Environmental Permit Application Report

MW Surfacing Limited

Owl Barn,
Norwich Rd,
Besthorpe,
Attleborough
NR17 2LA

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Change log

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1	Original Application	Joe Craddock	Tracey Westbury	25 January 2024
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1. Introduction

1.1. Westbury Environmental Limited have been instructed to prepare this Environmental Permit application on behalf of MW Surfacing Limited (the Operator) for a proposed recycling facility at Owl Barn, Norwich Rd, Besthorpe, Attleborough, NR17 2LA (the Site).

1.2. MW Surfacing Limited wish to operate a waste treatment facility to recycle construction / demolition waste to produce recycled aggregate products.

1.3. MW Surfacing Limited currently operate a fleet of road sweepers that carry out work predominantly on building and construction sites to keep access and haul roads free from mud. The residues that this work produces consists mainly of soils and stones rather than typical street cleaning residues. It is proposed that this waste is treated at the proposed facility.

1.4. It is proposed that waste will be treated by way of washing, screening and crushing to produce a recycled aggregate. This recycling will comply with the requirements of the WRAP Quality Protocol for Aggregates from Inert Waste 2011 and therefore the resultant aggregates will be considered to have reached an 'End of Waste' status.

1.5. The Site is located next to the Attleborough Bypass (A11), with agricultural land to its west, residential properties to the north and east, and the A11 runs parallel to the southern boundary, see Drawing No. 23/019b 001 Permit Boundary Plan.

1.6. This is a bespoke environmental permit application for the physical treatment of waste. The proposed waste treatment activities include screening, crushing, blending, sorting, hand-picking, and washing.

1.7. The extent of the proposed permit boundary is shown on Permit Boundary Plan, Drawing No. 23/019b 001.

1.8. Section 5, non-technical summary, provides more details on the proposed waste operations that will be carried out on Site.

1.9. The relevant Environment Agency forms (Part A, B2, B4 and F1) and supporting information, including TCM details, a Site Condition Report, Environmental Risk Assessment, Noise Management Plan and Dust Management Plan are included within this Environmental Permit Application.

2. Site Location and setting

2.1. The Site is located at Owl Barn, Norwich Rd, Besthorpe, Attleborough, NR17 2LA.

2.2. The Site is located next to the Attleborough Bypass (A11), with agricultural land to its west, residential properties to the north and east, and the A11 runs parallel to the southern boundary, see Drawing No. 23/019b 001 Permit Boundary Plan.

2.3. The Site was previously used for the storage of agricultural machinery, the Operator is not aware of any environmental incidents associated with this activity.

2.4. The Site is located within a Groundwater Water Protection Zone 3 – Total Catchment.

2.5. The Site is located on a Principal bedrock aquifer. The bedrock geology is comprised of Lewes Nodular Chalk, Seaford Chalk, Newhaven Chalk, Culver Chalk and Portsdown Chalk.

2.6. The Site is located on a Secondary A (Superficial Drift) Aquifer. The aquifer is comprised of Alluvium.

2.7. The Site is located in flood zone 1, therefore there is a low risk of flooding.

3. Operator Details

3.1. Company details, including information regarding the Directors of the company, are provided below:

Table 3.1 Company Details

Company Name	MW Surfacing Limited
Company Number	04630154
Registered Address	7 Beech Avenue Taverham Norwich England NR8 6HW
Incorporation Date	7th January 2003

Table 3.2 Company Directors

Name	Date of Birth
Daniel James Wilkinson	[redacted]
Lorraine Wilkinson	
Mark Wilkinson	

4. Site Management

4.1. MW Surfacing Limited will operate the Site in accordance with an Environmental Management System (EMS).

4.2. A hard copy of the EMS will be kept on Site at all times. The EMS folder will include 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 2 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.

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: Including a copy of the permit and EA Registrations for the Site.

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.
- Drainage Plan – showing the drainage arrangements and ground surfaces on site.

4.3. 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.

4.4. 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.

4.5. 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.

4.6. The Site will display a notice board at the site entrance which will include the following details:

- The permit holder's name – MW Surfacing 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.

4.7. The EMS will include a Complaints Procedure that will provide details for recording, investigating, and resolving complaints in regard to the permitted activities.

4.8. 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.

4.9. 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.

4.10. 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.

4.11. 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.

4.12. Each member of staff at the Site will have access to the EMS.

Technically Competent Management

4.13. Craig Wright will be the Technically Competent Manager (TCM) for the Site. A copy of the relevant TCM certificates is provided in Appendix 1 Evidence of Technically Competent Manager.

Site Condition

4.14. Part 1 of a Site Condition Report has been produced for this Site. A copy of the Site Condition Report is provided in Appendix 2 - Site Condition Report, Part 1.

Environmental Risk

4.15. An Environmental Risk Assessment has been completed as part of this permit application, see Appendix 3 Environmental Risk Assessment.

4.16. The Environmental Risk Assessment considers the potential impacts of the proposed waste operations with regard to the local receptors; population, watercourses, protected sites etc.

4.17. The Environmental Risk Assessment considers that there is no significant increased risk of pollution or harm to the environment from the proposed activities. Robust risk management measures will continue to be implemented while the Site is operating to ensure the identified risks are minimised.

4.18. The risk of dust being emitted from the Site is considered to be 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. A Dust Management Plan has been prepared, see Appendix 4, Dust Management Plan.

4.19. Washing is a wet process, therefore the risk of this process increasing dust emissions is low. Additionally, hoses, road sweepers and a wheel wash facility will be used to minimise dust emissions from the movement and processing of the waste.

5. Non-technical summary

5.1. The proposed waste activities will take place in the area shown on the permit boundary drawing, see Drawing No. 23/019b 001 Permit Boundary Plan.

5.2. The Site is located next to the Attleborough Bypass (A11), with agricultural land to its west, residential properties to the north and east, and the A11 runs parallel to the southern boundary, see Drawing No. 23/019b 001 Permit Boundary Plan.

5.3. Waste will be delivered onto the Site by Heavy Goods Vehicles (HGV's) and road sweeper vehicles that are operated by MW Surfacing Limited. Waste will be deposited and stored in stockpiles in the designated storage areas on Site.

5.4. Waste material collected using road sweeper vehicles will be stored on an impermeable surface with a sealed drainage system within the waste storage and processing area, see Drawing No. 23/019b 003 Site Layout Plan. Any water associated with this waste material will drain towards fully contained settlement ponds. Concrete Lego blocks will be used to contain this waste.

5.5. All other wastes will be stored on hardstanding.

5.6. The sources of dust emissions from the proposed activities and the mitigation measures, that are required to ensure that the risk of causing nuisance is minimised, have been assessed, see Appendix 4 Dust Management Plan.

5.7. Contravening wastes are hand-picked from the incoming waste to prevent them entering the treatment process.

5.8. Contravening waste will be stored within a secured container and removed from Site on a regular basis to a suitably licensed facility.

5.9. Wastes are screened (dry screening or wet screening in a wash plant) to separate waste types according to particle size.

5.10. Aggregate materials are crushed to reduce the particle size and washed to further screen the aggregate materials according to their particle size.

5.11. The crusher is proposed to operate on an infrequent basis at the site. The crusher is proposed to operate only circa two times per year between 07:00 and 18:00hrs. The crusher will not be permanently installed and will be moved to a position near the washer / screener when required.

5.12. The predominant waste treated at the site will be road sweepings. Road sweepers use under-mounted water jets, as a result road sweep waste no dry when it arrives at the site.

5.13. The treatment capacity has been estimated to be 50 to 80 tonnes of waste per day.

5.14. The washing / screening plant is proposed to operate up to six hours once per week (Fridays) between 07:00 and 18:00hrs during the summertime, reducing to six hours once per month during the wintertime. In-situ, there is a likelihood that actual operational time may be lower.

5.15. Washing of waste is undertaken to provide a better separation of the fractions. This will allow the operators to sort the materials in to separate, identifiable fractions which enables the end products to be used for specific purposes.

5.16. The washing of waste enables the operator to produce a higher quality end material.

5.17. Dirty water from the washing operations will be circulated through the settlement ponds to remove silt. Water will be recirculated for use back in the wash plant and the silt removed from Site as a waste material.

5.18. Wash water is managed through three lagoons to allow the sedimentation of solids from the water prior to it being recirculated. There is no filter press therefore no filter cake is produced.

5.19. The sediment from the lagoons will be sent off site as a waste material unless an end of waste body of evidence is prepared.

5.20. Water losses in the washed material means that the wash plant is topped up with water - there is no discharge of wash water

5.21. Quarterly testing of the wash plant water will be undertaken.

6. List of waste codes

6.1. Table 6.1 details the proposed waste codes to be accepted on to the Site.

Table 6.1 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
10	**WASTES FROM THERMAL PROCESSES**
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
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 plannings (other than those containing coal tar) only
17 05	**soil (including excavated soil from contaminated sites) stones and dredging spoil**
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
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTEWATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL WASTE**
19 08	**wastes from wastewater 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 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. Restricted to crushed bricks, tiles, concrete and ceramics and soils from the mechanical treatment of construction / demolition waste. Metal from reinforced concrete must be removed. Does not include gypsum from recovered plasterboard.

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
20 03	**Other municipal wastes**
20 03 03	Street cleaning residues

Application Forms

Part A

Application Forms

Part B2

Application Forms

Part B4

Application Forms

Part F1

Drawings

Permit Boundary Plan	Drawing No.	23/019b 001
Sensitive Receptors Plan	Drawing No.	23/019b 002
Site Layout Plan	Drawing No.	23/019b 003
Drainage Plan	Drawing No.	23/019b 004

Appendix 1

Evidence of Technically Competent Management

Appendix 2

Site Condition Report

Appendix 3

Environmental Risk Assessment

Appendix 4

Dust Management Plan

Appendix 5

Noise Management Plan