

Environmental Permit Variation Application

Peter Bennie Limited.

Pitsford Quarry Recycling Facility A508 Market Harborough Road Pitsford Northamptonshire NN6 9NL



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Contents

1.	Introduction	.1
2.	Site location and setting	.2
3.	Site Management	.3
	Technically Competent Management	6
	Site Condition	6
	Environmental Risk	6
4.	Non-technical summary	.7
5.	List of waste codes	.8

Application Forms

Part A Part B2

Part B4

Part F1

Drawings

Site Layout Plan	21/014	d 001
Permit Boundary F	Plan	21/014d 003

Appendices

Appendix 1	Evidence of Technically Competent Management
Appendix 2	Environmental Risk Assessment
Appendix 3	Dust Management Plan
Appendix 4	Site Condition Report
Appendix 5	Pre-Application advice



1. Introduction

- 1.1. Westbury Environmental Limited have been instructed to prepare this Environmental Permit variation application on behalf of Peter Bennie Ltd (the Operator) to allow the operation of a waste treatment facility located at Pitsford Quarry, A508 Market Harborough Road, Pitsford, Northampton, NN6 9NL.
- 1.2. This application comprises a bespoke environmental permit application for physical waste treatment. The proposed waste treatment activities include the sorting, separation, screening, crushing and blending of waste.
- 1.3. The pre-application advice states that a Dust Management Plan (DMP) will be required as part of this application. A copy of the DMP is provided as Appendix 3.
- 1.4. The extent of the proposed Permit boundary is shown on Site Layout Plan, Drawing No. 21/014d 001.
- 1.5. The relevant Environment Agency forms (Part A, B2, B4 and F1) and supporting information are included with this Environmental Permit application report.
- 1.6. Pre-application advice was sought from the Environment Agency in relation to the proposed waste activities. This pre-app advice concluded that because the Site is located within a Local Wildlife Site, it was not able to meet the location criteria to apply for Standard Rules (SR) SR2010 No 12 permit. It was advised that a bespoke permit to physically treat non-hazardous waste should be applied for.
- 1.7. The cost of a SR2010 No 12 application would be £2,641. The fee for this bespoke permit application in accordance with the Environment Agency Charging Scheme 2022 is £7,930.
- 1.8. The only reason that a SR2010 No 12 application was not applied for was because of the location within a Local Wildlife Site, designated for open mosaic and grassland. However, when looking at historical mapping, it is evident that there has not been grassland within the waste operation area for at least 15 years.
- 1.9. It is considered that the environmental risk posed by the proposed waste activities do not justify the difference in cost.
- 1.10. Therefore, an abatement of the application fee is being requested. We consider that the time to determine the permit for the proposed waste activities will be closer to that for the Standard Rules. It is requested that the actual application fee would be more akin to the fee required for the SR2010 No 12 of £2,641.



2. Site location and setting

- 2.1. The Site is located off the A508 Market Harborough Road at Pitsford Quarry, Pitsford Northampton, NN6 9NL. The proposed permit boundary is shown on Permit Boundary Plan 21/014d 003.
- 2.2. The Site is located at National Grid Reference (SP 75660 67153) approximately 6.6km north of the centre of Northampton.
- 2.3. The Site extends to an area of approximately 2.2 hectares.
- 2.4. The Site is located within a Local Wildlife Site, it was not able to meet the location criteria to apply for a SR2010 No 12 permit. It was advised that a bespoke permit to physically treat non-hazardous waste should be applied for.
- 2.5. The Site is surrounded by agricultural land to the north, east, south, and west. The land surrounding the permit boundary is under the control of the applicant.
- 2.6. The Site does not overlie a superficial aquifer but is located within a secondary A bedrock aquifer. The Site is not located within a Source Protection Zone (SPZ).



3. Site Management

- 3.1. Peter Bennie Limited operate under an Environmental Management System (EMS).
- 3.2. A hard copy of the EMS is kept on Site at all times. The EMS folder includes a copy of the Environmental Permit along with the following sections of the EMS:

EMS Report: This report contains a description of the purpose and scope of the EMS, all Site details including the location of the Site, receptors located in close proximity to the Site boundary, waste storage, the plant and equipment that is used on the Site, the waste handling procedures carried out on Site, the Site security measures, information on the competence of the staff working on Site, roles and responsibilities for each member of staff and details for Site closure.

Site Condition Report: This is used to record the condition of land covered by the Environmental Permit at various stages during the life of the permit. Site Condition Report, Part 1 to record the condition of the land at the permit application stage is included as Appendix 4 in this application report.

Environmental Impacts and Controls Assessment: This assessment will provide information on the processes, activities and equipment on site, the potential emissions and impact that they may have on air, water, energy usage, waste disposal, land contamination, nuisance and resource consumption and how any identified impact may be controlled.

Environmental Accident Management Plan: This report will contain an assessment of the potential accidents that could occur on Site, details of the likelihood of each accident occurring, the preventative measures taken to reduce the risk of each accident occurring, actions to be taken in the case of an accident on Site and an explanation on how to record any accidents that occur on Site. The types of accident included in this report include.

- Leaks or Spillages.
- Fire.
- Flooding (increasing risk from climate change).
- Unauthorised entry.
- Failure of plant and equipment.
- Cross-contamination.
- Failure of Services.

Flood Management Plan: This report will contain a brief description of the Site, its size, the key contacts to contact in an emergency, whether there are staff employed with any special needs, the locations of any gas, water and / or electric cut off points of Site and ways to keep all plant and computers / files safe in the event of a flood.

Residues Management Plan: This document provides guidance on:

- Optimising the reuse, regeneration, recycling, or energy recovery of residues, including packaging.
- Properly disposing of residues where recovery is technically or economically impractical.

Contingency Plan:

A document sets out the procedures to:

- Ensure compliance with the Environmental Permit and operating procedures during maintenance or shutdown on Site.
- Minimise the impact of non-operation of associated third-party facilities.
- Ensure Site storage capacity limits are not exceeded.
- Minimise the impact on the environment and ensure business continuity, from any breakdowns, enforced shutdowns and any other changes from normal operations.

Appendix B Authorisations: A copy of the permit and EA Registrations for the Site will be found in the EMS.



Appendix C Procedures & Forms: The EMS contains a number of procedures that cover its implementation, waste acceptance & storage, site management, environmental protection, environmental monitoring, emergency provisions and reporting. Records to be produced in accordance with these procedures are provided in the EMS as forms. These completed forms provide records that evidence the implementation of the EMS. The following list details procedures that are included in the EMS.

Implementation

- Environmental Training.
- Roles and Responsibilities.
- Reviewing & Auditing Documentation.
- Compliance with Legal & Other Requirements.

Waste Acceptance & Storage

- Waste Acceptance.
- Waste Classification.
- Waste Rejection.
- Waste Storage & Handling.

Site Management

- Fuel & Oil Storage.
- Refuelling of Plant / Equipment
- Housekeeping, Litter, Pest & Vermin Control.
- Wheel Washing.
- Site Security.
- Removal of Waste.

Environmental Protection

- Dust, Fibres and Particulates.
- Mud and Debris.
- Noise Control.
- Odour Control.
- Surface Water Management.

Maintenance

• Maintenance – Planned Preventative Maintenance and Inspection Checklists.

Emergency Provisions

- Environmental Accidents / Incidents / Complaints.
- Near Miss Reporting.
- Spill Response.
- Flood Management.
- Utility / Equipment Failure.
- Fire Prevention.



Reporting

- Waste Returns.
- Notifications to the Environment Agency.

(This list is not exhaustive)

Drawings

The drawings included in the EMS include:

- Permit Boundary Plan showing the boundary of the permitted area.
- Site Layout Plan showing waste storage and treatment areas, storage facilities for hazardous materials (fuel and oil), location of spill kits, and access for emergency services.
- Sensitive Receptors Plan showing nearby receptors including water courses, protected habitats, and residential, commercial and industrial premises.
- 3.3. The Waste Storage and Handling Procedure will include a Waste Storage Plan that will specify maximum storage times, maximum storage area capacities, and where different waste types will be stored on Site.
- 3.4. The Maintenance Procedure will ensure inspections of infrastructure, plant and equipment will be carried out on a daily, weekly and monthly basis. This procedure will also specify when planned preventative maintenance should be carried out on each item of plant and equipment located on the Site.
- 3.5. The EMS will include a Utility / Equipment Failure Procedure and Flood Management Procedure to ensure contingency measures are implemented in the event of a utility / equipment failure or a flood on the Site. The Flood Management Procedure will account for the potential increase in the risk of flooding at the Site due to climate change.
- 3.6. The Site will display a notice board at the site entrance which will include the following details:
 - The permit holder's name Peter Bennie Limited.
 - An emergency contact name and telephone number.
 - A statement that the site is permitted by the Environment Agency.
 - The permit number.
 - Environment Agency telephone number and the incident hotline telephone number.
- 3.7. The EMS will include a Complaints Procedure that will provide details for recording, investigating, and resolving complaints in regard to the permitted activities.
- 3.8. Each procedure within the EMS will specify who is responsible for implementing the required actions. The EMS will include a staff organogram which will show the roles and responsibilities of each staff member in relation to the activities covered by the permit.
- 3.9. An Environmental Training Procedure will be included in the EMS to ensure regular training on the EMS procedures is given to all site staff and is well documented.
- 3.10. Records required by the permit e.g. waste transfer notes, chemical analysis, hazardous waste assessments, maintenance records, staff training records etc. will be kept on file within the EMS.
- 3.11. The Reviewing & Auditing Documentation Procedure included within the EMS will ensure regular checks are carried on the EMS documentation in order to assess whether the EMS implements the requirements of the permit and relevant environmental legislation. Any changes to the permit or site operations will be recorded within the EMS and the relevant EMS documents will be updated accordingly.
- 3.12. Each member of staff at the Site will have access to the EMS.



Technically Competent Management

3.13. Adam Patrick will be the Technically Competent Manager (TCM) for the Site. Adam has awards for Landfill – Inert Waste (LIN) and Transfer- Non-Hazardous Waste (TSNH). A copy of the TCMs certificates is provided in Appendix 1.

Site Condition

3.14. Part 1 of a Site Condition Report has been produced for this Site. A copy of the Site Condition Report is provided in Appendix 4 - Site Condition Report, Part 1.

Environmental Risk

- 3.15. An Environmental Risk Assessment has been completed as part of this permit application, see Appendix 2 Environmental Risk Assessment.
- 3.16. The Environmental Risk Assessment considers the potential impacts of the proposed waste operations with regard to the local receptors; population, watercourses, protected sites etc.
- 3.17. Pre-application advice stated that a Dust Management Plan should be prepared due to the nature of the activity and the Site's technically being located within the Local Wildlife Site (LWS) T's Wood.
- 3.18. The Site is located within a designated LWS designated for open mosaic and acid grassland. However, historical mapping shows the former quarry has not been used as grassland/habitat for over 15 years.
- 3.19. However, the risk of dust being emitted from the Site is low as waste acceptance procedures will be in place to ensure that loads comprising mainly dust, fibres or loose fibres are not accepted on Site. Additionally, hoses and a wheel wash facility will be used to minimise dust emissions from the movement of the waste.
- 3.20. Furthermore, if dust was to escape the Site, there are hoses available on the Site to spray any dust that has been deposited.
- 3.21. The basic pre-application advice form advised that if we think they operation is likely to cause pollution from noise and vibration that a Noise Impact Assessment and Noise Management Plan are prepared to support the application. The Environmental Risk Assessment concludes that the risk posed by noise is not likely to adversely impact nearby receptors. As such, it is considered that a Noise Impact Assessment and Noise Management Plan are prepared to support this application.



4. Non-technical summary

- 4.1. This permit application has been prepared for a new Bespoke Environmental Permit for a Construction / Demolition waste recycling facility at Pitsford Quarry, A508 Market Harborough Road, Pitsford Northampton, NN6 9NL.
- 4.2. This permit is to allow for the treatment of waste to produce soil, soil substitutes and aggregate on Site.
- 4.3. Basic pre-application advice was requested from the EA. A copy of the pre-application advice is provided as Appendix 5.
- 4.4. Due to the Site being within a Local Wildlife Site, it was not able to meet the location criteria to apply for a SR2010 No 12 permit. It was advised that a bespoke permit to physically treat non-hazardous waste should be applied for.
- 4.5. Pre-application advice listed that site-specific risk assessment should be produced in line with Environment Agency guidance. A copy of the site-specific Environmental Risk Assessment is provided as Appendix 2.
- 4.6. A Dust Management Plan was identified as being required in the basic pre-application advice. A copy of the Dust Management Plan is enclosed as Appendix 3 Dust Management Plan.
- 4.7. The basic pre-application advice form advised that if we think they operation is likely to cause pollution from noise and vibration that a Noise Impact Assessment and Noise Management Plan are prepared to support the application. The Environmental Risk Assessment concludes that the risk posed by noise is not likely to adversely impact nearby receptors. As such, it is considered that a Noise Impact Assessment and Noise Management Plan were not required to support this application.
- 4.8. The Environmental Risk Assessment also concludes that the risk posed by odour is not likely to adversely impact nearby receptors. Therefore, an Odour Management Plan as not required.



5. List of waste codes

5.1. Table 5.1 details the proposed waste codes to be accepted on to the Site.

Table 5.1 List of waste codes

Waste Code	Description	
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	
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING	
02 02	waste from preparation and processing of meat, fish and other foods of animal origin	
02 02 02	shellfish shells from which the soft tissue or flesh has been removed only	
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD	
03 01	wastes from wood processing and the production of panels and furniture	
03 01 01	waste bark and cork	
03 03	wastes from pulp, paper and cardboard production and processing	
03 03 01	waste bark and wood	
10	WASTES FROM THERMAL PROCESSES	
10 01	waste 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	

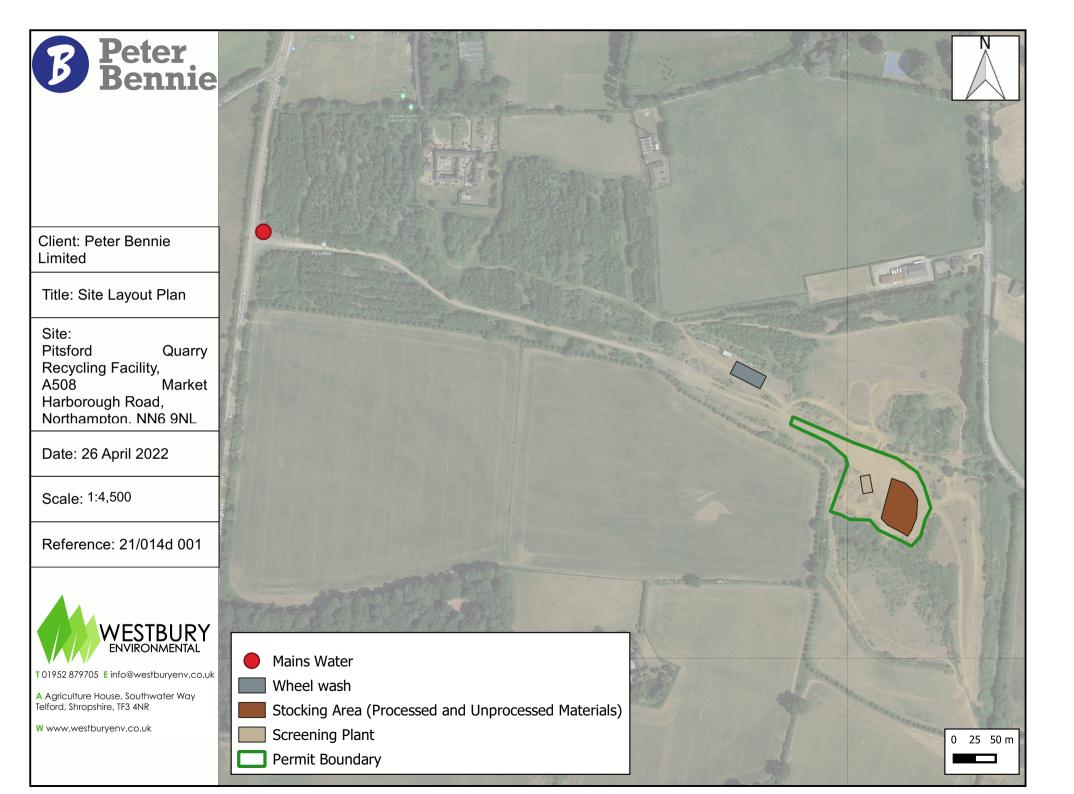


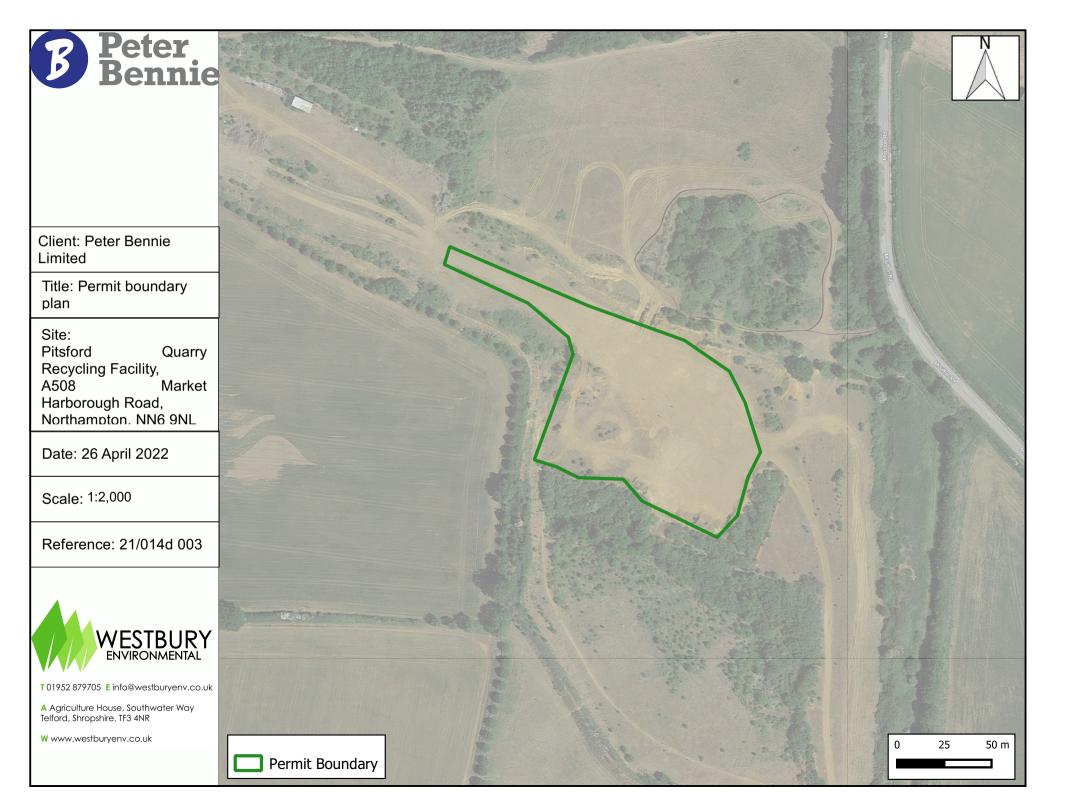
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17 05 04	soil and stones other than those mentioned in 17 05 03	
17 05 06	dredging spoil other than those mentioned in 17 05 05	
17 05 08	track ballast other than those mentioned in 17 05 07	
17 08	gypsum based construction material	
17 08 02	gypsum only other than that mentioned in 17 08 01	
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL WASTE	
19 05	wastes from aerobic treatment of solid waste	
19 05 03	compost from source segregated biodegradable waste only	
19 0 8	wastes from waste water treatment plants not otherwise specified	
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	
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	
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 SEPARATELY 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	



Drawings

Site Layout Plan	Drawing No. 21/014d 001
Permit Boundary Plan	Drawing No. 21/014d 003







Part A



Part B2



Part B4



Part F1

Permit Application Report, Version 1

Appendix 1

Evidence of Technically Competent Management



Environmental Risk Assessment

Dust Management Plan



Site Condition Report

Pre-application Advice

