



Brookhurst Wood MBT Facility

Environmental Permit Variation EPR/HP3238GW
Non-Technical Summary


Biffa Waste Services Limited

Project reference: EPR/HP3238GW/V005
Project number: 60586541
60586541-ACM-XX-00-RP-MBT-NTS-R04

May 2023

Quality information

Prepared by



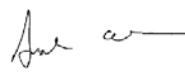
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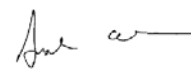
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Revision History

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Table of Contents

1.	Report Context.....	5
1.1	Introduction.....	5
1.2	Proposed Facility	5
2.	Reason for the Application.....	6
2.1	Background to the Application	6
2.2	Description of the Proposed Changes	6
2.3	Permit Conditions to be Modified.....	6
3.	Application Summary	8
3.1	The Operator	8
3.2	Existing Site Operations	9
3.3	Proposed Storage and Transfer Area	10
3.4	Need for the Facility.....	10
3.5	Acceptance of Waste.....	10
3.6	The Site	11
3.6.1	Overall Site Location	11
3.6.2	Location of New Waste Storage and Transfer Area	11
3.6.3	Site History	12
3.7	Management and Operational Control.....	12
3.8	Emissions Management	12
3.8.1	Existing Point Source Releases to Air	12
3.8.2	Existing Point Source Releases to Water	13
3.9	Odour Management.....	13
3.10	Dust Management	13
3.11	Noise Management	13
3.12	Impact Assessment	14
3.13	Fire Prevention Plan	14
3.14	Assessment of Best Available Techniques.....	14
4.	Application Type.....	15
	Appendix A Proposed Changes to Permit Schedule 1, Table S1.1	16
	Appendix B EA Pre-application Advice.....	18

Figures

No table of figures entries found.

Tables

Table 1.	Permit EPR/AB3700LS – Conditions Requiring Modification.....	6
Table 2.	Normal Waste Acceptance Hours	11
Table 3.	Point Source Releases To Air	12
Table 4.	Point Source Releases to Water.....	13

1. Report Context

1.1 Introduction

AECOM has been commissioned by Biffa Waste Services Limited (“the Operator” or Biffa) to prepare an application to vary the existing environmental permit (EPR/HP3238GW) to include an additional area of land in proximity to the current Mechanical and Biological Treatment (MBT) Facility for the storage and dispatch of MBT outputs. The site is located at Brookhurst Wood, Horsham, West Sussex.

This document represents the Non-Technical Summary which has been updated to include the new transfer and storage area and should be read in conjunction with the other supporting application reports and risk assessments.

1.2 Proposed Facility

There are no changes proposed to the existing MBT operations.

Biffa plan to extend the existing MBT Facility to include an area of land known as Site Ha to be used as a waste storage and transfer area for loose or baled refuse derived fuel (RDF) produced by the MBT process to meet the requirements of the West Sussex County Council Materials Resource Management Contract (MRMC).

The area will be operated as a trailer park whereby up to 36 empty transport trailers may be delivered to site empty and subsequently filled with RDF. It is intended that alternate bays will be used for the full and empty trailers so the drivers can drop off and collect in the same trip. The RDF will be stored for a maximum 72 hours prior to export from site to EfW's in the UK or abroad.

It is also proposed to allocate a controlled area for the storage of containerised covered CLO (Compost Like Output), this material will be a by-product of the food waste process and will be taken to land spreading within the vicinity of the site during the week. Over weekends there will be a need to store the CLO at the site.

No waste treatment or processing will take place as part of this activity and total waste storage (daily maximum) is estimated at 450 tonnes of RDF and estimated 100 tonnes of digestate.

2. Reason for the Application

2.1 Background to the Application

The Biffa MBT Facility services the West Sussex County Council Materials Resource Management Contract (MRMC) which facilitates the treatment of waste collected by the Waste Disposal authority to divert up to 300,000 tpa of municipal solid waste (MSW) from landfill. The installation comprises two main elements:

- Mechanical treatment and separation to achieve recovery of ferrous and non-ferrous metals, recovery of high calorific materials to produce refuse derived fuel (RDF) and to remove heavy/unacceptable materials for disposal at landfill; and
- Biological treatment through anaerobic digestion whereby the fine fraction from mechanical separation and organic fractions of the incoming wastes are subject to microbial degradation to produce an organic rich compost like output (CLO) and to produce biogas which can be combusted in the site CHP engines to generate energy. Extracted process water is sent to an onsite sequential batch reactor (SBR) to facilitate recycling through the process.

The solid recovered outputs from the treatment process are exported from site for landfill disposal (unacceptable fraction), for recovery (metals, for combustion to generate energy (RDF) and for land spreading (CLO).

Dependant on export routes, there is a need to transfer a proportion of RDF and CLO outputs to the adjacent permitted Britanniacrest waste facility for temporary storage prior to onward transfer, however, this transfer capacity will be removed as the Britanniacrest site is to be developed as a new Energy from Waste facility. As such Biffa plan to extend the existing MBT Facility to include an area of land known as Site Ha to be used as a waste storage and transfer area for loose or baled RDF and CLO material.

2.2 Description of the Proposed Changes

There are no changes proposed to the existing MBT processing operations.

The new Site Ha area will be operated as a trailer park whereby up to 36 empty transport trailers may be delivered to site empty and subsequently filled with RDF. It is intended that alternate bays will be used for the full and empty trailers so the drivers can drop off and collect in the same trip. The RDF will be stored for a maximum 72 hours prior to export from site to EfW's in the UK or abroad.

It is also proposed to allocate a controlled area for the storage of containerised covered CLO which will be taken to land spreading within the vicinity of the site during the week. Over weekends there will, however, be a need to temporarily store the CLO at the site.

No waste treatment or processing will take place as part of this activity and total waste storage (daily maximum) is estimated at 450 tonnes of RDF and estimated 100 tonnes of digestate.

2.3 Permit Conditions to be Modified

Site operations are currently regulated through an existing environmental permit (EPR/HP3238GW), and it is anticipated that the following permit conditions will need to be modified.

Table 1. Permit EPR/AB3700LS – Conditions Requiring Modification

Condition No	Subject	Anticipated Change
Status Log	Status	<ul style="list-style-type: none"> • Updated to reflect this variation.
Signature Box	Issue date	<ul style="list-style-type: none"> • Issue date to be updated for new variation.
Modify Schedule 1	Table S1.1 Activities	Modify Table S1.1, Activity A7 to reflect the addition of the storage and transfer area.

Condition No	Subject	Anticipated Change
	Table S1.2 Operating Techniques	The contents of this table should be modified to reflect the updating/addition of relevant documents as follows: <ul style="list-style-type: none">Site Management Plan July 2012 to be completely superseded by Site Management Plan dated May 2022 (ref:60586541-ACM-00-XX-RP-EN-MMP-R03) submitted with this application.
Schedule 7	Site Plan	<ul style="list-style-type: none">Update with new site plan showing the extended installation boundary.

3. Application Summary

3.1 The Operator

With a history of leading the UK's waste management industry for over 100 years, today Biffa is an established enabler of the UK circular economy. It describes itself as the UK's leading sustainable management business, employing over 10,000 employees across more than 200 sites. The Group operates across the waste management value chain to support the UK circular economy including collection, recycling, treatment, processing and disposal of waste including the production and sale of recovered commodities such as energy, compost, paper, glass, metals and plastic.

Biffa was listed on the London Stock Exchange in October 2016 and entered the FTSE-250 in March 2020. In FY21, the Group's Statutory Revenue exceeded £1B. It is headquartered in High Wycombe, Buckinghamshire.

Biffa's national customer base includes local authorities, large corporate entities, SMEs and purchasers of end-product commodities and energy, it carries out daily operations including collection, surplus redistribution, recycling, treatment, disposal and energy generation. Its strategic approach is based around circular economy and the waste hierarchy with a focus on "Reduce, Recycle and Recover" underpinned by collection. It is therefore structured in two operating divisions:

- Collections (this includes the Industrial & Commercial Division and Municipal Division)
- Resources & Energy

Biffa operates 76 waste processing facilities across the UK. Biffa's infrastructure can process a wide variety of waste types including paper, plastic, metal, wood, glass, food, soil, aggregates, textiles, Waste WEEE and hazardous waste. Our priority is to reuse and recycle materials wherever possible, followed by recovery and finally landfill. Our current portfolio in excess of 100 depots and 76 waste processing facilities including but not limited to:

- The flagship MBT Facility at Brookhurstwood Landfill in West Sussex;
- Food recycling is achieved via food waste transfer at St Helens, Dewsbury, Cardiff and Edmonton followed by Anaerobic Digestion (AD) at Brookhurstwood, Poplars and Wanlip;
- Plastic recycling is facilitated by mixed bottle sorting processes at Wigan, Aldridge and Grangemouth with state-of-the-art plastic recycling taking place at Redcar and Seaham;
- Materials Recycling Facilities at Aldridge, Edmonton and specialist polishing facility at Derby;
- Green waste recovery through in-vessel composting at Etwall and Ufton or via windrow composting at Kilsby, Skelton Grange, Walpole, Dimmer, Priorswood and Meece;
- Aggregate Treatment and Recycling Plants at Brookhurstwood Landfill in West Sussex and Meece Landfill in Staffordshire, both of which use as material washing process;
- Five Soil Treatment Facilities (STF) using biological treatment at Redhill Landfill Site in Surrey, Westmill, Meece, Skelton Grange and Trecatti; and
- Asbestos picking station at Redhill Landfill Site in Surrey.

In addition to the above, Biffa is one of the UK's largest producers of Refuse Derived Fuel (RDF), delivering more than 2,000 tonnes of RDF to energy recovery facilities every day. Transported by sea from multiple ports and in vehicles, the RDF is delivered to facilities throughout the UK, and to selected partners from the Netherlands, Germany, and Sweden

3.2 Existing Site Operations

The permitted facility is designed to divert over 75% of the incoming material into a resource and has the capacity to process over 310,000 tonnes per annum. The main areas of the existing operations comprise:

- Waste reception hall which has the capacity to hold up to two days' waste deliveries in 8 metre deep bunkers and is built as a fire-resistant compartment. Entrance and exit to/from the hall is via automatic rapid open-close doors with air curtains to minimize the potential for the release of odours. Internal travelling cranes will select and feed waste from the bunkers to the process shredder, via conveyors.
- Process hall which is directly linked to the waste reception hall via conveyors, with the penetrations through the walls protected by sprinkler systems. The building is maintained at slightly negative pressure to minimize the potential for odorous fugitive emissions. Treatment technologies include shredding, screening, ballistic separation, magnetic separation and eddy current separation to achieve the following:
 - a. Size reduction by shredding;
 - b. Separation of ferrous and non-ferrous metals for recycling;
 - c. Separation of high CV material into RDF for energy recovery;
 - d. Removal of heavy and/or unacceptable materials for disposal to landfill;
 - e. Production of the fine fraction to be used in the AD process.

Several separated waste streams are therefore generated which facilitate recycling, recovery or disposal according to characteristics.

- A biological treatment process which is based on two-stage mesophilic wet anaerobic digestion (operating at ~37°C) comprising the following process stages:
 - a. Homogenization by mixing the pre-treated waste (fine) fraction with process water to generate a pumpable slurry with a solids content of <10%;
 - b. Sand separation processing will remove inerts, comprising sand, glass, plastics and ceramics, in order to maximise the organic, thereby preventing silting of the process vessels in subsequent treatment stages;
 - c. Any anaerobic material is subjected to aerobic hydrolysis in a closed system with controlled and optimised process conditions to prevent the generation of odorous hydrogen sulphide;
 - d. Anaerobic digestion (AD) then uses microbial degradation of organic waste substances to produce compost (digestate) and biogas;
 - e. Three combined heat and power (CHP) engines combust the biogas generated by the AD process to generate up to 4.5MW electrical energy and thermal energy. Electricity is used to power the MBT and export to the national grid;
 - f. The compost digestate is dewatered via a mechanical process followed by thermal drying of a proportion of the digestate using the heat recovered from the CHP engines;
 - g. Extracted process water is directed to a membrane bio-reactor (MBR) for treatment and recycle to the process, where it is reused for homogenization and slurring of the organic waste fraction pre-digestion.

No changes are proposed to the existing MBT process operations – the variation will aim to add new additional, storage capacity for MBT outputs as outlined in section 3.3 below.

3.3 Proposed Storage and Transfer Area

The proposed new area (see drawing WZD230500 in Application Part 11) is designed to store RDF, either loose or baled ready for future onward transport off-site for recovery in the UK or abroad, as described below:

- The site design is to manage up to 36 haulage vehicles with curtain sider or enclosed containers (e.g RoRo or shipping containers) which will be used for the onward transport of either baled or loose RDF for further processing. The trucks will be delivered to site empty, and a full trailer will be collected.
- Alternate bays will be used for the full and then empty trailers and the drivers will be informed by the weighbridge at the MBT to drop the empty trailer in bay 1 and collect the full trailer from bay 2. This way the MBT Operations and Logistics team will be able to control the trailers ensuring that there is a good rotation of the trailers.
- All trailers will either be sealed curtain-siders or enclosed containers. All loading of containers for loose RDF will take place in the MBT building while baled and plastic wrapped RDF will be loaded in or adjacent to the MBT building.
- The RDF will be stored for a maximum 72 hours (i.e. from a Saturday pm to Tuesday am following a bank holiday).
- Surface run-off from the area where the trailers will be parked will be controlled and flow directed into the new site lagoon. Flow from the new lagoon will be tested prior to release to ensure the quality is appropriate for release to the wider site surface water system and discharge via the existing discharge consent. If that is not the case, then the run-off water will be transferred by tanker or similar to the MBT for processing in the MBR tank for reuse in the process.
- It is also proposed to allocate a controlled area at the site for the storage of containerised covered CLO. This material is a by-product of the MBT food waste process and is removed for land spreading within the vicinity of the site during the week, Over the weekends CLO will need to be stored ahead of transport from the site. The rainwater run-off from this area will be contained and processed at the MBT. The CLO area is shown as the magenta coloured area on drawing WZD230500 (Application Part 11).
- Total waste storage (daily max) is estimated at 450 tonnes of RDF and estimated 100 tonnes of digestate.
- The area will not be utilised for any waste processing activities.

3.4 Need for the Facility

RDF is produced as an output of the MBT process. This is currently stored loose in the MBT building before being moved either loose or baled to a nearby permitted storage area adjacent to the Britaniacrest Recycling building located to the southwest of the MBT. This area is due to be re-developed into an Energy from Waste (EfW) Plant and therefore will not have the capacity for storage of such material in the near future while the new EfW is being constructed.

Biffa Waste Services have therefore selected area HA for a new storage area to incorporate efficient vehicle movements and additional storage for digestate if required in abnormal situations. The development will future-proof operations and aid more efficient recovery of waste to recovery.

3.5 Acceptance of Waste

No changes are proposed to the list of wastes specified in Table S2.1 of the environmental permit (EPR/HP3238GW) for the existing MBT facility. The list of waste is presented in the Management and Technical Plan (refer to Application Part 3, 60586541-ACM-00-XX-RP-MBT-MTP-R03).

The MBT will receive waste for processing during the operating periods as identified in Table 2 below.

Table 2. Normal Waste Acceptance Hours

Day of the week	Opening Hours
Monday to Friday:	07:00 to 16:30
Saturday:	07:00 to 12:00
Sunday:	Closed for deliveries
Saturday following public holiday:	07:00 to 15:00
Public Holidays*:	07:00 to 15:00

* Extension of Opening hours on bank holiday from 10:00 to 15:00 is currently subject to a planning application.

It is recognised, however, that in emergency situations, waste may need to be accepted outside the above time periods (e.g. in response to a request from WSCC or EA under Civil Contingencies Act 2004 obligations or similar). Waste accepted during these periods will be received and managed in line with standard plant waste acceptance and operating procedures.

3.6 The Site

3.6.1 Overall Site Location

The MBT facility is located approximately 1km to the north of Horsham and 1.5km north east of Warnham, with the village of Kingsfold around 2km to the north west. It occupies an area of 5.6 hectares at NGR TQ 1720 3480. The main A24 and A264 roads run approximately 800 metres from the western and southern site boundaries respectively (nearest approach) and the Horsham – Dorking railway line runs about 200 metres from the western site boundary.

The centre of the extended MBT area is located at grid reference National Grid Reference (NGR) E517105, N134659 at Brookhurst Wood, Langhurstwood, Horsham, West Sussex.

The setting is regarded as predominantly rural. In the immediate neighbourhood, there are a scattering of farmhouses and other isolated dwellings to the west of the site.

- To the east there is a former residential property, known as 'Graylands' which has been converted for office use.
- To the north there is the Broadlands Business Park, which accommodates 11,000 square metres of office development.
- To the south are older buildings from the original Warnham Brickworks and the Warnham railway station. The main Dorking to Horsham railway line runs along the western border of the landfill site and the vehicular entrance to the landfill is by the Langhurstwood Road to the east.

3.6.2 Location of New Waste Storage and Transfer Area

The proposed extension to the MBT facility is a discrete area located to the west of the existing MBT installation boundary as shown on drawing WZD230400 (refer to Application Part 11). This is an existing area with impermeable hardstanding housing a temporary structure and storage containers which will be removed to facilitate the addition of the new site.

The new area will be developed to include:

- New tanker loading area developed on a new impermeable concrete base design to manage up to 36 Vehicles with enclosed containers or curtain sider trailer which will be used for the onward transport of either baled or loose RDF for further processing or use of the material offsite.
- Surface run-off from the area where the trailers will be parked will be controlled and flow directed into the new site lagoon. Flow from the new lagoon will be tested prior to release to ensure the quality is appropriate for release to the wider site surface water system and discharge via the existing discharge consent. If that

is not the case, then the run-off water will be transferred by tanker or similar to the MBT for processing in the MBR tank for reuse in the process.

- New controlled CLO storage area located to the east of the trailer park for the storage of containerised CLO. This will be constructed on a new impermeable concrete base with dedicated drainage system to contain rainwater run-off from this area. Collected rainwater will be contained and processed at the MBT.

3.6.3 Site History

The area has an extensive planning history, with mineral uses, including clay extraction and processing, and brick manufacture, dating back more than 100 years.

Specific details of the historical land use are provided in the updated Site Condition and Baseline Report (60586541-ACM-00-XX-RP-MBT-SCR-R03 Application Part 9).

3.7 Management and Operational Control

The existing MBT is operated by Biffa Waste Services Ltd and an environmental management system (EMS) has been implemented at the site. Biffa Waste Services Ltd. was originally certified in April 2004 as meeting the criteria defined in BS EN ISO14001 for its environmental management system (EMS). The current site ISO14001: 2015 certificate (issued 30/04/2021) is attached in the Site Management Plan, Appendix C (60586541-ACM-00-XX-RP-MBT-MMP-R03, Application Part 3).

The system defines operational and maintenance procedures, coupled with requirements to be met in the event of an accident or incident. The site management techniques including training and development which are used are detailed in the updated Site Management Plan (60586541-ACM-00-XX-RP-MBT-MMP-R03 Application Part 3).

3.8 Emissions Management

3.8.1 Existing Point Source Releases to Air

No changes are proposed to point source releases to air which are associated with the MBT processing plant. Point-source releases to air will be controlled by the techniques detailed in Table 3 below.

Table 3. Point Source Releases To Air

<i>Emission</i>	<i>Plant Source</i>	<i>Emissions</i>
Oxides of nitrogen	<ul style="list-style-type: none"> • CHP engines 	<ul style="list-style-type: none"> • Effective combustion and airflow control. • Use of electronic engine management system that provides continuous computer controlled adjustments of parameters such as engine timing, air flow and cooling water temperatures to achieve 'lean burn'.
	<ul style="list-style-type: none"> • Flare • Back-up boiler • Emergency Generator 	<ul style="list-style-type: none"> • Effective combustion and airflow control.
Sulphur dioxide	<ul style="list-style-type: none"> • CHP engines 	<ul style="list-style-type: none"> • As this is a factor of incoming gas composition and control will be effected by optimising biogas quality and reducing hydrogen sulphide present by addition of iron chloride during AD process.
	<ul style="list-style-type: none"> • Back-up boiler • Emergency Generator 	<ul style="list-style-type: none"> • Controlled via effective combustion control and through the use of low sulphur fuels.
Carbon monoxide and VOCs	<ul style="list-style-type: none"> • CHP engines • Flare • Back-up boiler 	<ul style="list-style-type: none"> • Controlled through the optimisation of the combustion process and air flows.

<i>Emission</i>	<i>Plant Source</i>	<i>Emissions</i>
	<ul style="list-style-type: none"> Emergency generator 	
Particulate matter	<ul style="list-style-type: none"> Mechanical treatment 	<ul style="list-style-type: none"> Dust filter.

3.8.2 Existing Point Source Releases to Water

No changes are proposed to point source releases to water which are associated with the MBT processing plant discharges to sewer and releases of surface water to the site lagoon. Point-source releases to water will be controlled by the techniques detailed in Table 4 below.

Table 4. Point Source Releases to Water

<i>Emission</i>	<i>Plant Source</i>	<i>Emissions Control</i>
<i>Discharge to Sewer</i>		
Nitrogen (ammoniacal as N)	Biological treatment processes /surface water run off	MBR water treatment process to facilitate recycling of water back through the process – discharge to sewer takes place when recycling of water can't be achieved.
Suspended Solids		
COD		
Total Sulphate		
<i>Discharge to Surface Water</i>		
Trace metals	Surface run off	Oil interceptors on drainage channels. Contaminated material can be directed to the MBR treatment via pump/tanker if necessary.
Phenol		
Oil and grease		

Site operational emissions management techniques are summarised in the management plans in Appendix A of the Impact Assessment (60586541-ACM-00-XX-RP-MBT-IAR-R03 Application Part 8). Specific management plans for odour, dust and noise are detailed below.

3.9 Odour Management

An updated Odour Management Plan (OMP) has been prepared to detail the operational control, maintenance and monitoring requirements that will be implemented for odour control at the site. The updated OMP (reference 60586541-ACM-00-XX-RP-MBT-OMP-R03) covers the existing MBT as well as the proposed extension to the MBT facility and is provided in Application Part 4.

The proposed extension to the MBT facility is not anticipated to generate significant odour levels at the site due to the nature of the waste being accepted and the controls proposed.

3.10 Dust Management

As the new process has the potential to generate dust as fugitive releases, in line with EA Guidance a Dust Management Plan (DMP) has been prepared to detail the operational control, maintenance and monitoring requirements that will be implemented for dust and fugitive release control at the site. The DMP (reference 60586541-ACM-00-XX-RP-MBT-DMP-R03) covers the existing MBT as well as the proposed extension to the MBT facility and is provided in Application Part 5.

3.11 Noise Management

As the new transfer and storage area includes a range of vehicle movements in an external environment a Noise and Vibration Management Plan (NVMP) has been prepared in accordance with EA "Noise and Vibration Management: Environmental Permits" guidance. The NVMP details the operational control, maintenance and monitoring requirements that will be implemented for control of noise and vibration at the site. The NVMP (reference 60586541-ACM-00-XX-RP-MBT-NVMP-R03) covers the existing MBT as well as the proposed extension to the MBT facility and is provided in Application Part 6.

The proposed additional waste transfer and storage area is not anticipated to generate significant noise levels as demonstrated through a noise assessment which was completed in accordance with BS 4142: 2014. This is attached as Appendix B to the Impact Assessment Report (60586541-ACM-00-XX-RP-MBT-IAR-R03 Application Part 8).

3.12 Impact Assessment

An assessment of the environmental impact associated with the site activities was completed and is presented in Application Part 8.

The assessment shows that:

- There were no anticipated significant environmental impact issues associated with site activities; and
- There were no anticipated human health impacts associated with the site activities.

3.13 Fire Prevention Plan

In accordance with the pre-application advice, a fire prevention plan (FPP) has been prepared making reference to the latest EA FPP Guidance. This covers the full MBT facility including the new waste storage and transfer area. The FPP (60586541-ACM-00-XX-RP-MBT-FPP-R02) is presented in Application Part 7.

3.14 Assessment of Best Available Techniques

The proposed additional processes have been assessed as meeting the relevant requirements of the Environment Agency guidance in:

- EA Guidance “Non-hazardous and inert waste: appropriate measures for permitted facilities” (July 2021); and
- EU “BREF Note for Waste Treatment” and the associated “BAT Conclusions” document.

The BAT assessment (60586541-ACM-00-XX-RP-MBT-BAT-R03) is presented in section 10 of the Application.

4. Application Type

This application is for a variation to the existing Environmental Permit (EPR/HP3238GW) to include an additional area of land in proximity to the current Mechanical and Biological Treatment (MBT) Facility for the loading, storage and dispatch of MBT outputs. The application is made under the Environmental Permitting (England and Wales) Regulations 2016, as amended and has been prepared as a bespoke variation application.

The Operator has completed an enhanced pre-application consultation process with the Environment Agency which has confirmed the application is classed as a normal variation. The pre-application feedback has also informed the final format and content of this application. A copy of the pre-application advice is attached at Appendix B for information.

Appendix A Proposed Changes to Permit Schedule 1, Table S1.1

Activity Reference	WFD Annex I and II Operations (Where applicable)	Activity Listed in Schedule 1 of the EP Regulations	Description of Specified Activity	Limits of Specified Activity
DIRECTLY ASSOCIATED ACTIVITIES				
A7	Storage and handling of separated waste streams	Not applicable	Post-treatment storage of separated non-hazardous outputs.	From receipt of separated materials to dispatch from site for recovery, recycling or disposal to include the transfer and storage area for RDF and CLO

Appendix B EA Pre-application Advice

Angela Graham
Biffa Waste Services Limited
Coronation Road
Cressex, High Wycombe
Bucks
HP12 3TZ

Our reference: EPR/HP3238GW/V005
Date: 16/05/2022

Dear Angela Graham,

Pre application advice – Enhanced service

Site: Brookhurst Wood MBT Facility, Langhurstwood Road, West Sussex, RH12 4QD

Thank you for your pre application enquiry on 15/03/22.

I am pleased to provide you with your enhanced level of pre-application advice. This advice is based on the information provided on your pre application advice form, associated background information and email recorded on the following date:

- 22/04/2022 to D.Griffiths

Below details our response to your questions submitted on your pre-application advice form.

Background

Biffa Waste Services Limited operate a Mechanical Biological Treatment Facility at Langhurstwood Road, West Sussex, RH12 4QD. The pre-application was submitted to answer questions raised around the application process for a new trailer park area where up to 36 transport trailers used for storing RDF and CLO will be parked/stored prior to export from site.

Questions

The Operator would like to confirm:

1. The appropriate mechanism to permit the new RDF storage and transfer area.

Response

The advised mechanism would be to apply for a variation to the existing permit. The storage and transfer area would be considered a Directly Associated Activity.

The alternative to this is it may be considered a waste operation if waste from sources outside of the MTB are being received into the storage area. Waste tonnages would then determine if it would be considered a Scheduled activity or waste operation.

A new site boundary drawing will be required.

2. In the event that a variation is recommended can you confirm if this is considered a normal variation and whether this would trigger the early MCP permit application for the MCP regulated under the IED permit.

Response

The application would be considered a normal variation.

The MCP permit conditions could be dealt with at this stage if the operator wishes but only in conjunction with a permit variation. This can be done with compliance dates set in the future to line up with legislation depending upon the size of the MCP. Alternatively, this can be left until the appropriate permitting and compliance dates when a separate permit variation may be required.

We are currently finalising our approach to permitting existing MCP's at IED sites.

3. In the event that a new permit is recommended, can you confirm if a standard rules approach is appropriate;

Response

As the above can be permitted with a variation to the existing permit a Standard Rules would not be appropriate.

4. The proposed list of activities under Schedule 1, EPR 2016, as amended and directly associated activities as required which would apply to the new waste transfer and storage area and any additional changes to existing Schedule 1 activities if a variation to the existing permit is to be pursued;

Response

Provided that waste from sources outside of the MBT is not being brought into to the storage area, A7 included within the current permit and pictured below would need to be amended.

A7	Directly associated activity	Storage and handling of separated waste streams	From receipt of separated waste materials to dispatch from site for recovery, recycling or disposal.
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5. Requirements in relation to provision of a Fire Prevention Plan (FPP) for the new transfer and storage area and any specific requirements to be addressed dependant on the permit application route recommended;

Response

An amended FPP would need to be submitted alongside the application detailing the associated risks from the new area of the facility, of storing combustible waste and the methods put in place to control these risks. As the new storage area would be considered part of the existing Installation amending the existing FPP would be considered appropriate.

Further to this we would expect to see amended operating techniques, site boundary plan, risk assessment and BAT assessment for the storage area as if it is considered a DAA it will need to comply with BAT.

6. Approach to surface water drainage is acceptable in principal including discharge into the surface water management network or recirculation of water run-off to the MBT for treatment – we anticipate that this won't require any H1 assessment but please confirm;

Response

Any runoff from areas where waste is stored will need to be risk assessed appropriately. This is especially important if any rainfall is directly impacting upon stored wastes. Your application will need to illustrate both drainage and controls in place to prevent pollution.

7. Application fee charges which will apply;

Response

5.4 (a) (i) – 1.16.2.2 - Non-hazardous waste installation – physico-chemical treatment for disposal.

Normal variation - £6722

Fire Prevention Plan Assessment - £1241

8. The BAT standards and other relevant guidance which should be referred to:

Response

Waste Treatment BAT - [EUR-Lex - 32018D1147 - EN - EUR-Lex \(europa.eu\)](#)

9. Any information the Agency will expect to be submitted with the application:

Response

The environment Agency would expect to see any or all of the below documents associated with the application if they are affected by the variation:

- **Fire Prevention Plan**
- **Odour management plan**

customer service line 03706 506 506 floodline 03459 88 11 88 incident hotline 0800 80 70 60

- Environmental risk assessment
- Site plan
- Drainage plan
- Non-technical summary
- BAT assessment
- Environment Management System Summary

What enhanced pre application covers

Further information on the enhanced pre-application service is detailed on section 2 of the [Environmental permitting charges guidance on GOV.UK](#).

As part of this service we have provided you with the following information:

Application reference number	EPR/HP3238GW/V005
Habitats screening	Attached
Application charge required	1.16.2.2 - Non-hazardous waste installation – physico-chemical treatment for disposal. Normal variation - £6722 Additional Charges (if applicable) 1.19.3 Fire prevention plan £1241
Forms required to be submitted	A, C2, C3, F1 Change, transfer or cancel your environmental permit - GOV.UK (www.gov.uk)
Additional documents required	Non-technical Summary Fire prevention plan Fire prevention plans: environmental permits - GOV.UK (www.gov.uk) Odour management plan (if required) BAT Assessment Best available techniques: environmental permits - GOV.UK (www.gov.uk) Environment Management System Summary Environmental Risk Assessment

Application reference number	EPR/HP3238GW/V005
	Risk assessments for your environmental permit - GOV.UK (www.gov.uk) Site plans <ul style="list-style-type: none"> • Permitted boundary • Emissions points • Site layout • Site drainage plans

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

A complete application must contain the following information below:

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary
Payment	Please note your application will not be processed until we receive the full payment.

What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: [EPR/HP3238GW/V005](http://www.gov.uk)

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to: psc@environment-agency.gov.uk

Please email applications where possible. If email is not possible you can submit by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

Current application timescales

Our current queues are large and we are taking longer than usual to allocate work for initial assessment, known as duly making. The table below shows our estimated queue

times by application type. Please note, this is based on our average times and some applications may be picked up before or after the timescales listed below.

Application type	Estimated time to allocation
New bespoke	24-28 weeks
New standard rules	21-25 weeks
Admin variation	15-19 weeks
Minor variation	21-25 weeks
Normal variation	25-27 weeks
Substantial variation	41-45 weeks
Transfer	25-29 weeks
Surrender	21-25 weeks

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site-specific requirements and the advice given is to address the specific pre-application request.

This advice covers installations only.

Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

Enhanced pre application cost estimate

At this stage the pre-application advice is expected to cost up to £400 plus VAT. An invoice will be sent separately at a later date.

If after receiving this letter you still require a meeting this would cost a further £200 plus VAT as agreed in the quotation. If any further written response is required, we would have to agree an additional fee.

If you have any questions regarding this letter, please contact Matthew Allen:

matthew.allen1@environment-agency.gov.uk

If you require additional enhanced pre-application advice, please complete our [online form](#).

We look forward to working with you on this project.

If you have any questions or you would like to arrange a meeting, please call myself on 02084746059.

Yours sincerely,

Matthew Allen

Senior Permitting Officer

matthew.allen1@environment-agency.gov.uk

