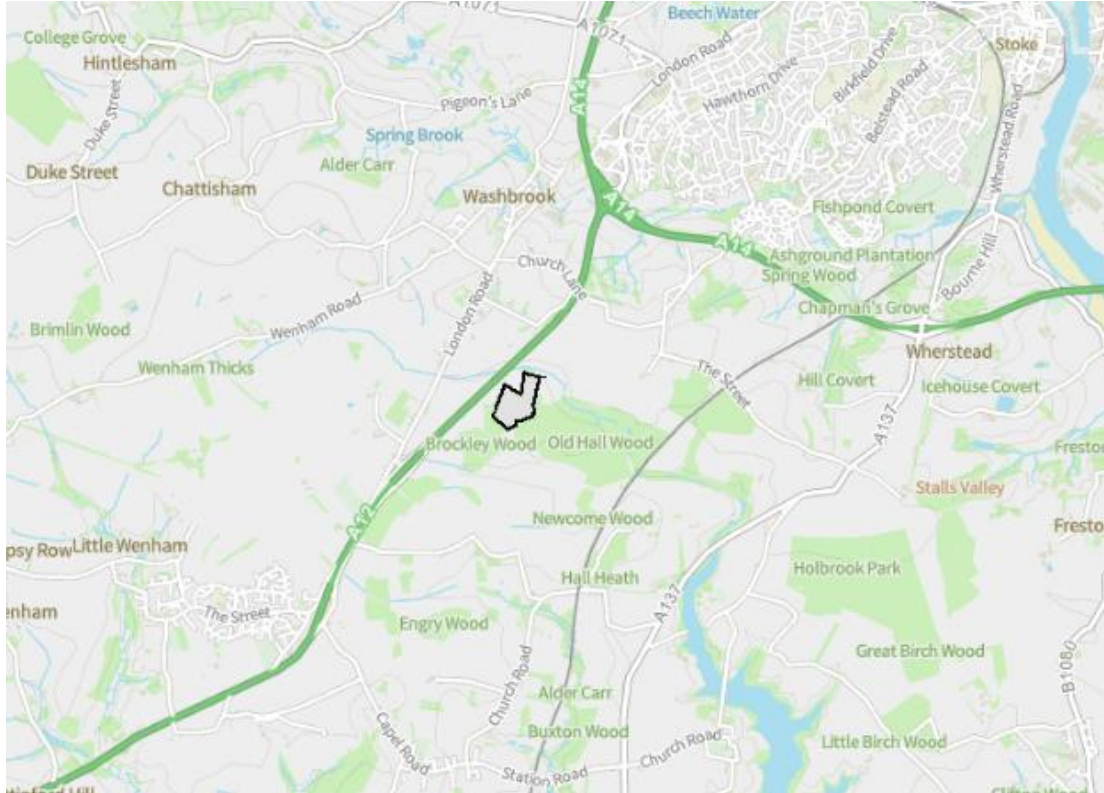
The EMS will cover company's EMS procedures, key EMS records and the standard operational procedures for all activities.

## Section 2.0: About the Facility

### 2.1 The site

The Inert Waste Treatment & Transfer Station (IWTTS), centred at TM 11698 40030, will be located to the eastern side of the A12, just south of the Copdock Interchange near Ipswich in Suffolk.

Figure 1: Site plan illustrating the general location of the site



The entire site is mainly arable farmland of some 35.8 hectares (88.5 acres), located primarily within Belstead Parish approximately 6.5 km to the south-west of the town centre of Ipswich and approximately 1 km south-west of Belstead village, 1 km south-east of Copdock village and 3 km north of Bentley village. The site is centred at Grid Reference [TM 117 403], as shown on the plan at Appendix 1.

The site lies with a landscape which is part of an extensive, low-lying plateau area etched by streams and rivers and predominantly in use as agricultural land, with small copses and areas of woodland including Old Hall Wood to the south-east of the site, Brockley Wood to the south and Bentley Long Wood which lies to the south of the site access. The site ranges in elevation from about 42 m AOD to about 45 m AOD and there is a small swale and stream and copse in the northern part of the site. The stream flows beneath the A12 in a culvert, where the levels are about 36 m AOD, and then eastwards towards the Alton water reservoir.

BWV are currently seeking full planning permission for the use of land for the extraction, processing, sale and distribution of sand and gravel, associated processing of inert waste materials and concrete batching with associated plant and related sales and distribution, access works and phased restoration, using inert fill and retained soils, to an agreed restoration plan.

The IWTTS will fulfil the role of 'inert processing' at the site.

## 2.2 The operation

The proposed IWTTs will remain for the life of the quarry and will be removed at the end of site operations, including site restoration. The IWTTs will process 'virgin' aggregates and process suitable incoming inert materials for, either;

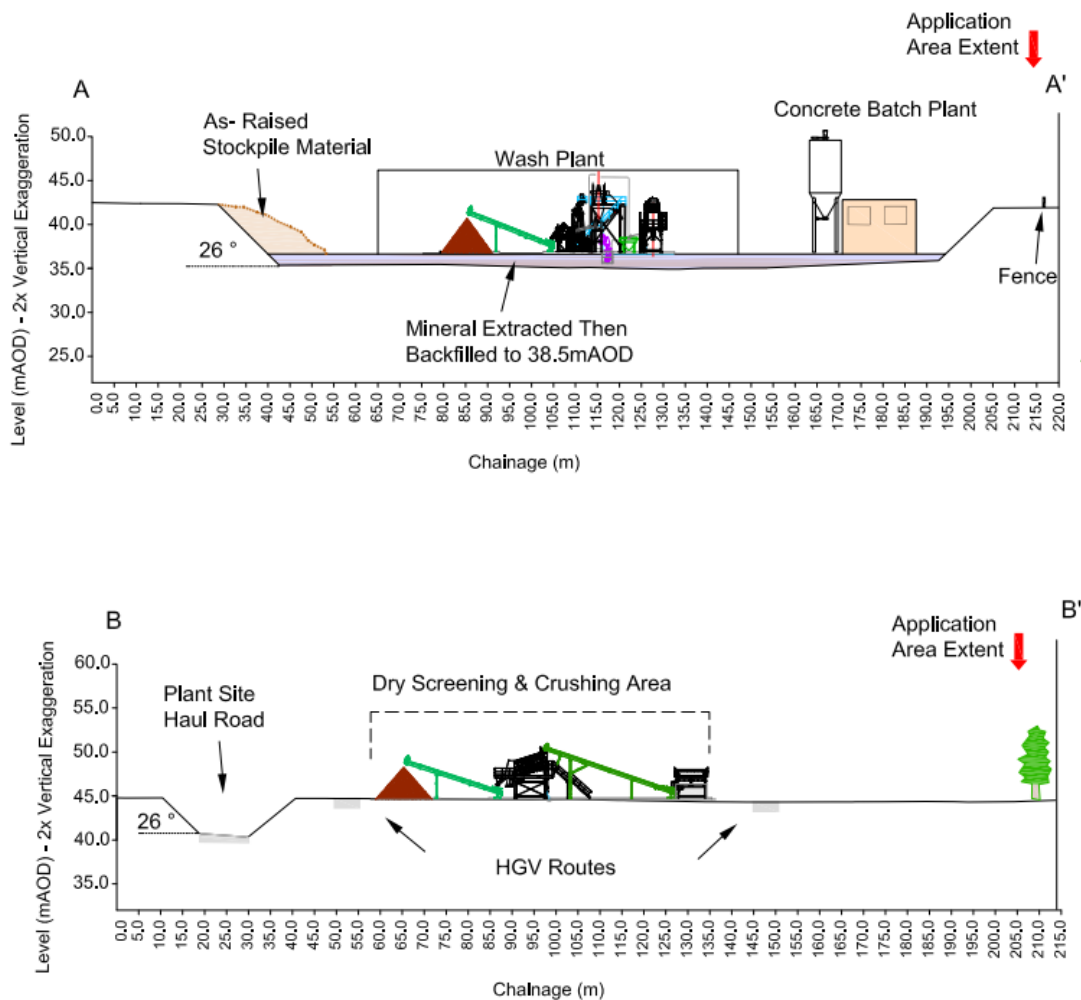
- Use in the restoration operation
- Production in the Aggregate Quality Protocol (Resource Framework)
- Despatched from site as a waste for use under a suitable exemption/waste management operation

Related activities taking place at the entire site are;

- Aggregate extraction (permitted under the Mining Waste Directive)
- Concrete production<sup>1</sup> (permitted by the Local Authority under Section 3.1 B(b) of the Environmental Permitting Regulations 2016)
- Site restoration

The operational area itself will be in an area proposed for sand and gravel extraction, as such it will be below the current ground levels.

Figure 2: Illustration showing site profile



<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/573004/blending-packing-loading-unloading-and-use-of-cement-process-guidance-note-3-01\\_12\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573004/blending-packing-loading-unloading-and-use-of-cement-process-guidance-note-3-01_12_.pdf)

## **Section 3.0: Management**

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### **3.1 General management**

As the site will operate as a dedicated inert waste processing facility the number of staff will be small.

Site management will comprise of the following staff members;

- A Technically Competent Manager (TCM); who will manage the operation and regularly attend site in compliance with the defined attendance requirement.
- A site supervisor; who will be responsible for the ongoing operation who may also undertake office and plant operation duties.
- Other trained plant operators as required.

Each TCM is subject to a two-year continuing Competence test to ensure they remain competent.

Toolbox talks are held regularly to ensure staff competence is maintained.

### **3.2 Accident Management Plan**

An Accident Management Plan (AMP) is to be initiated at permit issue at the site and will be reviewed every 4 years or as soon as practicable after an accident. Any identified changes will be implemented after the review.

Staff will be regularly briefed upon its contents.

### **3.3 Site security**

The site can only be accessed via the security-controlled gates at the site entrance.

Entry to the site is locked outside operating hours.

The whole of the site has perimeter fencing and CCTV.

### **3.4 Site notice board**

At the point of the permit issue, a site notice board, made of durable material, will be placed in a prominent position at the entrance to the site.

## Section 4.0: Proposed activities

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Treatment will consist only of sorting, separation, washing, screening or crushing of waste into different components for recovery.

The activities carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

*Table 1: Proposed waste activities*

Activity	Code
Crushing	R3 – recycling and reclaiming organic substances which are not used as solvents.
Screening	R3 – recycling and reclaiming organic substances which are not used as solvents.
Sorting	R3 – recycling and reclaiming organic substances which are not used as solvents.
Washing	R5 - Recycling or reclamation of other inorganic materials.
Storage	R13 – storage of wastes pending any of the operations numbered R1 to R12.

### 4.1 Storage (pre-treatment)

Prior to processing, the incoming waste materials will be stored within the permit boundary in designated storage areas. Waste shall be stored and treated on an impermeable surface with sealed drainage system or on hardstanding

### 4.2 The site boundary

The activities on site shall not extend beyond the site boundary.

### 4.3 Waste acceptance

Only permitted wastes as specified by the permit will be accepted.

The total quantity of waste accepted shall not exceed 250 000 tonnes per annum.



## **Section 5.0: Emissions and monitoring**

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### **5.1 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 shall be stored and treated on an impermeable surface with sealed drainage system or on hardstanding.
- Concrete surfacing falls towards drainage channels ensuring that potentially contaminated runoff is contained on site;
- Strict waste acceptance procedures will be adhered to, 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.

### **5.2 Fugitive emissions of substances**

The site infrastructure and operations are managed in such a way that the risk of fugitive emissions shall not cause pollution.

#### **5.2.1 Storage areas of liquids**

All liquid wastes produced on site as part of the process will be stored in secure bunded containers and subject to regular inspections.

## **5.2.2 Inspection and maintenance of engineered containment**

All areas will be inspected at least monthly to ensure the continuing integrity and fitness for purpose of their construction.

## **5.3 Odour**

The type of materials accepted reduces the potential for odours.

## **5.4 Noise and vibration**

The proposed treatment facility is being fitted with new modern equipment and therefore all the equipment will meet modern noise criteria.

## **5.5 Pests, scavenging animals and birds**

The permitted waste types accepted on site are unlikely to encourage scavenging animals, birds and other pests.

## **5.6 Control of mud and debris and loose waste**

Internal roads are designed, constructed and maintained to ensure they are adequate for traffic usage. The site surface is entirely constructed of concrete/asphalt so that mud will not be a problem. Exit through the wheelwash is mandatory for LGVs leaving the site.

## **5.7 Control, monitoring and reporting of dust, fibres and particulates**

It is likely that the operations will cause dust and particulates. However, procedures are in place to ensure that any emissions are within the specified limits.

## **5.8 Control of litter**

It is unlikely that the operations will cause the generation of litter, however, the site will monitor litter on site and litter pick where necessary.

## **5.9 Leaks and spillages**

Environmental incidents are often the result of mechanical breakdown of plant and vehicles. All areas will be inspected at least monthly to ensure the continuing integrity and fitness for purpose of their construction.

A system is in place to ensure that all machinery is correctly serviced and used servicing oils etc. are not stored on site.

## **5.10 Control of Water**

The wheelwash and wash plants operation are self-contained and all water will be reused wherever possible.

#### **5.11 Fires on the site**

Please see Accident Management Plan.

## **Section 6.0: Impact on the Environment**

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An environmental risk assessment (ERA) has been carried out to assess the environmental risks posed by the proposed activity.

There are no point source emissions to land, air, surface or groundwater from the proposed facility.

The proposed facility will have drainage infrastructure in place at the site so that all potentially contaminated site drainage is captured and directed via a sealed system, consisting of concrete impermeable pavement with falls towards the drain channels that captures all liquids and directs it to a sealed tank.

Operational procedures at the site will monitor and manage amenity and accident risks from the proposed activities and includes provision for the monitoring of odour, noise, and fugitive emissions.

The impact of the proposed development on surrounding human and environmental receptors has been assessed in the ERA.

As the management measures detailed in the risk assessment will be in place at permit issue, the conclusion has been reached that the proposed waste materials and treatment activities, are unlikely to result in a significant accident risk or risk to the local environment, including from odour and noise, or pollution of surface or ground waters.

## Section 7.0: Site Management

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Site management will comprise of the following staff members;

- A Technically Competent Manager (TCM); who will manage the operation and regularly attend site in compliance with the defined attendance requirement.
- A site supervisor; who will be responsible for the ongoing operation who may also undertake office and plant operation duties.
- Other trained plant operators as required.

## **Section 8.0: Site Condition Report**

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The Site Condition Report (SCR), produced as a part of this application for the proposed operation will be limited in its scope as the current area will be excavated during the proposed sand and gravel extraction operation.

However, the proposed facility will 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 therefore limited. Minor spillages, if they occur, will be dealt with immediately by trained staff using appropriate spill response procedure and spill kits located around the site.

## **Section 9.0: Information**

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All records required by the permit are retained for a minimum of 6 years.

### **9.1 Reporting**

A record of waste types and quantities removed from, and accepted at, the site, monitoring of wastewater and records of any abnormal operating conditions will be kept and made available for inspection by the Regulator.

### **9.2 Notifications**

The Regulator will be notified should any machinery, breakdown or failure of equipment cause significant pollution.

## Appendix A: Proposed waste types

<b>01</b>	<b>WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>
<b>01 04</b>	<b>wastes from physical and chemical processing of non-metalliferous minerals</b>
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>
<b>02 02</b>	<b>waste from preparation and processing of meat, fish and other foods of animal origin</b>
02 02 02	shellfish shells from which the soft tissue or flesh has been removed only
<b>03</b>	<b>WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD</b>
<b>03 01</b>	<b>wastes from wood processing and the production of panels and furniture</b>
03 01 01	waste bark and cork
<b>03 03</b>	<b>wastes from pulp, paper and cardboard production and processing</b>
03 03 01	waste bark and wood
<b>10</b>	<b>WASTES FROM THERMAL PROCESSES</b>
<b>10 01</b>	<b>waste from power stations and other combustion plants</b>
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
<b>10 11</b>	<b>wastes from manufacture of glass and glass products</b>
10 11 12	clean glass other than those mentioned in 10 11 11
<b>10 12</b>	<b>wastes from manufacture of ceramic goods, bricks, tiles and construction products</b>
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
<b>10 13</b>	<b>wastes from manufacture of ceramic goods, bricks, tiles and construction products</b>
10 13 14	waste concrete only
<b>15</b>	<b>WASTE PACKAGING</b>
<b>15 01</b>	<b>packaging</b>
15 01 07	clean glass only
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 01</b>	<b>Concrete, bricks, tiles and ceramics</b>
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
<b>17 02</b>	<b>Wood, glass and plastic</b>
17 02 02	glass
<b>17 03</b>	<b>Bituminous mixtures, coal tar and tarred products</b>
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
<b>17 05</b>	<b>Soil (including excavated soil from contaminated sites), stones and dredging spoil</b>
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
<b>17 08</b>	<b>gypsum based construction material</b>
17 08 02	gypsum only other than that mentioned in 17 08 01
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTEWATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL WASTE</b>
<b>19 05</b>	<b>wastes from aerobic treatment of solid waste</b>
19 05 03	compost from source segregated biodegradable waste only
<b>19 08</b>	<b>wastes from wastewater treatment plants not otherwise specified</b>
19 08 02	washed sewage grit (waste from desanding) free from sewage contamination only
19 08 99	stone filter media if free from sewage contamination only
<b>19 09</b>	<b>wastes from the preparation of water intended for human consumption or water for industrial use</b>
19 09 02	sludges from water clarification
<b>19 12</b>	<b>wastes from the mechanical treatment of wastes</b>
19 12 05	clean glass only
19 12 09	minerals (for example sand, stones)
19 12 12	treated bottom ash including IBA and slag other than that containing dangerous substances only
<b>19 13</b>	<b>wastes from soil and groundwater remediation</b>
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
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20 01</b>	<b>garden and park wastes (including cemetery waste)</b>
20 01 02	Clean glass only
<b>20 02</b>	<b>garden and park wastes (including cemetery waste)</b>
20 02 02	soil and stones