

**An application to vary environmental permit number EPR/WE2918AC in respect of
Luton Railhead, Crescent Road, Luton, Bedfordshire**

Non-technical summary

- 1.1** MJCA is commissioned by GRS (Roadstone) Limited (GRS) to prepare an application to vary Environmental Permit Number EPR/WE2918AC (the permit) in respect of Luton Railhead, Crescent Road, Luton, Bedfordshire LU1 3JG (the site). The permit currently comprises Standard Rules Permit SR2010 No12 '*Treatment of waste to produce soil, soil substitute and aggregate*'. In accordance with the permit up to 75,000 tonnes of waste per year can be accepted at the site. The permit was issued by the Environment Agency (EA) on 23 October 2023.
- 1.2** Although the permit provides for the treatment of waste to produce soil, soil substitute and aggregate the only waste related activities which are carried out at the site comprise the operation of an Incinerator Bottom Ash Aggregate (IBAA) blending facility. The IBAA activities undertaken at site comprise the acceptance, under List of Waste Code (LoW) 19 12 12, of IBAA that has been processed elsewhere to meet the BS13242 specification. The IBAA is stored on site before being blended with primary aggregates or aggregates produced in accordance with the Aggregates Quality Protocol¹. The IBAA is blended to form an aggregate output to meet a required specification which is sent off site for use. The processed IBAA is imported to the site by road and the aggregate product is predominantly exported from the site by road. It is possible that aggregate product may also be exported by rail. Primary aggregates or aggregates produced in accordance with the Aggregates Quality Protocol are predominantly imported to the site by rail although they may also be imported to the site by road.
- 1.3** The only change to the operations at the site as a result of this application to vary the permit is an increase in the maximum quantity of waste accepted at the site from 75,000 tonnes per annum to 100,000 tonnes per annum. Only LoW Code 19 12 12 is accepted at the site and generally consistent with Standard Rules Permit SR2010 No12 the LoW Coded 19 12 12 comprises '*other wastes (including mixtures of*

¹ WRAP (Waste & Resources Action Programme) Quality Protocol for Aggregates from inert waste, end of waste criteria to produce aggregates from inert waste published on 22 October 2013

materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 (processed incinerator bottom ash aggregate which complies with BS 13242 only)'. As the acceptance of up to 100,000 tonnes of LoW Coded 19 12 12 per annum is inconsistent with Standard Rules Permit SR2010 No12 this application comprises an application to vary the permit to a bespoke permit. There will be no changes to the permitted activities at the site.

- 1.4** The site is centred approximately at National Grid Reference (NGR) TL 09734 21476 to the north east of Luton town centre in an urban setting. The nearest residential properties are approximately 35m north east of the site. There will be no changes to the site boundary as a result of the application to vary the permit. The boundary of the permit covers the south eastern half of the GRS Luton Railhead. The operations the subject of the permit are limited only to the waste related operations and not the wider railhead operations.
- 1.5** The site is located in the open air. The IBAA storage and blending operations are carried out on an impermeable surface with a sealed drainage system. The IBAA storage and blending areas are delineated on three sides by concrete block walls up to 4m high. In summary the IBAA blending operations are carried out by loading shovels and the placement in the bays of alternate layers of IBAA and aggregate. Effective dust suppression is provided.
- 1.6** A Nuisance and Amenity Environmental Risk Assessment (ERA) has been prepared and is included in the application to vary the permit. It is concluded in the ERA that subject to the implementation of appropriate controls the blending operations have a low or very low risk of adverse impact on amenity or the surrounding environment including sites of heritage or nature conservation interest. A Dust and Emissions Management Plan (DEMP) has been prepared in respect of the blending operations and the DEMP is included in the application to vary the permit. Measures are included in the DEMP to minimise the risk that the blending operations will result in the unacceptable emissions of dust and particulate matter. A Noise Impact Assessment (NIA) has been prepared and is included in the application to vary the permit. It is concluded in the NIA that there will be no significant or unacceptable adverse impact at noise sensitive premises in the vicinity of the site. A Noise

Management Plan (NMP) has been prepared in respect of the blending operations and the NMP is included in the application to vary the permit.

- 1.7** The site is managed in accordance with an Environmental Management System (EMS) using sufficient competent persons and resources. A summary of the EMS is included in the application to vary the permit.