An application to vary environmental permit number EPR/DP313NM in respect of the non-hazardous waste treatment facility operated by JARL at Saxon Brickworks, Whittlesey, Cambridgeshire, PE7 1PJ

Non-technical summary

1.1 MJCA is commissioned by Johnsons Aggregates and Recycling Limited (JARL) to prepare an application to vary Environmental Permit number EPR/DP3131NM (the permit) for the non-hazardous waste treatment facility operated by JARL at Saxon Brickworks, Whittlesey, Cambridgeshire, PE7 1PJ (the site). The site is centred approximately at National Grid Reference (NGR) TL 25464 97168 to the west of Whittlesey and approximately 4km south east of Peterborough. The site is located at Saxon Works which was formerly a clay quarry and associated brickworks. The site is located within the excavation associated with the former works.

1.2 The permit currently authorises the receipt, storage and processing of up to 250,000 tonnes per annum (tpa) of Incinerator Bottom Ash (IBA) to produce Incinerator Bottom Ash Aggregate (IBAA) including recovery of ferrous and non-ferrous metals from the IBA, the receipt and storage and screening of up to 50,000 tpa of construction and demolition (C&D) wastes and blending/mixing of the treated C&D waste with IBAA and aggregate.

1.3 The proposed changes to the permit which are the subject of this variation application are listed below:

i. An increase in the total quantity of IBA waste accepted at the site from 250,000 tpa to 460,000 tpa.

ii. An increase in the total quantity of C&D waste accepted at the site from 50,000 tpa to 154,000 tpa.

iii. An increase in the daily treatment capacity for the treatment of IBA from 1,000 tonnes per day (tpd) to 2,000 tpd.

iv. An increase in the maximum quantity of IBA stored at any one time prior to treatment from 52,000 tonnes to 75,000 tonnes and an increase in the maximum stockpile height for IBA from 4.6m to 6.7m to accommodate the increase in storage capacity.

v. An increase in the maximum quantity of IBAA stored at any one time following treatment from 38,304 tonnes to 50,000 tonnes and an increase in the maximum stockpile height for IBAA from 4.6m to 6.7m to accommodate the increase in storage capacity.

vi. An increase in the maximum quantity of ferrous and non-ferrous metals stored at any one time following treatment from 1,786 tonnes to 2,500 tonnes.

vii. An increase in the maximum quantity of C&D waste stored at any one time from 7,373 tonnes to 15,000 tonnes and an increase in the maximum stockpile height

for C&D waste from 4.6m to 5.5m to accommodate the increase in storage capacity.

viii. Inclusion in Table S2.3 of additional C&D waste types for receipt, storage and processing.

ix. Addition of crushing of C&D waste at the site.

x. Addition of crushing of IBA/IBAA on a campaign basis.

xi. Inclusion in Table S2.2 of four additional IBA derived waste types to the list of wastes authorised to be accepted at the site.

xii. A change in the Environmental Permit boundary to add a small additional area to the south of the site measuring approximately 0.35 hectares to the permitted area including an additional building identified as Building 3. Building 3 will be used primarily for the purpose of storing metal recovered from IBA. The metal will be stored loose tipped in bays and/or in containers including bulk bags and skips. No treatment of waste will be undertaken in Building 3. As the metals have been recovered from IBA or IBAA (ie from a waste which has been generated from an incineration process), they do not comprise combustible waste as defined in the Environment Agency guidance on Fire Prevention Plans, hence a Fire Prevention Plan is not required for the storage and management of these waste types in Building 3.

xiii. An increase in the site operational hours to include 24 hour operation in building 1.

1.4 The changes in relation to tonnages of waste are summarised in the table below.

Activity	Current	Proposed
IBA acceptance	250,000 tpa	460,000 tpa
C&D waste acceptance	50,000 tpa	154,000 tpa
Daily treatment capacity IBA	1,000 tpd	2,000 tpd
IBA stored prior to treatment	52,000 t	75,000 t
Treated IBAA storage	38,304 t	50,000 t
Ferrous/non-ferrous waste storage	1,786 t	2,500 t
C&D waste storage	7,373 t	15,000 t

Summary of the proposed changes in tonnages

1.5 There are no National Parks, Areas of Outstanding Natural Beauty, Marine Conservation Zones, Ramsar Sites, National Nature Reserves or Local Nature Reserves within 2km of the site. Nene Washes, which comprises a Site of Special Scientific Interest, a Special Area of Conservation and a Special Protection Area, is located approximately 1km north of the site. The site is not located in a groundwater Source Protection Zone (SPZ). The site is not located in an Air Quality Management Area (AQMA). There are no World Heritage Sites, Scheduled Monuments or listed buildings within 500m of the site. There are areas of Deciduous Woodland Priority habitats approximately 50m north of the site and approximately 100m south of the site. There are no areas of Ancient Woodland within 2km of the site.

1.6 The only residential receptors within 250m of the site boundary are the properties at Holly Blue Gardens approximately 180m north north west of the site to the north of Peterborough Road (A605) and a small row of houses on the A605 approximately 250m north west of the site where the site access road meets the A605. The closest receptors down prevailing wind of the site to the east or ENE of the site are approximately 350m from the site boundary.

1.7 The application is supported by a qualitative Environmental Risk Assessment (ERA) for accidents, odour, noise and fugitive emissions. The ERA assesses the potential impacts on the surrounding environment from the proposed changes at the site. In the ERA it is concluded that the proposed changes will not increase significantly the potential for nuisance impacts on the surrounding environment.

1.8 An Air Quality Environmental Impact Assessment (AQEIA) has been prepared to assess the potential impacts on air quality from the proposed changes at the site. The AQEIA concludes that "..*the overall significance of fugitive dust effects as a result of the operation of the facility were predicted to be not significant*" and "*The results of the assessment indicated the predicted odour effect significance was negligible at all receptors. Following review of the relevant factors, overall odour effects associated with the operation of the facility were predicted to be not significant*".

1.9 An Environment Agency approved Dust Management Plan (DMP) is implemented at the site. The DMP has been updated to reflect the proposed changes the subject of this variation application. The DMP 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. The DMP has been prepared with reference to the AQEIA.

1.10 An updated Noise Impact Assessment (NIA) has been prepared to assess the potential impact of the proposed changes and an updated Noise Management Plan (NMP) has been prepared to provide details of the noise control measures and mitigation to be implemented at the site. In the summary of the NIA it is stated that "*Noise levels during the daytime periods would not increase as a result of the additional throughput, with a reduction in noise levels anticipated due to the additional mitigation and control measures to be implemented".* and that "*Overnight with Buildings 1 and 2 operational, noise levels would not increase above those accepted for the current application, which considers the operation of Building 2. This demonstrates that the proposed night-time operation would not result in a potential for adverse noise impacts at the neighbouring properties."*

1.11 A Best Available Techniques (BAT) assessment has been undertaken in respect of the crushing of IBA/IBAA on a campaign basis with reference to the BAT Conclusions for waste treatment. The BAT assessment concludes that based on the risk posed by the activity and the implemented control measures, the crushing activity does not need to be undertaken within an enclosed building.

1.12 The site will continue to be managed in accordance with an Environmental Management System (EMS) using sufficient competent persons and resources.