

DRAFT

AN APPLICATION TO TRANSFER AND VARY ENVIRONMENTAL PERMIT NUMBER EPR/LB3733AF IN RESPECT OF WELLINGBOROUGH RAILHEAD, NEILSONS YARD, MEADOW CLOSE, WELLINGBOROUGH, NORTHAMPTONSHIRE

Report reference: GRS/WE/JAD/5732/01/AR August 2023



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1. Introduction and scope of the applications

- 1.1 Wellingborough Railhead (the railhead site) is an operational railhead where aggregates are imported by rail, stored and loaded for onward distribution by road. The railhead site is located in a predominately industrial area on the north east outskirts of Wellingborough. The railhead site covers an area of approximately 6 hectares (ha). GRS Rail Services Limited (formerly Northampton Aggregates Limited) have the benefit of Standard Rules Environmental Permit SR2009No6 inert and excavation waste transfer station with treatment (number EPR/LB3733AF) for an area in the south of the railhead site (the site). Environmental Permit number EPR/LB3733AF (the permit) was issued by the Environment Agency on 31 October 2012, is centred approximately at National Grid Reference (NGR) SP 90458 69643 and covers an area of approximately 1.5ha. The approximate boundary of the permit is shown on Figure 1.
- 1.2 GRS Rail Services together with GRS (Roadstone) Limited are both part of the GRS Group of Companies. It is proposed that the permit is transferred to GRS (Roadstone) Limited and varied to become a bespoke Environmental Permit which, in addition to the operations currently authorised by the permit will also provide for the operation of an incinerator bottom ash aggregate (IBAA) blending facility at the site (the proposed blending facility). Standard Rules Environmental Permit SR2009No6 provides for the transfer and treatment of up to 250,000 tonnes per annum (tpa) of inert and excavation wastes. Inert and excavation wastes are stockpiled as necessary at the site and treated which consists of only manual sorting, separation, screening or crushing of wastes into different components for disposal (no more than 50 tonnes per day) or recovery. The IBAA activities which will be undertaken at the proposed blending facility will comprise the acceptance, under List of Waste Code (LoW) 19 12 12, of up to 200,000 tonnes per annum (tpa) of IBAA that has been processed elsewhere to meet the BS13242 specification. The IBAA will be stored on site before being blended with primary aggregates or aggregates produced in accordance with the Aggregates Quality Protocol¹. The IBAA will be blended to form an aggregate output to meet a required specification which will be sent off site for use. Consistent with the inert and excavation waste transfer and treatment operations, processed IBAA will be imported to the railhead site by road

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

and the aggregate product will be exported from the railhead site by road. (Confirm with GRS)

- 1.3 The layout of the site which includes the area in which the inert and excavation waste transfer and treatment operations are already authorised to be carried out together with the layout of the IBAA proposed blending facility are shown on Figure 2. The site including the proposed IBAA storage and blending area is located in the open air. Consistent with Standard Rules Environmental Permit SR2009No6 the inert and excavation waste transfer and treatment operations may be carried out on a hardstanding surface. The proposed IBAA storage and blending operations will be carried out on impermeable surfaces with sealed drainage systems. The IBAA storage and blending areas will be delineated on three sides by *m high (Confirm with GRS) concrete block walls. In summary the IBAA blending operations will be carried out by loading shovels and the placement in the bays of alternate layers of IBAA and aggregate. Effective dust suppression will be provided. (Note to GRS can any more detail be provided on the inert and excavation waste and IBAA transfer and treatment operations and layout?)
- 1.4 The proposal to transfer and vary the permit was explained in a request for enhanced pre-application advice submitted to the EA on 2 June 2023. A copy of the submission for pre-application advice is presented at Appendix A together with a copy of the Nature and Heritage Conservation Screening Report received from the Environment Agency on 7 July 2023.
- 1.5 The applications to transfer and vary the permit have been prepared with reference to relevant guidance provided by the Environment Agency on the gov.uk website and with reference to the pre-application advice (Note to GRS we draw to your attention our comments in the cover email in respect of the limited pre-application advice received from the EA).
- **1.6** Details of the transfer application are presented in section 2 of this report.
- **1.7** Details of the variation application are presented in section 3 of this report.
- 1.8 As explained above, GRS Rail Services Limited and GRS (Roadstone) Limited are both part of the GRS Group of Companies hence some of the information provided with the applications to transfer and vary the permit (for example the technically



competent site manager and the site management system) is relevant to both applications.



2. The application to transfer the permit

- 2.1 The application to transfer the permit from GRS Rail Services Limited to GRS (Roadstone) Limited comprises Part A, D2 and F1 of the Environment Agency Environmental Permit Application Forms which are presented at Appendix B. A non-technical summary of the application is presented at Appendix C. The approximate boundary of the permit is shown in green on Figure 1. There are no proposals to change the permit boundary as part of the transfer application.
- 2.2 Application form Part A, Question 5c and Appendix 1 requests details of the directors of the company. There are seven Officers included on the Companies House website for GRS (Roadstone) Limited. The Officers are listed below together with their dates of birth:-

Officer	Role	Date of birth
Antony Charles Beamish	Director	5 January 1978
Bevan John Browne	Director	29 March 1980
Jonathan Gareth Fisher	Director	28 October 1977
Adam Hancock	Director	27 November 1980
Craig Martin Hill	Director	1 March 1985
Martin Victor Hill	Director	31 May 1954
Martin Paul Reid	Director	11 January 1967

- A copy of the Certificate of Technical Competence and Certificate of Continuing
 Competence for the relevant technically competent person is provided at Appendix
 D. This information is provided in response to Question 4b of Application Form Part
 D2.
- 2.4 Question 4d of Application Form Part D2 specifies that the operator must have in place a written management system. A summary of the management system is presented at Appendix E (GRS to provide a summary of the EMS and confirm whether the EMS is certified to ISO 14001. It is not a pre-requisite that the EMS is certified to ISO 14001.)



3. The application to vary the permit

- 3.1 Following issue of the transfer notice, it is proposed that the Standard Rules SR2009No6 permit is varied to a bespoke Environmental Permit (see Paragraphs 1.2 and 1.3 for further details). The approximate boundary of the permit is shown in green on Figure 1. There are no proposals to change the permit boundary as part of the transfer application.
- 3.2 The application to vary the permit comprises Parts A1, C2, C4 and F1 of the Environment Agency Environmental Permit Application Forms which are presented at Appendix F.
- 3.3 Application form Part A, Question 5c requests details of the directors of the company.
 There are seven Officers included on the Companies House website for GRS (Roadstone) Limited. The Officers are listed below together with their dates of birth:-

Officer	Role	Date of birth
Antony Charles Beamish	Director	5 January 1978
Bevan John Browne	Director	29 March 1980
Jonathan Gareth Fisher	Director	28 October 1977
Adam Hancock	Director	27 November 1980
Craig Martin Hill	Director	1 March 1985
Martin Victor Hill	Director	31 May 1954
Martin Paul Reid	Director	11 January 1967

- 3.4 The variation application is supported by a qualitative Environmental Risk Assessment (ERA) for accidents, odour, noise and fugitive emissions which is presented at Appendix G. The ERA assesses the potential impacts to the surrounding environment from the proposed blending facility. In the ERA it is concluded that the proposed blending facility will not have a significant potential for nuisance impact on the surrounding environment. Based on the assessment presented in the ERA it is unnecessary to provide with this application a pest management plan or an odour management plan. The inert and excavation waste transfer and treatment operations already are the subject of a generic risk assessment and as no changes to these operations are proposed the scope of the ERA has been limited to the proposed blending operations.
- 3.5 A dust and emissions management plan (DEMP) associated with the inert and excavation waste transfer and treatment operations and the proposed blending



facility is presented at Appendix H. The DEMP identifies the operations at the site which may have the potential to have an impact on air quality as a result of emissions of particulate matter, presents the details of the operational controls which are implemented to minimise emissions and describes the monitoring which will be carried out to confirm the effectiveness of the management controls.

- 3.6 Although it is considered unlikely that the proposed blending operations will have a significant environmental impact in respect of noise, a noise impact assessment (NIA) has been undertaken with reference to the guidance provided within BS4142² and a noise management plan (NMP) has been proposed. The NIA and NMP prepared by Vibrock is presented at Appendix I. It is concluded in the NIA that *** (To be completed on receipt from Vibrock of the NIA and NMP).
- 3.7 As there are no proposals to increase the size of the permitted area, it is unnecessary to include a Site Condition Report with the application. (GRS to confirm whether a site condition report was prepared by Northampton Aggregates when the permit was first issued or by GRS Rail Limited or at a later date. We are preparing a qualitative Site Condition Report whilst the permit application is being determined to enable the Site Condition Report to be in place prior to GRS (Roadstone) Limited commencing operations at the site.)
- 3.8 The site will continue to be managed in accordance with an environmental management system (EMS) pursuant to Condition 1.1.1(a) of the permit using sufficient competent persons and resources pursuant to Condition 1.1.1(b) of the permit. A summary of the EMS is presented at Appendix E (As above GRS to provide a summary of the EMS and confirm whether the EMS is certified to ISO 14001. It is not a pre-requisite that the EMS is certified to ISO 14001) and the Certificate of Continuing Competence and Certificate of Technical Competence for the technically competent site manager are presented at Appendix D.

Application form Part C4 – Section 3a, Technical standards

3.9 As the site comprises a non-hazardous and inert waste treatment facility, the appropriate measures which are most relevant are "*Non-hazardous and inert waste*:

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² British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound, British Standards Institution 2019

appropriate measures for permitted facilities3" (the appropriate measures). Section 1 of the appropriate measures (when appropriate measures apply) states in paragraph 1.2 (assessing appropriate measures for your site):-

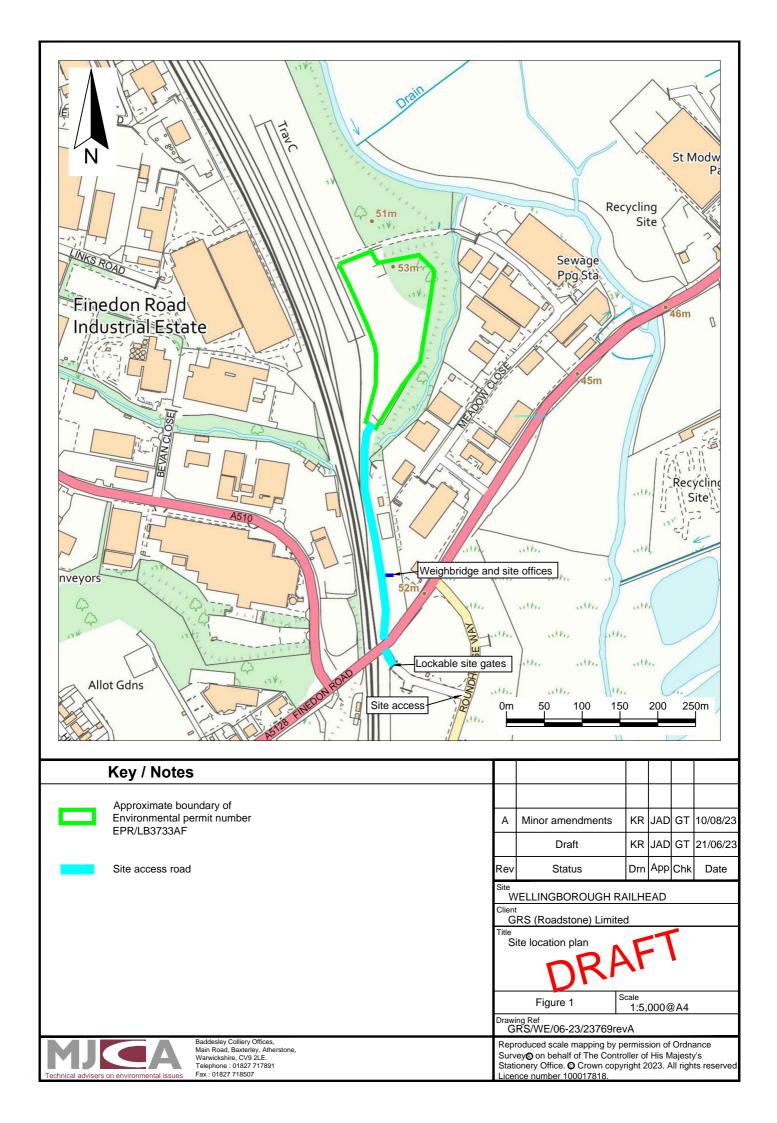
> "Some measures in this guidance may not be suitable or relevant for your operation. Appropriate measures will depend on the:

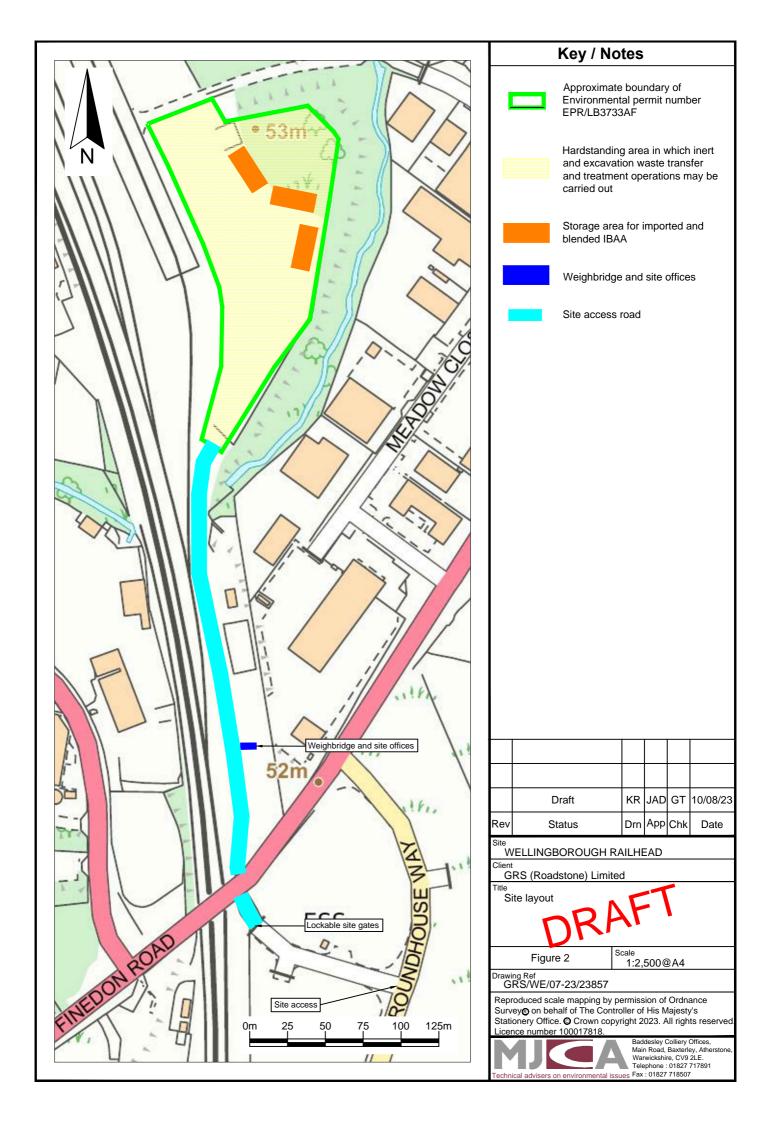
- activities being carried out
- size and nature of the activities
- location of the facility"
- 3.10 The proposed IBAA blending facility is located within the existing Wellingborough Railhead and the proposed operations consist of blending of processed IBAA with the aggregate. The proposed operations and waste types are very similar to the activities already undertaken at the site the subject of the permit. It is not considered that the site is located in a sensitive setting.
- 3.11 The appropriate measures are subdivided into the following categories:
 - 1. When appropriate measures apply
 - 2. General management appropriate measures
 - 3. Waste pre-acceptance, acceptance and tracking
 - 4. Waste storage
 - 5. Waste treatment
 - 6. Emissions control
 - 7. Emissions monitoring and limits
 - 8. Process efficiency appropriate measures
 - 9. Waste minimisation, recovery and disposal

https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities Published 12 July 2021. Last updated 1 August 2023. Last accessed 10 August 2023

- **3.12** Section 8 of the appropriate measures is not relevant as these appropriate measures apply only to installations.
- 3.13 Further details relevant to Section 6 emissions control are presented in the ERA, in the NRA and in the DEMP included with this application. Section 6.1 of the appropriate measures refers to enclosure within buildings and states the following:
 - 1. Enclosing activities within buildings <u>can be</u> an appropriate measure for preventing and minimising emissions of pollution
 - 2. If your <u>waste treatment</u> activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you <u>must</u> carry out that waste treatment activity within an enclosed building.
 - 3. You must also carry out non-treatment activities, such as <u>storing</u> and <u>transferring</u> waste (including loading and unloading) in enclosed buildings if these activities <u>are likely to cause</u> (or are causing) <u>significant pollution</u> at sensitive receptors which cannot be addressed by alternative measures. [Our emphasis]
- 3.14 Taking into consideration the guidance in relation to when appropriate measures apply which specifies that the appropriate measures will depend on the activities being carried out, the size and nature of the activities, the location of the facility and the conclusions of the ERA it is considered that it is unnecessary to enclose the proposed blending operations within a building as there is no significant risk that the proposed blending operations are likely to cause significant pollution at sensitive receptors. The control measures in respect of dust are specified in the DEMP.

FIGURES





APPENDICES



APPENDIX A PRE-APPLICATION INFORMATION





Screening Report: Bespoke Waste

Reference EPR/XP3525SD/P001

NGR SP 90458 69643

Buffer (m) 50

Date report produced 07/07/2023

Number of maps enclosed 1

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

Protected Habitats Screening distance (m) Further Information

Deciduous Woodland up to 46m Natural England

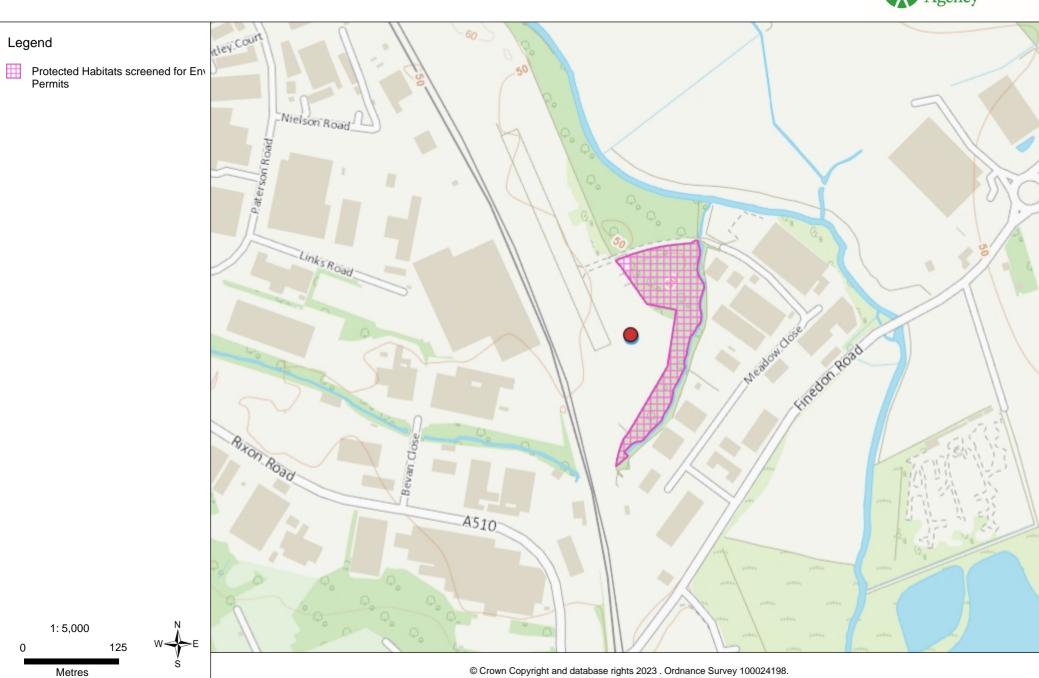
Please note we have screened this application for protected and priority sites, habitats and species for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be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





6/2/23, 3:39 PM Response Data

Waste permits: ask for pre-application advice

Q1. Will or does your activity take place in England? Yes

Q2. What is your main activity?

Using, treating, storing or disposing of waste or mining waste

Q3. Do you only need a free habitats and conservation screening?

The screening will tell you if there are protected areas or species close to your site or proposed site. We recommend you ask for a screening before applying for a new site.

No - I would like pre-application advice (you will be able to request a screening as well as advice)

Q4. Is your enquiry only about the resale of car parts?

No

Q5. What is your enquiry about?

None of the above

Q6. Will you be accepting hazardous waste as part of your activity?

No

Q12. Please choose the category your main activity will or does fall into.

Household, commercial or industrial waste site - including household amenity waste and inert waste and aggregate sites

Q23. What type of permit application do you want pre-application advice about?

A change (variation) to an existing permit

A transfer in full of an existing permit to another operator

Q24. We can carry out a free nature and heritage conservation screening for you to consider as part of your application.

You should request this if you're applying for a new site close to a protected site or species, because: some types of permit may not be allowed, such as a standard rules permit you may have to carry out a risk assessment Please choose your site type below or select 'I do not want a screening'.

Household, commercial and industrial waste, including waste transfer stations, aggregate and inert waste sites and waste treatment facilities and household amenity sites

Q26. What kind of site do you want a screening for?

Waste storage and waste transfer stations - including with or without treatment

Response Data

Q27. Please select the screening you would like us to carry out.

Each screening is specific to the standard rules set described. If you cannot operate within the conditions of a standard rules permit you need to apply for a bespoke permit. In this case, choose 'Bespoke permit screening'.

Bespoke permit screening

6/2/23, 3:39 PM

Q32. If you have already received pre-application advice regarding this application, you do not need to give us your contact and site details again unless something has changed or you need further advice.

Do you only need a screening and want us to use your existing details?

No - I also need pre-application advice or I want to change my contact details

Q36. Do you have an existing Environment Agency permit or pre-application reference? It's usually in the format EPR/AB1234CD/A001.

I have an existing permit reference

Enter your reference, if you have one. EPR/CB3733AF

What is your role?

Consultant or agent

Q37. Your full name

Guy Titman

Q38. Your email address

guytitman@mjca.co.uk

Q39. Your telephone number

01827 717891

Q40. Permit applicant name or business name

GRS (Roadstone) Limited

Q41. Company number (if the applicant has one)

03261275

Q42. What is the applicant's address?

Building or street 10 Goldsmith Way

Town or city Nuneaton

County Warwickshire

Postcode CV10 7RJ

Q43. What is the site name?

Wellingborough Railhead

Q44. What is the address of the site?

Building and street Neilsons Yard, Meadow Close

Town or city Wellingborough

County Northamptonshire

Postcode NN8 4BH

Q45. What is the National Grid reference for the centre of the site? This should be 2 letters and 10 digits, such as ST 58132 72695.

SP 90458 69643

Q46. What is the distance from the centre of the site to the site boundary in metres?

50

Q47. The Environment Agency can give free basic pre-application advice on: which application forms you should use what guidance you must follow how much you will need to pay if there are standard rules relevant to your activities and if you meet the criteria for them risk assessments you may need to complete and send with your application the administrative tasks the Environment Agency may need you to do as part of your application Do you need any more advice that is not mentioned here?

Yes

Q48. If you need more in depth advice about your application, the Environment Agency offers an enhanced pre-application advice service. The enhanced service costs £100 an hour plus VAT. For example, this could cover: the type of permit you need complex modelling preparing risk assessments parallel tracking for complex permits with planning applications monitoring requirements (including baseline) what guidance you must follow before you submit your application public engagement plans for high public interest applications Please note: we cannot normally confirm whether you qualify for a low-risk surrender charge via enhanced pre-application advice. You should discuss this first with your site officer. You can get contact details for your site officer by contacting 03708 506 506 or enquiries@environment-agency.gov.uk

Do you need this enhanced pre-application advice service?

Yes

Response Data 6/2/23, 3:39 PM

> Q49. What chargeable pre-application advice do you need? Try to include any specific technical questions you would like to ask us.

Wellingborough Railhead (the railhead site) is an operational railhead where aggregates are imported by rail, stored and loaded for onward distribution by road. The railhead site is located in a predominately industrial area on the north east outskirts of Wellingborough. The railhead site covers an area of approximately 6 hectares (ha). GRS Rail Services Limited (formerly Northampton Aggregates Limited) have the benefit of Standard Rules Environmental Permit SR2006No6 – inert and excavation waste transfer station with treatment (number EPR/LB3733AF) for an area in the south of railhead site. Environmental Permit number EPR/LB3733AF was issued by the Environment Agency on 31 October 2012 and covers an area of approximately 1.5ha. The approximate area of the railhead site and boundary of Environmental Permit number EPR/LB3733AF are shown on Figure 1.

GRS Rail Services together with GRS (Roadstone) Limited are both part of the GRS Group of Companies. It is proposed that Environmental Permit number EPR/LB3733AF is transferred to GRS (Roadstone) Limited and at same time varied to become a bespoke Environmental Permit for an incinerator bottom ash aggregate (IBAA) blending facility at the railhead site (the proposed blending facility). The activities which will be undertaken at the proposed blending facility will comprise the acceptance, under List of Waste Code (LoW) 191212, of up to 200,000 tonnes per annum (tpa) of IBAA that has been processed elsewhere to meet the BS13242 specification. The IBAA will be stored on site before being blended with primary aggregates in a mobile plant to form an aggregate output which will be sent off site for use. Processed IBAA will be imported to the railhead site by road and the aggregate product will be exported from the railhead site by road. The IBAA accepted at the railhead site will be classified under LoW code 191212 which will be restricted to processed IBAA material that achieves BS13242 specification. No processing of IBAA will be undertaken at the railhead site. The location of the proposed blending facility is shown as the hatched area on Figure 1. It is proposed that the stocking bays for the IBAA and blending facility will be located in the open air on a hardstanding area which is currently used for stockpiling aggregates.

We would welcome the opportunity to consult the Environment Agency (EA) prior to preparation of the Environmental Permit transfer and variation application for the proposed blending facility to confirm the approach to and content of the application. Specifically we would welcome comments on the following aspects of the application:

- 1. All IBAA which will be accepted at the proposed blending facility will be processed elsewhere to meet the BS13242 Specification. No un-processed IBAA will be accepted and no processing of IBAA will be undertaken at the railhead site. We would like to discuss whether the IBAA and aggregate blending activity comprises a waste operation as defined by The Environmental Permitting (England and Wales) Regulations 2016 (EPR 2016) as the material no longer comprises a slag or ash or whether (and if so why) the EA consider the activity comprises a Part A(1) installation activity as listed in Section 5.4(b) of Part 2 to Chapter 5 of Schedule 1 to the EPR 2016.
- 2. We would like to confirm the requirements for the enclosure/screening necessary for the proposed blending and storage activities and whether, in principle, a risk-based approach to the enclosure/screening based on the setting of the railhead site would be appropriate. Will the EA agree, in principle, that enclosure in a building will not be necessary for the operations at this location. If this is the case, we would like to discuss and confirm with the EA the dust emission controls which will be required at the railhead site if the blending facility is to operate outside of an enclosed building.
- 3. As mentioned above, all materials accepted and stored on the railhead site will be processed IBAA which meets the BS13242 Specification. We would like to confirm the requirements for the surface on which the proposed blending and storage activities will be undertaken and whether a risk-based approach to the site surfacing based on an assessment of the hydrogeological setting of the railhead site would be appropriate.
- 4. GRS (Roadstone) Limited are giving consideration to the retention of the operations the subject of Environmental Permit number EPR/LB3733AF (inert and excavation waste transfer station with treatment) and the incorporation, if appropriate, of processed aggregate in the IBAA blending operations but are concerned this may increase the complexity and determination time for the application. We would welcome the opportunity to discuss the inclusion of the operations the subject of Environmental Permit number EPR/LB3733AF in the transfer and variation application.
- 5. More generally we would like to agree with the EA the principles and scope of the transfer and variation application including application forms and risk assessments. We would like confirmation of the application fee for the application.

We would be grateful if the EA could provide, if necessary, a quote for the provision of enhanced preapplication advice. However, it may be that the EA conclude that the questions do not necessitate enhanced pre-application advice and the advice can be provided by the EA without charge.

Q53. The information you give in this form will not appear on the public register in accordance with our privacy notice (opens in a new tab) but may be made available (disclosed) under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004 when requested. More information can be found on the Information Commissioner's Office website (opens in a new tab)

Is there an exception to disclosure under the above mentioned legislation which applies to any of the information you have given in this form?

No

6/2/23, 3:39 PM

Give your feedback

Q55. Overall, how did you feel about completing this form today?

Satisfied

How could we improve this form?

Option to save prior to submission

APPENDIX B APPLICATION FORMS - TRANSFER



APPENDIX C

NON-TECHNICAL SUMMARY (NOT INCLUDED WITH THIS DRAFT)



APPENDIX D TECHNICAL COMPETENCE INFORMATION





Continuing Competence Certificate

This certificate confirms that

David Burt

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 01/12/2021

TMH

Treatment - Hazardous Waste

Expiry Date: 01/12/2023

Verification date: 30/11/2021

Authorised:

Learner ID: 24966

Certificate No.: 5189380

Date of Issue: 01/12/2021

Director of Qualifications and Standards

CIWM Chief Executive Officer



The Chartered Institution of Wastes Management





Certificate No. OCC5707

Operator Competence Certificate

Qualification Title:

Managing Physical & Chemical Treatment - Hazardous Waste - 4MPTH

This Certificate is awarded to

David Burt

Awarded: 17/03/2015

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.



APPENDIX E

ENVIRONMENTAL MANAGEMENT SYSTEM (SUMMARY) (SUMMARY NEEDED FROM GRS)

APPENDIX F APPLICATION FORMS - VARIATION



APPENDIX G ENVIRONMENTAL RISK ASSESSMENT



APPENDIX H DUST AND EMISSIONS MANAGEMENT PLAN



APPENDIX I

NOISE IMPACT ASSESSMENT AND NOISE MANAGEMENT PLAN (NOT INCLUDED WITH THIS DRAFT)

