



# ENVIRONMENTAL PERMIT VARIATION APPLICATION

**for the Physical Treatment of Wastes at**

**Great Central Way, Wembley, London, NW10 0UZ**

**Report Prepared on behalf of:**  
Sewells Reservoir Construction Limited



**Report Date:**  
November 2024

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## 1. INTRODUCTION

### Background

- 1.1. PDE Consulting Limited (the 'Agent') has been commissioned by Sewells Reservoir Construction Limited (the 'Operator') to prepare and submit to the Environment Agency (EA) an application to vary an environmental permit for a waste facility located at Great Central Way, Wembley, London, NW10 0UZ (the "Site").
- 1.2. Standard rules environmental permit No. EPR/LB3101LL was issued to the Operator on 20 June 2022. It authorises standard rules set SR2009 No 5: inert and excavation waste transfer station below 250,000 tonnes per annum. Under the standard rules permit, wastes can be bulked up for disposal or recovery elsewhere and can be manually sorted or separated for recovery, but the rules do not allow any waste treatment activities such as screening and crushing.
- 1.3. It is proposed to vary the standard rules permit to a bespoke permit. The bespoke application will allow the following additional activities:
  - The treatment (including crushing and screening) of wastes;
  - An increase in waste throughputs to 500,000 tonnes per annum; and
  - Add three additional waste types only.
- 1.4. Wastes will be treated to produce soils, soil substitutes and aggregate only.
- 1.5. The permit boundary which is shown on Drawing No. 0100 v3 will remain unchanged.
- 1.6. A non-technical summary of the permit application is provided in Appendix 1.

### Pre-application Advice

- 1.7. PDE requested pre-application advice from the EA on 26 July 2024 and a response was received on 05 August 2024. Whilst we requested bespoke advice, the EA deemed that the request would fall under basic pre-application advice. They provided basic advice and relevant templates for management plans.
- 1.8. The EA provided a list of information that may be required to support the application including:
  - A Non-Technical Summary;
  - A Site Plan – if you propose to increase your site boundary;
  - A summary of the Environmental Management System (EMS);
  - An Environmental Risk Assessment;
  - A technical description;
  - A list of waste codes;
  - Amenity Management Plans;

- A Noise Impact Assessment;
- A Fire Prevention Plan – not required as the proposals do not include the acceptance of combustible wastes;
- Technical competence; and
- A Site Condition Report – for variations to increase the area of the facility.

1.9. They subsequently advised that, in accordance with The Environment Agency (Environmental Permitting and Abstraction Licensing) (England) Charging Scheme 2022 V1.3, the charging scheme reference for the application would be 1.16.12 and that the application would be considered as a substantial variation.

### EPR Application Forms

1.10. This report has been completed in accordance with the Environmental Permitting (England and Wales) Regulations 2016 (EPR) and should be read alongside the completed application forms. The following completed application forms for the permit variation are presented in Appendix 3:

- Form EPA – About you;
- Form EPC2 – General – varying a bespoke permit;
- Form EPC4 – Varying a bespoke waste operation permit; and
- Form EPF1 – Charges and declarations.

### EA Charging Scheme

1.11. The application fee of **£9,624** has been provided alongside this application for:

- Physical treatment of non-hazardous waste – substantial variation (charge reference 1.16.12) – **£7,137**;
- Cost to review Dust Emissions Management Plan (charge reference 1.19.5) – **£1,241**; and
- Cost to review Noise Management Plan (charge reference 1.19.7) – **£1,246**.

### Planning Permission

1.12. A planning application was submitted in July 2024 by HGH Consulting to Brent Council for the:

*“Demolition of select buildings and structures; erection of buildings and yard storage areas for an aggregates depot including associated infrastructure, access and landscaping; and continued use of the railhead to transport aggregates”.*

1.13. The planning application boundary includes the waste operation and the adjacent aggregates depot. The planning application includes for the erection of a dedicated covered area to house the proposed waste treatment activities. Reference has been made in this application to the planning application documents where appropriate.

## 2. SITE DETAILS

### Site Location and Setting

- 2.1. The Site is located in Wembley which is a large suburb in the London Borough of Brent situated approximately 300 m east of Brent, approximately 800 m south of Neasden and approximately 1.8 km east of Wembley Stadium. It is centred at National Grid Reference (NGR) TQ 213 852 as shown on Drawing No. 0100 v3. It covers an area of approximately 0.8 hectares. The Site is located within an industrial area and is categorised within Brent as Land of Strategic Industrial Importance. The Site is accessed off Great Central Way.
- 2.2. The Site is presently used as a transfer station for inert and excavation wastes. The Site previously housed a concrete batching plant which was removed 2 to 3 years ago. Immediately to the south of the Site is a rail fed aggregates depot which is also run by the Operator.
- 2.3. A rail siding runs along the south eastern / eastern boundary of the recycling site and the aggregates depot. Aggregate trains arriving from the main line pass the depot and are reversed into the siding where they are offloaded in an offloading building, discharging into a hopper beneath the rails, with the materials conveyed to the main storage building (Building 1, the Toast Rack) and stocked in bays.
- 2.4. The train movements are permitted on a 24 hour basis and presently arrive at approximately 05:30 in the morning and are offloaded over a 4.5 hour window. During the offloading period, the train is slowly moved through the offloading building, unloading one wagon at a time. At present, the depot has a maximum of ten trains per week. The stocked materials within the bays are then loaded onto HGVs throughout the day, using a loading shovel, and transported to projects around London.
- 2.5. In terms of the surroundings, the Site is surrounded by a heavily urbanised area with numerous industrial buildings, roads, rail tracks and developed land on all sides of the Site. Towards the east of the Site is the mainline railway, followed by industrial uses including Glynn's Skip Hire, Hardcrete, EMR Neasden and NSX Autos. To the northeast is Neasden Underground Station. A traveller site is located to the south at Lynton Close, followed by further residential uses along Yeats Close, and Bridge Road allotment. Towards the southwest is Selco Builders Warehouse, Dog Lane allotment and further industrial estate uses. To the west of the Site are industrial estate uses, which are understood to also include residential dwellings at 18 Iron Bridge Close located approximately 20 m to the east of the Site. To the north of the Site is BCC van hire.
- 2.6. There are a number of other industrial uses in the surrounding area such as Neasden London Underground Train Depot.

### Environmental Site Setting

- 2.7. An Emapsite Groundsure report was purchased on 01 August 2024 which includes Geo Insight, Enviro Insight and historic land use maps to assist with the writing of this report.

### Geology

- 2.8. There are no superficial deposits underlying the Site. The bedrock geology comprises London Clay. The London Clay is a sedimentary rock comprised of clay, silt, sand and gravel formed approximately 34 to 56 million years ago in the Palaeogene Period.

### Hydrogeology

- 2.9. The London Clay is classed by the EA as unproductive strata. These are rock layers or drift deposits with low permeability that have negligible significance for water supply or river base flow.
- 2.10. The Site is not located within a groundwater Source Protection Zone (SPZ) designated by the EA.
- 2.11. There is one licensed groundwater abstraction within 1 km of the Site. Licence No: TH/039/0038/027 issued to Capital Concrete Ltd allows the abstraction of groundwater from a borehole at Drury Way for process water some 490 m to the northwest of the Site.

### Hydrology

- 2.12. There are no surface water bodies on or adjacent to the Site.
- 2.13. The River Brent is located approximately 1 km to the west of the Site at its closest point. It is understood that the River Brent eventually joins the River Thames approximately 7 km to the south of the Site.
- 2.14. The River Brent reservoir is located approximately 1.5 km to the north of the Site on the opposite side of railway tracks and the North Circular Road.
- 2.15. The Site is located in Flood Zone 1 (lowest risk). Land within flood zone 1 has a low probability of flooding from rivers and the sea.
- 2.16. There are no licenced surface water abstractions within 1 km of the Site.

### **Air Quality**

- 2.17. According to the Defra website<sup>1</sup> the Site is located in the Brent Air Quality Management Area (AQMA).
- 2.18. The Brent AQMA, which was declared in December 2006, covers the entire area south of the North Circular Road and all housing, schools and hospitals along the North Circular Road, Harrow Road, Bridgewater Road, Ealing Road, Watford Road, Kenton Road, Kingsbury Road, Edgware Road, Blackbird Hill, Forty Lane, Forty Avenue and East Lane.
- 2.19. The source of the existing air pollution is '*road transport unspecified*'. The pollutants declared are Particulate Matter PM<sub>10</sub> (24-Hour Mean) and Nitrogen Dioxide (NO<sub>2</sub>) (Annual Mean).

### **Habitats and Natural Heritage**

- 2.20. According to the planning application documents, there are no heritage assets on the Site or within close proximity. The Site is not located within a Conservation Area nor are there any in the immediate vicinity.

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<sup>1</sup> <http://uk-air.defra.gov.uk/aqma/>

### Non-statutory Designated Sites

- 2.21. In the Preliminary Ecological Assessment (PEA) (Three Shires Limited, May 2023) produced to support the planning application, ten non-statutory designated sites were identified within 2 km of the planning application boundary. These are Sites of Importance to Nature Conservation (SINC).
- 2.22. Dudding Hill Loop SINC is adjacent to the east side of the Site and has a Borough Importance Grade 1. It is described as a functioning wildlife corridor and has the potential to provide connectivity from the Site to surrounding habitats. The Site and the SINC are separated by a fence with a railway track separating the fence from the vegetation.
- 2.23. St Mary's Churchyard SINC, Willesden is situated approximately 330m south of the planning application boundary and is adjacent to the Dudding Hill Loop SINC. The churchyard is described as a large plot of semi-improved neutral grassland with a small plantation woodland and scattered trees throughout, with an abundance of herbaceous species. The woodland is thought to provide suitable roosting habitat for bats. Due to its location being bordered by Dudding Hill Loop there is high connectivity to the Site.
- 2.24. The remaining eight SINC's are not further explored in the PEA due to a lack of ecological and physical connectivity to the Site.
- 2.25. It is concluded in the PEA that:

*"Management procedures are advised by BC when working adjacent to SINC's and to reduce the potential impact of noise, shading and light according to London Policy G6. The development should be planned in such a way to minimise the impacts on the SINC from both light and noise to prevent any impacts on this wildlife corridor. Any proposed lighting should follow guidelines from the following Institute of Lighting Professional Guidance from the Bat Conservation Trust to ensure this commuting corridor is maintained. As a minimum, vegetation within this SINC should be left unilluminated during and post development. Any lighting should be chosen to minimise the impacts on species using the SINC despite resident species likely being acclimatised to the current illumination".*

### Statutory Designated Sites

- 2.26. Brent Reservoir Site of Special Scientific Interest (SSSI) is located approximately 1.5 km to the north of the Site. The interest feature of the SSSI is the breeding bird assemblage that is associated with the open water and its margins.
- 2.27. It is stated in the PEA that:
- "Although the nature of the proposals (industrial development) fall within those requiring Local Planning Authority (LPA) consultation with Natural England, as the Site lies within the Impact Risk Zone (IRZ) of the SSSI; it is considered that the proposals will likely have no negative effect due to a lack of viable pathways and potentially a very small beneficial effect due to improved material storage, handling and transport. There will be no direct loss or damage of habitat following the development and the Site is not hydrologically connected to the SSSI and it is considerably outside the radius where airborne pollution could be considered to have any effect".*
- 2.28. There are no other SSSI's within 2 km of the Site. There are no Ramsar sites or European sites within 2 km of the Site.

## Historic Development

- 2.29. The Site has been an operational railhead for over 50 years, originally known as Charrington Sidings which was established in the 1940s.
- 2.30. The Site has an extensive planning history over the last 20 years. According to the planning application, the planning history relates to the erection of buildings and shelter for the Site's operations and ancillary facilities. The Site is clearly a well-established industrial development.
- 2.31. A review of available historic maps from 1865 to 2024 is presented below. The historic maps are appended to the Site Condition Report (SCR) in Appendix 4.
- 2.32. In 1865 the Site is shown as a field with a field boundary running through the northern part of the Site. In 1914 there are railway sidings running along the western side of the Site and to the east of the Site. On the 1970 to 1973 map, the railway sidings running along the western side of the Site are no longer shown. The Site and adjacent aggregate yard is labelled as a coal depot. In the aggregate yard is a conveyor and coal hopper from the railway sidings to the east. In 2003 the existing Toast Rack building is shown in the aggregates depot to the south of the Site. There are conveyors shown in the southeastern part of the Site.
- 2.33. The Emapsite report also includes aerial imagery from 1999 to recent. In 1999 the Site is shown as being used as vehicle parking. In 2013 there is a stockpile of material in the northern part of the Site. In the southeastern part of the Site is a concrete batching plant. A number of mixer lorries can be seen on the Site. There is an asphalt plant in the adjacent aggregate yard close to the southern permit boundary. The 2016 photograph shows two bays in the northern part of the Site each containing a stockpile of different material. In 2021 the stockpiled material has gone and the Site looks generally unused. A number of buildings in the aggregate yard have been demolished including the asphalt plant. In the recent photograph the concrete batching plant has been dismantled and removed from the Site and the Site is largely vacant.



### 3. PROPOSED WASTE OPERATION

- 3.1. Waste will be delivered to Site in covered HGV's and stockpiled before being treated to produce soil, soil substitutes and aggregates only.
- 3.2. It is proposed that a dedicated covered area is constructed close to the northern boundary of the Site. The dedicated covered area is labelled as Building B5 on Drawing No. 0100 v3. The dedicated covered area will have solid façades, constructed using steel cladding along the northern and western sides and will be fully open on the eastern and southern sides which face into the Site, to allow safe access. Cross sections through the dedicated covered storage area are shown on Drawing No. 106 v3 as sections E5 and E6.
- 3.3. Wastes that are imported to the Site to be treated will be tipped into separate stockpiles in the dedicated covered area prior to treatment.
- 3.4. The crusher and screener used to process recycled materials will operate within the dedicated covered area. Two excavators would operate in this area to load the plants, and a loading shovel would work in this area and outside, managing the recycled materials, loading HGV's, and loading aggregate trains when required.
- 3.5. Processed materials will be stored outside adjacent to the covered area as shown on Drawing No. 0100 v3 prior to being exported from Site by road or potentially loaded back onto the trains. The processed waste storage area will have 7.5 m tall bay walls to the south and west.
- 3.6. Clay based waste will be imported to Site via HGV's and stored in Area Y2 on the eastern side of the Site shown on Drawing No. 1100 for loading onto trains. This activity is ongoing in accordance with the standard rules permit. These wastes will not be treated on Site.
- 3.7. It is proposed that the maximum annual throughputs of wastes are increased to 500,000 tonnes. The maximum amount of waste that will be stored on Site at any one time will be 25,000 tonnes.
- 3.8. No changes to the operational hours are proposed, with the existing operating hours of between 06:00 – 20:00 hours daily. Trains are permitted to arrive and offload at any point over a 24 hour period.
- 3.9. The entire Site is surfaced in concrete. The proposed drainage strategy has been designed to collect rainfall run-off from roofs on the permitted Site and the adjacent aggregate depot (including Building B5 shown on Drawing No. 0131 v1) via a series of rainwater pipes and store it in one existing and two new 30,000 litre tanks. A new water storage tank will be installed in the aggregate recycling area shown as B8 on Drawing No. 0100 v3.
- 3.10. Surface water run-off will be reused in the above ground dust suppression systems with an overflow discharging into a below ground drainage network, if required. Surface water runoff will be treated by a Hydro-International Downstream Defender Select Vortex, or similar. Excess surface water run-off from the Site will discharge into an existing Thames Water sewer (manhole: TW3203) at a discharge rate of 2.5 l/s, with attenuation provided in a concrete tank. The drainage strategy is shown on Drawing No. DR-C-2000 P02.

- 3.11. It is proposed that three dust canons are installed around the covered waste treatment and storage area as shown on Drawing No. 0100 v3. They have a reach of 30 m and can oscillate 359 degrees. The dust canons will provide full coverage of the waste storage and recycling activity as shown on Drawing No. 0100 v3.
- 3.12. In Area Y2 where clay based wastes are stored before being loaded on to trains, it is not possible to use dust cannons as Network Rail rules prohibit mist spray onto the railway line. Therefore a series of sprinklers with a 5 m radius spray will be installed along the whole length of the waste storage area. The locations of the sprinklers are shown on Drawing No. 1100 v3.
- 3.13. Further details on the proposed dust suppression measures are provided in the Dust Emissions Management Plan (DEMP) in Appendix 8.
- 3.14. The entire Site is fenced and has lockable gates to prevent unauthorised access. Behind the western fence that separates the Great Central Way pedestrian path and the Site runs a greened buffer zone. This zone provides a green buffer between the Site and the road consisting of earth banking and some partially developed trees.
- 3.15. Enhanced security and mitigation measures include the construction of a 7.5 m high boundary wall which will extend along the whole of the northern and western Site boundaries to ensure the Site is effectively screened from potentially sensitive properties.
- 3.16. It is also proposed to install a continuous gabion wall along the full length of the western Site boundary. The gabion wall, which will be positioned behind an enhanced green buffer zone, is to be filled with graded stones to provide a stratified elevation with differing bands of colour and stone size. The inclusion of the gabion wall also provides the opportunity to promote the intensification of habitat on the Site by treating it as a habitat / shelter feature wall. A wide range of wildlife will be supported through the inclusion of bee hotels, bumble bee boxes and hoverfly lagoons within the gabion frame.
- 3.17. In addition, a green wall trellis support system will be attached to the metal façade of Building B5. The fence line, greened boundary, gabion wall and green wall trellis behind Building B5 are shown on Drawing No. 106 v3.

### **Waste Acceptance Procedure**

- 3.18. All wastes will be imported to Site by road in HGV's either by the Operator's own vehicles or by third party waste contractors. The Operator's HGV's meet Euro 5 or 6 emission ratings. For all waste delivered by the Operator's vehicles, the source will be known as each customer will be booked into the database. At the time of ordering a collection, the customer is made aware of the waste that can be collected by the Operator. All third-party users are made aware of the Waste Acceptance Procedures (WAP).
- 3.19. All waste deliveries will be booked with the Site. As part of the booking procedure, details relating to the source of the waste will be noted. If there is any doubt about the nature of the source, based on the site description, further information will be required including site reports and chemical analysis data.

- 3.20. All deliveries will be sheeted until instructed to un-sheet by the Site staff. This will take place after the vehicle has been weighed and the driver provided directions to the unloading area. The vehicle will remain sheeted for as long as possible. Therefore, if there is a queue, the driver will only un-sheet when ready to discharge. This will ensure that vehicles are sheeted as they travel through the Site.
- 3.21. A visual check of each load will be made by the Site staff after they have been unsheeted. The contents of the load will be checked against the Waste Transfer Note (WTN). If the load is visually different to the description, the Operator's office staff will contact the customer to validate the changes.
- 3.22. If the delivery driver is not employed by the Operator, then the written description shall be changed on the WTN by the driver to correct the description. The waste producer will be notified. Site staff will check the environmental permit to validate that the description given is listed on the permit. Once accepted, the driver will be directed to the dedicated covered area.
- 3.23. Recyclable soil and stones (EWC 17 05 04) will be stockpiled and treated to produce 6F4 material. Concrete (EWC code 17 01 01) will be stockpiled and treated to create Type 1 crushed concrete. Concrete (EWC code 17 01 07) will also be stockpiled with road planings (EWC code 17 03 02) and treated to produce 6F5 material.

#### Waste Types

- 3.24. The waste types in Table 1 are already permitted. It is proposed that the waste types in Table 2 only are added to the permit.

**Table 1: Currently Permitted Waste Types**

Waste code	Description
<b>17 01</b>	<b>Concrete, bricks, tiles and ceramics</b>
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
<b>17 02</b>	<b>Wood, glass and plastic</b>
17 02 02	Glass
<b>17 03</b>	<b>Bituminous mixtures, coal tar and tarred products</b>
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
<b>17 05</b>	<b>Soil (including excavated soil from contaminated sites), stones and dredging spoil</b>
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 05 08	Track ballast other than those mentioned in 17 05 07
<b>20 02</b>	<b>Garden and park wastes (including cemetery waste)</b>
20 02 02	Soil and stones



**Table 2: Waste Types to be Added to the Permit**

Waste code	Description	Exclusions
<b>17 09</b>	<b>Other construction and demolition wastes</b>	
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03.	-
<b>19 12</b>	<b>Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>	-
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.	Waste aggregate generated from the recycling of metals only.

3.25. Wastes shall only be accepted at the Site if:

- It is of a type listed in the permit;
- It does not consist solely or mainly of dusts, powders or loose fibres;
- It is not in a form which is either sludge or liquid;
- It conforms to the description in the documentation supplied by the producer and holder through the accompanying waste transfer note;
- Its chemical, physical and biological characteristics make it suitable for its intended treatment;
- Any excavated soil from potentially contaminated sites has been shown by prior chemical analysis and assessment to be suitable for the intended use without significant risk of pollution; and
- It is visually inspected on Site to ensure that it complies with the permit.

3.26. Any waste that does not comply with the above shall be rejected and shall be;

- Removed from the Site; or
- Moved to a designated quarantine area pending removal.

3.27. The operator shall maintain and implement a system which ensures that a record is made of the quantity, characteristics, date of delivery and, where practicable, origin of any waste that is received for disposal or recovery and of the identity of the producer, or in the case of multiple collection vehicles, of the collector of such waste. Any information regarded by the operator as commercially confidential shall be clearly identified in the record.

3.28. Anybody having responsibility for approving waste streams at the Site must have a thorough understanding of the WAP.

### **Site Management**

3.29. The Operator shall manage and operate the activities:

- In accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- Using sufficient competent persons and resources.

3.30. The Operator will manage the Site in accordance with its own environmental management system (EMS) which includes:

- A series of operating procedures;
- An accident management plan; and
- Reporting forms (e.g. training records for Site staff, complaints record and maintenance record).

3.31. A summary of the EMS is presented in Appendix 5.

3.32. In accordance with the requirements of the permit and the EMS, the Site will be managed such that:

- A business identification board will be prominently displayed at the entrance to the Site, clearly stating the company name, emergency contact details and permit details;
- Minimum personal protective equipment shall be worn in all operational areas. This will include high visibility jacket or waistcoat in traffic areas and steel toe capped boots;
- All contractors visiting the Site will sign in and out of the visitors' book and will be made aware of the Site specific health and safety procedures;
- All liquids (e.g. fuel and oil for Site vehicles and machinery) shall be provided with secondary containment.

3.33. The operator shall take appropriate measures to ensure that the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities.

#### Technically Competent Management

3.34. The Operator will comply with the requirements of an approved competence scheme. Relevant WAMITAB certificates and proof of compliance with the Continuing Competence Scheme for the proposed Technically Competent Manager are provided in Appendix 6.

3.35. Any person having duties that are or may be affected by the matters set out in the permit shall have convenient access to a copy kept at or near the place where those duties are carried out. A copy of the EMS will be kept on Site in the office.

## 4. POLLUTION PREVENTION MEASURES

### Fugitive Emissions of Dust, Mud, Litter and Pests

- 4.1. EA guidance provides that you must take measures to prevent the spread of dust, mud and litter from your Site.
- 4.2. Wastes that are imported to Site for treatment will be stored and treated in a dedicated covered area to mitigate against dust and noise emissions.
- 4.3. The permitted and proposed waste types will not be odorous, therefore there is no requirement to produce an odour management plan.
- 4.4. Waste delivery or collection vehicles will not travel on unmade ground thus the potential for the generation of dust or for tracking mud onto the public highway is negligible. Wastes will be delivered to Site in sheeted vehicles.
- 4.5. The permitted Site will be kept clear of mud and debris.
- 4.6. The risk of scavenging animals, scavenging birds and other pests arising from the Site and affecting the surrounding environment is highly unlikely due to the type of waste accepted on the Site. Should pests become a problem then specialist contractors will be engaged to address the problem.
- 4.7. No combustible waste will be accepted at the Site therefore there is no requirement to produce a Fire Prevention Plan.

### Air Quality

- 4.8. An Air Quality Assessment (Redmore Environmental, August 2024) has been undertaken to support the planning and environmental permit applications.
- 4.9. The AQA concludes that:

*“The risk of potential effects as a result of fugitive dust emissions from the facility during the operational phase was assessed using the IAQM methodology<sup>2</sup>. This included consideration of the Source Emission potential, Pathway Effectiveness and sensitivity of relevant receptors in the vicinity of the site. The results of the assessment indicated the overall effects as a result of the development were predicted to be **not significant**”.*

*“Potential emissions from the development were assessed in order to determine compliance with the air quality neutral requirements of the London Plan<sup>3</sup>. Based on the assessment results, the development was considered to be air quality neutral”.*

- 4.10. A Dust Emissions Management Plan (DEMP) has been produced for the Site, which will ensure that any significant dust emissions arising from the process are prevented from escaping the Site and giving rise to pollution of the environment or nuisance.

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<sup>2</sup> Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1, IAQM, 2016

<sup>3</sup> The London Plan March 2021, GLA, 2021.

4.11. The AQA is presented in Appendix 7 and the DEMP is presented in Appendix 8.

### Noise

4.12. A Noise Impact Assessment (LF Acoustic Ltd, October 2024) has been produced to support planning and environmental permit applications. The NIA sets out the calculated noise levels arising from the operation of the proposed facilities, for use in a BS 4142:2014+A1:2019 assessment for the nearest dwellings to the Site.

4.13. The NIA concludes that:

*"The proposals would ensure that the noise levels attributable to the operation of the site would result in barely audible levels of noise above the existing noise climate at the surrounding residential properties and would ensure acceptable noise levels were generated in accordance with the EA guidance".*

4.14. A Noise Management Plan (NMP) has been produced for the Site, which will ensure that any significant noise emissions arising from the process are prevented from escaping the Site and giving rise to pollution of the environment or nuisance.

4.15. The AQA is presented in Appendix 9 and the NMP is presented in Appendix 10.

### Monitoring / Complaints

4.16. Visual and aural inspections of the Site boundary will be undertaken by the Site Manager or his nominee during each working day.

4.17. A complaints procedure is provided in the EMS which allows the following information to be recorded:

- Any complaints received in relation to activities covered by the permit (e.g. complaints from neighbours about noise or dust from the Site);
- How complaints are investigated; and
- Details of any actions taken as a result of complaints.

### Environmental Risk Assessment

4.18. The potential impact of pollution for each aspect of the Site has been considered and tabulated, see Appendix 11 (Environmental Risk Assessment) including:

- Dust;
- Odour;
- Noise;
- Surface Water;
- Groundwater;
- Accidents;
- Unauthorised access; and
- Flooding.

## Site Condition Report

- 4.19. A SCR describes and records the condition of the land and groundwater at a site at particular points in time. It is to enable an operator to demonstrate that they have protected land and groundwater during the lifetime of the site and that the land is in a satisfactory state when it comes to surrender a permit.
- 4.20. It is necessary to complete sections 1 to 3 of the EA's template for a SCR<sup>4</sup> and submit it with an application for a bespoke permit. Whilst the original application was for a standard rules permit, and therefore an SCR was not required, a bespoke SCR was produced anyway in accordance with good practice.
- 4.21. The SCR has been updated for this application because it is proposed to vary a standard rules permit to a bespoke permit which is a substantial change. The SCR, which includes historic maps, is presented in Appendix 4.
- 4.22. The Site will be used for the storage and treatment of construction and demolition wastes only. Imported wastes will be treated within a dedicated covered storage area with two walls and a roof and therefore there will be no pathway for emissions from the new waste activity to the underlying ground or groundwater.
- 4.23. The underlying London Clay is classed as unproductive strata. The Site is not located within a groundwater SPZ. There are no surface water bodies on or immediately adjacent to the Site.
- 4.24. The risk of contamination from the changes to the waste operation will be low, therefore it is considered that it is not necessary to provide a baseline report for the proposed waste operation (refer to ERA in Appendix 9).

---

<sup>4</sup> H5: Site condition report – guidance and templates (Version 3.00). Environment Agency, April 2013.



## 5. INFORMATION

### Records

- 5.1. All records required to be made by the permit shall be:
- Legible;
  - Made as soon as reasonably practicable;
  - Documented in such a way that where amendments are made, the original record and any changes are all recorded and retrievable; and
  - Retained for the minimum period of time stated in the permit.
- 5.2. The Operator will keep a record of weekly operational hours and site attendance of technically competent management. It is necessary to record start and finish times of operations and arrival and departure times of the Technically Competent Manager. The records must be available for the EA to inspect on request.

### Reporting

- 5.3. All reports required to comply with the permit will be provided to the EA as required. The records and reports will be retained in accordance with the procedures outlined in the permit.

### Notifications

- 5.4. The Operator shall notify the EA without delay following the detection of:
- Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
  - The breach of a limit specified in the permit; or
  - Any significant adverse environmental effects.
- 5.5. Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours. All notifications will be recorded and reported in line with Sections 5.1 and 5.2 above.

## DRAWINGS

Ground level – Permit Plan

Drawing No. 0100 v3

Scale 1:500@A3

Roof level – Permit Plan

Drawing No. 0131 v1

Scale 1:500@A3

Site Sections 3, 5 and 6

Drawing No. 106 v3

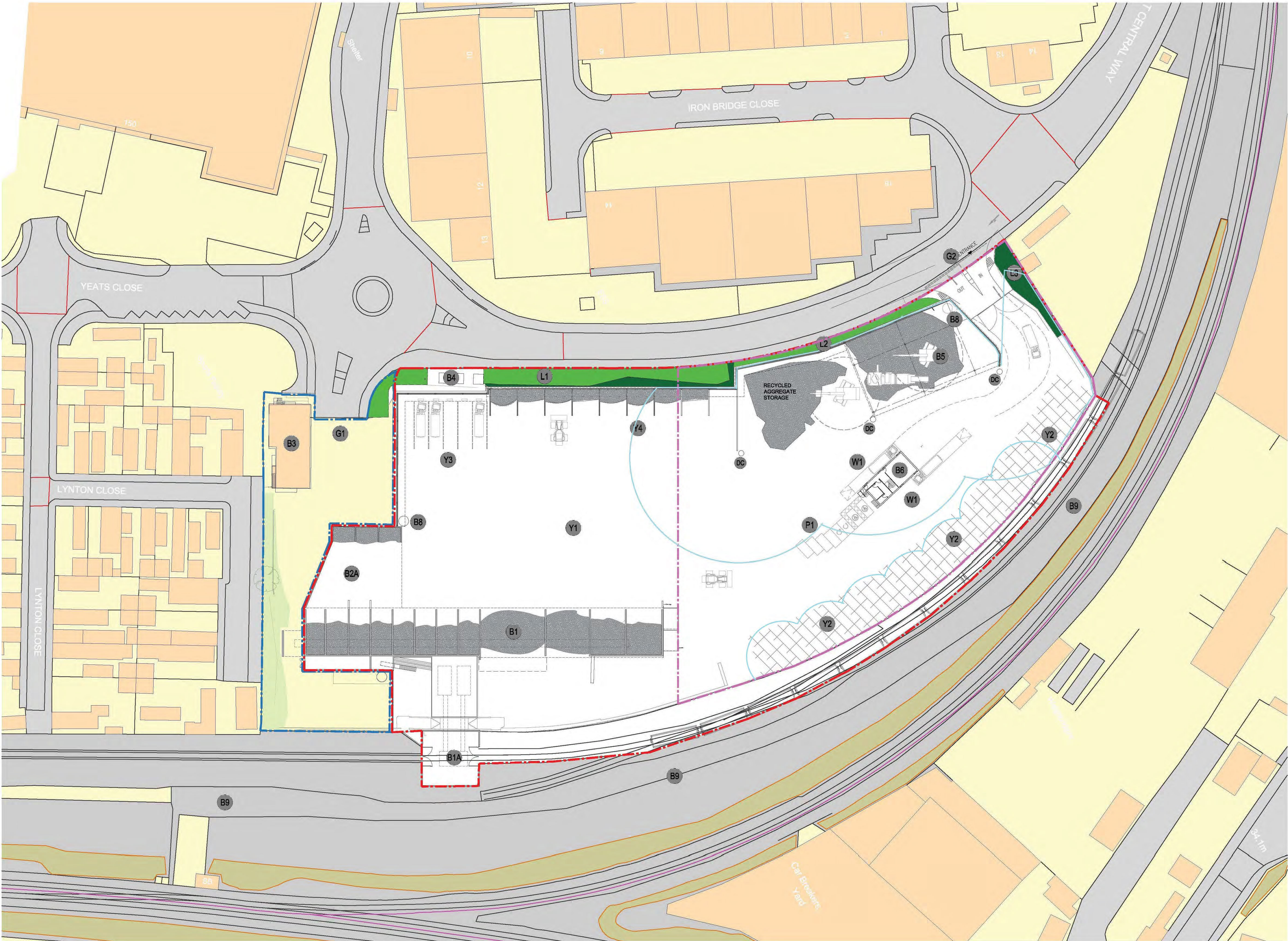
Scale: 1:200@A1

Drainage Strategy

Drawing No. DR-C-2000 P02

Scale: 1:500@A1

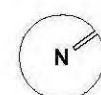




- Element Key
- B1 - Existing Aggregates storage building 'Toastrack'
  - B1a - Existing Aggregates delivery building for Bottom Dumping rail carriages 'BDU' building
  - B2a - New roof and rebuilt aggregates storage building
  - B3 - Existing network rail building
  - B4 - Existing substation
  - B5 - New aggregates processing area - under new roof
  - B6 - New prefabricated Office and welfare building
  - B7 - Boundary containment fence
  - B8 - Water tank storage new
  - B9 - Rail sidings
  - W1 - Weighbridge
  - G1 - Existing gates
  - G2 - New gates for entrance to site
  - Y1 - Main yard circulation retained
  - Y2 - Aggregate transfer zone - 12m zone kept for loading of trains with clam shell picker
  - Y3 - Lorry charging bays
  - Y4 - External aggregates store zone behind new rc containment walls
  - F1 - Fence retained to road
  - F2 - Fence retained to rail sidings
  - F3 - Fence wall to Lynton Close
  - L1 - Greened boundary zone 1
  - L2 - Greened boundary zone 2
  - L3 - Greened boundary zone 3
  - P1 - Parking Bikes and cars  
2 DDA, 2 charging, 4 standard parking bays
- DC DUST CANNON
- PERMIT BOUNDARY

Notes:  
No full scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor and any discrepancies reported to B3R immediately.

S	R	Date	Description
S3	3	18.07.24	ANNOUATION ADDED FOR WATER STORAGE TANKS B8 AGGREGATE STORAGE



0 5000 15000 40000

Scale Bar in mm

Client:  
SRC Group Holdings Ltd

Project Title:  
Charrington Sidings

Status:  
PLANNING

Stage:  
S3

Scale:  
1:500

Sheet:  
A1

Drawing Title:  
GROUND LEVEL - PERMIT PLAN

Project No:  
19280

Drawing No: Revision:  
0100 3

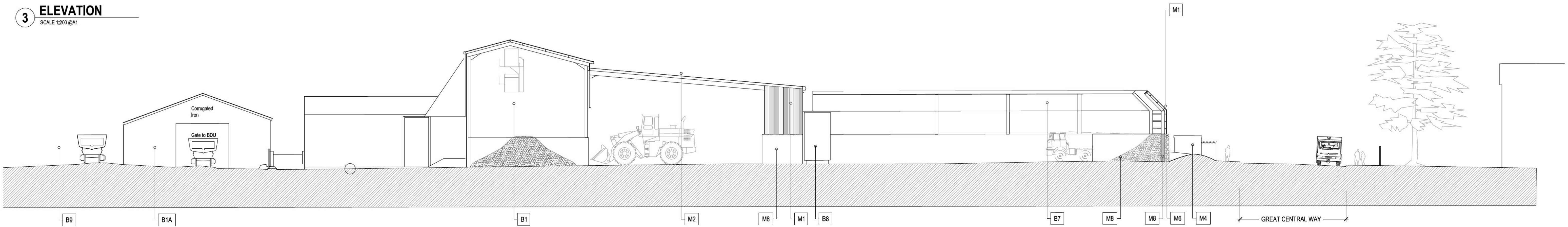






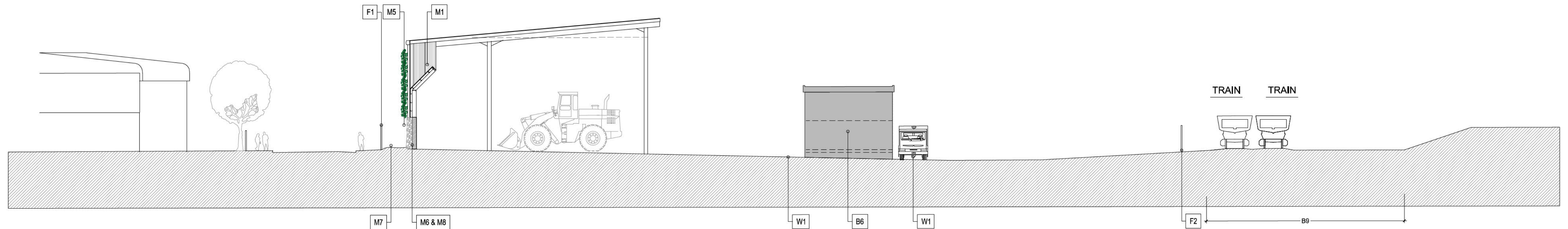
3 ELEVATION

SCALE 1:200 @A1



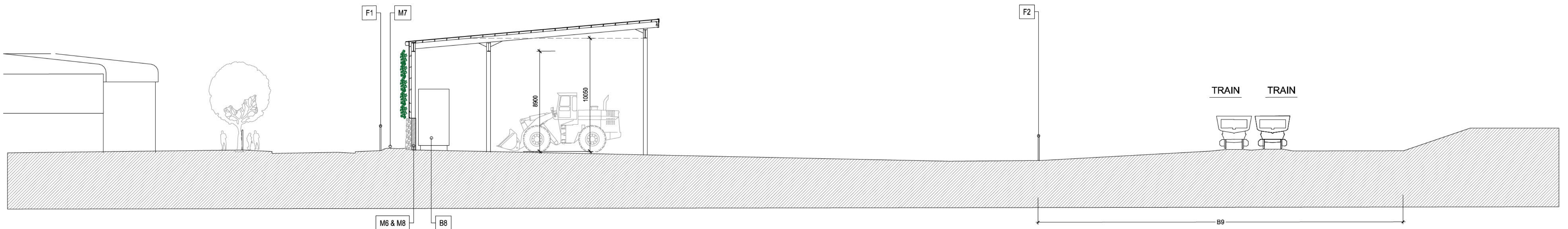
5 ELEVATION

SCALE 1:200 @A1



6 ELEVATION

SCALE 1:200 @A1

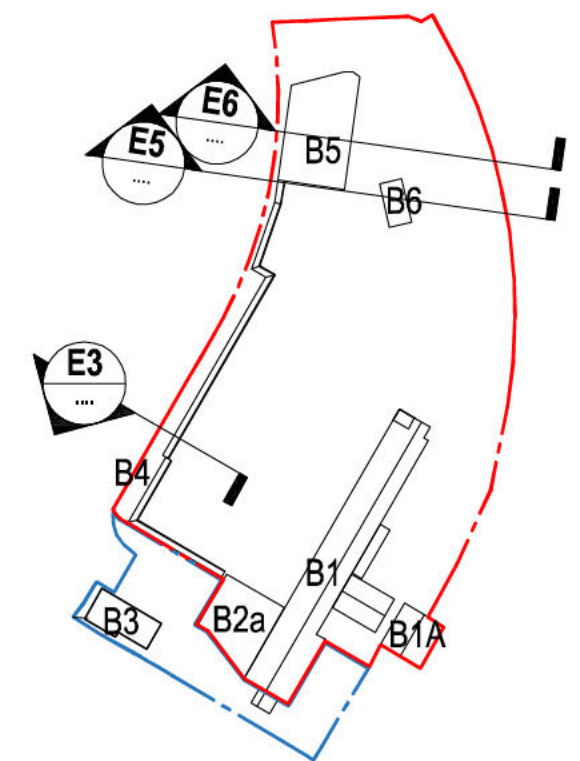


Materials Key

- M1 - Corrugated metal cladding - Polyester powder coated
- M2 - Corrugated metal roofing - Polyester powder coated
- M3 - Metal Gutter - Polyester powder coated
- M4 - Metal RWP- Polyester powder coated
- M5 - Green Wall - Support system fixed through to cladding subframe
- M6 - Gabion Wall - and concrete containment wall wall to contain environmental intensification pockets
- M7 - Planted - green planted boundary zone
- M8 - Precast concrete containment walls
- M9 - Stored aggregates

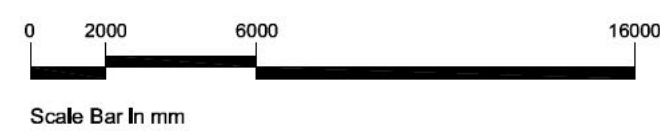
Element Key

- B1 - Existing Aggregates storage building 'Toastrack'
- B1a - Existing Aggregates delivery building for Bottom Dumping rail carriages 'BDU' building
- B2a - New roof and rebuilt aggregates storage building
- B3 - Existing network rail building
- B4 - Existing substation
- B5 - New aggregates processing area - under new roof
- B6 - New prefabricated Office and welfare building
- B7 - Boundary containment fence
- B8 - Water tank storage new
- B9 - Rail sidings
- W1 - Weighbridge
- G1 - Existing gates
- G2 - New gates for entrance to site
- Y1 - Main yard circulation retained
- Y2 - Aggregate transfer zone - 12m zone kept for loading of trains with dam shell picker
- Y3 - Lorry charging bays
- Y4 - External aggregates store zone behind new rc containment walls
- F1 - Fence retained to road
- F2 - Fence retained to rail sidings
- F3 - Fence wall to Lynton Close
- L1 - Greened boundary zone 1
- L2 - Greened boundary zone 2
- L3 - Greened boundary zone 3



Notes:  
Do not scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor and any discrepancies reported to B3R immediately.

S	R	Date	Description
S3	3	06.02.24	ISSUED FOR PLANNING SUBMISSION DWG TITLE NAME REVISED



Client:  
SRC Group Holdings Ltd  
Project Title:  
Charrington Sidings  
Status:  
PLANNING

Stage:  
S3  
Scale:  
1:200  
Sheet:  
A1

Drawing Title:  
SITE SECTIONS 3, 5 & 6  
Project No:  
19280  
Drawing No:  
106  
Revision:  
3







## **APPENDIX 1**

Non – Technical Summary

## Non – Technical Summary

### Background

Sewells Reservoir Construction Limited (the ‘Operator’) has commissioned PDE Consulting Limited (the ‘Agent’) to prepare an application vary an environmental permit for a waste activity undertaken at Great Central Way, Wembley, London, NW10 0UZ (the “Site”).

Standard rules environmental permit No. EPR/LB3101LL was issued to the Operator on 20 June 2022. It authorises standard rules set SR2009 No 5: inert and excavation waste transfer station below 250,000 tonnes per annum. Under the standard rules permit, wastes can be bulked up for disposal or recovery elsewhere and can be manually sorted or separated for recovery, but the rules do not allow any waste treatment activities such as screening and crushing.

It is proposed to vary the standard rules permit to a bespoke permit. The bespoke application will allow the following additional activities:

- Treatment (including crushing and screening) of wastes;
- An increase in waste throughputs to 500,000 tonnes per annum;
- Add three additional waste types only.

Wastes will be treated to produce soils and secondary aggregates only.

The permit boundary which is shown on Drawing No. 0100 v3 will remain unchanged.

### Site Location and Surroundings

The Site is located in Wembley approximately 300 m east of Brent, approximately 800 m south of Neasden and approximately 1.8 km east of Wembley Stadium.

The Site is located in an industrial setting and is bound by a railway line to the east, BCC van hire to the north and Great Central Way to the west. To the south is an aggregate depot which is also run by the Operator. There are industrial units, some of which have been converted to residential dwellings, located to the west of the Site on the opposite side of Great Central Way.

### Environmental Site Setting

The bedrock geology comprises London Clay. The London Clay is classed by the EA as unproductive strata. These are rock layers or drift deposits with low permeability that have negligible significance for water supply or river base flow. The Site is not located within a groundwater Source Protection Zone (SPZ) designated by the EA.

There are no surface water bodies on or immediately adjacent to the Site. The Site is located in flood zone 1 (lowest risk).

According to the Defra website the Site is located in Brent Air Quality Management Area.

Brent Reservoir Site of Special Scientific Interest (SSSI) is located approximately 1.4 km to the north of the Site. The interest feature of the SSSI is the breeding bird assemblage that is associated with the open water and its margins. There are no other SSSI's within 2 km of the Site. There are no Ramsar sites or European sites to consider within 2 km of the Site.

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## Operational Details

Clay based materials will be imported to the Site and stockpiled adjacent to the railway before being transferred from Site via train.

Other construction and demolition wastes will be imported to Site and stockpiled and treated via crushing and screening in a dedicated covered area before being stockpiled outside and exported from Site via road or rail.

The dedicated covered area, labelled as Building B5 on Drawing No. 0100 v3, will have solid façades, constructed using steel cladding along the northern and western sides and will be fully open on the eastern and southern sides which face into the Site, to allow safe access. A 7.5 m boundary wall will extend along the whole of the northern and western Site boundary to ensure the Site is effectively screened from existing noise and dust sensitive properties.

The Site is surfaced in concrete. Rainwater will be harvested from roofs to be used in the dust suppression system which includes spray bars on the crushing and screening plant, dust canons around the new waste storage and treatment area, and sprinklers covering the clay storage area. The Site has a mains water supply which can be used to top up the water storage tanks if necessary.

It is proposed that the maximum annual throughputs of wastes are 500,000 tonnes. The maximum amount of waste that will be stored on Site at any one time will be 25,000 tonnes.

No changes to the operational hours are proposed, with the existing operating hours of between 06:00 – 20:00 hours daily.

The Site will be operated by Technically Competent Management who will operate the Site in accordance with the environmental permit, the Environmental Management System (EMS) and the planning permission. The EMS includes a Dust Emissions Management Plan, a Noise Management Plan, an Accident Management Plan and an Environmental Risk Assessment.

---

## APPENDIX 2

### Pre-Application Advice

**From:** [Garg, Palak](#)  
**To:** [Suzanne Walsh](#)  
**Subject:** RE: Pre-application Basic Advice Email - Sewells Reservoir Construction Limited - SRC Aggregates Wembley - EPR/LB3101LL/P001  
**Date:** 07 August 2024 16:59:41  
**Attachments:** [image006.png](#)

---

Hi Suzanne,

Thank you for your email.

**Based on the information supplied, the charge reference 1.16.12 would be correct and this would be considered a substantial variation.** Further information can be found in the attachments enclosed in my previous email.

**As per our previous email, we recommend that you use all of the available guidance, the relevant templates and on our website to help you complete your environmental permit application.**

Thank you,  
Palak Garg

---

**From:** Suzanne Walsh <[suzanne@pdeconsulting.co.uk](mailto:suzanne@pdeconsulting.co.uk)>  
**Sent:** Monday, August 5, 2024 5:04 PM  
**To:** Garg, Palak <[Palak.Garg@environment-agency.gov.uk](mailto:Palak.Garg@environment-agency.gov.uk)>  
**Cc:** PreApplication Service <[preapplicationservice@environment-agency.gov.uk](mailto:preapplicationservice@environment-agency.gov.uk)>  
**Subject:** RE: Pre-application Basic Advice Email - Sewells Reservoir Construction Limited - SRC Aggregates Wembley - EPR/LB3101LL/P001

Hi Palak,

Thank you very much for your e-mail.

Please can you confirm if the baseline charge for varying a standard rules permit to a bespoke is the same as if you were applying for a new permit for that activity?

So if we are varying a standard rules permit to allow the physical treatment of wastes by crushing and screening, the fee will be £7930 (charge reference 1.16.12)?

Many thanks

Kind regards'

Suzanne.

---

**From:** Garg, Palak <[Palak.Garg@environment-agency.gov.uk](mailto:Palak.Garg@environment-agency.gov.uk)>  
**Sent:** Monday, August 5, 2024 4:34 PM  
**To:** Suzanne Walsh <[suzanne@pdeconsulting.co.uk](mailto:suzanne@pdeconsulting.co.uk)>  
**Subject:** Pre-application Basic Advice Email - Sewells Reservoir Construction Limited - SRC

Hello Suzanne Walsh,

**Pre-application reference: EPR/LB3101LL/P001**

**Operator name: Sewells Reservoir Construction Limited**

**Site address: SRC Aggregates Wembley, Great Central Way, Wembley, Greater London, NW10 0UZ**

**For your information we consider this a basic pre-application enquiry rather than enhanced, and therefore there will be no charge for the advice.**

Thank you for your pre-application enquiry submitted on 26/07/2024 and for taking the time to speak with me on 02/08/2024.

You confirmed that you would need to include a non-[??](#) technical summary, an amenity management plan, a dust emissions management plan and a noise impact assessment & management plan with your environmental permit application. You have requested pre-application advice on what other information/ risk assessments will be required to support the application.

**Below are details about how to apply for this permit variation:**

**Application forms**

To make an administrative change only to your permit you must complete application form C0.5. You must also complete form A if you are changing an address or contact details.

To change (vary) a standard rules permit you must complete application forms A, C1 and F1.

To change (vary) a bespoke permit, you must complete application forms A, C2, C4 and F1.

[Forms and guidance to change \(vary\) your environmental permit](#)

**Declaration (in Part F1)**

Please ensure the Declaration section is completed by each “relevant person”.

- For an application from an individual, a relevant person is the person to be named on the permit.
- For an application from more than one individual, each person who is applying for their name to be on the permit must complete the declaration – you will have to complete a separate copy of the declaration page for each additional individual.
- In the case of a company a relevant person must be an active director/company secretary as listed on [Companies House](#).
- For a limited liability partnership, the declaration must be completed by a partner.
- For a charity, a relevant person is a key post holder: chair, chief executive, director or trustee.

Further information on who should complete the declaration can be found in section 5 of the [guidance notes for the F1 application form](#).

When sending documents please ensure they are named appropriately to clearly identify the contents. Please use the following format: Application [Application Type] [Document Title] DDMMYYYY

The document name cannot contain special characters apart from -\_.( ). If additional text is required, it should go before the document date. For example:

Application Bespoke Supporting Information Risk Assessment 14022024

Application Bespoke Non Tech Summary 14022024

Application Standard Rules Site Plan 16022024

Application Variation Part C2 16022024

You need to email the completed forms, along with supporting documentation, to [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

**IMPORTANT:** Do not reply to this email address, it is not monitored. Please send any replies to [preapplicationservice@environment-agency.gov.uk](mailto:preapplicationservice@environment-agency.gov.uk)

### **Supporting documents – bespoke rules permits variations:**

#### **Non-Technical Summary**

For bespoke permit variation applications you need to send us a simple explanation of the changes you propose to make. This should include a summary of your operations and a summary of the key technical standards and control measures arising from your risk assessment.

As a guide, this summary document should be no more than one to two pages in length.

#### **Site plan**

Submit a revised site plan if you propose to increase your site boundary.

The plan must clearly show the full site boundary in a single unbroken line.

Your plan should clearly mark the site layout, infrastructure and drainage arrangements.

If possible, try to include local features, such as roads or landmarks, this helps identify the site location in the surrounding area.

#### **Environmental Management System**

If you are applying to change your activity or add a new activity to your permit, an update of your environmental management system (EMS) is required, and you must send a summary of your EMS with your application. You should follow the [guidance on developing a management system](#)

Your EMS should include a plan for dealing with any incidents or events that could result in pollution. This should follow our [guidance on producing an accident prevention and management plan](#).

A copy of your ISO 14001 certificate (or equivalent) is not sufficient on its own. You need to provide a summary of the site-specific management system.

#### **Environmental Risk Assessment**

When you make changes to your permit, you must consider the environmental risk posed

by your proposals. This must take the form of an environmental risk assessment which should follow the methodology set out in [risk assessments for your environmental permit](#). You should read our guide to [risk assessments for specific activities](#) and consider using our assessment tool to evaluate your environmental risk. Our assessment tool will inform you when more detailed modelling is required.

You should [check if your site is located in a flood risk zone](#). If the site is in a flood zone, you should assess the risk of pollution in the event of a flood.

You should check if your site is located within screening distance of a non-statutory designated site (local wildlife site, ancient woodland etc.) or a protected species. A heritage and nature conservation screening can identify this and will contain additional information to that found on Magic map. If a non-statutory designated site or protected species is identified you should assess the risk from your site to this sensitive receptor, including this in your risk assessment. More information can be found in [construction near protected areas and wildlife](#).

Depending on the outcome of your initial environmental assessment, you may be required to undertake detailed modelling of your environmental risk.

An Environmental Risk Assessment is not required for a minor variation application.

### **Technical Description**

When applying to vary your permit, you should detail any existing operating techniques (as listed in table S1.2 of your permit) that are subject to change by the application being made. You must demonstrate how they will meet any relevant technical standards.

As well as the guidance on risk assessments, management systems and controlling emissions, there is [specific technical guidance for some regulated industry sectors](#). For waste permits, this includes additional guidance on:

- Landspreading
- Mining waste
- Chemical waste
- Healthcare waste
- Non-hazardous and inert waste

Your technical description should include plans showing the layout of your site. The technical assessment should also include details of your operating techniques and the infrastructure you are using to minimise the risk of pollution, including any details of secondary containment used (such as bunds) and how this meets any relevant standards. Please see the [pollution prevention guidance](#) for additional advice.

### **Waste codes**

For variations to change the types of waste accepted at your site, you need to provide a list of waste codes from the European Waste Catalogue. You should follow the [waste classification technical guidance](#) to decide what waste code your waste should be classified under.

New waste codes can only be added to bespoke permits under a minor technical variation where the new codes would not change the waste activity or the risk. If there is a change in risk, you will need to apply for a normal or substantial variation.

For example, if a site is currently operating as a household, commercial and industrial waste transfer station, you will not be able to add clinical waste codes, or hazardous waste

codes under a minor technical variation as these require an additional activity adding to the permit.

Under a minor technical variation, you also cannot add waste codes which change the risk of the site, or the management plans required. For example, if a site currently accepts inert construction waste only, adding codes for combustible waste would require a fire prevention plan. If the risk is changing, we also require an updated risk assessment, and could require other updated documents and plans, including an EMS summary and drainage plan.

If there is a change in waste activity because of adding the new waste codes, you will need to apply to add the relevant activity or vary from the existing one.

### **Amenity management plans**

You must read our guidance on how to [control and monitor emissions for your environmental permit](#).

This includes guidance on controlling pollution from odour, dust, noise, pests and other 'fugitive emissions' (emissions without set emission limits).

For variation applications which may lead to an increase in emissions as a result of the changes being proposed, you may be required to produce standalone amenity management plans, to demonstrate how you will control and monitor emissions. The guidance sets out which activities require amenity management plans.

Your amenity management plan will be assessed as part of your application. You may need to pay an additional charge for the assessment. Further information on this is included in the 'How much will my permit cost' section above.

We have included additional notes below on specific considerations for noise impact assessments below.

### **Risks from Noise and Vibration, Industrial and Commercial Sound and Noise Management Plans**

If your risk assessment shows your operation is likely to cause pollution from noise or vibration beyond your site boundary you must [provide a noise impact assessment](#) (NIA) based on BS4142:2014+A1:2019 – 'Methods for rating and assessing industrial and commercial sound'.

Where your assessment has used calculations or modelling to predict sound pressure levels at receptors, you must follow our [guidance on the presentation of your acoustic data: Noise impact assessments involving calculations or modelling](#).

Your NIA must be accompanied by a [Noise Management Plan](#) (NMP) based on the results of your NIA.

If you are unsure whether you need to produce a NIA or NMP, we can complete a screening check to check if you are likely to need one. The noise screening is available as part of our enhanced service. You should apply for the enhanced service using the [online pre-application form](#).

We are aware that applicants are not always sure what to provide, and this can cause delays in getting your permit determined. We have produced supplementary advice on completing your NIA and a NMP template to help you get your application right first time. For sectors where we know noise is a common issue, we will provide these documents as part of the basic pre-application response. If you haven't received them but would like a

copy, please request them in a follow-up enquiry.

### **Fire Prevention Plan (FPP)**

If you store combustible waste at your site, and your permit variation will lead to an increased fire risk, then you need to submit a new or updated FPP.

You must follow our [guidance on Fire Prevention Plans](#). This tells you what to include in your FPP and the fire prevention measures you must put in place. We have also produced a [Fire Prevention Plan template](#) to help you prepare your plan.

### **Technical Competence**

If your activities include waste management you must meet [legal operator and competence requirements](#). If you are changing activity or adding an activity to your permit, you will need to send in evidence of appropriate technical competence for the proposed activities. You will need to include valid certificates or other acceptable evidence.

If you are supplying WAMITAB certificates as evidence of your technical competency, you need to provide both the original award certificate and a current certificate of continuing competence (if the validity of your original award has expired).

Grace periods are not applicable to variation applications. You need to meet the full technical competence requirements at the time of applying to vary your permit.

### **Site condition report**

For variations to increase the area of your facility you should send us a site condition report which covers the area that will be covered by the permit. This should be in line with our guidance [H5 Site condition report – guidance and templates](#).

This needs to include a conceptual site model and identify any relevant hazardous substances on site. Quantitative baseline soil and groundwater monitoring data on the condition of the site should be included or a justification on why this is not required should be provided. You should also consider if you need to undertake soil gas monitoring.

If you choose not to take baseline data, this may make it more difficult to demonstrate you have not caused pollution at the site when you apply to surrender the site.

**We have also attached basic advice and relevant template documents.**

**We recommend that you use all of the available guidance, the relevant templates in the attached advice and on our website to help you complete your environmental permit application.**

**If after reading the advice documents you still have questions or want to access other pre-application services then you should follow the instructions given towards the end of this email.**

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

**This pre-application request is now closed.**

Further enquiries resulting from this response must be logged as a new request using the online form: <https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>

Our basic pre-application service is free and is limited to the information detailed on section 2 of the Environmental permitting charges guidance on gov.uk.

If you need more extensive or technical pre-application advice, you can ask for our enhanced pre-application service. The enhanced pre-application advice is charged at £100 per hour plus VAT. You will need to complete and submit a new online pre-application request to request enhanced pre-application advice.

Regards,

**Palak Garg**

Permitting Officer (Waste), National Permitting Service

**Environment Agency** | Foss House, Kings Pool, Peasholme Green, York, North Yorkshire, YO1 7PX

Email: [palak.garg@environment-agency.gov.uk](mailto:palak.garg@environment-agency.gov.uk)

Mobile: 07443133252

Working days: Monday to Friday



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## APPENDIX 3

EPR Application Forms

# Application for an environmental permit

## Part A – About you



You will need to fill in this part A if you are applying for a new permit, applying to change an existing permit or surrender your permit, or want to transfer an existing permit to yourself. Please check that this is the latest version of the form available from our website.

You can apply online for Waste standard rules environmental permits, bespoke waste permits and bespoke Medium combustion plant permits

Apply online for an environmental permit.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

**Note:** if you believe including information on a public register would not be in the interests of national security you must enclose a letter telling us that you have told the Secretary of State. We will not include the information in the public register unless directed otherwise.

It will take less than one hour to fill in this part of the application form.

Where you see the term 'document reference' on the form, give the document references and send the documents with the application form when you've completed it.

### Contents

- 1 About you
  - 2 Applications from an individual
  - 3 Applications from an organisation of individuals or charity
  - 4 Applications from public bodies
  - 5 Applications from companies or corporate bodies
  - 6 Your address
  - 7 Contact details
  - 8 How to contact us
  - 9 Where to send your application
- Appendix 1 – Date of birth information for installation and waste activities (applications for a new permit or transferring a permit) only

## 1 About you

Are you applying as an individual, an organisation of individuals (for example, a partnership), a company (this includes Limited Liability Partnerships) or a public body?

An individual

- ☐ Now go to section 2 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

An organisation of individuals (for example, a partnership)

- ☐ Now go to section 3 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

A public body

- ☐ Now go to section 4

A registered company or other corporate body

- ☒ Now go to section 5 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

## 2 Applications from an individual

### 2a Please give us the following details

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to section 6

### 3 Applications from an organisation of individuals or charity

#### 3a Type of organisation

For example, a charity, a partnership, a group of individuals or a club

#### 3b Details of the organisation or charity

If you are an organisation of individuals, please give the details of the main representative below. If relevant, provide details of other members (please include their title Mr, Mrs and so on) on a separate sheet and tell us the document reference you have given this sheet

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to question 3c or section 6

#### 3c Details of charity

Full name of charity

This should be the full name of the legal entity not any trading name.

#### 3d Company registration number

If you are registered with Companies House please tell us your registration number

#### 3e Charity Commission number

If you are registered with the Charity Commission please tell us your registration number

Now go to section 6

### 4 Applications from public bodies

#### 4a Type of public body

For example, NHS trust, local authority, English county council

#### 4b Name of the public body

#### 4c Please give us the following details of the executive

An officer of the public body authorised to sign on your behalf

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position

Now go to section 6

### 5 Applications from companies or corporate bodies

#### 5a Name of the company

#### 5b Company registration number

Date of registration (DD/MM/YYYY)

If you are applying as a corporate organisation that is not a limited company, please provide evidence of your status and tell us below the reference you have given the document containing this evidence.

Document reference

## 5 Applications from companies or corporate bodies, continued

### 5c Please give details of the directors

If relevant, provide details of other directors and company secretary, if there is one, on a separate sheet and tell us the reference you have given this sheet.

Document reference	See additional sheet
Details of company secretary (if relevant) and director/s	
Title (Mr, Mrs, Miss and so on)	
First name	
Last name	
Title (Mr, Mrs, Miss and so on)	
First name	
Last name	

Now go to section 6

## 6 Your address

### 6a Your main (registered office) address

For companies this is the address on record at Companies House.

Contact name	
Title (Mr, Mrs, Miss and so on)	Mr
First name	Matthew
Last name	Yeates
Address	Crown Business Centre
	Old Ipswich Road
	Ardleigh
	Colchester
Postcode	CO7 7QR
Contact numbers, including the area code	
Phone	01371 874212
Fax	
Mobile	
Email	matthew.yeates@srcaggregates.co.uk

For an organisation of individuals every partner needs to give us their details, including their title Mr, Mrs and so on. So, if necessary, continue on a separate sheet and tell us below the reference you have given the sheet.

Document reference	
--------------------	--

### 6b Main UK business address (if different from above)

Contact name	
Title (Mr, Mrs, Miss and so on)	
First name	
Last name	
Address	
Postcode	

## 6 Your address, continued

Contact numbers, including the area code

Phone

Fax

Mobile

Email

Now go to section 7

## 7 Contact details

### 7a Who can we contact about your application?

It will help us if there is someone we can contact if we have any questions about your application. The person you name should have the authority to act on your behalf.

Please add a second contact on a separate sheet if this person is not always available.

Document reference of this separate sheet

This can be someone acting as a consultant or an 'agent' for you.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

### 7b Who can we contact about your operation (if different from question 7a)?

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

## 7 Contact details, continued

### 7c Who can we contact about your billing or invoice?

**Note:** Please provide the name and address that all invoices should be sent to for your subsistence fees.

As in question 7a ☐

As in question 7b ☒

Please give details below if different from question 7a or 7b.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

## 8 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it. More information on how to do this is available at: [www.gov.uk/government/organisations/environment-agency/about/complaints-procedure](http://www.gov.uk/government/organisations/environment-agency/about/complaints-procedure).

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

## 9 Where to send your application

For how many copies to send see the guidance note on part A.

For water discharges by email to [PSC-WaterQuality@environment-agency.gov.uk](mailto:PSC-WaterQuality@environment-agency.gov.uk)

For waste and installations by email to [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)

For flood risk activity permits send 1 copy only to [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk) or to the local Environment Agency office for where the work is proposed to be carried out.

Or

Permitting Support, NPS Sheffield  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

## Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

\_\_\_\_\_

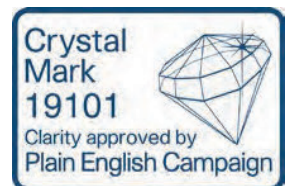
We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

☐

No thank you

☐

### For Environment Agency use only

Date received (DD/MM/YYYY)

\_\_\_\_\_

Our reference number

\_\_\_\_\_

Payment received?

No ☐

Yes ☐

Amount received

£ \_\_\_\_\_



## Appendix 1 – Date of birth information for installation and waste activities (applications for a new permit or transferring a permit) only

### Date of birth information in this appendix will not be put onto our Public Register

Are you applying as an individual, an organisation of individuals (for example, a partnership) or a company (this includes Limited Liability Partnerships)?

- |   |   |
|---|---|
| An individual   | <input type="checkbox"/> Now go to 2            |
| An organisation of individuals (for example, a partnership) | <input type="checkbox"/> Now go to 3            |
| A registered company or other corporate body                | <input checked="" type="checkbox"/> Now go to 4 |

### 2 Applications from an individual

Please give us the following details

Name	<input type="text"/>
Date of birth (DD/MM/YY)	<input type="text"/>

### 3 Applications from an organisation of individuals or charity

#### Details of the organisation or charity

If you are an organisation of individuals, please give the date of birth details of the main representative below. If relevant, provide details of other members on a separate sheet and tell us the document reference you have given this sheet.

Name	<input type="text"/>
Date of birth (DD/MM/YY)	<input type="text"/>
Document reference	<input type="text"/>

### 4 Applications from companies or corporate bodies

Name of the company	<input type="text" value="Sewells Reservoir Constrution"/>
---------------------	--

Please give the date of birth details for all directors and company secretary if there is one. If relevant, provide those details of other directors on a separate sheet and tell us the document reference you have given this sheet.

Details of company secretary (if relevant) and director/s

Name	<input type="text" value="See additional sheet"/>
Date of birth (DD/MM/YY)	<input type="text"/>
Name	<input type="text"/>
Date of birth (DD/MM/YY)	<input type="text"/>
Name	<input type="text"/>
Date of birth (DD/MM/YY)	<input type="text"/>
Document reference	<input type="text"/>

Application for an environmental permit: Part A – About you

Form A: Q5c

<b>Company Name:</b>	Sewells Reservoir Construction Limited
<b>Registration Number:</b>	02349942
<b>Registered Address:</b>	Crown Business Centre Old Ipswich Road Ardleigh Colchester England CO7 7QR

Director Name	Date of Birth
Oliver Rees	
David Hunter	
Louise Yeates	
Craig Chaplin	
Thomas Wise	
Anna Helen Gray	
Brett James Hallworth	
Natalie White	

# Application for an environmental permit

## Part C2 – General – varying a bespoke permit



Fill in this part of the form, together with part A and the relevant parts of C3 to C7 and part F1 or F2, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or changing existing ones).

**Waste operation changing to installation or vice versa?**

If your changes mean that a waste operation becomes an installation (or vice versa) you also need to fill in either part C3 (waste to installation) or part C4 (installation to waste).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

**Contents**

- 1 About the permit
  - 2 About your proposed changes
  - 3 Your ability as an operator
  - 4 Consultation
  - 5 Supporting information
  - 6 Environmental risk assessment
  - 7 How to contact us
- Appendix 1 – Low impact installation checklist  
Appendix 2 – Date of birth information for Relevant offences and/or Technical ability questions only

### 1 About the permit

Note: If you are applying to convert your existing permit to a standard permit or add a standard facility you need to fill out form C1.

#### 1a Discussions before your application

If you have had discussions with us before your application, give us the permit reference or details on a separate sheet. Tell us below the reference you have given this extra sheet.

Permit or document reference

Refer to Appendix 2 in the application report.

#### 1b Permit number

What is the permit number that this application relates to?

EPR/LB3101LL

#### 1c Site details

What is the name, address and postcode of the site?

Site name

SRC Aggregates Wembley

Address

Great Central Way

Wembley

Postcode

NW10 0UZ

### 2 About your proposed changes

#### 2a Type of variation

What type of variation are you applying for?

Minor technical

☐

Normal variation

☐

Substantial

☒

## 2 About your proposed changes, continued

### 2b Changes or additions to existing activities

Please give us brief details in the box below. More detailed information can be given in Table 1 below.

It is proposed to vary the standard rules permit to a bespoke permit. The bespoke application will allow the following additional activities:

- The treatment (including crushing and screening) of wastes;
- An increase in waste throughputs to 500,000 tonnes per annum;
- Add three additional waste types only.

Fill in Table 1 with details of all the proposed changes to current activities. In the final column of the table, give us the document reference for the proposed changes and send them to us with your filled in application form.

Fill in a separate table for each activity you are applying to vary or add. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given this document.

Document reference

You only need to fill in one table for your mining waste operations.

### 2c Consolidating (combining) or updating existing permits

If your proposed change is to modernise (update) your permit, now answer 2c1; otherwise go to 2d.

If your proposed change is to consolidate (combine) a number of permits, now answer 2c2; otherwise go to 2d.

Note: In both cases we may require additional information from you about, for example, your management system. Therefore we would always advise you to talk to us before you submit any application to modernise or consolidate permits.

2c1 Do you want to have a modern style permit?

No ☐

Yes ☒

2c2 Identify all the permits you want to consolidate (combine) by listing the permit numbers in Table 2 below

**Table 2 – Permit numbers**


### 2d Treating batteries

2d Are you proposing to treat batteries?

No ☒

Yes ☐ Tell us how you will do this and send us a copy of your explanation and tell us below the reference you have given this explanation

Document reference for the explanation

### 2e Ship recycling

2e1 Is your activity covered by the Ship Recycling Regulations 2015? (See the guidance notes on part C2.)

No ☒

Yes ☐ Tell us how you will do this. Please send us a copy of your explanation and your facility recycling plan, and tell us below the reference numbers you have given these documents

Document reference for the explanation

Document reference for the facility recycling plan

2e2 Is this a renewal of an existing authorisation covered by the Ship Recycling Regulations 2015?

No ☒

Yes ☐ Tell us the expiry date of your existing authorisation

(DD/MM/YYYY)

## 2 About your proposed changes, continued

**Table 1 – Changes to existing activities**

Fill in Table 1 with details of all the proposed changes to current activities. In the final column of the table, give us the document reference for the proposed changes and send them to us with your filled in application form.

Name	Installation schedule 1 references	Description of the installation activity	Description of waste operation	Description of the mining waste operations	Description of water discharge activity	Description of groundwater activity	Proposed changes document reference
i.e. name of installation, waste operation, mining waste operation, water discharge activity or groundwater activity							
Example – effluent unique name					Example – treated sewage effluent		
If you do not have enough room, go to the line below or send a separate document and give us the document reference here							
SRC Aggregates			Inert & excavation				Refer to application
Wembley			waste transfer station				report.

## 2 About your proposed changes, continued

### 2f Low impact installations (installations only)

2f1 Will any changes mean that any of the regulated facilities will become low impact installations?

No ☒ Now go to section 3

Yes ☐ If yes, tell us how you meet the conditions for a low impact installation (see the guidance notes on part C2 – Appendix 1)

Document reference

Tick the box to confirm you have filled in the low impact installation checklist in appendix 1 for each regulated facility

☐

## 3 Your ability as an operator

If you are applying to add waste installations or waste operations to a permit that has not previously had them, you need to fill in all of section 3.

If you are applying to consolidate (combine) two or more permits or have an updated permit you must fill in question 3d.

This section does not apply for applications to surrender a permit.

### 3a Relevant offences

Installations and waste operations only (see the guidance notes on part C2).

3a1 Have you, or any other relevant person, been convicted of any relevant offence?

No ☒ Now go to question 3b

Yes ☐ Please give details below

Name of the relevant person

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position held at the time of the offence

Name of the court where the case was dealt with

Date of the conviction (DD/MM/YY)

Offence and penalty set

Date any appeal against the conviction will be heard (DD/MM/YYYY)

If necessary, use a separate sheet to give us details of other relevant offences and tell us below the reference number you have given the extra sheet.

Document reference

Now go to question 3b

Please also complete the details in Appendix 2.

### 3b Technical ability

Specified waste management activities and waste operations only (see the guidance notes on part C1).

Please indicate which of the two schemes you are using to demonstrate you are technically competent to operate your facility and the evidence you have enclosed to demonstrate this.

#### ESA/EU skills

I have enclosed a copy of the current Competence Management System certificate

☐

#### CIWM/WAMITAB scheme

Please select **one** of the following:

• I have enclosed a copy of:

– the relevant qualification certificate/s

☒

or

– evidence of deemed competence

☐

or

**3 Your ability as an operator, continued**

- Environment Agency assessment ☐
- or
- evidence of nominated manager status under the transitional provisions for previously exempt activities ☐

and, if deemed competent or Agency-assessed, or if there is evidence of a nominated manager, or if the original qualification is over two years old:

I have enclosed a copy of the relevant current continuing competence certificate/s ☒

For each technically competent manager please give the following information. If necessary, use a separate sheet to give us these details and tell us below the document reference you have given the extra sheet.

Title (Mr, Mrs, Miss and so on)

First name

Last name

Phone

Mobile

Email

Please provide the environmental permit number/s and site address for **all** other waste activities that the proposed technically competent manager provides technical competence for, including permits held by other operators. Continue on a separate sheet as required.

Permit number	Site address	Postcode
EPR/GB3106SE	Crown Quarry, Old Ipswich Road, Ardleigh, Essex	CO7 7RU
EPR/HB3109CX	Barking Riverside Recycling Centre, Choats Road, Barking, Essex	RM9 6RJ

Document reference

Now go to question 3c

Please also complete the details in Appendix 2.

**3c Finances**

Installations, waste operations and mining waste operations only (see the guidance notes on part C2).

**Please note that if you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.**

Do you or any relevant person or a company in which you were a relevant person have current or past bankruptcy or insolvency proceedings against you?

No ☒

Yes ☐ Please give details below, including the required set-up costs (including infrastructure), maintenance and clean up costs for the proposed facility against which a credit check may be assessed

We may want to contact a credit reference agency for a report about your business's finances.



### 3 Your ability as an operator, continued

#### Landfill, Category A mining waste facilities and mining waste facilities for hazardous waste only

How do you plan to make financial provision (to operate a landfill or a mining waste facility you need to show us that you are financially capable of meeting the obligations of closure and aftercare)?

Renewable bonds ☐

Cash deposits with the Environment Agency ☐

Other – provide comprehensive details ☐

Document reference

Provide a cost profile and expenditure plan of your estimated costs throughout the aftercare period of your site.

Document plan reference

Now go to question 3d

#### 3d Management systems

You must have an effective, written management system in place that identifies and reduces the risk of pollution. You may show this by using a certified scheme or your own system.

Your permit requires you (as the operator) to ensure that you manage and operate your activities in accordance with a written management system.

You need to be able to explain what happens at each site and which parts of the overall management system apply. For example, at some sites you may need to show you are carrying out additional measures to prevent pollution because they are nearer to sensitive locations than others.

You can find guidance on management systems on our website at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency).

Tick this box to confirm that you have read the guidance and that your management system will meet our requirements ☐

What management system will you provide for your regulated facility?

ISO 14001 ☐

BS 8555 (Phases 1–5) ☐

Acorn ☐

Green dragon ☐

Own management system ☒

Please make sure you send us a summary of your management system with your application.

Document reference/s

### 4 Consultation

Fill in 4a to 4c for installations and waste operations and 4d for installations only.

Could the waste operation or installation involve releasing any substance into any of the following?

#### 4a A sewer managed by a sewerage undertaker?

No ☐

Yes ☒ Please name the sewerage undertaker

#### 4b A harbour managed by a harbour authority?

No ☒

Yes ☐ Please name the harbour authority

#### 4c Directly into relevant territorial waters or coastal waters within the sea fisheries district of a local fisheries committee?

No ☒

Yes ☐ Please name the fisheries committee

## 4 Consultation, continued

### 4d Is the installation on a site for which:

4d1 a nuclear site licence is needed under section 1 of the Nuclear Installations Act 1965?

No ☐

Yes ☐

4d2 a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards Regulations 2015, or a safety report is needed under regulation 7 of those Regulations?

No ☐

Yes ☐

## 5 Supporting information

### 5a Provide a plan or plans for the site

See the guidance notes on part C2 for what needs to be marked on the plan.

Clearly mark the site boundary or discharge point, or both. Also include site drainage plans, site layout plans, and plant design drawings/process flow diagrams (as required). (See the guidance notes on part C2.)

Document reference/s of the plans

Refer to application report

### 5b Do any of the variations you plan to make need extra land to be included in the permit?

No ☒

Yes ☐ Please provide a site report for the extra land

Document report reference/s

### 5c Provide a non-technical summary of your application

Document reference of the summary

Refer to Appendix 1 of the application report.

### 5d Risk of fire from sites storing combustible waste

Are you applying for an activity that includes the storage of combustible wastes?

(This applies to all activities excluding standalone water and groundwater discharges.)

No ☒ Go to question 5f

Yes ☐ Go to question 5e

### 5e Will your variation increase the risk of a fire occurring or increase the environmental risk if a fire occurs?

See the guidance notes on part C2.

No ☐

Yes ☐ Provide a fire prevention plan. You need to highlight any changes you have made since your pre-application discussions

Document reference of the plan

### 5f Adding an installation

If you are applying to add an installation, tick the box to confirm that you have sent in a baseline report and provide a reference

☐

Document reference of the report

## 6 Environmental risk assessment

If you need one, see the guidance notes on part C2.

Provide an assessment of any additional risks the proposed changes or additions to your regulated facilities poses to the environment as part of your application to vary this permit. The risk assessment must follow the methodology set out in 'Risk assessments for your environmental permit' at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit> or an equivalent method.

Document reference for the assessment

Refer to Appendix 11 of the application report.

## 7 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

### Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

\_\_\_\_\_

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

☐

No thank you

☐

### For Environment Agency use only

Date received (DD/MM/YYYY)

\_\_\_\_\_

Our reference number

\_\_\_\_\_

Payment received?

No ☐

Yes ☐ Amount received

£ \_\_\_\_\_

**Plain English Campaign's Crystal Mark does not apply to appendix 1.****Appendix 1 – Low impact installation checklist**

Installation reference				
Condition	Response			Do you meet this?
A – Management techniques	Provide references to show how your application meets A			Yes <input type="checkbox"/>
	References			No <input type="checkbox"/>
B – Aqueous waste	Effluent created		m <sup>3</sup> /day	Yes <input type="checkbox"/> No <input type="checkbox"/>
C – Abatement systems	Provide references to show how your application meets C			Yes <input type="checkbox"/>
	References			No <input type="checkbox"/>
D – Groundwater	Do you plan to release any hazardous substances or non-hazardous pollutants into the ground?		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
E – Producing waste	Hazardous waste		Tonnes per year	Yes <input type="checkbox"/>
	Non-hazardous waste		Tonnes per year	No <input type="checkbox"/>
F – Using energy	Peak energy consumption		MW	Yes <input type="checkbox"/> No <input type="checkbox"/>
G – Preventing accidents	Do you have appropriate measures to prevent spills and major releases of liquids? (See 'How to comply'.)		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
	Provide references to show how your application meets G			
	References			
H – Noise	Provide references to show how your application meets H			Yes <input type="checkbox"/>
	References			No <input type="checkbox"/>
I – Emissions of polluting substances	Provide references to show how your application meets I			Yes <input type="checkbox"/>
	References			No <input type="checkbox"/>
J – Odours	Provide references to show how your application meets J			Yes <input type="checkbox"/>
	References			No <input type="checkbox"/>
K – History of keeping to the regulations	Say here whether you have been involved in any enforcement action as described in Compliance History Appendix 1 explanatory notes		Yes <input type="checkbox"/> No <input type="checkbox"/>	

## Appendix 2 – Date of birth information for Relevant offences and/or Technical ability questions only

### Date of birth information in this appendix will not be put onto our Public Register

Have you filled in the Relevant Offences question?

Yes ☒

No ☐

Have you filled in the Technical ability question?

Yes ☒

No ☐

### 2 Relevant Offences - date of birth information

Please give us the following details

Name

Date of birth (DD/MM/YY)

### 3 Technical ability - date of birth information

Name

Date of birth (DD/MM/YY)

# Application for an environmental permit

## Part C4 – Varying a bespoke waste operation permit



Fill in this part of the form, together with parts A, C2 and F1, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or making changes to existing ones).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

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- Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations

## 1 What waste operations are you applying to vary?

Fill in Table 1a with details of what you are applying to vary.

Fill in a separate table for each waste operation you are applying to vary. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given this document.

Document reference

### Types of waste accepted

For each line in Table 1a, fill in a separate document to list those wastes you will accept on the site for that operation, giving the List of Wastes catalogue code (search for 'Technical guidance on how to assess and classify waste' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)). If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

**1 What waste operations are you applying to vary?, continued****Table 1a – Waste operations which do not form part of an installation**

Name of the waste operation	Description of the waste operation	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 1)	Non-hazardous waste treatment capacity (if this applies) (See note 1)
Add extra rows if you need them. If you do not have enough room, go to the line below or send a separate document and give us the document reference here	Use the description from the guidance. Include any extra detail that you think would help to accurately describe what you want to do			
SRC Aggregates Wembley	Inert & excavation waste transfer station	D15, R13, D14, D9, R3 & R5.		
For all waste operations	Total storage capacity (see note 2)			
	New total if varying to increase			
	Annual throughput (tonnes each year)			250,000.00
	New total if varying to increase			500,000.00



**1 What waste operations are you applying to vary?, continued****Notes**

1 By 'capacity', we mean:

- the total landfill capacity (cubic metres) for landfills
- the total treatment capacity (tonnes each day) for waste treatment
- the total storage capacity (tonnes) for waste-storage operations

2 By 'total storage capacity', we mean the maximum amount of waste in tonnes you store on the site at any one time.

Please provide the document reference. You can use Table 1b as a template.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description of the waste in the document, (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste.

Document reference

**Table 1b – Template example – types of waste accepted and restrictions**

Waste code	Description of the waste
Example	Example
02 01 08*	Agrochemical waste containing hazardous substances
18 01 03*	Infectious clinical waste, not contaminated with chemicals or medicines – human healthcare (may contain sharps) for alternative treatment
17 05 03*/17 06 05*	Non-hazardous soil from construction or demolition contaminated with fragments of asbestos cement sheet

**1c Deposit for recovery purposes (see the guidance notes on part C4)**

Are you applying for a waste recovery activity involving the permanent deposit on waste on land for construction or land reclamation (including landfill restoration)?

No ☒ Go to section 2

Yes ☐

Are you applying for an inert landfill permit that includes a restoration activity using waste?

No ☐ Go to section 2

Yes ☐ Please send us a copy of your restoration plan in accordance with our guidance at <https://www.gov.uk/guidance/landfill-operators-environmental-permits/restore-your-landfill-site>

Have we advised you during pre-application discussions that we believe the activity is waste recovery?

No ☐ Go to section 2

Yes ☐

Have there been any changes to your proposal since the discussions?

No ☐

Yes ☐

Please send us a copy of your waste recovery plan that complies with our guidance at <https://www.gov.uk/guidance/waste-recovery-plans-and-permits>. You need to highlight any changes you have made since your pre-application discussions. Also give us the reference number of the document with your justification.

**Please note that there is an additional charge for the assessment of a waste recovery plan that must be submitted as part of this application. For the charge see <https://www.gov.uk/topic/environmental-management/environmental-permits>.**

Document reference

## 2 Point source emissions to air, water and land

Fill in Table 2 below with details of the point source emissions that result from the operating techniques at each of your waste operations.

Fill in one table for each waste facility.

**Table 2 – Emissions**

Name of the waste operation	SRC Aggregates Wembley			
<b>Point source emissions to air</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
<b>Point source emissions to water (other than sewers)</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				
<b>Point source emissions to sewers, effluent treatment plants or other transfers off site</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
Site drainage only - no change				
<b>Point source emissions to land</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
None				

## Supporting information

### 3 Operating techniques

#### 3a Technical standards

Fill in Table 3a for each waste operation you refer to in Table 1a above and list the ‘appropriate measures’ you are planning to use. If you are using the standards set out in the relevant technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a.

You must justify your decisions in a separate document if:

- there is no technical standard
- the technical guidance provides a choice of standards, or
- you plan to use another standard

This justification could include a reference to the Environmental Risk Assessment provided in part C2 of the application form.

Table 3a should summarise:

- the operations undertaken
- the measures you will use to control the emissions from your process, as identified in your risk assessment or the relevant technical guidance
- how you will meet other standards set out in the relevant technical guidance

#### Table 3a – Technical standards

Fill in a separate table for each waste operation.

Waste operation		
Description of the waste operation Add extra rows if you need them	Appropriate measure (TGN reference)	Document reference (if appropriate)
Physical treatment of non-hazardous waste.	Non-hazardous and inert waste:	
	appropriate measures for permitted facilities	

In all cases, describe the type of facility or operation you are applying for and provide site infrastructure plans, location plans and process flow diagrams or block diagrams to help describe the operations and processes undertaken. Give the document references you use for each plan, diagram and description.

Document reference

#### 3b General requirements

Fill in a separate table for each waste operation.

#### Table 3b – General requirements

Name of the waste operation	SRC Aggregates Wembley
If the technical guidance or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references Appendix 8 of the application report.
If the technical guidance or your risk assessment shows that odours are an important issue, send us your odour management plan.  If your activity type is listed in the guidance document ‘Control and monitor emissions for your environmental permit’ as needing an odour management plan, or your risk assessment shows that odours are an important issue, you need to send us your odour management plan.	Document reference or references n/a
If the technical guidance or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references Appendix 10 of the application report.

### 3 Operating techniques, continued

We may need to ask for management plans or risk assessments in other circumstances based on our regulatory experience. If you are unsure as to whether you need to submit a management plan with your application, please discuss this with the Environment Agency prior to submission.

Search for 'Risk assessment for your environmental permit' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency).

#### 3c Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed in Table 3c, you must answer the questions in the related document.

**Table 3c – Questions for specific sectors**

Sector	Appendix
Recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes	See the questions in appendix 1
Inert landfill and deposit of waste on land for construction, land reclamation, restoration or improvement	See the questions in appendix 2

### General information

#### 4 Monitoring

##### 4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures
- the methods you use
- the procedures you follow to assess the measures

Document reference

As discharge consent conditions.

##### 4b Point source emissions to air only

Provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must use M1 (search for 'M1 sampling requirements for stack emission monitoring' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)).

Document reference of the assessment

n/a

#### 5 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

## Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

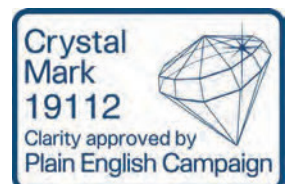
We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

☐

No thank you

☐

### For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐

Amount received

£

## Plain English Campaign's Crystal Mark does not apply to appendices 1 to 2.

### Appendix 1 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes

**1 Please provide an accurate and reliable characterisation of your compost like outputs (CLO). This should be based on sampling and analysis of the CLO produced by the treatment (MBT) process over a 12-month period and in accordance with section 2 of TGN 6.15**

Document reference

**2 Please provide an agricultural benefit assessment for the use of your CLO. This should be based on section 2 of TGN 6.15 and should be signed and dated by an appropriate technical expert**

Document reference

**3 Please provide a site-specific risk assessment of risks to soil and food chain receptors. This should be based on Schedule 2 of TGN 6.15 and include a map with a green outline showing the boundary of the area being treated and include:**

- locations where the waste will be stored and spread
- any spring, well or borehole used to supply water for domestic or food production purposes that is within 250 metres of the area being treated
- any spring, well or borehole not being used for domestic or food production purposes that is within 50 metres of the area being treated
- any European designated sites (candidate or Special Area of Conservation, proposed or Special Protections Area in England and Wales or Ramsar Site) or Sites of Special Scientific Interest (SSSI) which are within 500 metres of the place where waste is to be stored or spread
- the location of public rights of way
- any Groundwater Source Protection Zones
- surface watercourses
- any buildings or houses within 250 metres of the area being treated
- land drains within the boundary

Document reference

**4 Are the technical standards and measures fully in line with those set out in section 3 of TGN 6.15?**

No ☐ Provide justification for departure from TGN 6.15 and a copy of the proposed technical standards, measures or procedures

Document reference

Yes ☐

### Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations

**1 Please provide your Environmental Setting and Site Design (ESSD) report**

Document reference

Note: You should use the Environment Agency template to help you develop an environmental setting and site design (ESSD) report.

**2 Please provide your Waste Acceptance Procedures (including Waste Acceptance Criteria)**

Document reference

**3 Have you provided a hydrogeological risk assessment (HRA) for the site?**

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

**4 Have you completed an outline engineering plan for the site?**

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

**5 Have you provided a stability risk assessment (SRA) for your site?**

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

## Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations, continued

### 6 Have you completed a monitoring plan for the site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

### 7 Have you completed a plan for closing the site and procedures for looking after the site once it has closed?

No ☐ If no for deposit for recovery activities please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ For inert waste landfill you must provide a closure plan

Document reference

## Spreading waste to support plant growth

### 8a Does the activity involve the deposit of waste to create or treat a growing medium (R10 for land treatment)?

No ☐

Yes ☐

### 8b If you answered 'yes' to question 8a, does the R10 activity include the spreading of waste to improve the quality of the growing medium (e.g. soil conditioner to improve existing soil profile)?

No ☐

Yes ☐ Go to question 8c

### 8c If you have answered 'Yes' to question 8b, have you completed a benefit statement?

No ☐ Please explain why

Document reference

Yes ☐

Note: Refer to our guidance when completing your statement (including EPR 8.01, section 6).

# Application for an environmental permit Part F1 – Charges and declarations



We recommend you use an Adobe Acrobat product to complete the form. You may not be able to complete the form using different software, such as the PDF reader built into your internet browser

Fill in this part for all applications for:

- installations (excluding new permit and variation applications for intensive farming. Use application form Part B3.5 or C3.5 instead)
- waste operations
- mining waste operations
- medium combustion plant
- specified generators
- water discharges (excluding treated domestic sewage effluent discharges of up to 15 cubic metres (15m<sup>3</sup>) a day into ground or up to 20 cubic metres (20m<sup>3</sup>) a day to surface water)
- groundwater activities (excluding small discharges of 15m<sup>3</sup> per day or less if using Part B6.5 OR existing small discharges to Source Protection Zone1 if using Part B6.6)

Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

We anticipate it will take less than 3 hours to fill in this form if you have all the necessary information available.

## Contents

- 1 Working out charges**
- 2 Payment**
- 3 Privacy notice**
- 4 Confidentiality and national security**
- 5 Declaration**
- 6 Application checklist**
- 7 How to contact us**
- 8 Where to send your application**



# 1 Working out charges

You must fill out this section for all applications except for waste mobile plant and Part B surrender notifications.

You have to submit an application fee with your application. For guidance on the fee and how to pay your charges, please see our charging guidance (<https://www.gov.uk/government/publications/environmental-permitting-charges-guidance>) and the current charging scheme <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>. You can also contact us for pre-application advice to help work out the charges.

Please note that there is an annual subsistence charge to cover the costs we incur in the ongoing regulation of the permit.

**Table 1 – Type and number of facilities being applied for**

For example, if you are submitting one installation application, enter the number one into the first column.

Installation	Waste	Mining waste	Medium Combustion Plant (MCP)/ Specified Generator (SG)	Water discharge	Groundwater activity
	1				

**Table 2 – General application charge (A)**

Charge activity reference from the charging scheme tables	Charge activity description from the charging scheme tables	What are you applying for? For example, a new permit, minor variation, normal variation, substantial variation, surrender, low risk surrender, transfer	Amount
e.g. 1.17.3	e.g. Section 5.2 – landfill for hazardous waste	e.g. transfer application	e.g. £5,561
1.6.12	Physical treatment of non- hazardous	Substantial variation	7,137
Total A			7137

## 1 Working out charges, continued

Table 3 – Additional assessment charges (B)

Part 1.19 Charges for plans and assessments			Tick appropriate
Reference	Plan or assessment	Charge	
1.19.1	Waste recovery plan or variation or revision of a waste recovery plan.	£1,231	<input type="checkbox"/>
1.19.2	Habitats assessment (except where the application activity is a flood risk activity, water discharge or groundwater activity).	£779	<input type="checkbox"/>
1.19.3	Fire prevention plan (except where the application activity is a farming installation).	£1,241	<input type="checkbox"/>
1.19.4	Pests management plan (except where the application activity is a farming installation).	£1,241	<input type="checkbox"/>
1.19.5	Emissions management plan (except where the application activity is a farming installation).	£1,241	<input checked="" type="checkbox"/>
1.19.6	Odour management plan (except where the application activity is a farming installation).	£1,246	<input type="checkbox"/>
1.19.7	Noise and vibration management plan (except where the application activity is a farming installation).	£1,246	<input checked="" type="checkbox"/>
1.19.8	Ammonia modelling assessment	£620	<input type="checkbox"/>
1.19.9	Dust and bio-aerosol management plan.	£620	<input type="checkbox"/>
1.19.10	Habitats assessment for discharges to water and groundwater activities.	£2,035	<input type="checkbox"/>
1.19.11	Specific Substances Assessment for a water discharge activity to surface water.	£3,774	<input type="checkbox"/>
1.19.12	Specific Substances Assessment for a groundwater activity.	£1,546	<input type="checkbox"/>
1.19.13	Advertising	£500	<input type="checkbox"/>
Total B			2487

### Total charges

Add the total charges from Table 1 to the total charges from Table 2 (total A plus total B)

9624

## 2 Payment

You must fill out this section for all applications except for waste mobile plant and Part B surrender notifications.

Tick below to show how you have paid.

- ☐ Cheque
- ☐ Credit or debit card
- ☒ Electronic transfer (for example, BACS)

### Cheques

You should make cheques payable to 'Environment Agency' and make sure they have 'A/c Payee' written across them if it is not already printed on.

## 2 Payment, continued

Please write the name of your company and application reference number on the back of your cheque. We will not accept cheques with a future date on them.

### Credit/debit cards

If you are paying by credit or with debit card we will call you. We can accept payments by Visa, MasterCard or Maestro card only.

☐ Call me to arrange payment by debit or credit card

### Electronic transfer BACS

If you choose to pay by electronic transfer, you will need to use the following information to make your payment:

Company name	Environment Agency
Company address	SSCL (Environment Agency), PO Box 797, Newport Gwent, NP10 8FZ
Bank	RBS/NatWest
Address	London Corporate Service Centre, CPB Services, 2nd Floor, 280 Bishopsgate, London EC2M 4RB
Sort code	60-70-80
Account number	10014411
Account name	EA RECEIPTS
Payment reference number	PSCAPPXXXXYYY

You need to create your own reference number. It should begin with PSCAPPWASTE (Waste), PSCAPPINST (Installation), PSCAPPWQ (Water Quality) (to reflect the facility type) and it should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). The reference number that you supply will appear on our bank statements.

You should also email your payment details and reference number to [ea\\_fsc\\_ar@gov.sscl.com](mailto:ea_fsc_ar@gov.sscl.com).

If you are making your payment from outside the United Kingdom, it must be in sterling. Our IBAN number is GB23NWBK60708010014411 and our SWIFTBIC number is NWBKGB2L.

If you do not quote your reference number, there may be a delay in processing your payment and application.

Provide a unique reference number for the application, i.e. do not only use the company name only

PSCAPPSEWEL656

State who is paying (full name and whether this is the agent/applicant/other)

Applicant

Fee paid

£ 9624

Date payment sent (DD/MM/YYYY)

11/11/2014

### 3 Privacy notice

The Environment Agency runs the environmental permit application service.

See <https://www.gov.uk/guidance/environmental-permits-privacy-notice> for how we use your personal information in services to support environmental permitting.

### 4 Confidentiality and national security

#### Confidentiality

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential.

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application. You can find guidance on confidentiality in ‘Environmental permitting guidance: core guidance’, published by Defra and available at <https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>.

Only tick the box below if you wish to claim confidentiality for parts of your application

☐ Please treat the specified information in my application as confidential

#### National security

You can tell the Secretary of State that you believe including information on a public register would not be in the interests of national security. You must enclose a letter with your application telling us that you have told the Secretary of State and you must still include the information in your application. We will not include the information in the public register unless the Secretary of State decides that it should be included.

You can find guidance on national security in ‘Environmental permitting guidance: core guidance’, published by Defra and available at <https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>

You cannot apply for national security via this application.

Now fill in section 5

### 5 Declaration

If you knowingly or recklessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

Each individual (or individual trustee) who is applying for their name to appear on the permit must complete this declaration. You will have to print a separate copy of this page for each additional individual to complete.

If you are transferring all or part of your permit, both you and the person receiving the permit must make the declaration. You must fill in the declaration directly below; the person receiving the permit must fill in the declaration under the heading ‘For transfers only’.

## 5 Declaration, continued

Note: we will issue a letter to both current and new holders to confirm the transfer. If you are changing address we will need to send this letter to your new address; therefore please tell us your new address in a separate letter.

If you are unable to trace one or more of the current permit holders please see below under the transfers declaration.

I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

- ☐ Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)
- ☐ I confirm that my standard facility will fully meet the rules that I have applied for (this only applies if the application includes standard facilities)
- ☐ Tick this box if you do not want us to use information from any ecological survey that you have supplied with your application (for further information please see the guidance notes on part F1)

### Name

Title

Mr

First name

Oliver

Last name

Rees

on behalf of (if relevant; for example, a company or organisation and so on)

Sewells Reservoir Construction Limited

Position (if relevant; for example, a company or organisation and so on)

Director

Today's date (DD/MM/YYYY)

11/11/2024

### For transfers only – declaration for person receiving the permit

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this application to transfer an environmental permit to me is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

Note: If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration as above. Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

## 5 Declaration, continued

- ☐ Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

Name

Title

\_\_\_\_\_

First name

Last name

\_\_\_\_\_

\_\_\_\_\_

on behalf of (if relevant; for example, a company or organisation and so on)

\_\_\_\_\_

Position (if relevant; for example, a company or organisation and so on)

\_\_\_\_\_

Today's date (DD/MM/YYYY)

\_\_\_\_\_

Now go to section 6

## 6 Application checklist

You must fill in this section.

If your application is not complete, we will return it to you. If you aren't sure about what you need to send, contact us before you submit your application. For further information on pre-application advice, see <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>.

You must do the following:

- ☒ Complete legibly all parts of the application form that are relevant to you and your activities
- ☒ Identify relevant supporting information in the form and send it with the application
- ☒ List all the documents you are sending in the table below.
- ☐ For new permit applications or any changes to the site plan, provide a plan that meets the standards given in the guidance note on part F1
- ☐ Provide a supporting letter for any claim that information is confidential
- ☒ Get the declaration completed by a relevant person (not an agent)
- ☒ Send the correct fee

## 6 Application checklist, continued

Continue on an extra sheet if necessary.

Question reference	Document title	Document reference
Form A Q5c	Details of the directors	Appendix 3 of application report
Form C2, Q1a	Discussions before your application	Appendix 2 of application report
Form C2, Table 1	Changes to existing activities	Refer to application report.
Form C2, Q3b	Technical ability	Appendix 6 of application report
Form C2, Q3d	Management systems	Appendix 5 of application report
Form C2, Q5a	Provide a plan or plans for the site	Refer to application report.
Form C2, Q5c	Provide a non-technical summary of your application.	Appendix 1 of application report
Form C2, Q6	Environmental risk assessment	Appendix 11 of application report
Form C4, Q3b	Dust Emissions Management Plan	Appendix 8 of application report
Form C4, Q3b	Noise Management Plan	Appendix 10 of application report

Document reference

## 7 How to contact us

If you have difficulty filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422549 (Monday to Friday, 8am to 6pm)

Email: [\*\*enquiries@environment-agency.gov.uk\*\*](mailto:enquiries@environment-agency.gov.uk)

Website: [\*\*www.gov.uk/government/organisations/environment-agency\*\*](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

## 8 Where to send your application

For how many copies to send see the guidance note on part F1.

Please send your filled in application form and supporting documents to:

For water discharges and groundwater activities by email to

[\*\*PSC-WaterQuality@environment-agency.gov.uk\*\*](mailto:PSC-WaterQuality@environment-agency.gov.uk)

For waste, installations, medium combustion plant and specified generators by email to

[\*\*PSC@environment-agency.gov.uk\*\*](mailto:PSC@environment-agency.gov.uk)

For large electronic documents (too large for email attachment) you can upload your applications to file sharing sites and send us a link to download the documents. Alternatively, you can send more than one email with documents attached.

Or by post to:

Permitting Support, NPS Sheffield  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

Do you want all information to be sent to you by email?

- ☐ Please tick this box if you wish to have all communication about this application sent via email (we will use the details provided in the Part A form).



## Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

\_\_\_\_\_

We will use your feedback to improve our forms and guidance notes.

Would you like a reply to your feedback?

☐ Yes please

☐ No thank you

### For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

\_\_\_\_\_

\_\_\_\_\_

Payment received?

☐ No

☐ Yes

Amount received (£)

\_\_\_\_\_

## APPENDIX 4

### Site Condition Report

## Application Site Condition Report (SCR)

1.0 SITE DETAILS	
Name of the applicant	Sewells Reservoir Construction Limited
Activity address	Great Central Way, Wembley, London, NW10 0UZ
National grid reference	TQ 213 852
Document reference and dates for Site Condition Report at permit application and surrender	<p>Original permit application - Environmental Management System, PDE Consulting Limited, July 2022.</p> <p>Permit variation application - PDE Consulting Limited, November 2024.</p>
2.0 CONDITION OF THE LAND AT PERMIT ISSUE	
<p>Environmental setting including:</p> <ul style="list-style-type: none"> <li>• geology</li> <li>• hydrogeology</li> <li>• surface waters</li> </ul>	<p><u>Geology</u></p> <p>According to the British Geological Survey (BGS) website<sup>1</sup> there are no superficial deposits underlying the Site. The solid geology comprises London Clay.</p> <p><u>Hydrogeology</u></p> <p>According to the MAGIC website<sup>2</sup>, the London Clay is classed by the EA as unproductive strata. These are rock layers or drift deposits with low permeability that have negligible significance for water supply or river base flow.</p> <p>The Site is not located within a groundwater source protection zone (SPZ).</p> <p><u>Surface Waters</u></p> <p>The Site is not located within 20 metres of a watercourse (e.g., river, stream, or beck). The Site is located within Flood Zone 1 (lowest risk).</p>
<p>Pollution history including:</p> <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> <li>• historical land-uses and associated contaminants</li> <li>• any visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to pollution prevention measures</li> </ul>	<p>The Site is located in an industrial setting and is bound by a vehicle storage lot to the north, and a railway line to the east. The adjacent railway siding is used for the import and export of materials. To the west of the site lies Great Central Way then industrial units and some apartments which were converted from industrial units.</p> <p>The site is surfaced in concrete and wastes will be treated in a dedicated covered area.</p> <p>The Site has been used in the past as railway sidings a coal depot and vehicle parking. It has also been used for the stockpiling of materials. A concrete batching plant was previously located on the site.</p> <p>An asphalt plant previously abutted the southern boundary but has since been demolished and the adjacent site is used by the</p>

<sup>1</sup> <https://www.bgs.ac.uk>

<sup>2</sup> <https://magic.defra.gov.uk>

	<p>Operator as an aggregates depot.</p> <p>Refer to historic maps in Annex 1.</p> <p>According to a Groundsure report dated 01 August 2024, there are no records of substantiated pollution incidents on the site (since 2006 this data has only included category 1 (major) and 2 (significant) pollution incidents).</p> <p>We are not aware of any pollution incidences on the Site.</p>
Evidence of historic contamination, for example, historical site investigation, assessment, remediation, and verification reports (where available)	<p>Not applicable.</p> <p>Previous uses were limited, see historic maps in Annex 1. No site investigation data is available.</p>
Baseline soil and groundwater reference data	Not applicable.

3.0 PERMITTED ACTIVITIES	
Permitted activities	Original application - Operation of an inert and excavation waste transfer station in accordance with Standard Rules environmental permit number SR2009 No.5.
Non-permitted activities undertaken	None.
Document references for: <ul style="list-style-type: none"> <li>plan showing activity layout; and</li> <li>environmental risk assessment.</li> </ul>	Original application - Environmental Management System, PDE Consulting Limited, July 2022.

## Operational Phase

4.0 CHANGES TO THE ACTIVITY	
Have there been any changes to the activity boundary?	No
Have there been any changes to the permitted activities?	November 2024 application to add treatment of imported construction and demolition wastes to the permitted activities.
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No dangerous substances identified in ASR.

5.0 MEASURES TAKEN TO PROTECT LAND

6.0 POLLUTION INCIDENTS THAT MAY HAVE HAD AN IMPACT ON LAND, AND THEIR REMEDIATION

## 7.0 SOIL GAS AND WATER QUALITY MONITORING (WHERE UNDERTAKEN)

## Surrender SCR

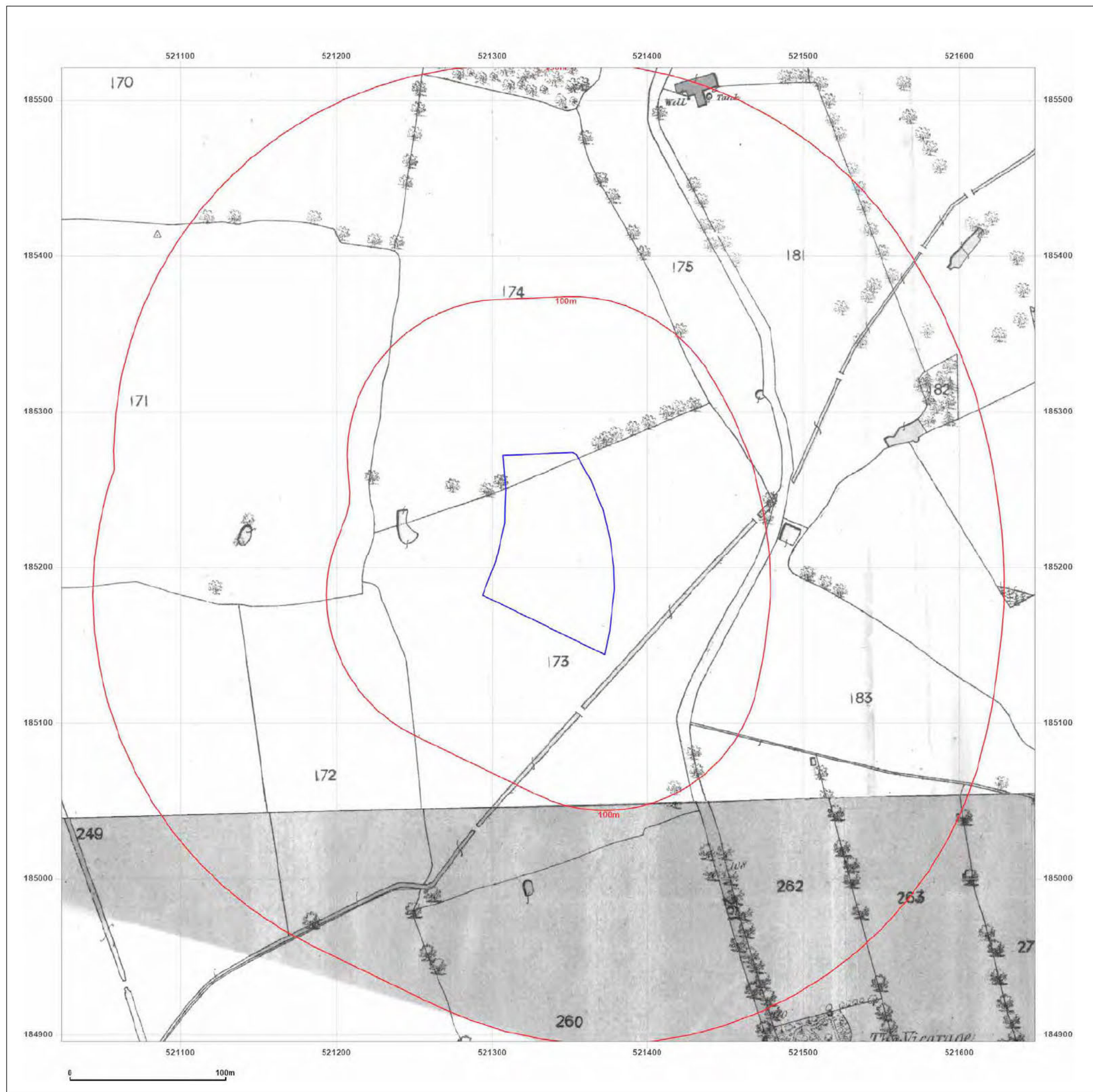
### 8.0 DECOMMISSIONING AND REMOVAL OF POLLUTION RISK

### 9.0 REFERENCE DATA AND REMEDIATION (WHERE RELEVANT)

### 10.0 STATEMENT OF SITE CONDITION

Annex 1: Historical Maps





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## Site Details:

unspecified

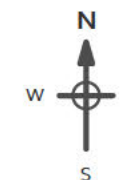
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**Map Name:** County Series

**Map date:** 1865

**Scale:** 1:2,500

**Printed at:** 1:2,500



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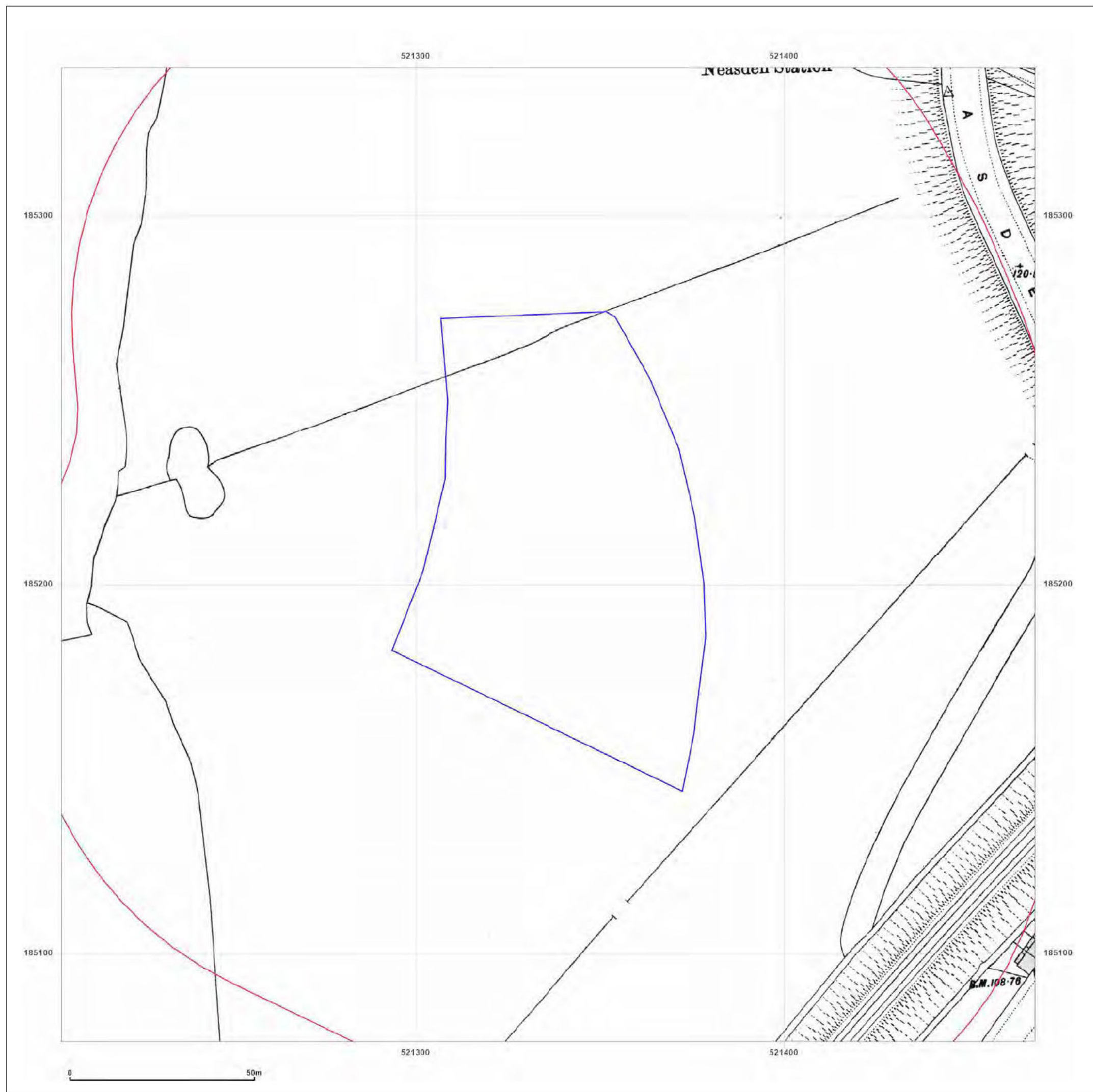
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**Grid Ref:** 521336, 185208

**Map Name:** 1056 Scale Town Plan

**Map date:** 1896

**Scale:** 1:1,056

**Printed at:** 1:1,056



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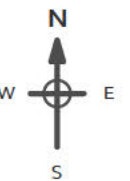
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Grid Ref: 521336, 185208

Map Name: County Series

Map date: 1896

Scale: 1:2,500

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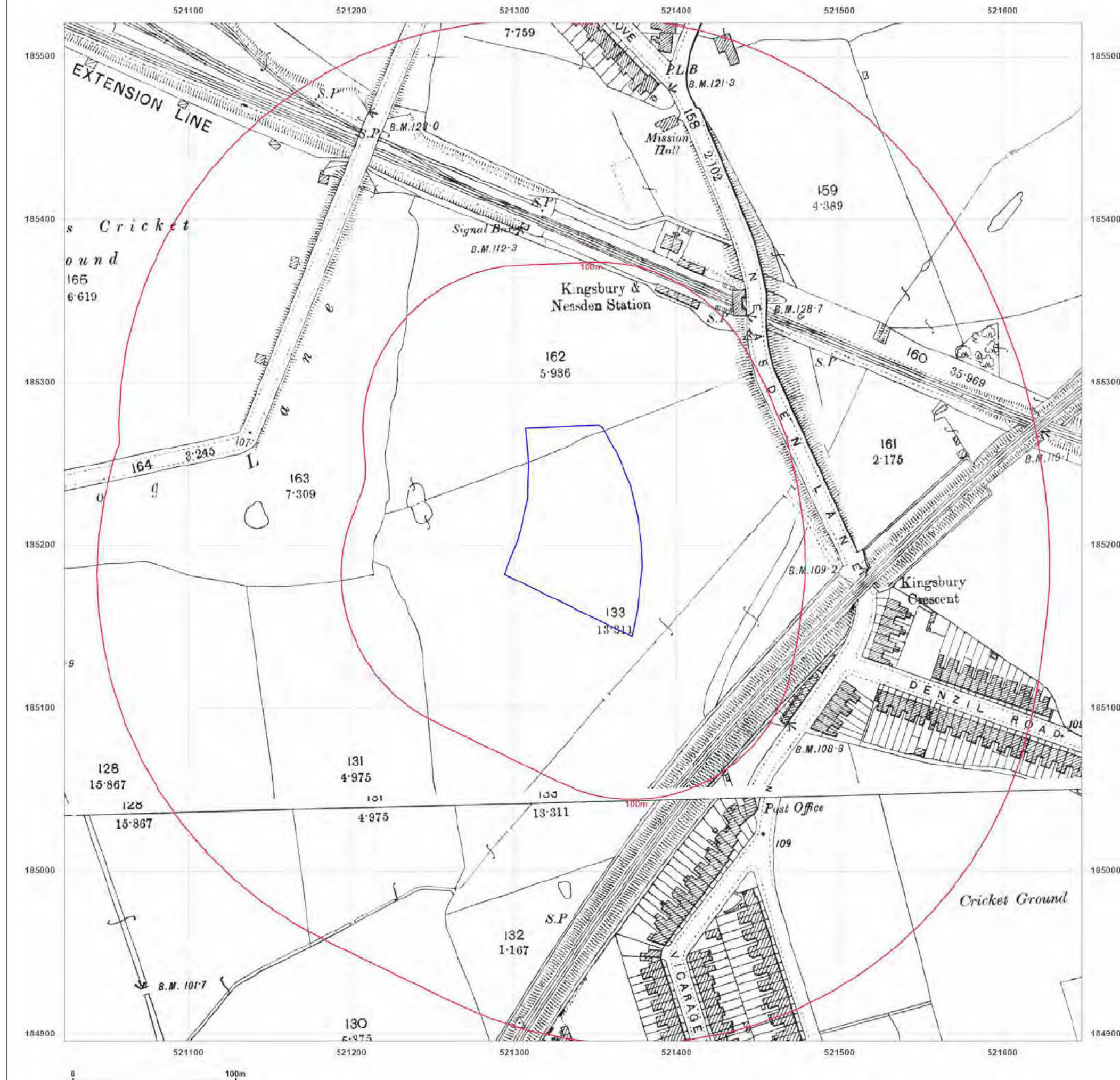


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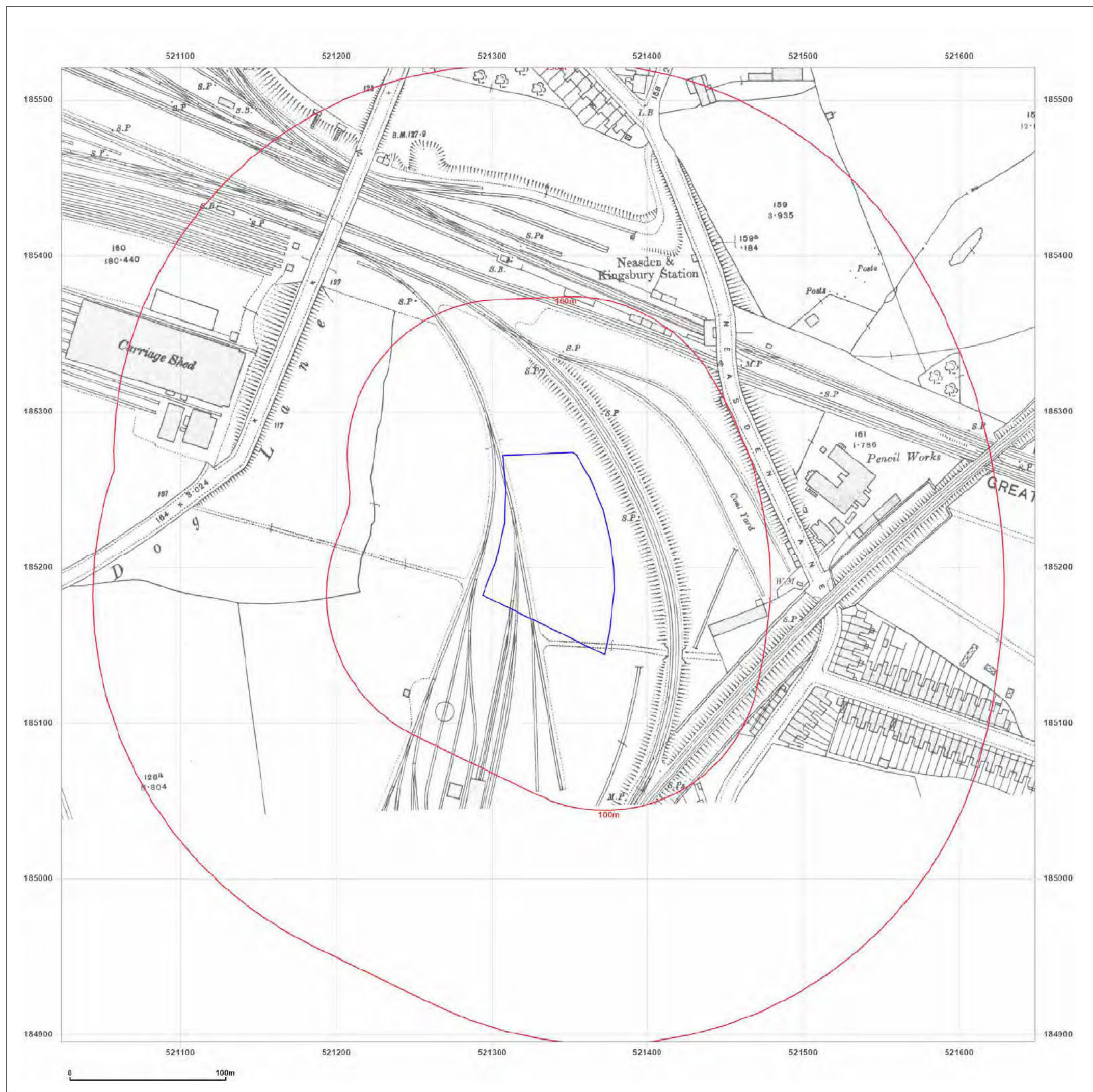
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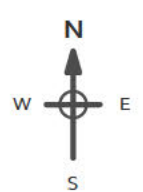
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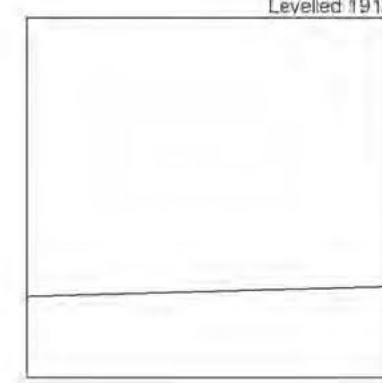
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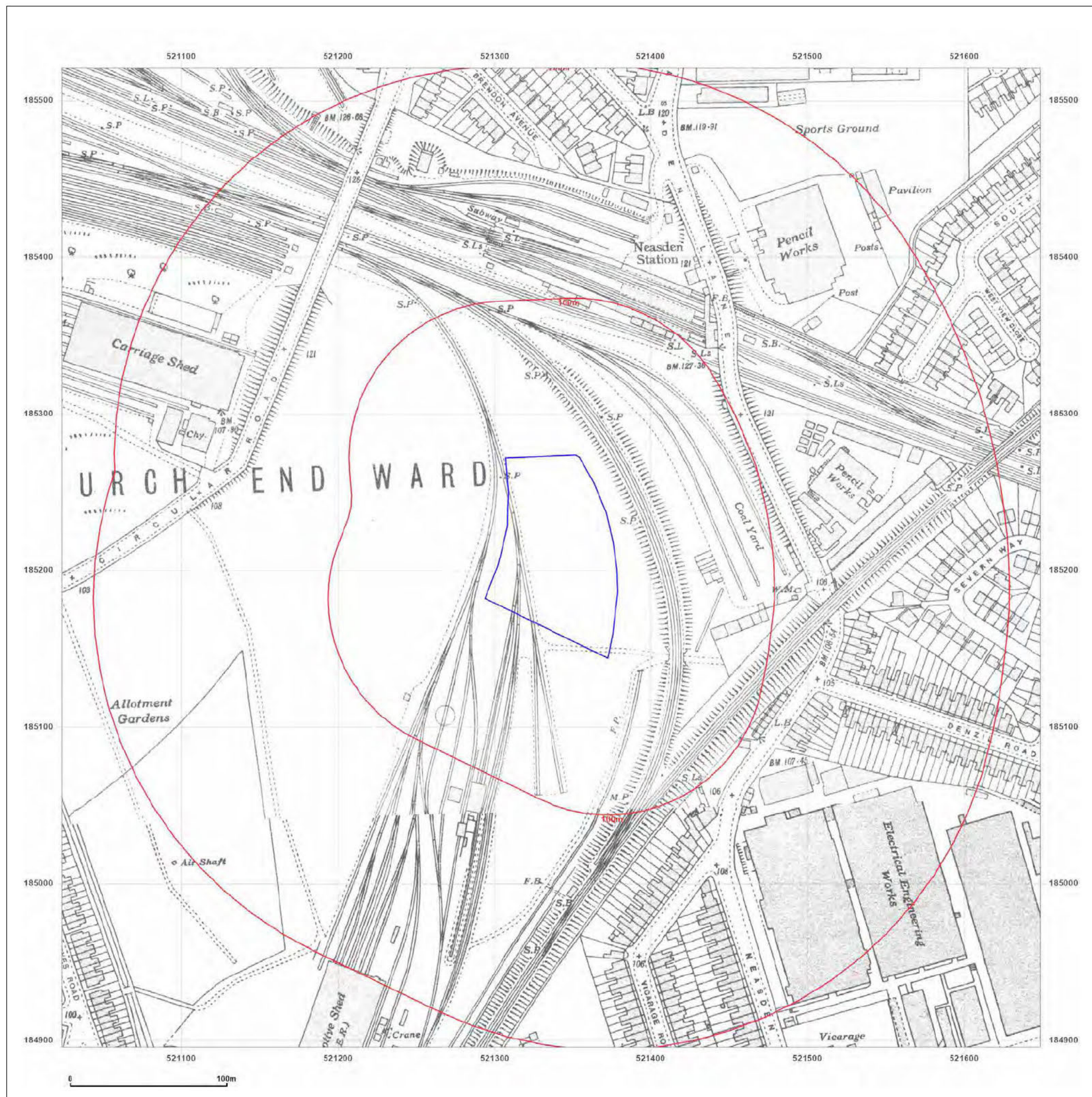
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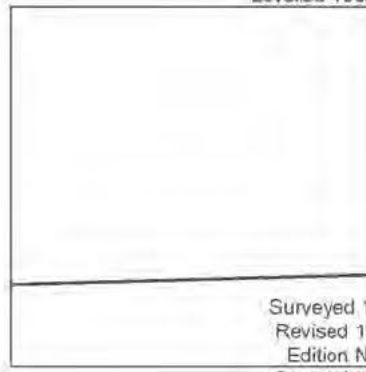
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Scale: 1:2,500

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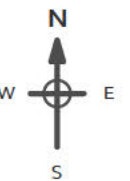
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Grid Ref: 521336, 185208

Map Name: National Grid

Map date: 1954

Scale: 1:1,250

Printed at: 1:2,000



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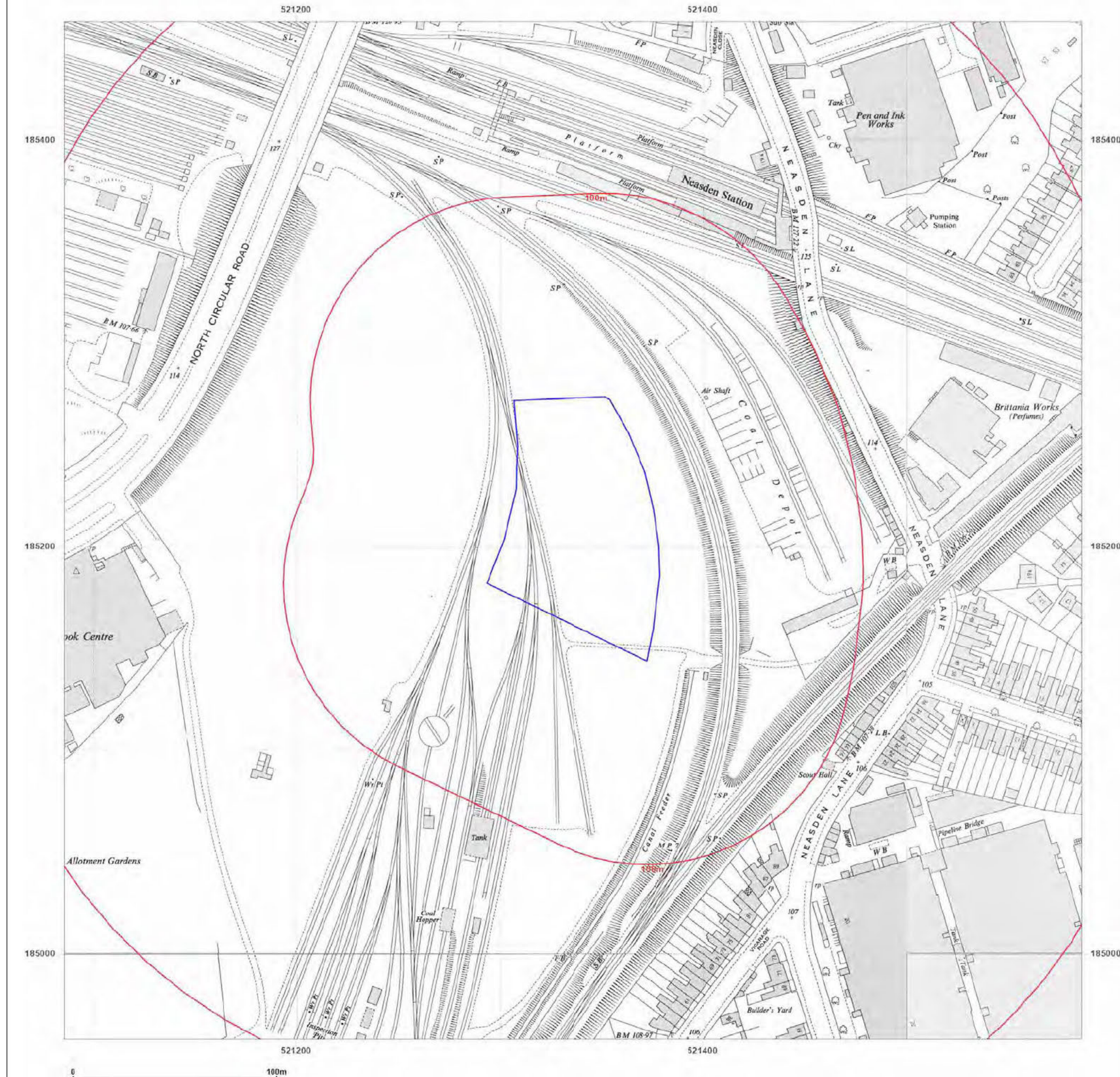


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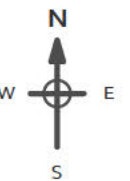
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Map Name: National Grid

Map date: 1955

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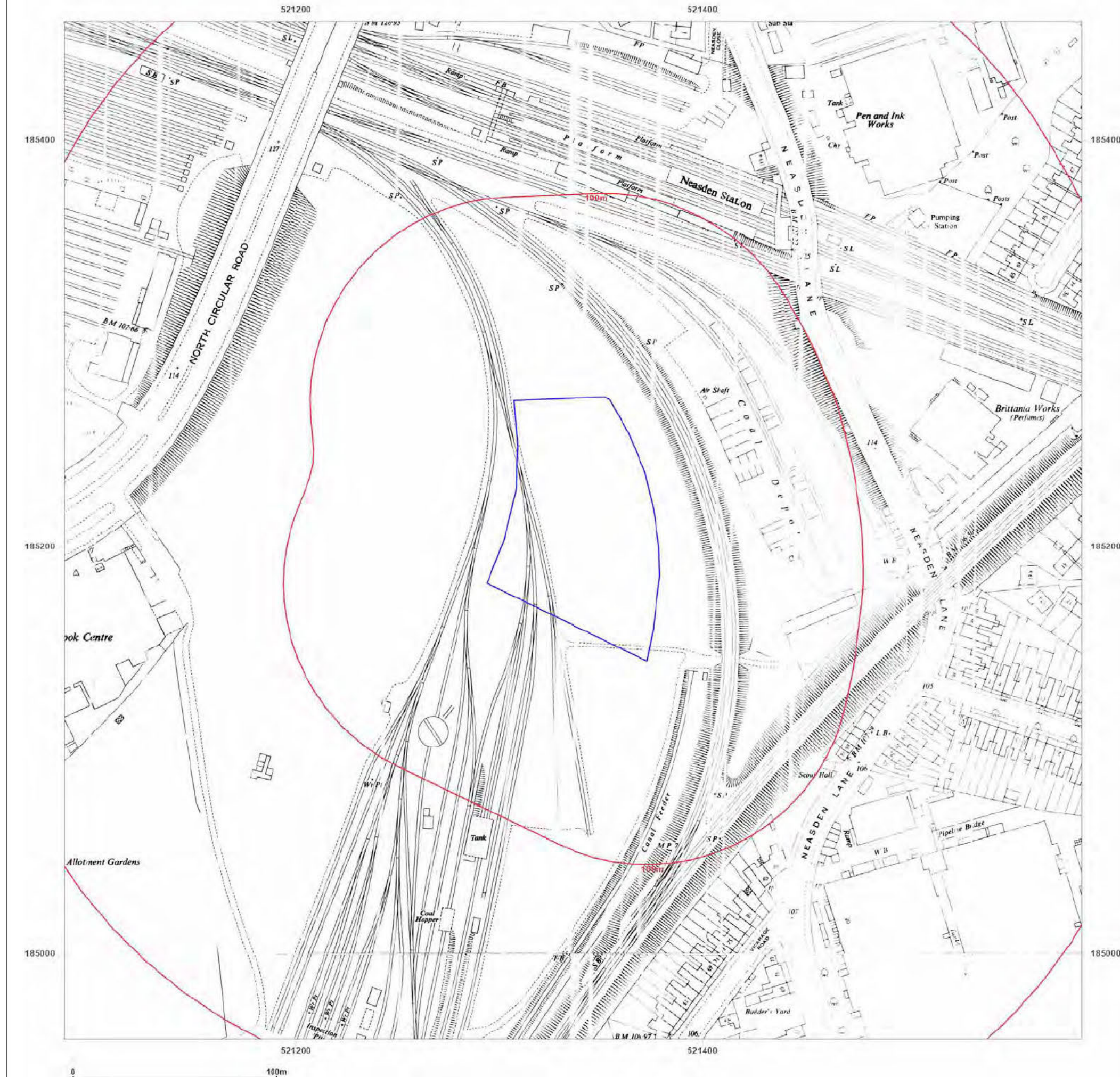


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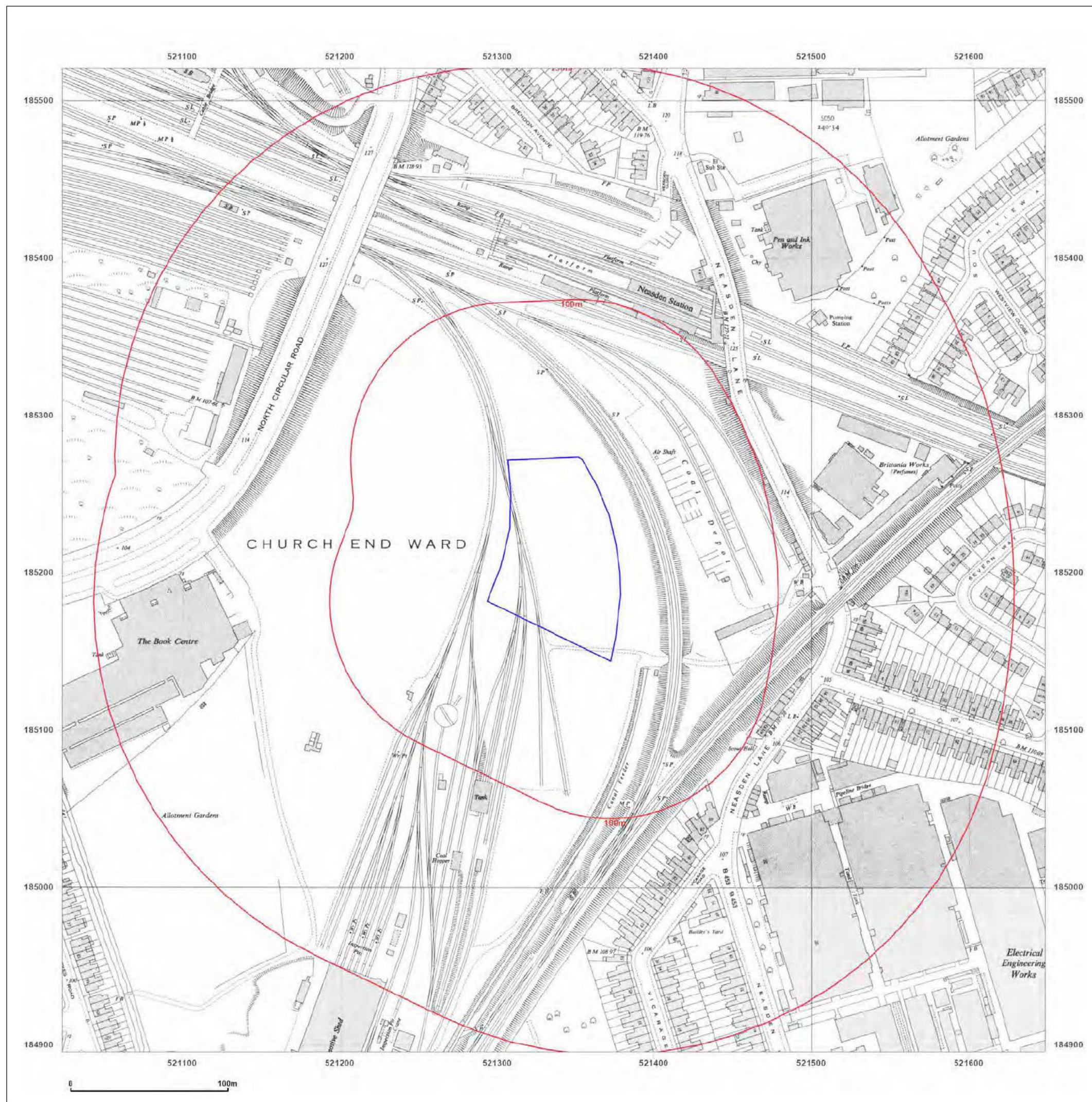
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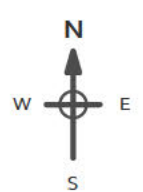
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Map Name: National Grid

Map date: 1955-1956

Scale: 1:2,500

Printed at: 1:2,500



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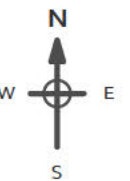
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**Map Name:** National Grid

**Map date:** 1970-1973

**Scale:** 1:1,250

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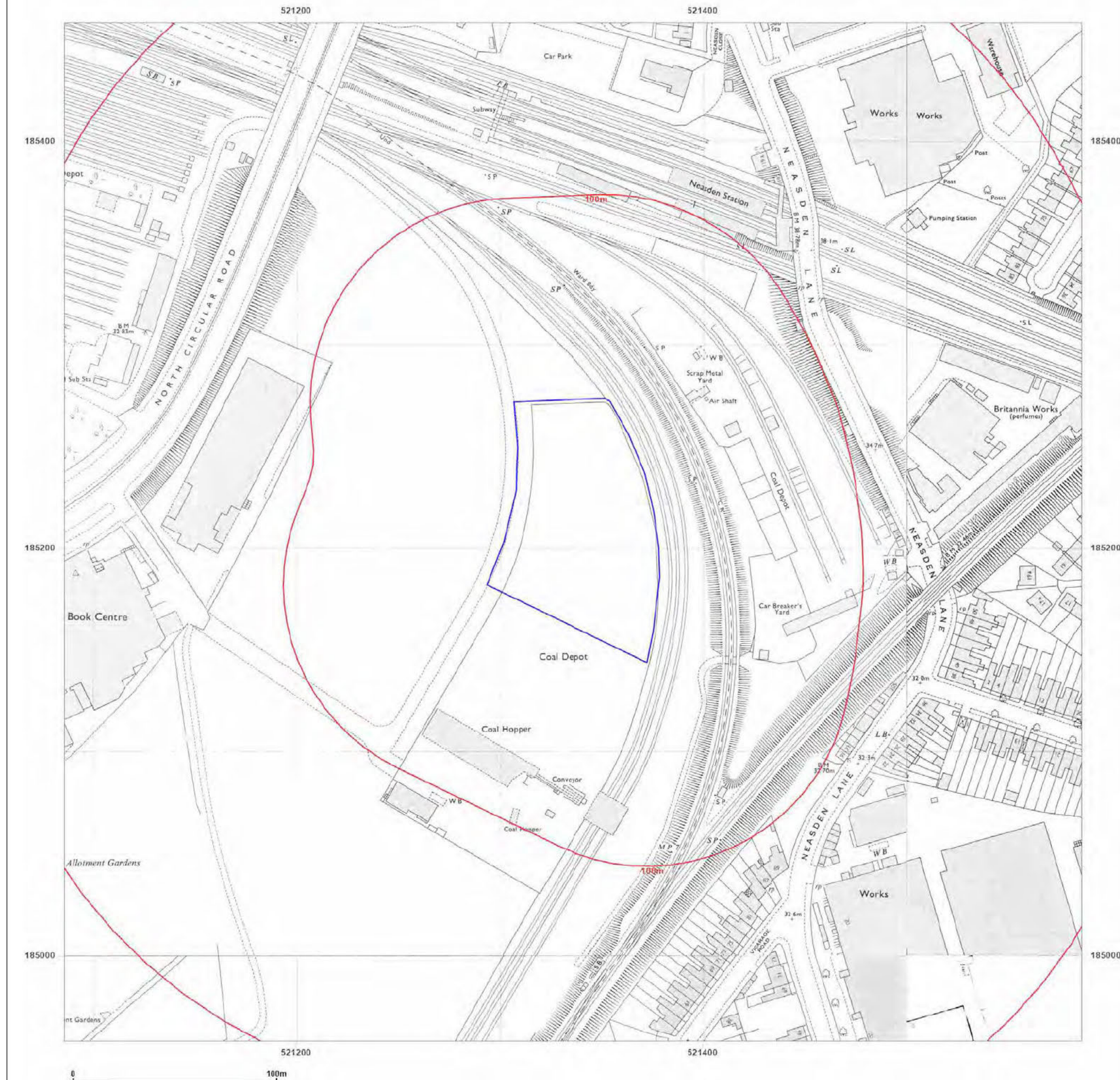


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## Site Details:

unspecified

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**Map Name:** National Grid

**Map date:** 1973-1976

**Scale:** 1:1,250

**Printed at:** 1:2,000



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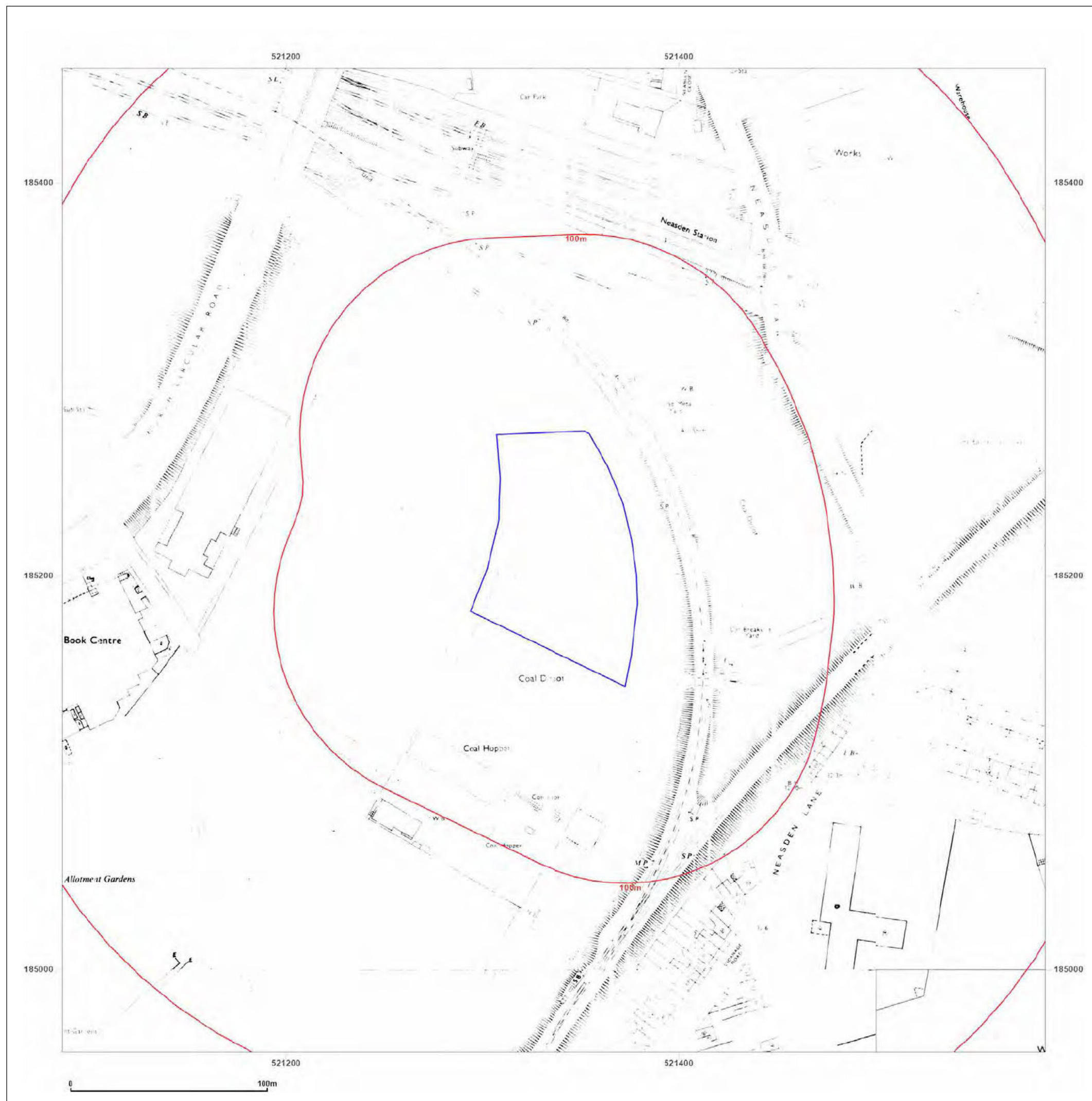


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## Site Details:

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Grid Ref: 521336, 185208

Map Name: National Grid

Map date: 1976-1978

Scale: 1:1,250

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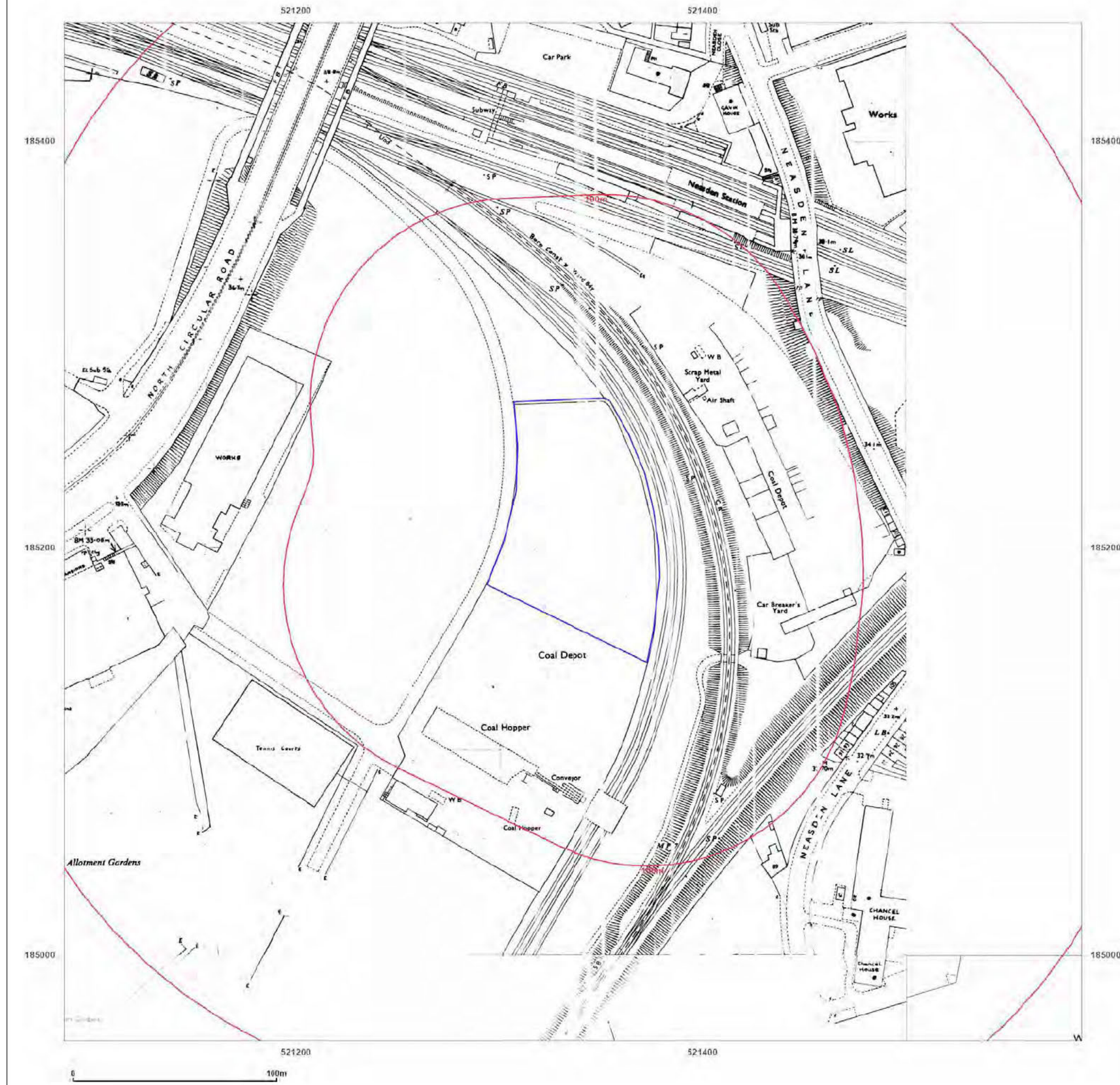


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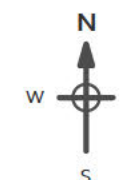
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**Map Name:** National Grid

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**Scale:** 1:1,250

**Printed at:** 1:2,000



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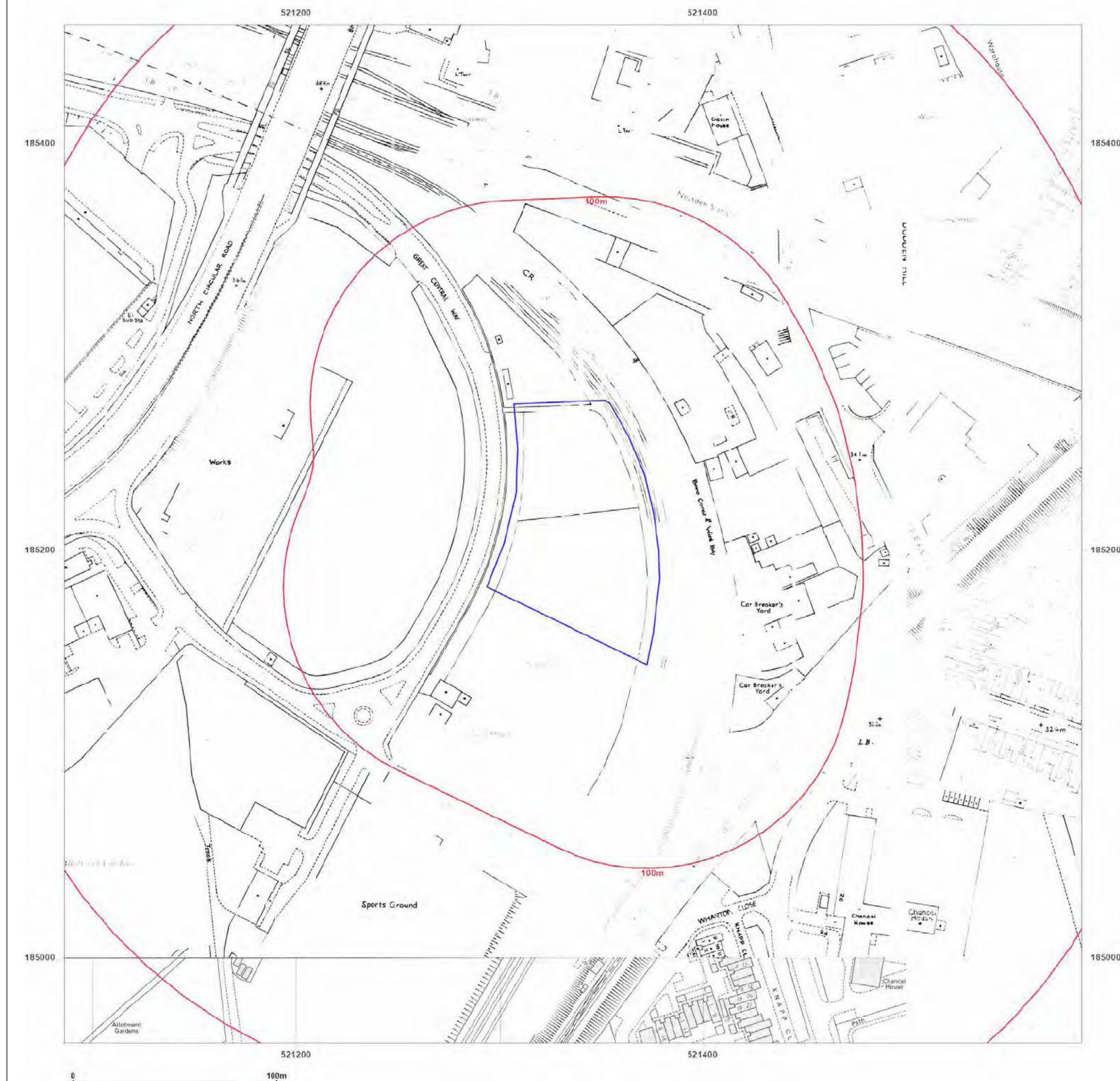


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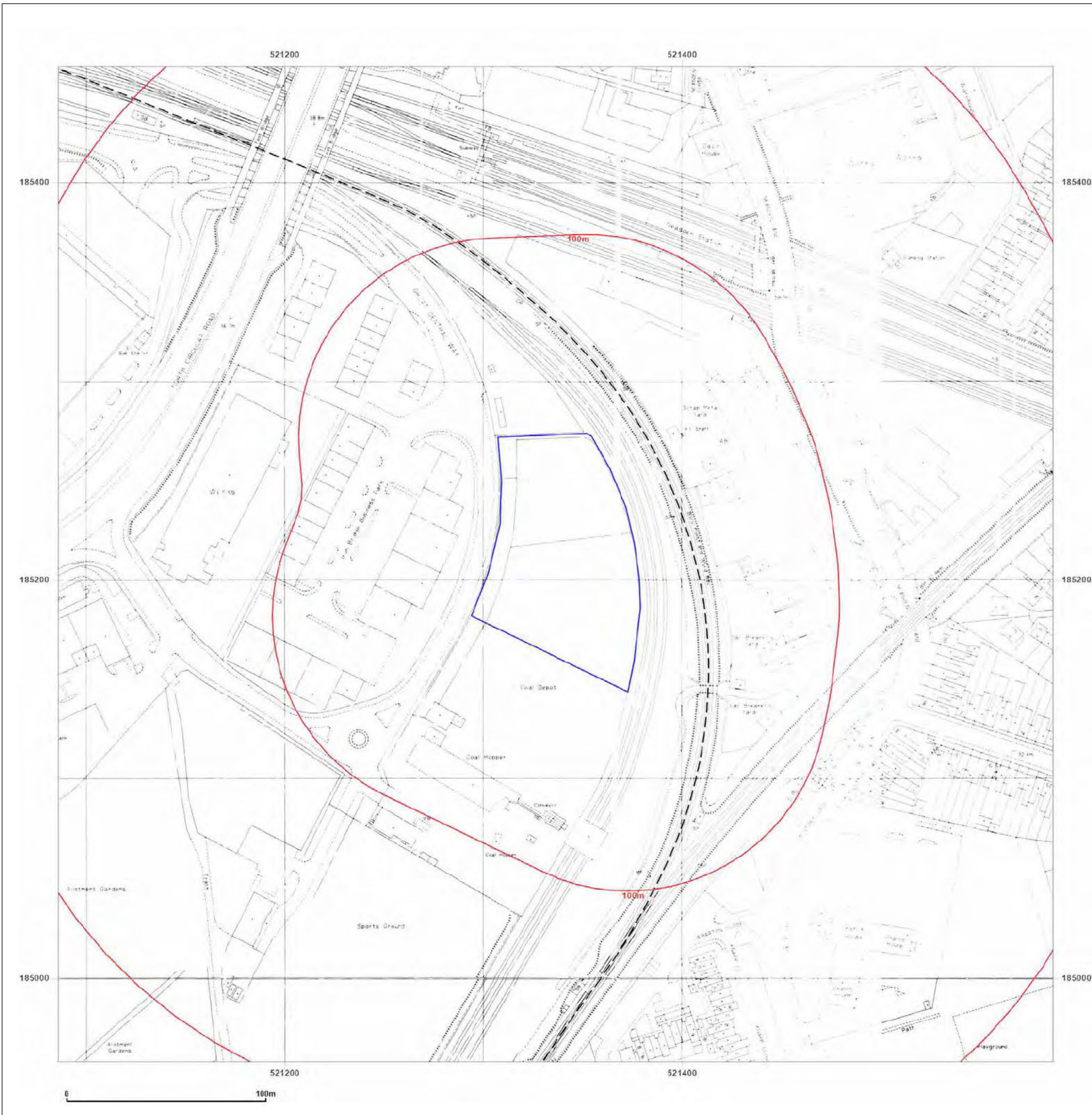


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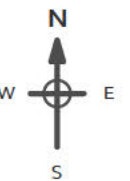
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**Map Name:** National Grid

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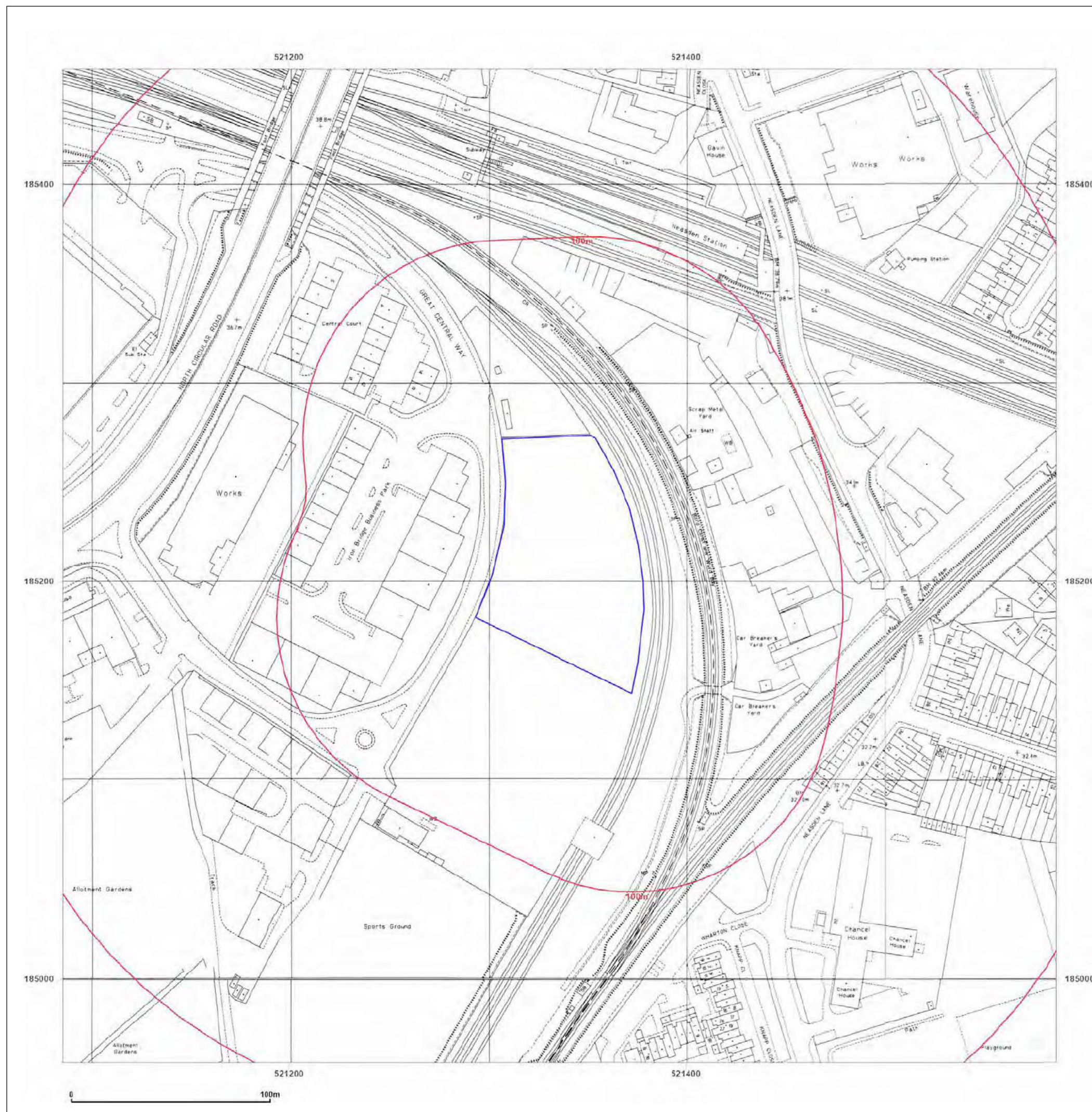


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## Site Details:

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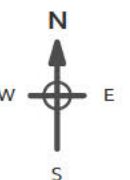
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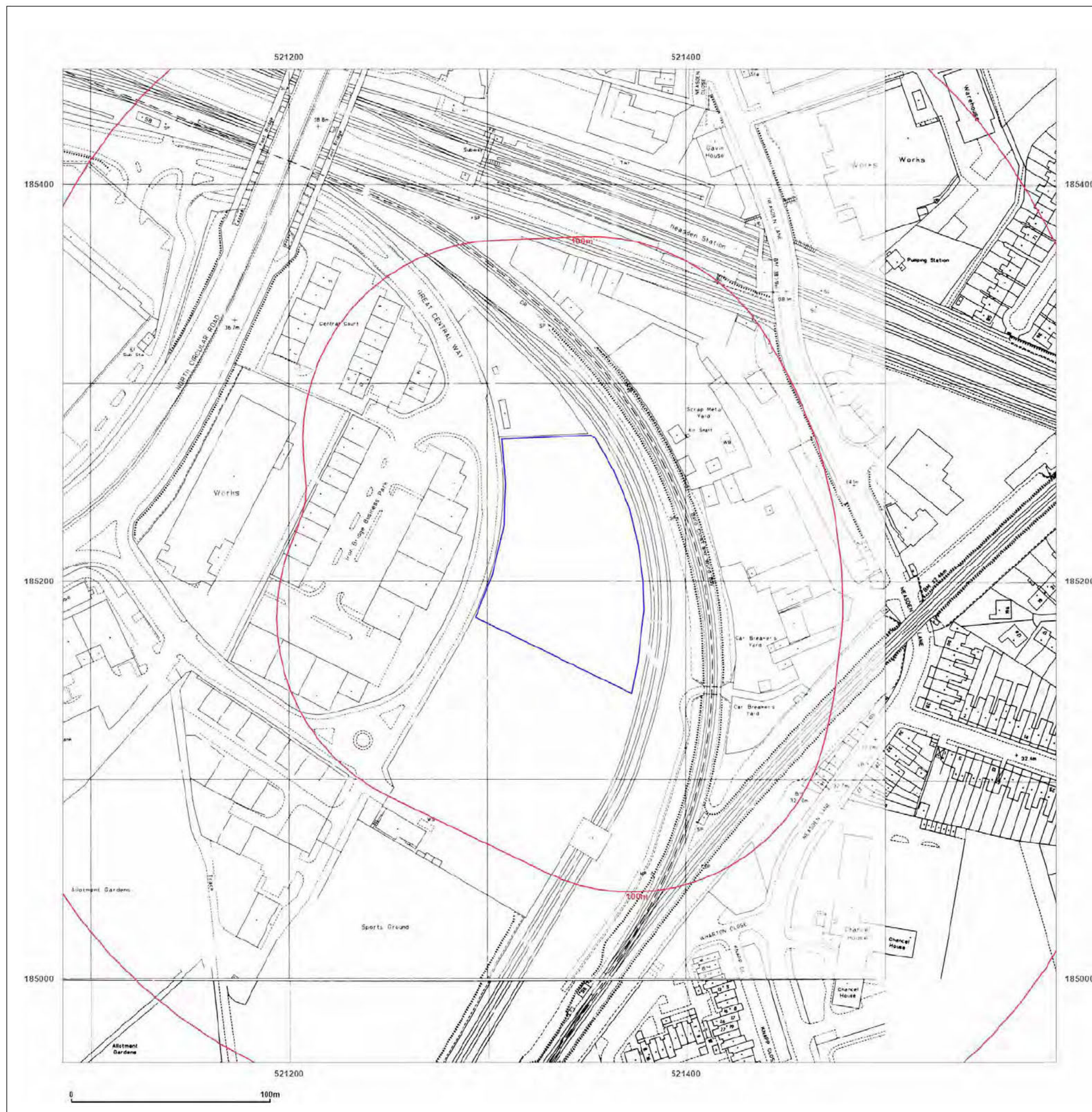


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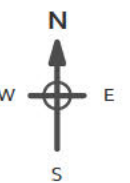
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**Map Name:** National Grid

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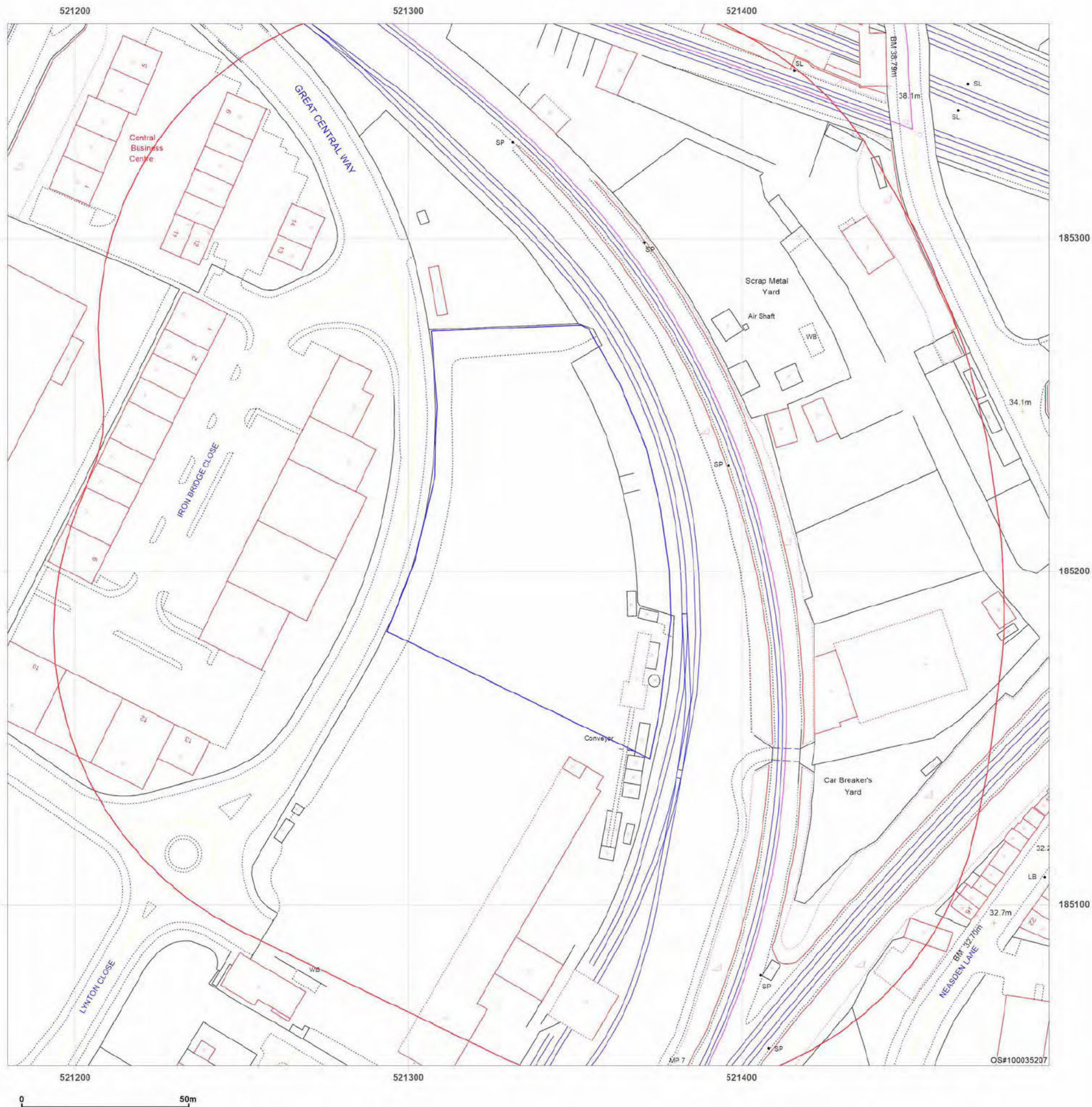
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## Site Details:

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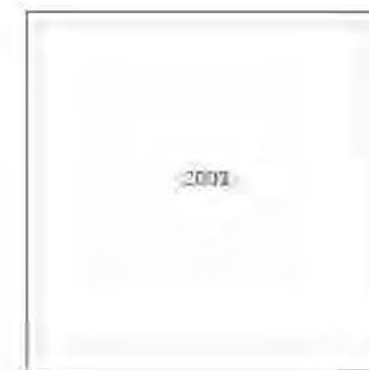
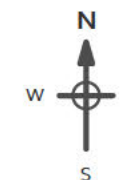
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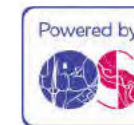
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## **APPENDIX 5**

### Summary Environmental Management System





**DRAFT  
ENVIRONMENTAL  
MANAGEMENT  
SYSTEM  
(EPR/LB3101LL), V2**

for an Inert and Excavation Waste Transfer Station  
with treatment located at

**Great Central Way, Wembley, London, NW10 0UZ**

**Report Prepared on behalf of:**  
Sewells Reservoir Construction Limited



**Report Date:**  
November 2024

This Environmental Management System was prepared by PDE Consulting Limited on behalf of Sewells Reservoir Construction Limited



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## Environmental Management System - Document History

The following revision history sheet will be completed to detail any issued changes to this documentation

Version No.	Version date	Description
Original	July 2022	Original EMS produced following issue of Permit No. EPR/LB3101LL.
V2	November 2024	Updated to support a permit variation application to add waste treatment activity.

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Ground level – Permit Plan	Drawing No. 0100 v3	Scale 1:500@A3
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Drainage Strategy	Drawing No. DR-C-2000 P02	Scale: 1:500@A1

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# 1. INTRODUCTION

## Background

- 1.1. PDE Consulting Limited (the 'Agent') has been commissioned by Sewells Reservoir Construction Limited (SRC) (the 'Operator') to draft an update to an Environmental Management System (EMS) for a waste operation undertaken at Great Central Way, Wembley, London, NW10 0UZ (the 'Site').
- 1.2. The Site is located in Wembley approximately 300 m to the east of Brent Park, 800 m south of Neasden, and approximately 1.8 km east of Wembley Stadium. It is centred at National Grid Reference (NGR) TQ 21331 85169 as shown on Drawing Number KD.WMBL.D.001.
- 1.3. Standard rules environmental permit No. EPR/LB3101LL was issued to the Operator on 20 June 2022. It authorises standard rules set SR2009 No 5: inert and excavation waste transfer station below 250,000 tonnes per annum. Under the standard rules permit, wastes can be bulked up for disposal or recovery elsewhere and can be manually sorted or separated for recovery but the rules do not allow any waste treatment activities such as screening and crushing.
- 1.4. It is proposed to vary the standard rules permit to a bespoke permit. The bespoke application will allow the following additional activities:
  - The treatment (including crushing and screening) of wastes;
  - An increase in waste throughputs to 500,000 tonnes per annum; and
  - Add three additional waste types only.
- 1.5. Wastes will be treated to produce soils, soil substitutes and aggregate only.
- 1.6. The permit boundary which is shown on Drawing No. 0100 v3 will remain unchanged.
- 1.7. A copy of the Permit is presented as Appendix 1.
- 1.8. Condition 1.1.1 of the permit requires that the activities are managed and operated in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure, and those drawn to the attention of the operator as a result of complaints.
- 1.9. There are three main commitments for this EMS:
  - Prevention of pollution;
  - Compliance with permitting regulations; and
  - Continual environmental improvement.
- 1.10. This draft EMS has been produced to support the permit application and it will be finalised when the permit is issued.



## Review Process

- 1.11. This EMS needs to be reviewed to ensure that targets are being met, and to take account of any process changes/ developments in environmental control or/ and changes to the Permit. This EMS should be considered as a 'live' document and new procedures shall be added and/ or existing procedures amended as necessary as the Site develops.
- 1.12. It is necessary to review and update this EMS as follows:
- When you make changes to your Site, operations, or equipment that affect the activities covered by the Permit;
  - Whenever you apply to change ('vary') the Permit;
  - After any accident, complaint, or breach of the Permit; and
  - If you encounter a new environmental problem or issue and have implemented new measures to control it.
- 1.13. Any revisions or changes will be logged in a revision history table at the beginning of the document.
- 1.14. The EA may also review your management system and make recommendations for improvements after any accident, permit breach, or other incident.

## Reference Documents

- 1.15 This EMS has been prepared in accordance with the environmental management guidance<sup>1</sup> on the EA website ([www.gov.uk](http://www.gov.uk)).

---

<sup>1</sup> Develop a management system: environmental permits. Published 1 February 2016 and updated 03 April 2023.

## 2. OPERATIONS

- 2.1. Waste will be delivered to Site in covered HGV's and stockpiled before being treated to produce soil, soil substitutes and aggregates only.
- 2.2. It is proposed that a dedicated covered area is constructed close to the northern boundary of the Site. The dedicated covered area is labelled as Building B5 on Drawing No. 0100 v3. The dedicated covered area will have solid façades, constructed using steel cladding along the northern and western sides and will be fully open on the eastern and southern sides which face into the Site, to allow safe access. Cross sections through the dedicated covered storage area are shown on Drawing No. 106 v3 as sections E5 and E6.
- 2.3. Wastes that are imported to the Site to be treated will be tipped into separate stockpiles in the dedicated covered area prior to treatment.
- 2.4. The crusher and screener used to process recycled materials will operate within the dedicated covered area. Two excavators would operate in this area to load the plants, and a loading shovel would work in this area and outside, managing the recycled materials, loading HGVs, and loading aggregate trans when required.
- 2.5. Processed materials will be stored outside adjacent to the covered area as shown on Drawing No. 0100 v3 prior to being exported from Site by road or potentially loaded back onto the trains. The processed wastes storage area will have 7.5 m tall bay walls to the south and west.
- 2.6. Clay based waste will be imported to Site via HGV's and stored in Area Y2 on the eastern side of the Site shown on Drawing No. 1100 for loading onto trains. This activity is ongoing in accordance with the standard rules permit. These wastes will not be treated on Site.
- 2.7. It is proposed that the maximum annual throughputs of wastes are increased to 500,000 tonnes. The maximum amount of waste that will be stored on Site at any one time will be 25,000 tonnes.
- 2.8. No changes to the operational hours are proposed, with the existing operating hours of between 6:00 – 20:00 hours daily. Trains are permitted to arrive and offload at any point over a 24-hour period.
- 2.9. The entire Site is surfaced in concrete. The proposed drainage strategy has been designed to collect rainfall run-off from roofs on the permitted Site and the adjacent aggregate depot (including Building B5 shown on Drawing No. 0131 v1) via a series of rainwater pipes and store it in one existing and two new 30,000 litre tanks. A new water storage tank will be installed in the aggregate recycling area shown as B8 on Drawing No. 0100 v3.
- 2.10. Surface water run-off will be reused in the above ground dust suppression systems with an overflow discharging into a below ground drainage network, if required. Surface water runoff will be treated by a Hydro-International Downstream Defender Select Vortex, or similar. Excess surface water run-off from the Site will discharge into an existing Thames Water sewer (manhole: TW3203) at a discharge rate of 2.5 l/s, with attenuation provided in a concrete tank. The drainage strategy is shown on Drawing No. DR-C-2000 P02.
- 2.11. It is proposed that three dust canons are installed around the covered waste treatment and storage area as shown on Drawing No. 0100 v3. They have a reach of 30 m and can oscillate 359 degrees. The dust canons will provide full coverage of the waste storage and recycling activity as shown on Drawing No. 0100 v3.

- 2.12. In Area Y2 where clay based waste are stored before being loaded on to trains, it is not possible to use dust cannons as Network Rail rules prohibit mist spray onto the railway line. Therefore a series of sprinklers with a 5m radius spray will be installed along the whole length of the waste storage area. The locations of the sprinklers are shown on Drawing No. 1100 v3.
- 2.13. The entire Site is fenced and has lockable gates to prevent unauthorised access. Behind the western fence that separates the Great Central Way pedestrian path and the Site runs a greened buffer zone. This zone provides a green buffer between the Site and the road consisting of earth banking and some partially developed trees.
- 2.14. Enhanced security and mitigation measures include the construction of a 7.5 m high boundary wall which will extend along the whole of the northern and western Site boundaries to ensure the Site is effectively screened from potentially sensitive properties.
- 2.15. It is also proposed to install a continuous gabion wall along the full length of the western Site boundary. The gabion wall, which will be positioned behind an enhanced green buffer zone is to be filled with graded stones to provide a stratified elevation with differing bands of colour and stone size. The inclusion of the gabion wall also provides the opportunity to promote the intensification of habitat on the Site by treating it as a habitat/ shelter feature wall. A wide range of wildlife will be supported through the inclusion of bee hotels, bumble bee boxes and hoverfly lagoons within the gabion frame.
- 2.16. In addition, a green wall trellis support system will be attached to the metal façade of Building B5. The fence line, greened boundary, gabion wall and green wall trellis behind Building B5 are shown on Drawing No. 106 v3.

### **Waste Acceptance Procedure**

- 2.17. All wastes will be imported to Site by road in HGV's either by the Operator's own vehicles or by third party waste contractors. The Operators HGV's meet Euro 5 or 6 emission ratings. For all waste delivered by the Operator's vehicles, the source will be known as each customer will be booked into the database. At the time of ordering a collection, the customer is made aware of the waste that can be collected by the Operator. All third-party users are made aware of the Waste Acceptance Procedures (WAP).
- 2.18. All waste deliveries will be booked with the Site. As part of the booking procedure, details relating to the source of the waste will be noted. If there is any doubt about the nature of the source, based on the site description, further information will be required including site reports and chemical analysis data.
- 2.19. All deliveries will be sheeted until instructed to un-sheet by the Site staff. This will take place after the vehicle has been weighed and the driver provided directions to the unloading area. The vehicle will remain sheeted for as long as possible. Therefore, if there is a queue, the driver will only un-sheet when ready to discharge. This will ensure that vehicles are sheeted as they travel through the Site.

- 2.20. A check of the load will be made by the Site staff on arrival and/ or during deposit by the Site foreman and /or plant operator by visual assessment. The contents of the load will be checked against the Waste Transfer Note (WTN). If the load is visually different to the description, the Operator's office staff will contact the customer to validate the changes.
- 2.21. If the delivery driver is not employed by the Operator, then the written description shall be changed on the WTN by the driver to correct the description. The waste producer will be notified. Site staff will check the environmental permit to validate that the description given is listed on the permit. Once accepted, the driver will be directed to the dedicated covered area.
- 2.22. Recyclable soil and stones (EWC 17 05 04) will be stockpiled and treated to produce 6F4 material. Concrete (EWC code 17 01 01) will be stockpiled and treated to create Type 1 crushed concrete. Concrete (EWC code 170107) will also be stockpiled with road planings (EWC code 17 03 02) and treated to produce 6F5 material.
- 2.23. The waste types to be stored and treated on Site are listed in Table 1 below.

**Table 1: Waste Types**

Waste code	Description	Exclusions
<b>17 01</b>	<b>Concrete, bricks, tiles and ceramics</b>	
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	
<b>17 02</b>	<b>Wood, glass and plastic</b>	
17 02 02	Glass	
<b>17 03</b>	<b>Bituminous mixtures, coal tar and tarred products</b>	
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01	
<b>17 05</b>	<b>Soil (including excavated soil from contaminated sites), stones and dredging spoil</b>	
17 05 04	Soil and stones other than those mentioned in 17 05 03	
17 05 08	Track ballast other than those mentioned in 17 05 07	
<b>17 09</b>	<b>Other construction and demolition wastes</b>	
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03.	
<b>19 12</b>	<b>Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>	
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.	Waste aggregate generated from the recycling of metals only.
<b>20 02</b>	<b>Garden and park wastes (including cemetery waste)</b>	
20 02 02	Soil and stones	

2.24 Wastes shall only be accepted at the Site if:

- It is of a type listed in the permit;
- It does not consist solely or mainly of dusts, powders or loose fibres;
- It is not in a form which is either sludge or liquid;
- It conforms to the description in the documentation supplied by the producer and holder through the accompanying waste transfer note;
- Its chemical, physical and biological characteristics make it suitable for its intended treatment;
- Any excavated soil from potentially contaminated sites has been shown by prior chemical analysis and assessment to be suitable for the intended use without significant risk of pollution; and
- It is visually inspected on Site to ensure that it complies with the permit.

2.25 Any waste that does not comply with the above shall be rejected and shall be;

- Removed from the Site; or
- Moved to a designated quarantine area pending removal.

2.26 The operator shall maintain and implement a system which ensures that a record is made of the quantity, characteristics, date of delivery and, where practicable, origin of any waste that is received for disposal or recovery and of the identity of the producer, or in the case of multiple collection vehicles, of the collector of such waste. Any information regarded by the operator as commercially confidential shall be clearly identified in the record.

2.27 Anybody having responsibility for approving waste streams at the Site must have a thorough understanding of the WAP.



### 3. SITE MANAGEMENT

- 3.1. The Operator of the Site is Sewells Reservoir Construction (who operate as SRC Aggregates), whose registered address is: Crown Business Centre Old Ipswich Road, Ardleigh, Colchester, England, CO7 7QR.
- 3.2. The Site will be managed using sufficient competent persons and resources. Certificates for the technically competent manager are provided in Appendix 2.
- 3.3. A notice will be displayed at or near the Site entrance informing the public of the nature of the Site and who they can contact for further information, or who to notify if they have a concern. It needs to be easily readable from outside the Site in daylight hours and must include:
  - The Permit holder/ Operators name;
  - An emergency contact name and the Operator's telephone number;
  - A statement that the Site is permitted by the EA;
  - The Permit number (EPR/LB3101LL); and
  - The EA national numbers, 03708 506506 (general enquiries) and 0800 807060 (incident hotline).
- 3.4. The Site perimeter is secured by lockable gates and fencing. The Site is kept locked and secure when not manned.
- 3.5. Minimum personal protective equipment shall be worn in all operational areas of the Site. This will include a high visibility jacket or waistcoat in traffic areas and steel toe capped boots.
- 3.6. All contractors visiting the Site will sign in and out of the visitors' book and will be made aware of the Site's health and safety procedures.
- 3.7. All Site staff will be made aware of the waste hierarchy, which is (from most to least favourable option):
  - **Prevention:** preventing and reducing waste generation;
  - **Reuse and preparation for reuse:** giving the products a second life before they become waste;
  - **Recycling:** turning waste into a new substance or product. Includes composting if it meets quality protocols;
  - **Recovery:** includes anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat, and power); and
  - **Disposal:** processes to dispose of waste, i.e., landfill and incineration without energy recovery.
- 3.8. A list of Site procedures is presented in Appendix 3. Reporting forms are presented in Appendix 4 and comprise:
  - Form A: Environmental Training Record;
  - Form B: Environmental Training Checklist;
  - Form C: Accident and Incident Record Form;
  - Form D: Complaints Record Form; and
  - Form E: Maintenance Record Form.

## 4. ACCIDENT MANAGEMENT PLAN

4.1. An Accident Management Plan is maintained and implemented for the waste operation and is presented in Table 2.

4.2. Accidents identified as part of the assessment are:

- Flooding due to ingress of watercourse floodwater, blocked drains, burst water main, and use of fire water;
- Fire;
- Failure of services due to failure of supply in water, gas, electricity;
- Failure of containment;
- Leaks or spillages (e.g., spillage of liquids during refuelling or of material during transfer and sorting, of inert waste); and
- Unauthorised entry and tampering or malicious damage to equipment.

4.3. If an accident or incident causes damage to the environment, or risks doing so, you must: report it to the EA and complete the form in Appendix 4.

**Table 2: Accident Management Plan**

Event	Likelihood of Occurrence	Consequence of Occurrence	Mitigation measures	Actions planned if the event does occur
Flooding	Unlikely. The Site is located in Flood Zone 1 (lowest risk).	Possible loss of containment of stockpiled inert waste.	Issue with loss of containment rather than effects of the materials.	Recovery of released material where possible.  Report any significant effects to the EA.
Fires	Unlikely. The waste types stored on-Site are not combustible. The Permit does not allow the burning of wastes.	Damage to infrastructure and injury to personnel.	Sources of ignition will be removed from the operational area and it shall be designated a 'No Smoking' zone.  Flammable liquids are stored appropriately.	Appropriate fire-fighting equipment will be available on-Site.
Failure of Services	Unlikely. Due to failure of the supply of: water; electricity and/ or gas supply.	Build-up of wastes.	Provision of standby facilities.  Maintenance of up to date plans showing location of utilities.	Cancel further waste imports if necessary.
Failure of Containment	Unlikely Due to land movement, corrosion, impact, etc.	Contamination of land, drains, groundwater, and watercourses.	Provision of secondary containment for fuel tanks.	As above re: leaks and spills

**Table 2 continued: Accident Management Plan**

Event	Likelihood of Occurrence	Consequence of Occurrence	Mitigation measures	Actions planned if the event does occur
Leaks/ Spills	Possible spillage during transfer of wastes.	Contamination of land, drains, groundwater, and watercourses.	Inspect and validate all incoming wastes.  Only inert and non-hazardous wastes will be accepted.	Material will be returned to the stockpile immediately.
	Possible spillage during delivery of fuel.		Delivery tankers should have in-built mitigation.  Supervise fuel deliveries. Use drip trays and spill materials.	Leaks and spills will be dealt with by spill kits or by covering with inert material.
	Possible spillages during refuelling of vehicles and equipment.		Vehicles and equipment will be refuelled in designated areas.  All filling points, vents, and sight glasses shall be within the sealed impermeable enclosure.	Contaminated material will be disposed of at a suitably permitted site.
Vandalism/ Fly tipping	Unlikely  Unauthorised entry and tampering or malicious damage to vehicles and equipment, illegal deposit of waste.	Contamination of land, groundwater, and watercourses.	Site security measures.	As above re: leaks and spills.  Contact the EA re: any incidents of fly tipping.

- 4.4. If you need to notify the EA during normal working hours you can contact your local office as follows:

Local Office: Welwyn Garden City Alchemy, Bessemer Road, Welwyn Garden City, Hertfordshire, AL7 1HE: 0370 850 6506  
 General Enquires Telephone number: 03708 506 506  
 Out of hours free 24 hour incident hotline: 0800 80 70 60



## 5. EMISSIONS AND MONITORING

- 5.1. There are no emission limits or associated monitoring requirements specified in the Permit.
- 5.2. Condition 3.1 of the Permit requires that emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The Operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise those emissions.
- 5.3. Due to the nature of the proposed waste types, it is considered that they have negligible potential for odorous emissions.
- 5.4. Inert waste operations have negligible potential to attract pests and vermin. Should pests become a problem then specialist contractors will be engaged to address the problem.

### **Dust Emissions Management Plan**

- 5.5. Appropriate measures to reduce / control dust from the Site are presented in the DEMP in Appendix 5.

### **Noise Management Plan**

- 5.6. Appropriate measures to reduce / control noise emissions from the operations are presented in the Noise Management Plan in Appendix 6.

### **Environmental Risk Assessment**

- 5.7. The potential impact of pollution for each aspect of the waste facility have been considered and tabulated in the Environmental Risk Assessment in Appendix 7 including:
  - Dust;
  - Odour;
  - Noise;
  - Accidents;
  - Unauthorised access; and
  - Flooding.

### **Site Condition Report**

- 5.8. A Site Condition Report (SCR) describes and records the condition of the land and groundwater at a site at particular points in time. It enables the operator to demonstrate that they have protected land and groundwater during the lifetime of the Site, and that the land is in a satisfactory state when it comes to surrender a permit.

- 5.9. Sections 1 to 3 of the EA's template for a SCR<sup>2</sup> are completed prior to any waste activities taking place (refer to Appendix 6 for the completed Application SCR).
- 5.10. Any changes to your activity can be logged in Sections 4 to 7 of the SCR.
- 5.11. At permit surrender it is necessary to complete sections 8 to 10 of the SCR and submit it with your surrender application.
- 5.12. Guidance on the SRC can be found on the EA website:  
<https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report>.
- 5.13. The SCR is presented in Appendix 8.

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<sup>2</sup> H5: Site condition report – guidance and templates (Version 3.00). Environment Agency, April 2013.

## 6. CLIMATE CHANGE

- 6.1. This EMS has considered how operations at the Site could be affected by a changing climate in light of climate projections for the UK, as presented in Table 3 below.

**Table 3: Site Operations in Relation to the Changing Climate**

Result of a changing Climate	Potential effect on the operation of the Site	Additional Mitigation
Higher average temperatures particularly in summer and winter AND More heat waves and hot days	Increased likelihood of dust/particulate entrainment.	Increased use of dust suppression, reduction of activities, implementation of dust monitoring.
Rising sea levels	Not applicable.  Ground levels are significantly above sea level (majority of the Site lies at between 31 mAOD and 32 mAOD).	Not applicable.
Changes in rainfall patterns and intensity	Surface water flooding is highly unlikely as set out in the AMP, as the Site is located within Flood Zone 1 (lowest risk).	Not applicable.
More storms	As above regarding flooding following heavy rainfall.  Short term interruption of services – such as electricity following storms.	As above regarding flooding.  Service infrastructure in the UK is excellent and promptly resumes following interruption within a short time frame.



## 7. INFORMATION

- 7.1. Records will be maintained in accordance with Condition 4.1 in the Permit. A copy of this EMS shall be kept on file on Site in the office.
- 7.2. Within one month of the end of each quarter, the Operator shall submit to the EA using the form made available for the purpose, the information specified on the form relating to the Site and the waste accepted and removed from it during the previous quarter.
- 7.3. Waste returns can also be made on-line at the following address:  
  
<https://www.gov.uk/government/publications/gor-online-system-spreadsheet>.
- 7.4. The Permit requires that the EA shall be notified without delay (i.e., by telephone) following the detection of:
  - Any malfunction, breakdown, or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
  - The breach of a limit specified in the Permit; and
  - Any significant adverse environmental effects.

## **APPENDIX 6**

### Evidence of Technically Competent Management



# WAMITAB

Waste Management Industry  
Training and Advisory Board



The Chartered Institution  
of Wastes Management

Certificate No. OCC3718

## Operator Competence Certificate

**Qualification Title:**

**Managing Physical & Chemical Treatment - Hazardous Waste - 4MPTH**

**This Certificate is awarded to**

**Craig Chaplin**

**Awarded: 14/03/2013**

**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.



00031479





# WAMITAB

Waste Management Industry  
Training and Advisory Board

## Qualification Title:

**WAMITAB Level 4 Diploma in Waste Management Operations : Managing  
Physical & Chemical Treatment - Hazardous Waste (QCF) - 4MPTH**

## Qualification Accreditation Number:

600/0331/5

**This Certificate is awarded to**

**Craig Chaplin**

**Awarded:** 14/03/2013

**Serial No:**21882/4MPTH/1

**Authorised**

Ray Burberry  
Qualifications Manager, WAMITAB



00031350

# Continuing Competence Certificate

**This certificate confirms that**

**Craig Chaplin**

**Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 29/11/2022**

TSH	Transfer - Hazardous Waste
TMH	Treatment - Hazardous Waste
TMNH	Treatment - Non Hazardous Waste

**Expiry Date:**  
**29/11/2024**

Verification date: 23/11/2022

Authorised:



Professional Services Director

Learner ID: 21882

Certificate No.: 5212421

Date of Issue: 29/11/2022



CIWM Chief Executive Officer



The Chartered Institution  
of Wastes Management



## **APPENDIX 7**

### Air Quality Assessment



Air Quality Assessment  
Great Central Way, London

Client: SRC Group

Reference: 6271r3

Date: 12<sup>th</sup> August 2024



## **Report Issue**

Report Title: Air Quality Assessment - Great Central Way, London

Report Reference: 6271

Field	Report Version			
	1	2	3	4
Prepared by	Emily Macey	Emily Macey	Emily Macey	
Position	Senior Air Quality Consultant	Senior Air Quality Consultant	Senior Air Quality Consultant	
Reviewed by	Alex Crayton	Alex Crayton	Alex Crayton	
Position	Associate Director	Associate Director	Associate Director	
Authorised by	Jethro Redmore	Jethro Redmore	Emily Pears-Ryding	
Position	Director	Director	Associate Director	
Date of Issue	13 <sup>th</sup> February 2024	3 <sup>rd</sup> April 2024	12 <sup>th</sup> August 2024	
Comments	Draft for comment	Minor text amendments	Updated Dust Emissions Assessment	

Serendipity Labs, Building 7, Exchange Quay, Salford, M5 3EP

info@red-env.co.uk | 0161 706 0075 | www.red-env.co.uk

This report has been prepared by Redmore Environmental Ltd in accordance with the agreed terms and conditions of appointment. Redmore Environmental Ltd cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

## Executive Summary

Redmore Environmental Ltd was commissioned by SRC Group to undertake an Air Quality Assessment in support of the extension to a minerals handling facility on land off Great Central Way, London.

An Air Quality Assessment was undertaken to:

- Assess potential impacts associated with fugitive dust emissions during the operational phase of the proposed development;
- Assess potential impacts associated with road transport emissions during the operational phase of the proposed development;
- Provide an Air Quality Neutral Assessment; and,
- Identify the requirement for relevant mitigation measures.

Potential air quality impacts may occur due to fugitive dust emissions during operation. A risk assessment was therefore undertaken which included consideration of a number of factors such as the scale and nature of emissions from the site, the location and sensitivity of nearby receptors and prevailing meteorological conditions. Following consideration of the relevant factors, overall effects as a result of fugitive dust emissions were not predicted to be significant.

Potential impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. Dispersion modelling was therefore undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the highway network both with and without the development in place. Results were subsequently verified using local monitoring data.

Review of the dispersion modelling results indicated that air quality impacts as a result of traffic generated by the development were not predicted to be significant at any sensitive location in the vicinity of the site.

Potential emissions from the development were assessed in order to determine compliance with the air quality neutral requirements of the London Plan. Based on the assessment results, the overall development was considered to be air quality neutral.



Based on the assessment results, air quality issues are not considered a constraint to planning consent for the proposed development.

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## 1.0 INTRODUCTION

### 1.1 Instruction

1.1.1 Redmore Environmental Ltd was commissioned by SRC Group to undertake an Air Quality Assessment in support of the extension to a minerals handling facility on land off Great Central Way, London.

### 1.2 Site Location and Context

1.2.1 The site is located at Charrington Sidings, off Great Central Way, London, at approximate National Grid Reference (NGR): 521324, 185128. The relevant Local Authority (LA) is the London Borough of Brent (LBoB). Reference should be made to Figure 1 for a map of the site and surrounding area.

1.2.2 The operations at the site are as follows:

- Delivery of aggregates is made by 20 wagon freight trains that run through Building 1A. A Bottom Dumping Unit (BDU) is located under the tracks, where material is offloaded and passed through conveyors. The aggregate is then transported to the 'Toast Rack' storage area. These are enclosed on three sides;
- Materials are separated via a mechanical splitter that runs along a high level conveyor belt. The material is sorted into the appropriate storage bay within Building 2; and,
- Heavy Good Vehicles (HGVs) enter the site to collect the material. They are weighed on entry and exit via a weigh bridge.

1.2.3 The site operates under a Standard Rules Environmental Permit issued by the Environment Agency (EA) (No. SR2009).

1.2.4 The proposals comprise the following:

- A new shed to house a crusher and screener for storing and recycling construction arisings;
- Revised vehicular access from the north-west of the site;

- A roof extension between the two existing storage buildings to the south-west, creating a further storage bay for additional materials and assisting in dust suppression and containment;
- Installation of two additional water storage tanks to support the dust suppression system across the site;
- A new boundary containment fence;
- Installation of a Portakabin for office space; and,
- A continuous gabion wall along the western boundary with green wall trellis support.

1.2.5 The proposed operational hours are 06.00 to 20.00 daily, with train offloads occurring over 24-hours.

1.2.6 The proposals will result in an average of 150-160 HGV movements per day and the maximum throughput of materials will increase to up to 640,000 tonnes per annum (tpa).

### 1.3 Assessment Scope

1.3.1 The development has the potential to cause air quality impacts during operation. As such, an Air Quality Assessment was undertaken to:

- Assess potential impacts associated with fugitive dust emissions;
- Assess potential impacts associated with road transport emissions;
- Provide an Air Quality Neutral Assessment; and,
- Identify the requirement for relevant mitigation measures.

1.3.2 This is detailed in the following report.

## 2.0 LEGISLATION AND POLICY

### 2.1 Legislation

2.1.1 The Air Quality Standards Regulations (2010) and subsequent amendments include Air Quality Limit Values (AQLVs) for the following pollutants:

- Nitrogen dioxide (NO<sub>2</sub>);
- Sulphur dioxide;
- Lead;
- Particulate matter with an aerodynamic diameter of less than 10µm (PM<sub>10</sub>);
- Particulate matter with an aerodynamic diameter of less than 2.5µm (PM<sub>2.5</sub>);
- Benzene; and,
- Carbon monoxide.

2.1.2 Air Quality Target Values were also provided for several additional pollutants. It should be noted that the AQLV for PM<sub>2.5</sub> stated in the Air Quality Standards Regulations (2010) was amended in the Environment (Miscellaneous Amendments) (EU Exit) Regulations (2020).

2.1.3 The Air Quality Strategy (AQS) was produced by the Department for Environment, Food and Rural Affairs (DEFRA) and published on 28<sup>th</sup> April 2023<sup>1</sup>. The document contains standards, objectives and measures for improving ambient air quality, including a number of Air Quality Objectives (AQOs). These are maximum ambient pollutant concentrations that are not to be exceeded either without exception or with a permitted number of exceedences over a specified timescale. These are generally in line with the AQLVs, although the requirements for the determination of compliance vary.

2.1.4 The Environmental Improvement Plan 2023<sup>2</sup> was published in January 2023, providing long term and Interim Targets in order to reduce population exposure to PM<sub>2.5</sub>. The concentration target for 2040 was subsequently adopted in the Environmental Targets (Fine Particulate Matter) (England) Regulations (2023).

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<sup>1</sup> AQS: Framework for Local Authority Delivery, DEFRA, 2023.

<sup>2</sup> Environmental Improvement Plan 2023, DEFRA, 2023.

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2.1.5 Table 1 presents the AQOs and Interim Target for pollutants considered within this assessment.

**Table 1 Air Quality Objectives/Interim Target**

Pollutant	Air Quality Objective/Interim Target	
	Concentration ( $\mu\text{g}/\text{m}^3$ )	Averaging Period
NO <sub>2</sub>	40	Annual mean
	200	1-hour mean, not to be exceeded on more than 18 occasions per annum
PM <sub>10</sub>	40	Annual mean
	50	24-hour mean, not to be exceeded on more than 35 occasions per annum
PM <sub>2.5</sub>	12 <sup>(a)</sup>	Annual mean

Note: (a) Interim Target to be achieved by end January 2028.

2.1.6 Table 2 summarises the advice provided in Greater London Authority (GLA) guidance<sup>3</sup> on where the AQOs for pollutants considered within this report apply.

**Table 2 Examples of Where the Air Quality Objectives Apply**

Averaging Period	Objective Should Apply At	Objective Should Not Apply At
Annual mean	All locations where members of the public might be regularly exposed  Building façades of residential properties, schools, hospitals, care homes etc.	Building façades of offices or other places of work where members of the public do not have regular access  Hotels, unless people live there as their permanent residence  Gardens of residential properties  Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term
24-hour mean	All locations where the annual mean objective would apply, together with hotels  Gardens of residential properties	Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term

<sup>3</sup> London Local Air Quality Management (LLAQM), Technical Guidance 2019 (LLAQM.TG (2019)), GLA, 2019.

Averaging Period	Objective Should Apply At	Objective Should Not Apply At
1-hour mean	<p>All locations where the annual mean and 24 and 8-hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets)</p> <p>Those parts of car parks, bus stations and railway stations etc which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more</p> <p>Any outdoor locations where members of the public might reasonably be expected to spend one hour or longer</p>	Kerbside sites where the public would not be expected to have regular access

## 2.2 Local Air Quality Management

- 2.2.1 LAs are required to periodically review and assess air quality within their area of jurisdiction under the system of Local Air Quality Management (LAQM). This review and assessment of air quality involves comparing present and likely future pollutant concentrations against the AQOs. If it is predicted that levels at locations of relevant exposure, as summarised in Table 2, are likely to be exceeded, the LA is required to declare an Air Quality Management Area (AQMA). For each AQMA the LA is required to produce an Air Quality Action Plan (AQAP), the objective of which is to reduce pollutant concentrations in pursuit of the AQOs.

## 2.3 Industrial Pollution Control Legislation

- 2.3.1 Atmospheric emissions from industry are controlled in England through the Environmental Permitting (England and Wales) Regulations (2016) and subsequent amendments. The operation of a minerals handling facility is included within the Regulations and therefore the facility is required to operate in accordance with an Environmental Permit issued by the EA. This includes conditions for operation of the plant. Compliance with these must be demonstrated through periodic monitoring requirements which are set in order to limit potential impacts in the surrounding area.

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## 2.4 National Planning Policy

2.4.1 The revised National Planning Policy Framework<sup>4</sup> (NPPF) was published in December 2023 and sets out the Government's planning policies for England and how these are expected to be applied.

2.4.2 The purpose of the planning system is to contribute to the achievement of sustainable development. In order to ensure this, the NPPF recognises three overarching objectives, including the following of relevance to air quality:

"c) an environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

2.4.3 Chapter 15 of the NPPF details objectives in relation to conserving and enhancing the natural environment. It states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

[...]

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality [...]."

2.4.4 The NPPF specifically recognises air quality as part of delivering sustainable development and states that:

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<sup>4</sup> NPPF, Ministry of Housing, Communities and Local Government, 2023.



"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan."

2.4.5 The implications of the NPPF have been considered throughout this assessment.

## 2.5 National Planning Practice Guidance

2.5.1 The National Planning Practice Guidance<sup>5</sup> (NPPG) web-based resource was launched by the Department for Communities and Local Government on 6<sup>th</sup> March 2014 and updated on 1<sup>st</sup> November 2019 to support the NPPF and make it more accessible. The air quality pages are summarised under the following headings:

1. What air quality considerations does planning need to address?
2. What is the role of plan-making with regard to air quality?
3. Are air quality concerns relevant to neighbourhood planning?
4. What information is available about air quality?
5. When could air quality considerations be relevant to the development management process?
6. What specific issues may need to be considered when assessing air quality impacts?
7. How detailed does an air quality assessment need to be?
8. How can an impact on air quality be mitigated?

2.5.2 These were reviewed and the relevant guidance considered as necessary throughout the undertaking of this assessment.

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<sup>5</sup> <https://www.gov.uk/guidance/air-quality--3>.

## 2.6 Regional Planning Policy

2.6.1 The London Plan 2021<sup>6</sup> is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. Review of this document indicated the following of relevance to this report:

### "Policy SI 1 - Improving Air Quality

A. Development plans, through relevant strategic, site specific and area-based policies should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.

B. To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed.

1. Development proposals should not:

- a) lead to further deterioration of existing poor air quality
- b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedence of legal limits
- c) create unacceptable risk of high levels of exposure to poor air quality.

2. In order to meet the requirements of Part 1, as a minimum:

- a) development proposals must be at least Air Quality Neutral
- b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.
- c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
- d) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as

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<sup>6</sup> The London Plan March 2021, GLA, 2021.

children or older people, should demonstrate that design measures have been used to minimise exposure.

C. Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:

- a) How proposals have considered ways to maximise benefits to local air quality, and
- b) What measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.

D. In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

E. Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development."

2.6.2 The requirements of this policy have been considered throughout this Air Quality Assessment.

## 2.7 Local Planning Policy

2.7.1 The Brent Local Plan 2019-2041<sup>7</sup> was adopted by LBoB in February 2022 and sets out the strategy for future development within the borough.

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<sup>7</sup> Brent Local Plan 2019-2041, LBoB, 2022.



2.7.2 A review of the document indicated the following policy of relevance to this assessment:

"Policy DMP1 Development Management General Policy

Subject to other policies within the development plan, development will be acceptable providing it is:

a) of a location, use, concentration, siting, layout, scale, type, density, materials, detailing and design that provides high levels of internal and external amenity and complements the locality;

[...]

g) not unacceptably increasing, and where possible reducing, exposure to flood risk, noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality;

[...]"

2.7.3 The above policy was taken into consideration throughout the undertaking of the assessment.

### 3.0 METHODOLOGY

#### 3.1 Introduction

- 3.1.1 The development has the potential to cause air quality impacts during the operational phase. These were assessed in accordance with the following methodology, which was agreed with Emma Tindall, Environmental Health Enforcement Officer at LBoB, on 16<sup>th</sup> September 2023.

#### 3.2 Fugitive Dust Emissions

##### Introduction

- 3.2.1 Fugitive dust emissions associated with the proposed operations have the potential to cause impacts at sensitive locations in the vicinity of the site. The potential risk of adverse effects has therefore been assessed using the Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Mineral Dust Impacts for Planning V1.1'<sup>8</sup> document and professional judgement. It is noted that the IAQM document provides guidance for the assessment of impacts associated with mineral extraction sites, rather than minerals handling facilities. However, it contains useful research on dust emissions, similar to those that may occur from minerals handling, and was therefore considered a suitable source of information for this assessment in lieu of specific industry guidance.
- 3.2.2 The Source-Pathway-Receptor connection presents the hypothetical relationship between the source of the pollutant, the pathway by which exposure might occur, and the receptor that could be adversely affected. The dust impact at relevant receptors was assessed using this concept, as outlined in the following Sections.

##### Risk Assessment Procedure

- 3.2.3 The first step in the assessment was to estimate the dust generating potential of site activities. This is termed the Source Emission Potential, which takes into account the scale (magnitude) of the release from the source, as well as the effectiveness of any control or

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<sup>8</sup> Guidance on the Assessment of Mineral Dust Impacts for Planning V1.1, IAQM, 2016.

mitigation measures. This involves judging the relative size of the release rate after mitigation and taking account of any pattern of release (e.g. intermittency).

3.2.4 The criteria for categorising the Source Emissions Potential as **small**, **medium** or **large** is provided in Table 3.

**Table 3 Fugitive Dust Emissions - Source Emissions Potential**

Magnitude	Activity	Criteria
Large	Materials Handling	<ul style="list-style-type: none"> <li>More than 10 loading vehicles within 50m of a site boundary</li> <li>Transferring material of a high dust potential and/or low moisture content on dry, poorly surfaced ground</li> </ul>
	Material Processing	<ul style="list-style-type: none"> <li>Processing more than 1,000,000tpa of material</li> </ul>
	Stockpiles/ Exposed Surfaces	<ul style="list-style-type: none"> <li>Total exposed area more than 10ha in an area exposed to high wind speeds</li> <li>Located less than 50m from the site boundary</li> <li>Material production more than 1,000,000tpa</li> </ul>
	Off-Site Transportation	<ul style="list-style-type: none"> <li>More than 200 HGV movements in any one day on unsurfaced site access road less than 20m in length</li> </ul>
Medium	Materials Handling	<ul style="list-style-type: none"> <li>5 to 10 loading vehicles between 50m and 100m from the site boundary</li> </ul>
	Material Processing	<ul style="list-style-type: none"> <li>Processing between 200,000tpa and 1,000,000tpa of material</li> </ul>
	Stockpiles/ Exposed Surfaces	<ul style="list-style-type: none"> <li>Stockpiles with a total exposed area between 2.5ha and 10ha</li> <li>Located 50m to 100m from the site boundary</li> </ul>
	Off-Site Transportation	<ul style="list-style-type: none"> <li>Total HGV movements between 25 and 200 movements in any one day</li> </ul>
Small	Materials Handling	<ul style="list-style-type: none"> <li>Less than 5 loading vehicles, more than 100m from a site boundary, transferring material of low dust potential and/or high moisture content</li> </ul>
	Material Processing	<ul style="list-style-type: none"> <li>Fixed plant with effective design in dust control</li> <li>Processing less than 200,000tpa of material</li> </ul>
	Stockpiles/ Exposed Surfaces	<ul style="list-style-type: none"> <li>Stockpiles with a total exposed area of less than 2.5ha</li> <li>Located more than 100m from the site boundary</li> <li>Production less than 200,000tpa</li> </ul>



Magnitude	Activity	Criteria
	Off-Site Transportation	<ul style="list-style-type: none"> <li>Less than 25 HGV movements per day</li> <li>Paved surfaced site access road more than 50m in length</li> <li>Effective HGV cleaning facilities and procedures</li> </ul>

3.2.5 The second step was to estimate the effectiveness of the pollutant pathway as the transport mechanism for the emission through the air to the receptor, versus the dilution/dispersion in the atmosphere. The primary factor influencing the pathway is the distance between the sensitive receptor and the dust sources. However, other factors can cause a higher or lower category to be assigned. These factors include:

- Orientation of receptors relative to the prevailing wind direction; and;
- Topography, terrain and physical features.

3.2.6 Table 4 provides the criteria for determining the frequency of potentially dusty winds, based on twelve 30° wind direction sectors.

**Table 4 Fugitive Dust Emissions - Categorisation of Frequency of Potentially Dusty Winds**

Frequency Category	Criteria
Infrequent	Frequency of winds (>5m/s) from the direction of the dust source on dry days are less than 5%
Moderately frequent	Frequency of winds (>5m/s) from the direction of the dust source on dry days are between 5% and 12%
Frequent	Frequency of winds (>5m/s) from the direction of the dust source on dry days are between 12% and 20%
Very frequent	Frequency of winds (>5m/s) from the direction of the dust source on dry days are greater than 20%

3.2.7 It should be noted that the assessment was undertaken based on all meteorological data, rather than just dry days as a worst-case.

3.2.8 The criteria used to categorise the distance from each receptor to the source is provided in Table 5.

**Table 5 Fugitive Dust Emissions - Categorisation of Receptor Distance from Source**

Category	Criteria
Distant	Receptor is between 125m and 250m from the dust source
Intermediate	Receptor is between 75m and 125m from the dust source
Close	Receptor is less than 75m from the dust source

3.2.9 The Pathway Effectiveness was classified using the frequency of potentially dusty winds from Table 4 and the receptor distance from source from Table 5, as shown in Table 6.

**Table 6 Fugitive Dust Emissions - Pathway Effectiveness**

Category	Frequency of Potentially Dusty Winds			
	Infrequent	Moderately Frequent	Frequent	Very Frequent
Close	Ineffective	Moderately Effective	Highly Effective	Highly Effective
Intermediate	Ineffective	Moderately Effective	Moderately Effective	Highly Effective
Distant	Ineffective	Ineffective	Moderately Effective	Moderately Effective

3.2.10 The Source Emission Potential and Pathway Effectiveness were combined to predict the impact risk at individual receptors, as shown in Table 7.

**Table 7 Fugitive Dust Emissions - Estimation of Dust Impact Risk**

Pathway Effectiveness	Source Emission Potential		
	Small	Medium	Large
Highly Effective Pathway	Low	Medium	High
Moderately Effective Pathway	Negligible	Low	Medium
Ineffective Pathway	Negligible	Negligible	Low

3.2.11 The magnitude of effect was predicted based on the interaction between dust impact risk and the sensitivity of the receptor. Table 8 outlines the criteria for determining sensitivity to dust soiling effects.

**Table 8 Sensitivities of People to Dust Soiling Effects**

Sensitivity	Description
High	<ul style="list-style-type: none"> <li>Users can reasonably expect enjoyment of a high level of amenity; or,</li> <li>The appearance, aesthetics or value of their property would be diminished by soiling; or,</li> <li>The people or property would reasonably be expected to be present continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land.</li> </ul> <p>Indicative examples include dwellings, medium and long term car parks and showrooms</p>
Medium	<ul style="list-style-type: none"> <li>Users would expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; or,</li> <li>The appearance, aesthetics or value of their property could be diminished by soiling; or</li> <li>The people or property wouldn't reasonably be expected to be present continuously or regularly for extended periods, as part of the normal pattern of use of the land</li> </ul> <p>Indicative examples include parks and places of work</p>
Low	<ul style="list-style-type: none"> <li>The enjoyment of amenity would not reasonably be expected; or,</li> <li>There is property that would not reasonably be expected to be diminished in the appearance, aesthetics or value by soiling; or,</li> <li>There is transient exposure, where the people would reasonably be expected to present only for limited periods of time as part of the normal pattern of use of the land</li> </ul> <p>Indicative examples include playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks and roads</p>

3.2.12 The predicted effect was determined by combining the dust impact risk in Table 7 and the receptor sensitivity shown in Table 8, as shown in Table 9.

**Table 9 Fugitive Dust Emissions - Descriptors for Magnitude of Dust Effects**

Risk of Exposure	Receptor Sensitivity		
	Low	Medium	High
High	Slight	Moderate	Substantial
Medium	Negligible	Slight	Moderate
Low	Negligible	Negligible	Slight
Negligible	Negligible	Negligible	Negligible



## Overall Significance

3.2.13 The IAQM guidance<sup>9</sup> states that an assessment must reach a conclusion on the likely significance of the predicted impact. Where the overall effect is moderate or substantial, the effect is likely to be considered significant, whilst if the effect is slight or negligible, the impact is likely to be considered not significant. It should be noted that this is a binary judgement of either it is significant or it is not significant. This has been considered to determine the overall significance of potential effects associated with the proposed development.

3.2.14 The IAQM guidance<sup>10</sup> recognises that assessment of dust requires some degree of professional judgement. Qualitative methodologies such as those utilised within this report provide guidance for assessing potential impacts. However, professional judgement should be exercised in order to take account of the specific details which are unique to each development. This has been considered as necessary throughout the assessment.

## 3.3 Road Vehicle Exhaust Emissions

3.3.1 The development has the potential to affect existing air quality as a result of road traffic exhaust emissions associated with vehicles travelling to and from the site during the operational phase. Potential impacts have therefore been defined by predicting pollutant concentrations at sensitive locations using dispersion modelling for the following scenarios:

- 2019 - Verification;
- Opening year Do-Minimum (DM) (predicted traffic flows in 2024 should the proposals not proceed); and,
- Opening year Do-Something (DS) (predicted traffic flows in 2024 should the proposals be completed).

3.3.2 Reference should be made to Appendix 1 for assessment input data and details of the verification process.

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<sup>9</sup> Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1, IAQM, 2016.

<sup>10</sup> Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1, IAQM, 2016.

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- 3.3.3 Locations sensitive to potential changes in off-site pollutant concentrations were identified within 200m of the highway network in accordance with the guidance provided within the Design Manual for Roads and Bridges (DMRB)<sup>11</sup> on the likely limits of pollutant dispersion from road sources. The criteria provided within GLA guidance<sup>12</sup> on where the AQOs apply, as summarised in Table 2, was utilised to determine worst-case receptor positions in the vicinity of links likely to be affected by changes in traffic flows as a result of the development.
- 3.3.4 The significance of predicted air quality impacts was determined in accordance with the guidance provided within the IAQM document 'Land-Use Planning & Development Control: Planning for Air Quality'<sup>13</sup>. Using this methodology impacts were defined based on the interaction between the predicted pollutant concentration from the DS scenario and the magnitude of change between the DM and DS scenarios, as outlined in Table 10.

**Table 10 Significance of Road Vehicle Exhaust Emission Impacts**

Concentration at Receptor in Assessment Year	Predicted Concentration Change as Proportion of AQO/Interim Target (%)			
	1	2 - 5	6 - 10	> 10
75% or less of AQO/Interim Target	Negligible	Negligible	Slight	Moderate
76 - 94% of AQO/Interim Target	Negligible	Slight	Moderate	Moderate
95 - 102% of AQO/Interim Target	Slight	Moderate	Moderate	Substantial
103 - 109% of AQO/Interim Target	Moderate	Moderate	Substantial	Substantial
110% or more of AQO/Interim Target	Moderate	Substantial	Substantial	Substantial

- 3.3.5 The matrix shown in Table 10 is intended to be used by rounding the change in percentage pollutant concentration to whole numbers, which makes it clearer which cell the impact falls within. It should be noted that changes of 0%, i.e. less than 0.5%, are described as **negligible**.

<sup>11</sup> LA 105: Air Quality, Highways England, 2019.

<sup>12</sup> London Local Air Quality Management (LLAQM), Technical Guidance 2019 (LLAQM.TG (2019)), GLA, 2019.

<sup>13</sup> Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

3.3.6 Following the prediction of impacts at discrete receptor locations, the IAQM document<sup>14</sup> provides guidance on determining the overall air quality impact significance of the operation of a development. The following factors are identified for consideration by the assessor:

- The existing and future air quality in the absence of the development;
- The extent of current and future population exposure to the impacts; and,
- The influence and validity of any assumptions adopted when undertaking the prediction of impacts.

3.3.7 The IAQM guidance states that an assessment must reach a conclusion on the likely significance of the predicted impact. Where the overall effect is moderate or substantial, the effect is likely to be considered significant, whilst if the impact is slight or negligible, the impact is likely to be considered not significant. It should be noted that this is a binary judgement of either it is significant or it is not significant.

3.3.8 The determination of significance relies on professional judgement and reasoning has been provided as far as practicable. The IAQM guidance<sup>15</sup> suggests the provision of details of the assessor's qualifications and experience. These are provided in Appendix 2.

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<sup>14</sup> Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

<sup>15</sup> Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

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## 4.0 BASELINE

### 4.1 Introduction

- 4.1.1 Existing air quality conditions in the vicinity of the proposed development site were identified in order to provide a baseline for assessment. These are detailed in the following Sections.

### 4.2 Local Air Quality Management

- 4.2.1 As required by the Environment Act (1995), as amended by the Environment Act (2021), LBoB has undertaken Review and Assessment of air quality within their area of jurisdiction. This process has indicated that annual mean concentrations of NO<sub>2</sub> and 24-hour mean concentrations of PM<sub>10</sub> are above the relevant AQOs within the borough. As such, one AQMA has been declared. This is described as follows:

"The entire area south of the North Circular Road and all housing, schools and hospitals along the North Circular Road, Harrow Road, Bridgewater Road, Ealing Road, Watford Road, Kenton Road, Kingsbury Road, Edgware Road, Blackbird Hill, Forty Lane, Forty Avenue and East Lane."

- 4.2.2 The site is located within the AQMA. As such, there is the potential for vehicles travelling to and from the development to increase pollution levels in this sensitive area. This has been considered throughout the assessment.
- 4.2.3 LBoB has concluded that concentrations of all other pollutants considered within the AQS are currently below the relevant AQOs. As such, no further AQMAs have been designated.

### 4.3 Air Quality Focus Areas

- 4.3.1 Air Quality Focus Areas (AQFAs) have been designated throughout London in locations where the annual mean AQO for NO<sub>2</sub> is exceeded and there is a high level of human exposure. They were defined to address concerns raised by boroughs within the LAQM review process and forecasted air pollution trends.

4.3.2 Review of the London Atmospheric Emissions Inventory (LAEI)<sup>16</sup> indicated the closest AQFAs to the site are located approximately 82m east and 335m north of the boundary and cover the A406 North Circular from Stonebridge Park to Gresham Road and Neasden Junction including Neasden Lane/Dudden Hill, respectively. These have been considered throughout the assessment. Reference should be made to Figure 2 for the AQFA locations.

#### 4.4 Air Quality Monitoring

4.4.1 Monitoring of pollutant levels is undertaken by LBoB throughout their area of jurisdiction. Recent NO<sub>2</sub> concentrations recorded in the vicinity of the development, as provided in LBoB's 'Air Quality Annual Status Report (ASR)'<sup>17</sup>, are shown in Table 11. Exceedences of the relevant AQO are shown in **bold**.

**Table 11 Monitoring Results - NO<sub>2</sub>**

Monitoring Site		Annual Mean NO <sub>2</sub> Concentration (µg/m <sup>3</sup> )			
		2019	2020	2021	2022
BT4	IKEA	<b>63.0</b>	<b>49.0</b>	<b>46.4</b>	<b>43.2</b>
BT5	Neasden Lane	38.0	29.0	30.0	28.0
52	IKEA hut North Circular Road	37.7	30.3	35.5	34.0

4.4.2 As shown in Table 11, annual mean NO<sub>2</sub> concentrations were above the AQO of 40µg/m<sup>3</sup> at the BT4 - IKEA monitor in recent years. As the site is positioned at a roadside location within an AQMA, elevated results would be expected. Levels were below the AQO at the remaining survey sites in recent years.

4.4.3 Recent PM<sub>10</sub> concentrations recorded in the vicinity of the development, as provided in LBoB's 'Air Quality ASR'<sup>18</sup>, are shown in Table 12.

<sup>16</sup> LAEI 2019 - London Datastore.

<sup>17</sup> LBoB Air Quality ASR, LBoB, 2023.

<sup>18</sup> LBoB Air Quality ASR, LBoB, 2023.

**Table 12 Monitoring Results - PM<sub>10</sub>**

Monitoring Site		Annual Mean PM <sub>10</sub> Concentration (µg/m <sup>3</sup> )			
		2019	2020	2021	2022
BT4	IKEA	30.0	26.0	25.6	27.9
BT5	Neasden Lane	26.0	21.0	21.4	18.9

4.4.4 As shown in Table 12, annual mean PM<sub>10</sub> concentrations were below the AQO of 40µg/m<sup>3</sup> at both monitoring locations in recent years.

4.4.5 Recent PM<sub>2.5</sub> concentrations recorded in the vicinity of the development, as provided in LBoB's 'Air Quality ASR'<sup>19</sup>, are shown in Table 13. Exceedences of the Interim Target are shown in **bold**.

**Table 13 Monitoring Results - PM<sub>2.5</sub>**

Monitoring Site		Annual Mean PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )			
		2019	2020	2021	2022
BT4	IKEA	<b>20.7</b>	<b>13.0</b>	<b>13.5</b>	<b>12.8</b>

4.4.6 As shown in Table 13, annual mean PM<sub>2.5</sub> concentrations were above the Interim Target of 12µg/m<sup>3</sup> at the BT4 - IKEA monitor in recent years.

4.4.7 Pollution concentrations recorded during 2020 and 2021 were affected by changes to travel patterns associated with the COVID-19 pandemic. The results should therefore be viewed with caution. However, data for 2022 is now considered representative of post-pandemic conditions. This is supported by the IAQM<sup>20</sup>, who have adopted the following position:

"ambient air quality monitoring data for the year 2022 and beyond is generally considered to represent the current post-pandemic baseline."

4.4.8 Reference should be made to Figure 2 for a map of the survey sites.

<sup>19</sup> LBoB Air Quality ASR, LBoB, 2023.

<sup>20</sup> Use of 2020 and 2021 Monitoring Datasets - IAQM Position Statement V1.1, IAQM, 2023.



#### 4.5 Background Pollutant Concentrations

- 4.5.1 Predictions of background pollutant concentrations on a 1km by 1km grid basis have been produced by DEFRA for the entire of the UK to assist LAs in their Review and Assessment of air quality. The proposed development site is located in grid square NGR: 521500, 185500. Data for this location was downloaded from the DEFRA website<sup>21</sup> for the purpose of the assessment and is summarised in Table 14. Exceedences of the Interim Target are shown in **bold**.

**Table 14 Background Pollutant Concentration Predictions**

Pollutant	Predicted Background Pollutant Concentration (µg/m <sup>3</sup> )	
	2019	2024
NO <sub>2</sub>	28.47	22.81
PM <sub>10</sub>	19.26	17.97
PM <sub>2.5</sub>	<b>12.61</b>	11.70

- 4.5.2 As shown in Table 14, predicted background NO<sub>2</sub> and PM<sub>10</sub> concentrations are below the relevant AQOs at the proposed development site. Predicted annual mean PM<sub>2.5</sub> concentrations are above the Interim Target during 2019, though levels are below in 2024.

#### 4.6 Sensitive Receptors

- 4.6.1 A sensitive receptor is defined as any location which may be affected by changes in air quality as a result of a development. These are detailed in the following Sections.

##### **Fugitive Dust Emissions Sensitive Receptors**

- 4.6.2 A desk-top study was undertaken in order to identify any sensitive receptor locations in the vicinity of the site that required specific consideration as part of the assessment of fugitive dust emissions. A summary of the receptors and their associated sensitivity, based on the criteria detailed in Table 8, is provided in Table 15. It should be noted that the distances specified in Table 15 were measured from the development boundary in order

<sup>21</sup> <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>.

to provide worst-case assessment of the separation between potential sources and sensitive receptor locations.

**Table 15 Fugitive Dust Emissions Sensitive Receptor Locations**

Receptor		NGR (m)		Distance from Boundary (m)	Direction from Boundary	Sensitivity
		X	Y			
D1	Educational Facility - North Brent School	521482.3	185068.7	120	East	High
D2	Neasden Goods Yard	521413.8	185181.9	30	East	Medium
D3	Residential - Brendon Avenue	521362.4	185457.4	185	North	High
D4	Residential - Southview Avenue	521544.9	185335.0	195	North-east	High
D5	Residential - Brendon Avenue	521256.0	185491.3	225	North-west	High
D6	Residential - Iron Bridge Close	521290.2	185231.5	20	West	High
D7	Commercial - Selco	521194.9	185106.5	55	West	Medium
D8	Residential - Yeats Close	521190.5	184987.6	100	South	High
D9	Residential - Yeats Close	521263.3	184968.8	75	South	High
D10	Residential - Wharton Close	521369.5	184966.1	75	South-east	High
D11	Residential - Wharton Close	521409.0	185011.8	80	East	High

4.6.3 Reference should be made to Figure 3 for a map of the dust sensitive receptor locations.

#### **Road Vehicle Exhaust Emissions Sensitive Receptors**

4.6.4 Locations sensitive to potential operational phase road vehicle exhaust emission impacts were identified from a desk-top study and are summarised in Table 16.

**Table 16 Road Vehicle Exhaust Emissions Sensitive Receptor Locations**

Receptor		NGR (m)	
		X	Y
R1	Residential - Woodheys Road	520962.6	185157.4
R2	Residential - A406 North Circular Road	520848.0	185123.8
R3	Residential - A406 North Circular Road	520770.7	185105.1
R4	Residential - A406 North Circular Road	520706.9	185081.2
R5	Residential - A406 North Circular Road	521249.6	185494.4
R6	Residential - A406 North Circular Road	521219.8	185522.2
R7	Residential - A406 North Circular Road	521212.1	185644.0
R8	Residential - A406 North Circular Road	521171.1	185644.8
R9	Educational - Pheonix Arch/Little Aisha Nursery	520551.3	185305.4
R10	Residential - Besant Way	520609.8	185193.8
R11	Residential - St Raphael's Way	520636.4	185145.3
R12	Residential - Yeats Close	521190.5	184987.6
R13	Residential - A406 North Circular Road	520630.9	184984.5
R14	Residential - A406 North Circular Road	520549.1	184903.1

4.6.5 Reference should be made to Figure 4 for a map of the road vehicle exhaust emission sensitive receptor locations.

#### **4.7 Meteorological Conditions**

4.7.1 The potential for atmospheric emissions to impact at sensitive locations depends significantly on the meteorology, particularly wind direction, during release. Meteorological data for use in the Fugitive Dust Emissions Assessment was obtained from Heathrow Airport meteorological station over the period 1<sup>st</sup> January 2016 to 31<sup>st</sup> December 2020 (inclusive). Heathrow Airport is located at NGR: 506947, 176515, approximately 16.8km south-west of the site. It is considered that conditions are likely to be reasonably similar over a distance of this magnitude and the information is a suitable source of data for an assessment of this nature. The utilised records are summarised in



Table 17. Reference should be made to Figure 5 for a wind rose of the meteorological data.

**Table 17 Wind Frequency Data**

Wind Direction (°)	Total Frequency of Wind (%)	Frequency of Potentially Dusty Winds (%) <sup>(a)</sup>
345 - 15	5.0	0.4
15 - 45	8.1	0.8
45 - 75	6.4	1.4
75 - 105	5.1	1.2
105 - 135	3.6	0.8
135 - 165	5.1	1.1
165 - 195	8.4	2.3
195 - 225	14.7	6.9
225 - 255	13.3	7.5
255 - 285	14.3	5.2
285 - 315	7.9	1.2
315 - 345	5.3	0.4
Sub-Total	97.2	29.3
Calms	2.0	69.9
Missing/Incomplete	0.8	0.9

Note: (a) Winds with a speed greater than 5m/s and precipitation levels of less than 0.2mm.

- 4.7.2 As shown in Table 17, the prevailing wind direction at the site is from the west through south-west. Winds from the north and east are relatively infrequent, which is indicative of conditions throughout the majority of the UK.
- 4.7.3 All meteorological data used in the assessment was provided by Atmospheric Dispersion Modelling Ltd, which is an established distributor of meteorological data within the UK.

## 5.0 **FUGITIVE DUST EMISSIONS ASSESSMENT**

### 5.1 **Introduction**

- 5.1.1 There is the potential for emissions from the proposed development to cause adverse impacts at the sensitive locations in the vicinity of the site. The risk was therefore assessed in accordance with the IAQM methodology<sup>22</sup>. The results are summarised in the following Sections.

### 5.2 **Source Emission Potential**

- 5.2.1 The first step was to classify the Source Emission Potential. This is summarised in Table 18. It should be noted that the development will operate in accordance with an Environmental Permit issued by the EA. This will include requirements for dust minimisation and provides regulatory control of potential impacts throughout the operational life of the plant. A comprehensive Dust Management Plan (DMP) to minimise and control potential releases from the site will also be implemented. This can be secured through planning condition if required by the Local Planning Authority.

**Table 18 Fugitive Dust Emissions - Source Emission Potential**

Activity	Residual Source Emission	Justification
Materials handling	Medium	5 to 10 loading vehicles Operating within 50m of site boundary
Material processing	Medium	Fixed plant with effective design in dust control Processing between 200,000tpa and 1,000,000tpa of material
Stockpiles and exposed surfaces	Medium	Stockpiles with a total exposed area of less than 2.5ha Processing between 200,000tpa and 1,000,000tpa of material
Off-site transportation	Medium	More than 200 HGV movements in any one day Paved surfaced access road more than 50m in length Effective HGV cleaning facilities and procedures

<sup>22</sup> Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1, IAQM, 2016.

5.2.2 As shown in Table 18, the magnitude of residual source emissions from dust generating activities was classified as **medium**.

### 5.3 Pathway Effectiveness

5.3.1 The Pathway Effectiveness was defined based on the distance between the facility and the identified receptors, as well as the prevailing meteorological conditions. This is summarised in Table 20.

**Table 19 Fugitive Dust Emissions - Pathway Effectiveness**

Receptor		Frequency of Potentially Dusty Winds		Distance from Site Boundary		Pathway Effectiveness
		Frequency of Winds (%)	Category	Distance (m)	Category	
D1	Educational Facility - North Brent School	6.4	Moderately frequent	120	Distant	Ineffective
D2	Neasden Goods Yard	14.5	Frequent	30	Close	Highly Effective
D3	Residential - Brendon Avenue	2.3	Infrequent	185	Distant	Ineffective
D4	Residential - Southview Avenue	14.5	Frequent	195	Distant	Moderately Effective
D5	Residential - Brendon Avenue	2.3	Infrequent	225	Distant	Ineffective
D6	Residential - Iron Bridge Close	3.4	Infrequent	20	Close	Ineffective
D7	Commercial - Selco	2.0	Infrequent	55	Close	Ineffective
D8	Residential - Yeats Close	2.2	Infrequent	100	Intermediate	Ineffective
D9	Residential - Yeats Close	1.2	Infrequent	75	Intermediate	Ineffective
D10	Residential - Wharton Close	0.8	Infrequent	75	Intermediate	Ineffective
D11	Residential - Wharton Close	1.5	Infrequent	80	Intermediate	Ineffective



5.3.2 As shown in Table 19, the Pathway Effectiveness was determined to be **highly effective** at one location, **moderately effective** at one position and **ineffective** at nine receptors.

#### 5.4 Risk Assessment

5.4.1 The residual source emission, Pathway Effectiveness and receptor sensitivity were combined to assess potential effects resulting from the proposed development. This is summarised in Table 20.

**Table 20 Fugitive Dust Emissions - Risk Assessment**

Receptor		Source Emission Potential	Pathway Effectiveness	Exposure Risk	Sensitivity	Effect Significance
D1	Educational Facility - North Brent School	Medium	Ineffective	Negligible	High	Negligible
D2	Neasden Goods Yard	Medium	Highly Effective	Medium	Medium	Slight
D3	Residential - Brendon Avenue	Medium	Ineffective	Negligible	High	Negligible
D4	Residential - Southview Avenue	Medium	Moderately Effective	Low	High	Slight
D5	Residential - Brendon Avenue	Medium	Ineffective	Negligible	High	Negligible
D6	Residential - Iron Bridge Close	Medium	Ineffective	Negligible	High	Negligible
D7	Commercial - Selco	Medium	Ineffective	Negligible	Medium	Negligible
D8	Residential - Yeats Close	Medium	Ineffective	Negligible	High	Negligible
D9	Residential - Yeats Close	Medium	Ineffective	Negligible	High	Negligible
D10	Residential - Wharton Close	Medium	Ineffective	Negligible	High	Negligible
D11	Residential - Wharton Close	Medium	Ineffective	Negligible	High	Negligible

5.4.2 As shown in Table 20, the effect significance was predicted to be **slight** at two positions and **negligible** at nine receptors.

5.4.3 The IAQM guidance<sup>23</sup> states that only if the impact is moderate or substantial, the effect is considered significant. As such, potential impacts as a result of fugitive dust emissions from the development are considered not significant, in accordance with the stated methodology.

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<sup>23</sup> Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1, IAQM, 2016

## 6.0 ROAD VEHICLE EXHAUST EMISSIONS ASSESSMENT

### 6.1 Introduction

6.1.1 Vehicle movements associated with the operation of the proposal will generate exhaust emissions on the local and regional road networks. An assessment was therefore undertaken using dispersion modelling in order to quantify potential changes in pollutant concentrations at sensitive locations in the vicinity of the site.

6.1.2 The assessment considered the following scenarios:

- 2019 - Verification;
- 2024 - DM; and,
- 2024 - DS.

6.1.3 The DM scenario (i.e. without development) included baseline traffic data, inclusive of anticipated growth for the relevant assessment year. The DS scenario (i.e. with development) included baseline traffic data, inclusive of anticipated growth for the relevant assessment year, in addition to predicted vehicle trips associated with the operation of the proposals.

6.1.4 Reference should be made to Appendix 1 for full assessment input details.

### 6.2 Predicted Concentrations

6.2.1 Annual mean NO<sub>2</sub> concentrations were predicted at the sensitive receptor locations for the DM and DS scenarios. These are summarised in Table 21. Exceedences of the relevant AQO are shown in **bold**.

**Table 21 Predicted Annual Mean NO<sub>2</sub> Concentrations**

Receptor		Predicted Annual Mean NO <sub>2</sub> Concentration (µg/m <sup>3</sup> )		
		DM	DS	Change
R1	Residential - Woodheys Road	<b>40.03</b>	<b>40.04</b>	0.01
R2	Residential - A406 North Circular Road	39.72	39.73	0.01



Receptor		Predicted Annual Mean NO <sub>2</sub> Concentration (µg/m <sup>3</sup> )		
		DM	DS	Change
R3	Residential - A406 North Circular Road	<b>44.62</b>	<b>44.65</b>	0.03
R4	Residential - A406 North Circular Road	<b>46.50</b>	<b>46.54</b>	0.04
R5	Residential - A406 North Circular Road	<b>42.61</b>	<b>42.64</b>	0.03
R6	Residential - A406 North Circular Road	<b>42.30</b>	<b>42.32</b>	0.02
R7	Residential - A406 North Circular Road	<b>42.84</b>	<b>42.87</b>	0.03
R8	Residential - A406 North Circular Road	37.39	37.41	0.02
R9	Educational - Pheonix Arch/Little Aisha Nursery	29.54	29.55	0.01
R10	Residential - Besant Way	31.52	31.57	0.05
R11	Residential - St Raphael's Way	33.40	33.46	0.06
R12	Residential - Yeats Close	29.49	29.49	0.00
R13	Residential - A406 North Circular Road	<b>41.08</b>	<b>41.09</b>	0.01
R14	Residential - A406 North Circular Road	38.53	38.54	0.01

6.2.2 As indicated in Table 21, predicted annual mean NO<sub>2</sub> concentrations were below the relevant AQO at seven sensitive receptors and above at seven positions in both scenarios. It should be noted that there are no new predicted exceedences in the DS scenario when compared with the DM.

6.2.3 Reference should be made to Figures 6 and 7 for graphical representations of annual mean NO<sub>2</sub> concentrations across the assessment area for DM and DS scenarios, respectively.

6.2.4 Annual mean PM<sub>10</sub> concentrations were predicted at the sensitive receptor locations for the DM and DS scenarios. These are summarised in Table 22.

**Table 22 Predicted Annual Mean PM<sub>10</sub> Concentrations**

Receptor		Predicted Annual Mean PM <sub>10</sub> Concentration (µg/m <sup>3</sup> )		
		DM	DS	Change
R1	Residential - Woodheys Road	26.12	26.14	0.02
R2	Residential - A406 North Circular Road	25.83	25.84	0.02
R3	Residential - A406 North Circular Road	27.94	27.96	0.02
R4	Residential - A406 North Circular Road	28.90	28.92	0.02
R5	Residential - A406 North Circular Road	27.85	27.88	0.03
R6	Residential - A406 North Circular Road	27.64	27.68	0.03
R7	Residential - A406 North Circular Road	28.00	28.03	0.03
R8	Residential - A406 North Circular Road	24.50	24.52	0.02
R9	Educational - Pheonix Arch/Little Aisha Nursery	19.82	19.83	0.01
R10	Residential - Besant Way	20.74	20.76	0.02
R11	Residential - St Raphael's Way	21.66	21.69	0.02
R12	Residential - Yeats Close	19.82	19.82	0.00
R13	Residential - A406 North Circular Road	26.49	26.50	0.01
R14	Residential - A406 North Circular Road	25.12	25.13	0.01

6.2.5 As indicated in Table 22, predicted annual mean PM<sub>10</sub> concentrations were below the relevant AQO at all sensitive receptors in both scenarios.

6.2.6 Reference should be made to Figures 8 and 9 for graphical representations of annual mean PM<sub>10</sub> concentrations across the assessment area for DM and DS scenarios, respectively.

6.2.7 Annual mean PM<sub>2.5</sub> concentrations were predicted at the sensitive receptor locations for the DM and DS scenarios. These are summarised in Table 23. Exceedences of the Interim Target are shown in **bold**.

**Table 23 Predicted Annual Mean PM<sub>2.5</sub> Concentrations**

Receptor		Predicted Annual Mean PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )		
		DM	DS	Change
R1	Residential - Woodheys Road	16.33	16.33	0.01
R2	Residential - A406 North Circular Road	16.16	16.17	0.01
R3	Residential - A406 North Circular Road	17.23	17.24	0.01
R4	Residential - A406 North Circular Road	17.72	17.73	0.01
R5	Residential - A406 North Circular Road	17.26	17.28	0.02
R6	Residential - A406 North Circular Road	17.15	17.17	0.02
R7	Residential - A406 North Circular Road	17.34	17.36	0.02
R8	Residential - A406 North Circular Road	15.45	15.46	0.01
R9	Educational - Pheonix Arch/Little Aisha Nursery	12.91	12.91	0.00
R10	Residential - Besant Way	13.40	13.41	0.01
R11	Residential - St Raphael's Way	13.89	13.90	0.01
R12	Residential - Yeats Close	12.91	12.91	0.00
R13	Residential - A406 North Circular Road	16.51	16.52	0.01
R14	Residential - A406 North Circular Road	15.78	15.79	0.01

6.2.8 As indicated in Table 23, predicted annual mean PM<sub>2.5</sub> concentrations were above the Interim Target at all sensitive receptors in both scenarios.

6.2.9 Reference should be made to Figures 10 and 11 for graphical representations of annual mean PM<sub>2.5</sub> concentrations across the assessment area for DM and DS scenarios, respectively.

### 6.3 Predicted Impacts

6.3.1 Predicted impacts on annual mean NO<sub>2</sub> concentrations at the sensitive receptor locations are summarised in Table 24.



**Table 24 Predicted Impacts - NO<sub>2</sub>**

Receptor		Predicted Annual Mean NO <sub>2</sub> Concentration	Predicted Concentration Change as Proportion of AQO (%)	Impact Significance
R1	Residential - Woodheys Road	110% or more of AQO	0	Negligible
R2	Residential - A406 North Circular Road	110% or more of AQO	0	Negligible
R3	Residential - A406 North Circular Road	110% or more of AQO	0	Negligible
R4	Residential - A406 North Circular Road	110% or more of AQO	0	Negligible
R5	Residential - A406 North Circular Road	110% or more of AQO	0	Negligible
R6	Residential - A406 North Circular Road	110% or more of AQO	0	Negligible
R7	Residential - A406 North Circular Road	110% or more of AQO	0	Negligible
R8	Residential - A406 North Circular Road	110% or more of AQO	0	Negligible
R9	Educational - Pheonix Arch/Little Aisha Nursery	76 - 94% of AQO	0	Negligible
R10	Residential - Besant Way	76 - 94% of AQO	0	Negligible
R11	Residential - St Raphael's Way	103 - 109% of AQO	0	Negligible
R12	Residential - Yeats Close	Below 75% of AQO	0	Negligible
R13	Residential - A406 North Circular Road	103 - 109% of AQO	0	Negligible
R14	Residential - A406 North Circular Road	95 - 102% of AQO	0	Negligible

6.3.2 As indicated in Table 24, impacts on annual mean NO<sub>2</sub> concentrations as a result of the proposed development were predicted to be **negligible** at all receptors.

6.3.3 Predicted impacts on annual mean PM<sub>10</sub> concentrations at the sensitive receptor locations are summarised in Table 25.

**Table 25 Predicted Impacts - PM<sub>10</sub>**

Receptor		Predicted Annual Mean PM <sub>10</sub> Concentration	Predicted Concentration Change as Proportion of AQO (%)	Impact Significance
R1	Residential - Woodheys Road	Below 75% of AQO	0	Negligible
R2	Residential - A406 North Circular Road	Below 75% of AQO	0	Negligible
R3	Residential - A406 North Circular Road	Below 75% of AQO	0	Negligible
R4	Residential - A406 North Circular Road	Below 75% of AQO	0	Negligible
R5	Residential - A406 North Circular Road	Below 75% of AQO	0	Negligible
R6	Residential - A406 North Circular Road	Below 75% of AQO	0	Negligible
R7	Residential - A406 North Circular Road	Below 75% of AQO	0	Negligible
R8	Residential - A406 North Circular Road	Below 75% of AQO	0	Negligible
R9	Educational - Pheonix Arch/Little Aisha Nursery	Below 75% of AQO	0	Negligible
R10	Residential - Besant Way	Below 75% of AQO	0	Negligible
R11	Residential - St Raphael's Way	Below 75% of AQO	0	Negligible
R12	Residential - Yeats Close	Below 75% of AQO	0	Negligible
R13	Residential - A406 North Circular Road	Below 75% of AQO	0	Negligible
R14	Residential - A406 North Circular Road	Below 75% of AQO	0	Negligible

6.3.4 As indicated in Table 25, impacts on annual mean PM<sub>10</sub> concentrations as a result of the proposed development were predicted to be **negligible** at all receptors.

6.3.5 Predicted impacts on annual mean PM<sub>2.5</sub> concentrations at the sensitive receptor locations are summarised in Table 26.

**Table 26 Predicted Impacts - PM<sub>2.5</sub>**

Receptor		Predicted Annual Mean PM <sub>2.5</sub> Concentration	Predicted Concentration Change as Proportion of Interim Target (%)	Impact Significance
R1	Residential - Woodheys Road	110% or more of Interim Target	0	Negligible
R2	Residential - A406 North Circular Road	110% or more of Interim Target	0	Negligible
R3	Residential - A406 North Circular Road	110% or more of Interim Target	0	Negligible
R4	Residential - A406 North Circular Road	110% or more of Interim Target	0	Negligible
R5	Residential - A406 North Circular Road	110% or more of Interim Target	0	Negligible
R6	Residential - A406 North Circular Road	110% or more of Interim Target	0	Negligible
R7	Residential - A406 North Circular Road	110% or more of Interim Target	0	Negligible
R8	Residential - A406 North Circular Road	110% or more of Interim Target	0	Negligible
R9	Educational - Pheonix Arch/Little Aisha Nursery	103 - 109% of Interim Target	0	Negligible
R10	Residential - Besant Way	110% or more of Interim Target	0	Negligible
R11	Residential - St Raphael's Way	110% or more of Interim Target	0	Negligible
R12	Residential - Yeats Close	103 - 109% of Interim Target	0	Negligible
R13	Residential - A406 North Circular Road	110% or more of Interim Target	0	Negligible
R14	Residential - A406 North Circular Road	110% or more of Interim Target	0	Negligible

6.3.6 As indicated in Table 26, impacts on annual mean PM<sub>2.5</sub> concentrations as a result of the proposed development were predicted to be **negligible** at all receptors.



## 6.4 Overall Impact Significance

- 6.4.1 The overall significance of operational phase road traffic emission impacts was determined as **negligible**. This was based on the predicted impacts at the discrete receptor locations and the considerations outlined previously. Further justification is provided in Table 27.

**Table 27 Overall Impact Significance of Road Vehicle Exhaust Emissions**

Guidance	Comment
The existing and future air quality in the absence of the development	<p>Predicted annual mean NO<sub>2</sub> concentrations were above the relevant AQO at seven receptors and below at seven locations in the DM scenario</p> <p>Predicted annual mean PM<sub>10</sub> concentrations were below the AQO at all receptors in the DM scenario</p> <p>Predicted PM<sub>2.5</sub> concentrations were above the relevant Interim Target at all receptors in the DM scenario</p> <p>The predictions are unlikely to change in the absence of the proposals given the relatively established nature of the area</p>
The extent of current and future population exposure to the impacts	The development is not predicted to affect the population exposed to exceedences of the AQOs and Interim Target
The influence and validity of any assumptions adopted when undertaking the prediction of impacts	The assessment assumed that background pollutant concentrations will not reduce in future years. This is likely to provide an overestimation of concentrations during the operation of the proposals and is therefore considered to provide a robust assessment

- 6.4.2 The IAQM guidance<sup>24</sup> states that only if the impact is greater than **slight** the effect is considered **significant**. As the impacts were predicted to be **negligible**, overall effects are considered **not significant**, in accordance with the stated methodology.

<sup>24</sup> Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

## 7.0 AIR QUALITY NEUTRAL ASSESSMENT

### 7.1 Introduction

7.1.1 The London Plan<sup>25</sup> requires that all developments are 'air quality neutral' to ensure proposals do not lead to further deterioration of existing poor air quality. In order to support the policy, guidance<sup>26</sup> has been produced by the GLA. The document provides a methodology for determining potential emissions from a development and benchmark values for comparison purposes.

7.1.2 There are two sets of benchmarks which cover the main sources of air pollution from new developments. These are:

- Building Emissions Benchmark (BEB) - emissions from equipment used to supply heat and energy to the buildings; and,
- Transport Emissions Benchmark (TEB) - emissions from private vehicles travelling to and from the development.

7.1.3 A development must meet both benchmarks separately in order to be Air Quality Neutral. Where one or both benchmarks are exceeded, appropriate action is required, either by on-site mitigation measures or by way of off-setting.

7.1.4 The Air Quality Neutral Assessment for the proposed development is provided in the following Sections.

### 7.2 Building Emissions

7.2.1 The guidance<sup>27</sup> states the following in relation to the BEB:

"Developments, including major developments, that do not include additional emissions sources are assumed to be Air Quality Neutral and meet the Air Quality Neutral benchmarks [...]"

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<sup>25</sup> The London Plan - The Spatial Development Strategy for Greater London, GLA, 2021.

<sup>26</sup> London Plan Guidance: Air Quality Neutral, GLA, 2023.

<sup>27</sup> London Plan Guidance: Air Quality Neutral, GLA, 2023.

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7.2.2 The proposed development will not include new combustion plant. Heating and hot water for the Portakabin will be through connection to the existing electricity network. As such, the proposals are considered to be air quality neutral from a building emissions perspective and no further mitigation is required.

### 7.3 Transport Emissions

7.3.1 The guidance<sup>28</sup> states the following in relation to the TEB:

"The TEB only estimates car or light van trips undertaken directly by the development occupiers (residents, businesses etc and their staff/customers). The TEB does not include 'operational' trips generated by the developments."

7.3.2 The proposed development will lead to an increase in Heavy Duty Vehicle (HDV) movements only. There will be no change to the existing Light Duty Vehicle (LDV) trip generation. As such, the proposals are considered to be air quality neutral from a transport emissions perspective and no further mitigation is required.

### 7.4 Summary

7.4.1 Potential emissions from the development were assessed in order to determine compliance with the air quality neutral requirements of the London Plan.

7.4.2 The building energy strategy includes connection to the existing electricity network. As such, the development is air quality neutral from a building emissions perspective.

7.4.3 The development will not lead to an increase in LDV trips from the site. As such, the development is air quality neutral from a transport emissions perspective.

7.4.4 Based on the above, the development is considered air quality neutral in accordance with the GLA guidance<sup>29</sup>.

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<sup>28</sup> London Plan Guidance: Air Quality Neutral, GLA, 2023.

<sup>29</sup> London Plan Guidance: Air Quality Neutral, GLA, 2023.



## 8.0 CONCLUSION

- 8.1.1 Redmore Environmental Ltd was commissioned by SRC Group to undertake an Air Quality Assessment in support of the extension to a minerals handling facility on land off Great Central Way, London.
- 8.1.2 The proposals have the potential to cause air quality impacts as a result of fugitive dust and road vehicle exhaust emissions during operation. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions and assess potential effects as a result of the scheme.
- 8.1.3 The risk of potential effects as a result of fugitive dust emissions from the facility during the operational phase was assessed using the IAQM methodology<sup>30</sup>. This included consideration of the Source Emission potential, Pathway Effectiveness and sensitivity of relevant receptors in the vicinity of the site. The results of the assessment indicated the overall effects as a result of the development were predicted to be not significant.
- 8.1.4 Potential impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. Dispersion modelling was therefore undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the highway network both with and without the development in place. Results were subsequently verified using local monitoring data.
- 8.1.5 Review of the dispersion modelling results indicated that impacts on annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations were predicted to be negligible at all sensitive receptor locations. Following consideration of the relevant issues, air quality impacts as a result of road vehicle exhaust emissions associated with the operation of the development were considered to be not significant, in accordance with the IAQM guidance.
- 8.1.6 Potential emissions from the development were assessed in order to determine compliance with the air quality neutral requirements of the London Plan. Based on the assessment results, the development was considered to be air quality neutral.

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<sup>30</sup> Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1, IAQM, 2016.

8.1.7 Based on the assessment results, air quality factors are not considered a constraint to planning consent or an environmental permit for the proposed development.

## 9.0 ABBREVIATIONS

AADT	Annual Average Daily Traffic
ADM	Atmospheric Dispersion Modelling
AQAP	Air Quality Action Plan
AQFA	Air Quality Focus Area
AQLV	Air Quality Limit Value
AQMA	Air Quality Management Area
AQO	Air Quality Objective
AQS	Air Quality Strategy
ASR	Annual Status Report
BDU	Bottom Dumping Unit
BEB	Building Emissions Benchmark
CERC	Cambridge Environmental Research Consultants
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DM	Do-Minimum
DMP	Dust Management Plan
DMRB	Design Manual for Roads and Bridges
DS	Do-Something
EA	Environment Agency
EFT	Emissions Factor Toolkit
GLA	Greater London Authority
HDV	Heavy Duty Vehicle
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
LA	Local Authority
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LBoB	London Borough of Brent
LDV	Light Duty Vehicle
NB	Northbound
NGR	National Grid Reference
NO <sub>2</sub>	Nitrogen dioxide
NO <sub>x</sub>	Oxides of nitrogen
NPPF	National Planning Policy Framework



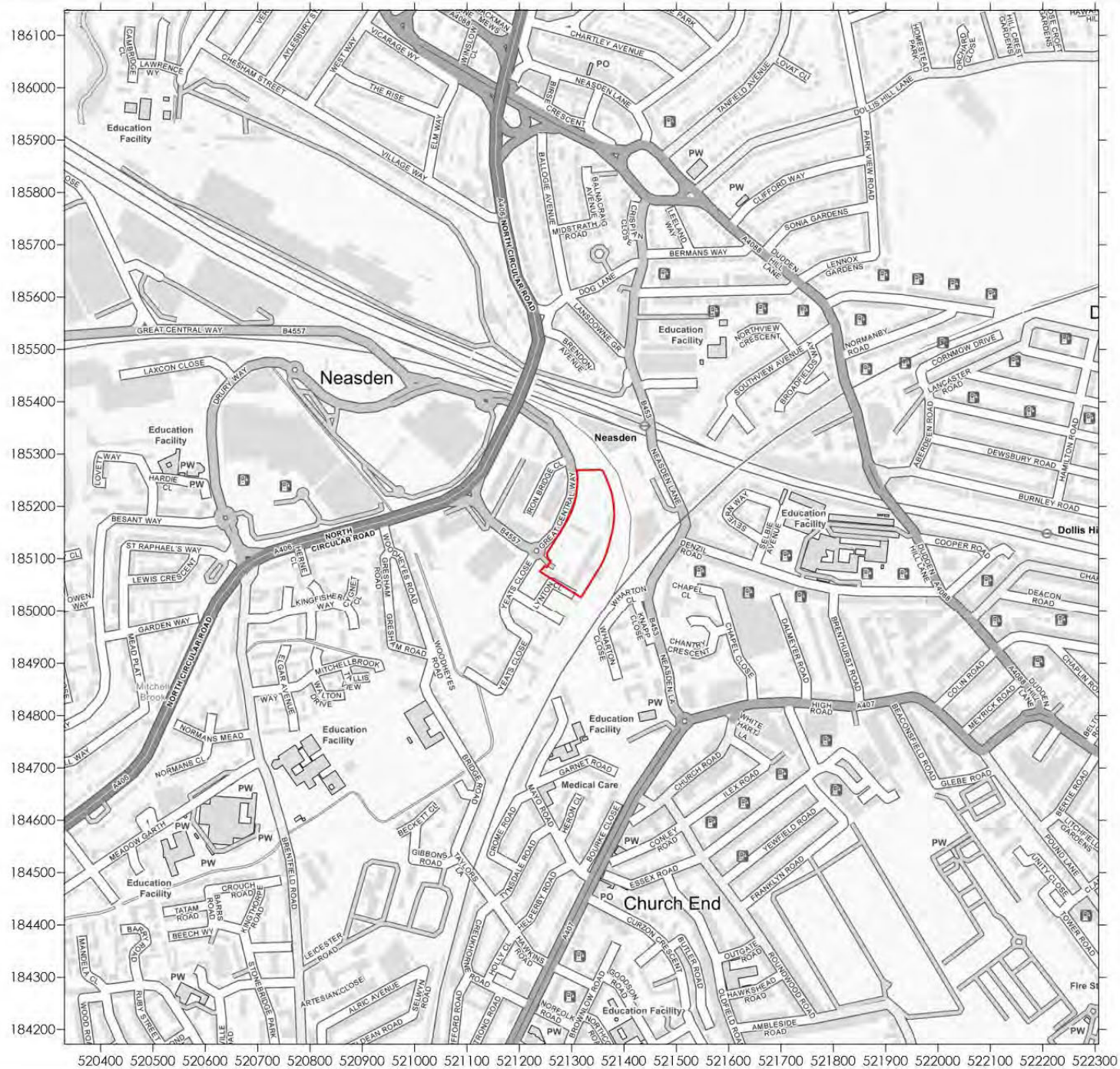
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NPPG	National Planning Policy Guidance
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter of less than 10µm
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter of less than 2.5µm
SB	Southbound
SP	Slow Phase
TEB	Transport Emissions Benchmark
tpa	Tonnes per annum
Z <sub>0</sub>	Roughness Length

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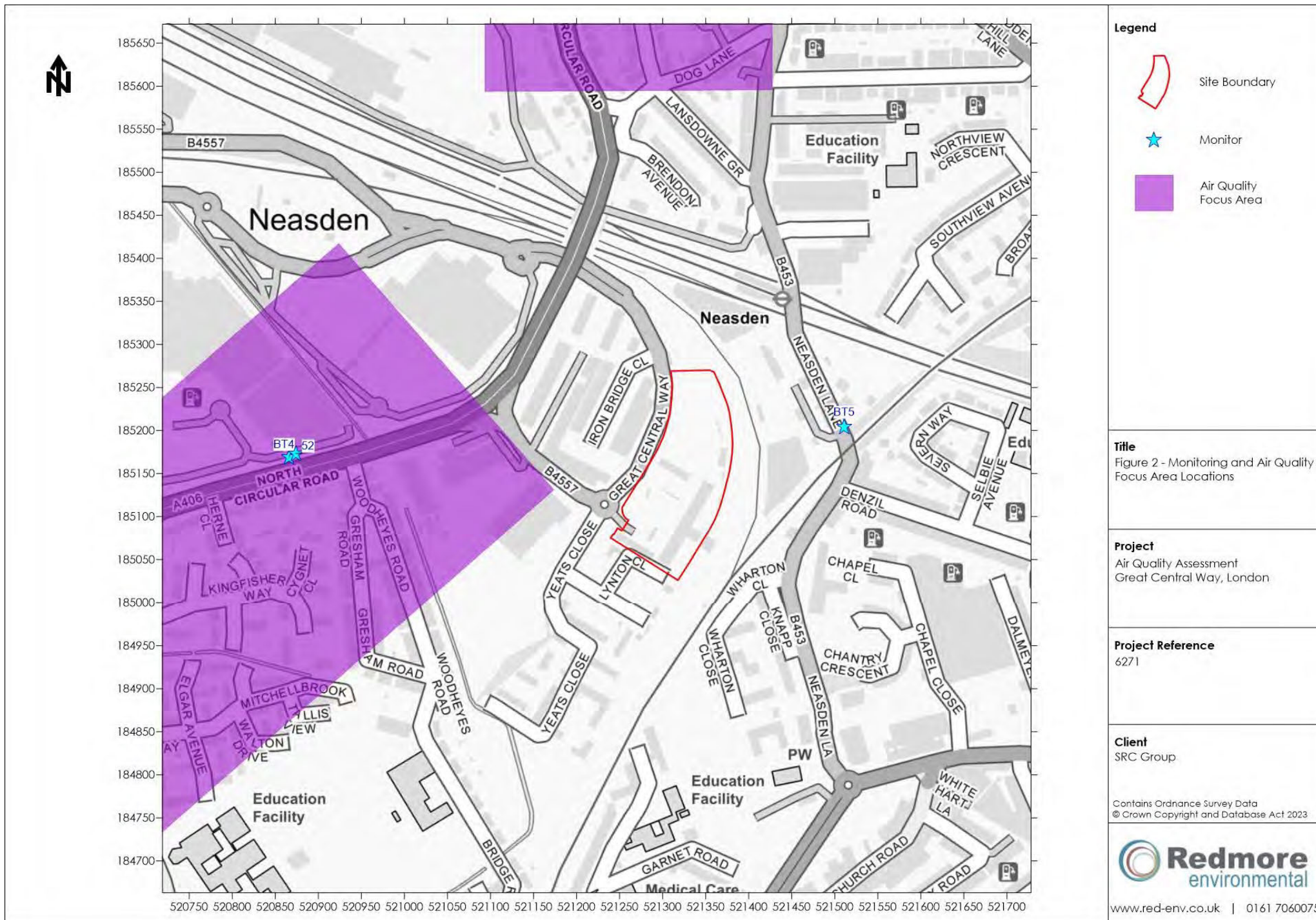
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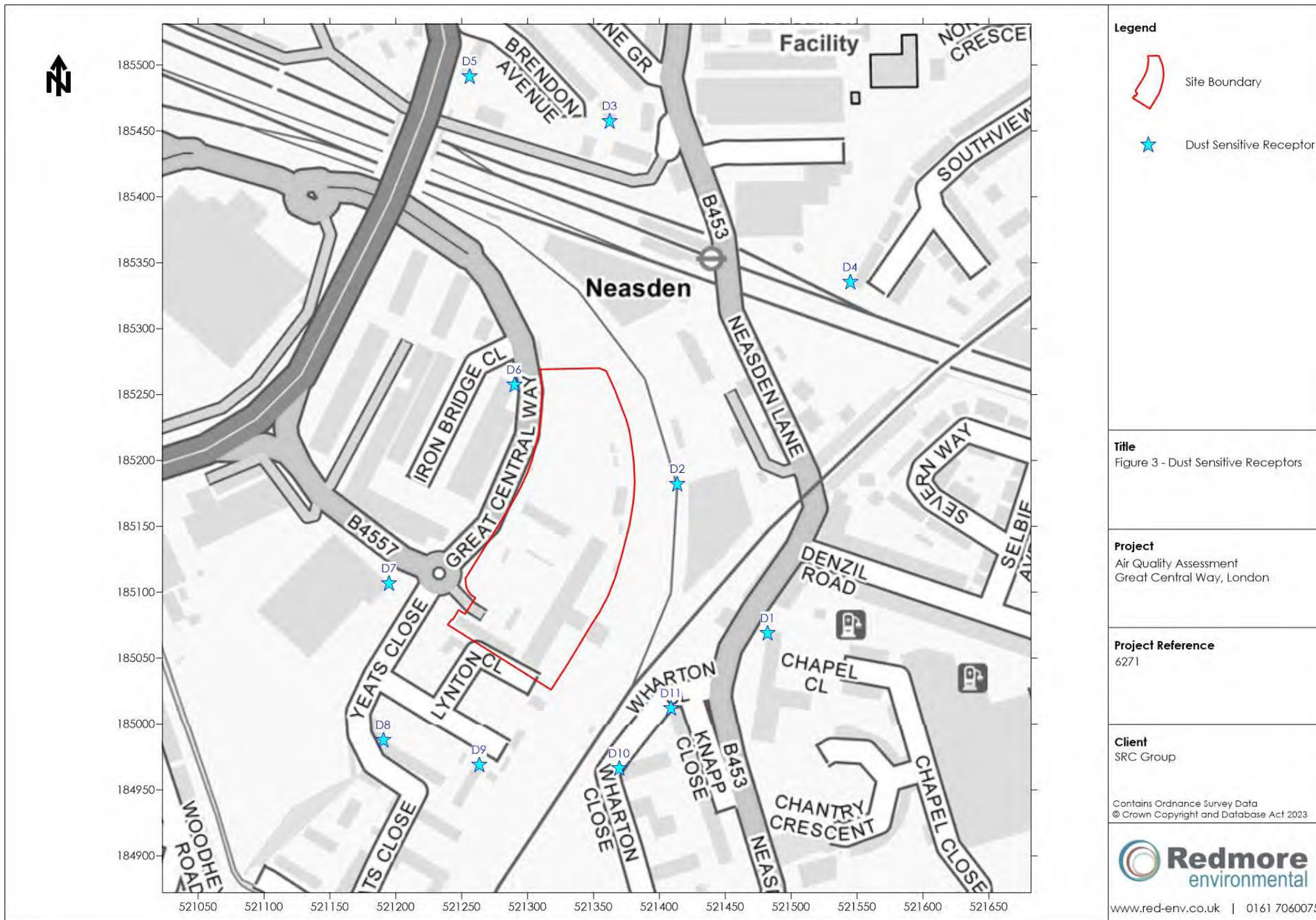


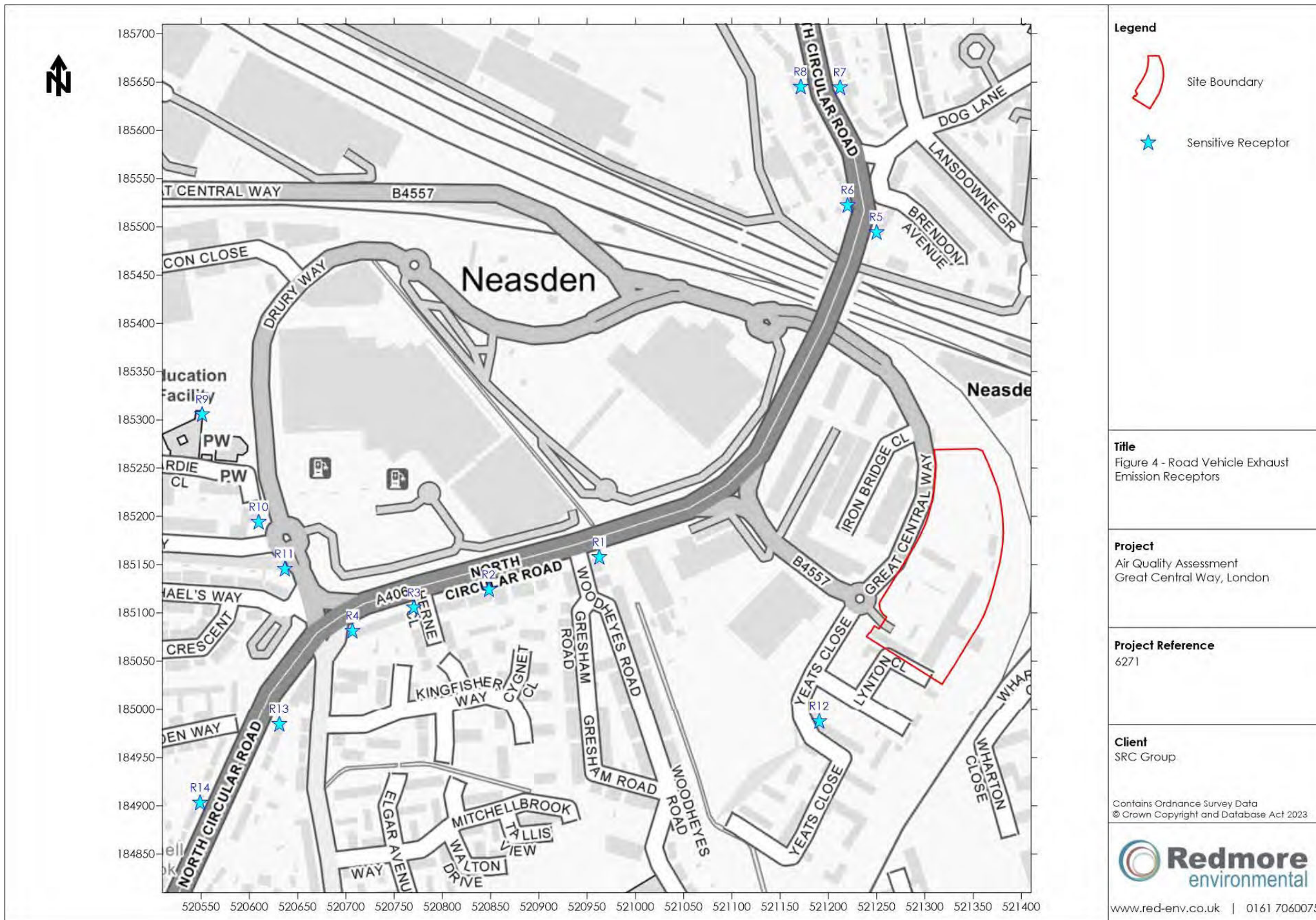
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<b>Title</b> Figure 1 - Site Location Plan
<b>Project</b> Air Quality Assessment Great Central Way, London
<b>Project Reference</b> 6271
<b>Client</b> SRC Group
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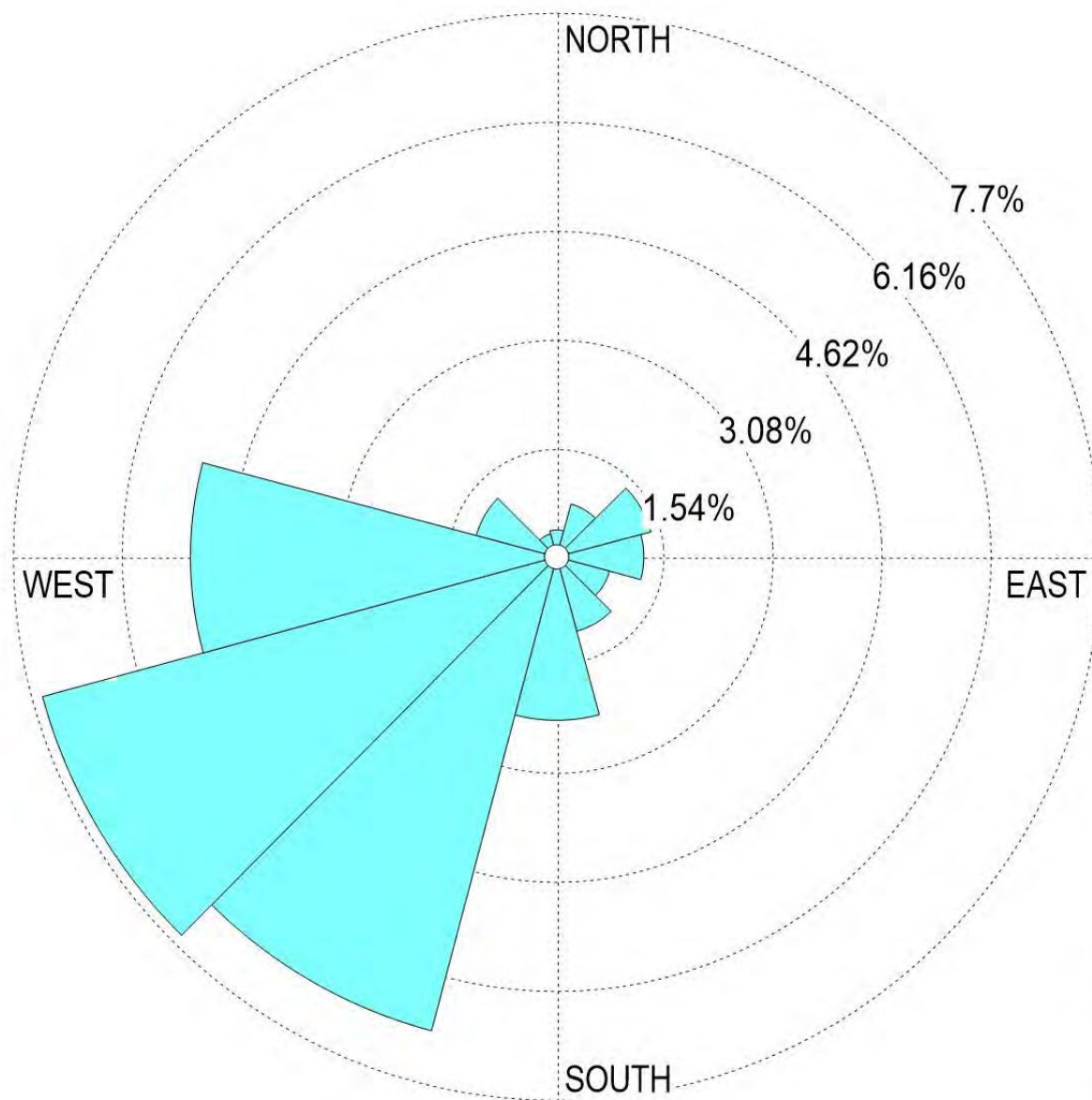












# Legend

## Title

Figure 5 - Wind Rose of 2016 to 2020  
Heathrow Airport Meteorological  
Data

## Project

Air Quality Assessment  
Great Central Way, London

## Project Reference

6271

## Client

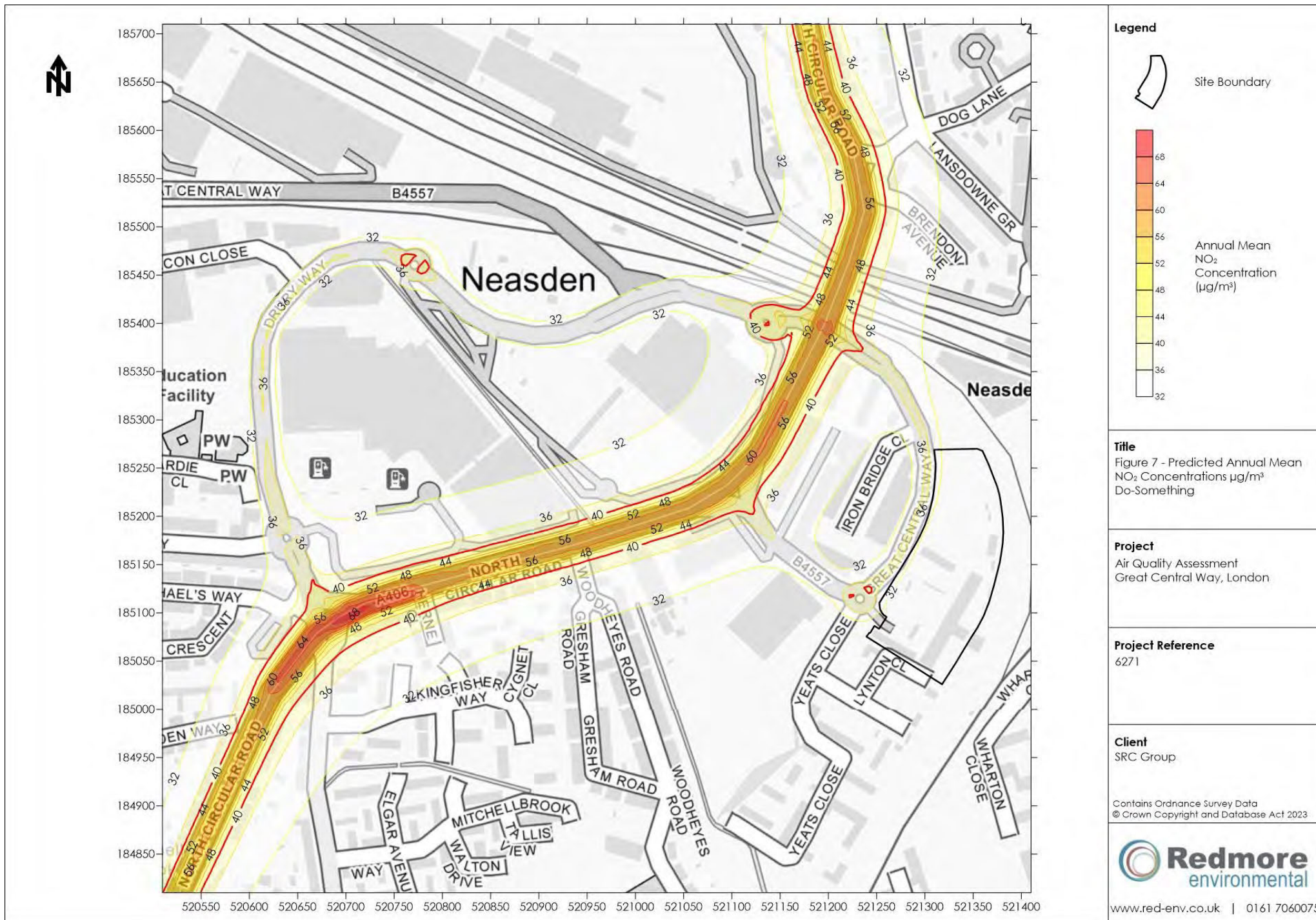
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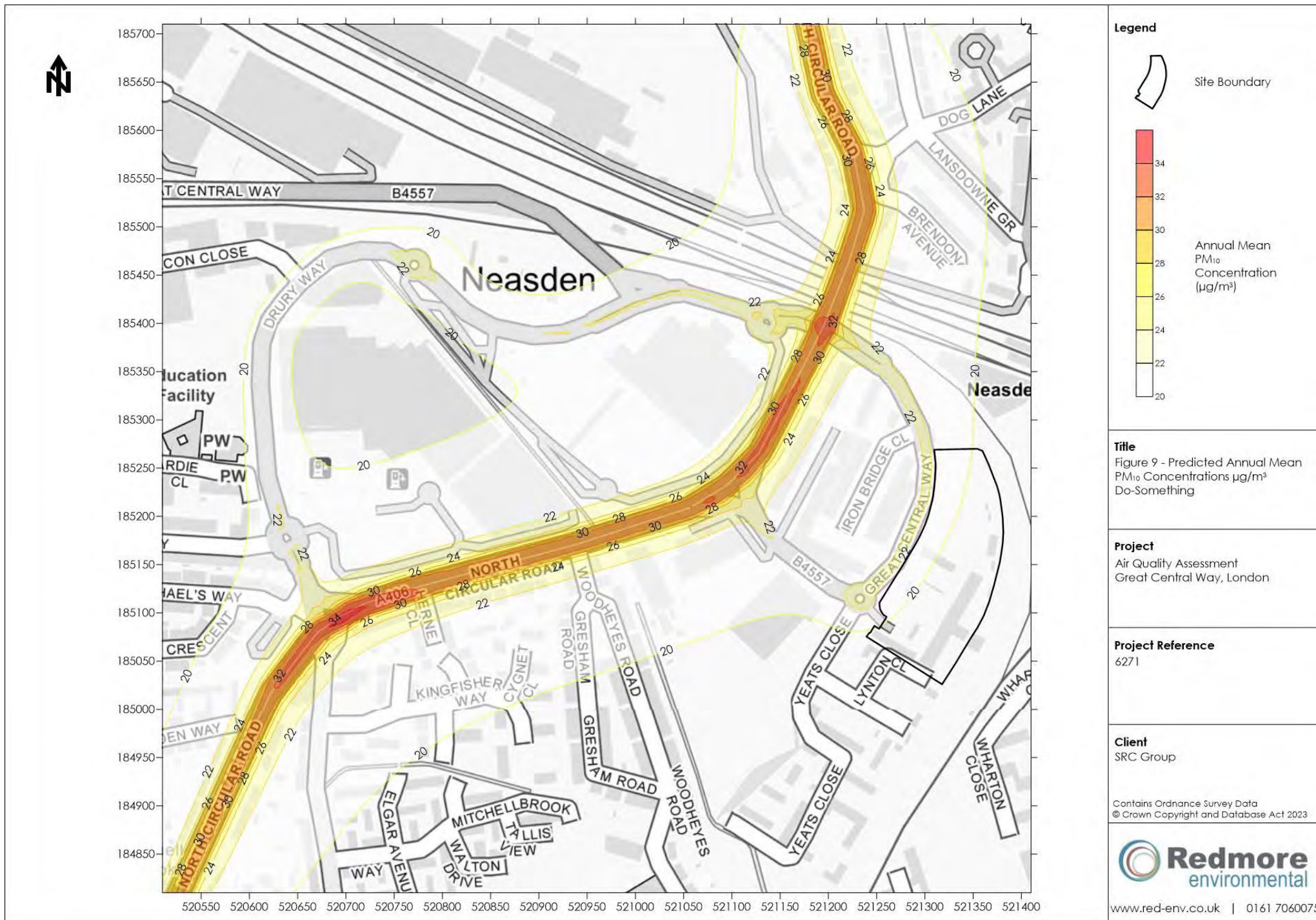




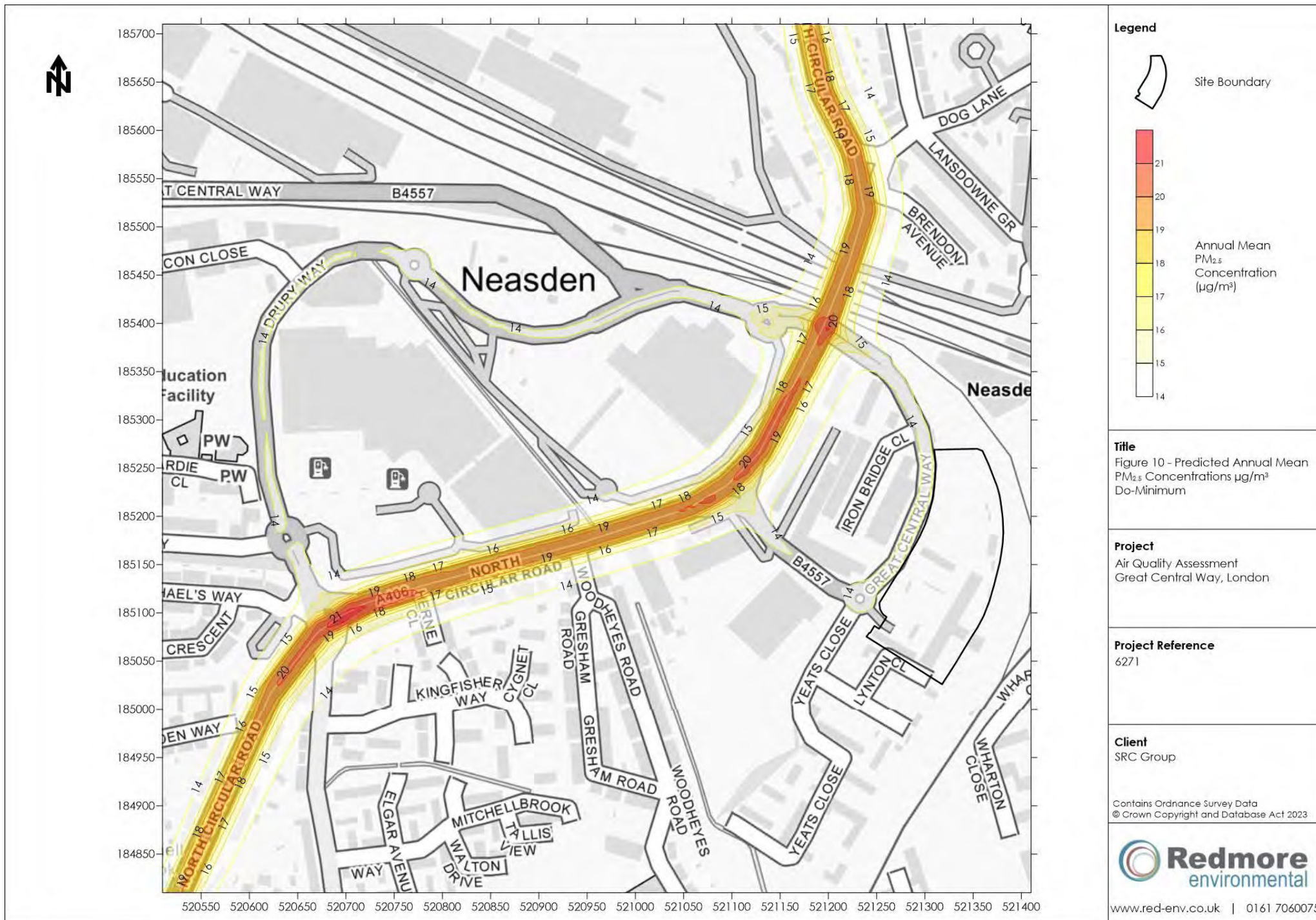




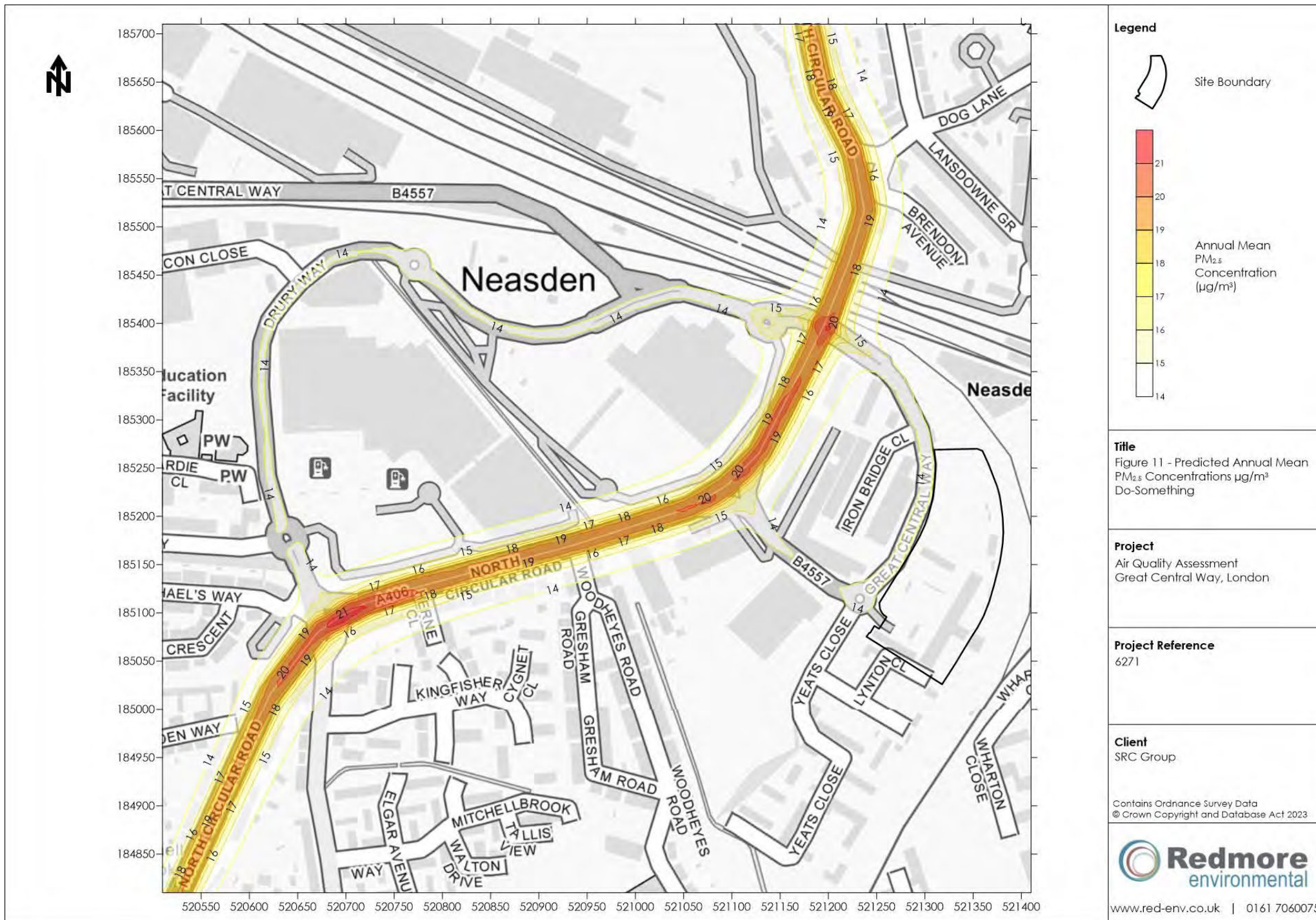




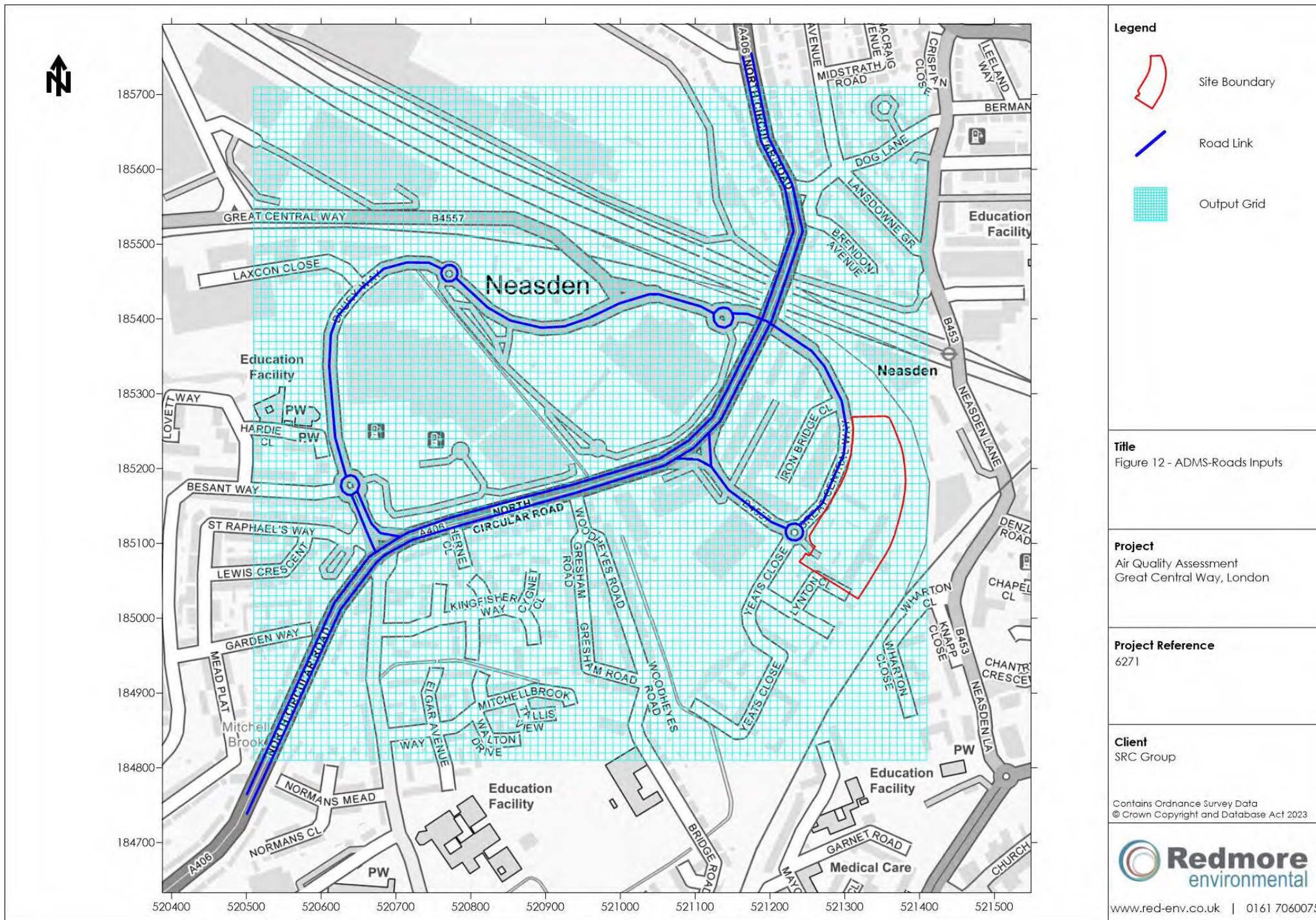




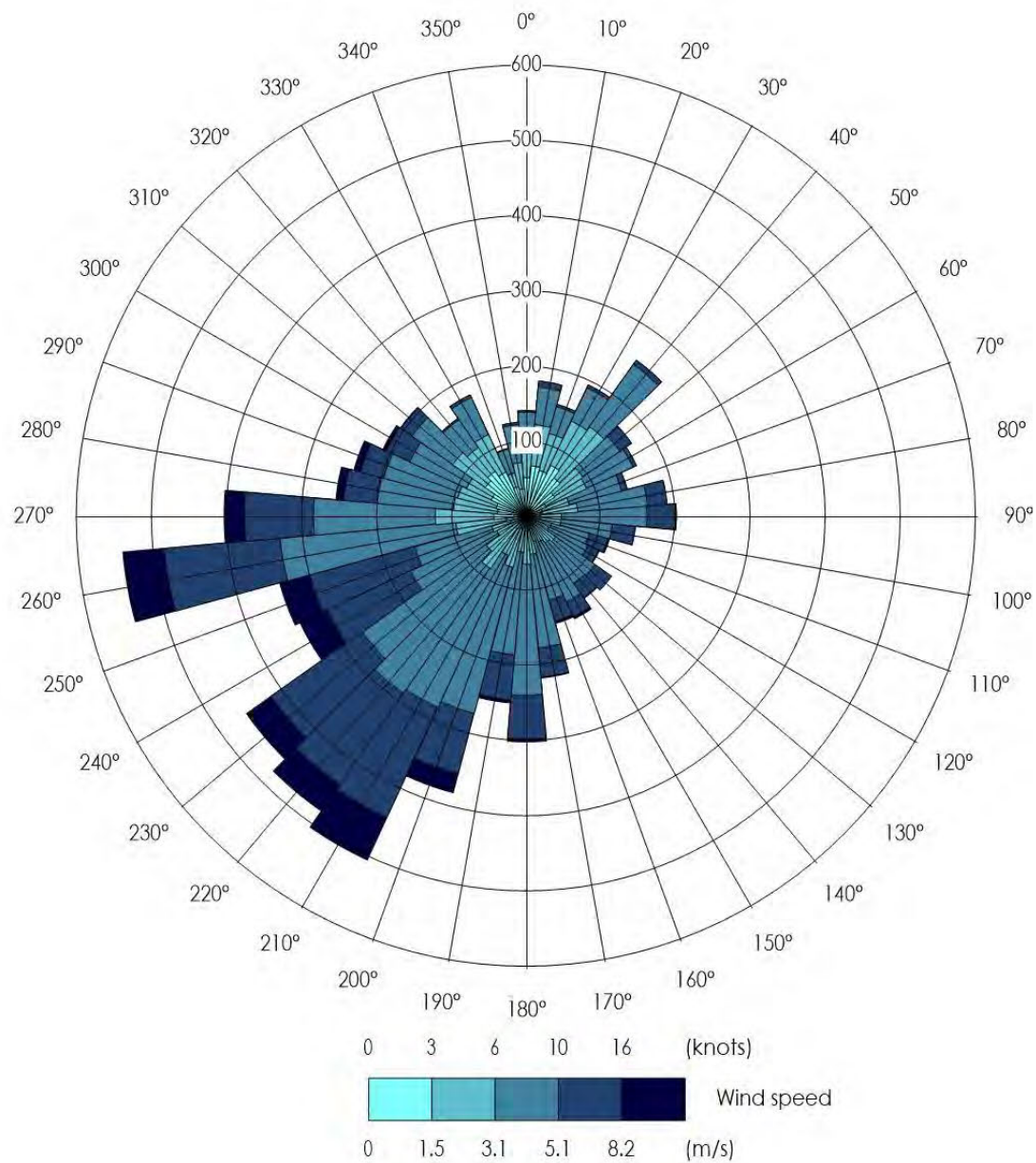












## Legend

### Title

Figure 13 - Wind Rose of 2019  
Heathrow Airport Meteorological  
Data

### Project

Air Quality Assessment  
Great Central Way, London

### Project Reference

6271

### Client

SRC Group



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Appendix 1 - Assessment Input Data

## Introduction

The proposed development has the potential to cause air quality impacts as a result of exhaust emissions associated with vehicles travelling to and from the site during the operational phase. In order to assess NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations at sensitive locations, detailed dispersion modelling was undertaken in accordance with the following methodology.

## Dispersion Model

Dispersion modelling was undertaken using the ADMS-Roads dispersion model (version 5.0.1.3). ADMS-Roads is developed by Cambridge Environmental Research Consultants (CERC) and is routinely used throughout the world for the prediction of pollutant dispersion from road sources. Modelling predictions from this software package are accepted within the UK by the Environment Agency and DEFRA.

The model requires input data that details the following parameters:

- Assessment area;
- Traffic flow data;
- Vehicle emission factors;
- Spatial co-ordinates of emissions;
- Street width;
- Meteorological data;
- Roughness length ( $z_0$ ); and,
- Monin-Obukhov length.

These are detailed in the following Sections.

## Traffic Flow Data

Baseline traffic data for use in the assessment was obtained from the latest version of the LAEI, 2019<sup>31</sup>. The LAEI was produced by the GLA and provides traffic flows throughout London for a number of scenarios. It should be noted that the LAEI is referenced in GLA guidance<sup>32</sup> as being a

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<sup>31</sup> LAEI 2019 - London Datastore.

<sup>32</sup> London Local Air Quality Management (LLAQM), Technical Guidance 2019 (LLAQM.TG (19)), GLA, 2019.

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suitable source of data for air quality assessments and is therefore considered to provide a reasonable estimate of traffic flows in the vicinity of the site.

The baseline traffic data was converted to the opening year of the development utilising a factor obtained from TEMPro (version 8.0). This software package has been developed by the Department for Transport (DfT) to calculate future traffic growth throughout the UK.

Development trip generation data was provided by Intermodal Transportation, the Transport Consultants for the project. This was applied to the relevant links in order to develop the DS scenario inputs.

A summary of the traffic flows is provided in Table A1.1.

**Table A1.1 Traffic Flows**

Link		24-hour Annual Average Daily Traffic (AADT) Flow			HDV Prop. of Fleet (%)		
		Verif.	2024 DM	2024 DS	Verif.	2024 DM	2024 DS
L1	B4557 Great Central Way, north of site access	10,902	11,491	11,574	10.4	10.4	11.0
L2	B4557 Great Central Way, approach to A406 North Circular Road, southbound (SB), Slow Phase (SP)	5,141	5,419	5,444	7.1	7.1	7.6
L3	A406 North Circular Road, SB, north of Brury Way	57,139	60,225	60,250	9.1	9.1	9.1
L4	A406 North Circular Road, SB, north of Brury Way, SP	57,139	60,225	60,250	9.1	9.1	9.1
L5	A406 North Circular Road, SB, south of Brury Way	51,685	54,476	54,501	7.2	7.2	7.2
L6	A406 North Circular Road, northbound (NB)	57,544	60,651	60,683	9.4	9.4	9.4
L7	A406 North Circular Road, NB, south of Brury Way, SP	57,544	60,651	60,683	9.4	9.4	9.4
L8	A406 North Circular Road, NB	57,544	60,651	60,728	9.4	9.4	9.5
L9	A406 North Circular, NB, between B4557 Great Central Way slip roads	57,139	60,225	60,225	9.1	9.1	9.1



Link		24-hour Annual Average Daily Traffic (AADT) Flow			HDV Prop. of Fleet (%)		
		Verif.	2024 DM	2024 DS	Verif.	2024 DM	2024 DS
L10	A406 North Circular, NB, north of B4557 Great Central Way	57,139	60,225	60,283	9.1	9.1	9.1
L11	A406 North Circular, NB	57,139	60,225	60,283	9.1	9.1	9.1
L12	B4557 Great Central Way, exit from A406 North Circular Road, SB	5,782	6,094	6,152	13.4	13.4	14.2
R1	B4557 Great Central Way Roundabout 1	10,482	11,048	11,090	8.6	8.6	8.9
L13	B4557 Great Central Way, south of site access	11,983	12,630	12,713	12.0	12.0	12.5
L14	B4557 Great Central Way, north of site access	11,983	12,630	12,739	12.0	12.0	12.7
L15	B4557 Drury Way	11,983	12,630	12,739	12.0	12.0	12.7
L16	B4457 Drury Way south of Laxcon Close	11,983	12,630	12,739	12.0	12.0	12.7
L17	B4457 Drury Way south of Laxcon Close, SP	11,983	12,630	12,739	12.0	12.0	12.7
L18	B4457 Drury Lane, NB, SP	4,504	4,747	4,779	12.6	12.6	13.2
L19	B4457 Drury Lane, SB, SP	5,769	6,081	6,158	13.7	13.7	14.8
L20	A406 North Circular Road, between B4457 Drury Lane NB and SB	57,544	60,651	60,651	9.4	9.4	9.4
R2	B4557 Great Central Way Roundabout 2	11,983	12,630	12,685	12.0	12.0	12.4
R3	B4457 Drury Lane, Roundabout 1	11,983	12,630	12,685	12.0	12.0	12.4
R4	B4457 Drury Lane, Roundabout 2	4,589	4,837	4,891	13.9	13.9	14.8

Road widths were estimated from aerial photography and UK highway design standards. A summary of the link parameters is provided in Table A1.2.

**Table A1.2 Road Parameters**

Link		Road Width (m)	Average Vehicle Speed (km/h)
L1	B4557 Great Central Way, north of site access	11.5	65

Link		Road Width (m)	Average Vehicle Speed (km/h)
L2	B4557 Great Central Way, approach to A406 North Circular Road, southbound SB, SP	6.0	20
L3	A406 North Circular Road, SB, north of Brury Way	10.8	65
L4	A406 North Circular Road, SB, north of Brury Way, SP	11.4	20
L5	A406 North Circular Road, SB, south of Brury Way	10.0	65
L6	A406 North Circular Road, NB	10.6	65
L7	A406 North Circular Road, NB, south of Brury Way, SP	13.7	20
L8	A406 North Circular Road, NB	11.1	65
L9	A406 North Circular, NB, between B4557 Great Central Way slip roads	11.3	65
L10	A406 North Circular, NB, north of B4557 Great Central Way	14.3	65
L11	A406 North Circular, NB	10.2	65
L12	B4557 Great Central Way, exit from A406 North Circular Road, SB	5.6	65
R1	B4557 Great Central Way Roundabout 1	8.3	20
L13	B4557 Great Central Way, south of site access	7.1	45
L14	B4557 Great Central Way, north of site access	7.4	45
L15	B4557 Drury Way	11.6	45
L16	B4457 Drury Way south of Laxcon Close	11.6	30
L17	B4457 Drury Way south of Laxcon Close, SP	12.3	20
L18	B4457 Drury Lane, NB, SP	5.8	20
L19	B4457 Drury Lane, SB, SP	5.5	20
L20	A406 North Circular Road, between B4457 Drury Lane NB and SB	11.1	65
R2	B4557 Great Central Way Roundabout 2	9.0	20
R3	B4457 Drury Lane, Roundabout 1	9.4	20
R4	B4457 Drury Lane, Roundabout 2	11.6	20

Reference should be made to Figure 12 for a graphical representation of the road link locations.

### Emission Factors

Emission factors for each link were calculated using the relevant traffic flows and the Emissions Factor Toolkit (EFT) (version 12.0.1). This has been produced by DEFRA and incorporates COPERT 5.6 vehicle emission factors and fleet information.

### Meteorological Data

Meteorological data used in the assessment was taken from Heathrow Airport meteorological station over the period 1<sup>st</sup> January 2019 to 31<sup>st</sup> December 2019 (inclusive).

All meteorological records used in the assessment were provided by Atmospheric Dispersion Modelling (ADM) Ltd, which is an established distributor of data within the UK. Reference should be made to Figure 13 for a wind rose of utilised meteorological data.

### Roughness Length

The  $z_0$  is a modelling parameter applied to allow consideration of surface height roughness elements. A  $z_0$  of 1.0m was used to describe the modelling extents. This is considered appropriate for the morphology of the area and is suggested within ADMS-Roads as being suitable for 'cities, woodland'.

A  $z_0$  of 0.3m was used to describe the meteorological site. This value is considered appropriate for the morphology of the area due to the large expanse of surrounding flat land use, such as runways, grassland and open water, and is suggested within ADMS-Roads as being suitable for 'agricultural areas (max)'.

### Monin-Obukhov Length

The Monin-Obukhov length provides a measure of the stability of the atmosphere. A minimum Monin-Obukhov length of 100m was used to describe the modelling extents and meteorological site. This value is considered appropriate for the nature of both areas and is suggested within ADMS-Roads as being suitable for 'large conurbations > 1 million'.

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### Background Concentrations

Background annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations for use in the assessment were obtained from the DEFRA mapping study for the grid square containing site, as shown in Table 14.

Background concentrations from 2019 were utilised throughout the assessment in preference to the development opening year. This provided a robust assessment and is likely to overestimate pollutant concentrations during the operation of the proposal.

It is noted that the GLA has released background concentration maps with a spatial resolution of 20m for 2013, 2020, 2025 and 2030. However, as the modelling area is considerably greater than 20m, and values were not available for the verification or opening years, this data was not considered appropriate for use in the assessment.

### NO<sub>x</sub> to NO<sub>2</sub> Conversion

Predicted annual mean NO<sub>x</sub> concentrations were converted to NO<sub>2</sub> concentrations using the spreadsheet (version 8.1) provided by DEFRA, which is the method detailed within DEFRA guidance<sup>33</sup> and GLA guidance<sup>34</sup>.

### Verification

The predicted results from a dispersion model may differ from measured concentrations for a large number of reasons, including:

- Estimates of background concentrations;
- Uncertainties in source activity data such as traffic flows and emission factors;
- Variations in meteorological conditions;
- Overall model limitations; and,
- Uncertainties associated with monitoring data, including locations.

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<sup>33</sup> Local Air Quality Management Technical Guidance (TG22), DEFRA, 2022.

<sup>34</sup> London Local Air Quality Management (LLAQM), Technical Guidance 2019 (LLAQM.TG (19)), GLA, 2019.

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Model verification is the process by which these and other uncertainties are investigated and where possible minimised. In reality, the differences between modelled and monitored results are likely to be a combination of all of these aspects.

For the purpose of the assessment, model verification was undertaken for 2019 using traffic data, meteorological data and monitoring results from this year. The choice of 2019 as the verification year is due to uncertainty with traffic patterns following COVID-19 and associated impacts on ambient pollution levels.

Monitoring of NO<sub>2</sub> concentrations was undertaken at two locations within the vicinity of roads included in the model during 2019. Review of the results indicated that the BT4 automatic monitoring station is co-located with diffusion tube 52. The continuous analyser is considered to provide the most accurate record of NO<sub>2</sub> concentrations at this location. As such, the diffusion tube result was removed from the verification procedure.

The continuous analyser result was obtained and the road contribution to total NO<sub>x</sub> concentration calculated following the methodology contained within DEFRA guidance<sup>35</sup>. The monitored annual mean NO<sub>2</sub> concentration and calculated road NO<sub>x</sub> concentration are summarised in Table A1.3.

**Table A1.3 NO<sub>x</sub> Verification - Monitoring Result**

Monitoring Location		Monitored NO <sub>2</sub> Concentration (µg/m <sup>3</sup> )	Calculated Road NO <sub>x</sub> Concentration (µg/m <sup>3</sup> )
BT4	IKEA	63.00	90.13

The annual mean road NO<sub>x</sub> concentration predicted from the dispersion model and the 2019 road NO<sub>x</sub> concentration calculated from the monitoring result are summarised in Table A1.4.

**Table A1.4 NO<sub>x</sub> Verification - Modelling Result**

Monitoring Location		Calculated Road NO <sub>x</sub> Concentration (µg/m <sup>3</sup> )	Modelled Road NO <sub>x</sub> Concentration (µg/m <sup>3</sup> )
BT4	IKEA	90.13	43.50

<sup>35</sup> Local Air Quality Management Technical Guidance (TG22), DEFRA, 2022.

The monitored and modelled road NO<sub>x</sub> concentrations were compared to calculate the associated ratio. This indicated a verification factor of 2.0721 was required to be applied to all modelling results.

Monitoring of PM<sub>10</sub> concentrations was undertaken at one location within the modelling extents during 2019. The monitored annual mean PM<sub>10</sub> concentration and modelled PM<sub>10</sub> concentration is shown in Table A1.5.

**Table A1.5 PM<sub>10</sub> Verification - Modelling Result**

Monitoring Location		Monitored PM <sub>10</sub> Concentration (µg/m <sup>3</sup> )	Modelled PM <sub>10</sub> Concentration (µg/m <sup>3</sup> )
BT4	IKEA	30.0	23.6

The monitored and modelled PM<sub>10</sub> concentrations were compared to calculate the associated ratio. This indicated a verification factor of 1.2719 was required to be applied to all modelling results.

Monitoring of PM<sub>2.5</sub> concentrations was undertaken at one location within the modelling extents during 2019. The monitored annual mean PM<sub>2.5</sub> concentration and modelled PM<sub>2.5</sub> concentration is shown in Table A1.6.

**Table A1.6 PM<sub>2.5</sub> Verification - Modelling Result**

Monitoring Location		Monitored PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )	Modelled PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )
BT4	IKEA	20.7	15.1

The monitored and modelled PM<sub>2.5</sub> concentrations were compared to calculate the associated ratio. This indicated a verification factor of 1.3724 was required to be applied to all modelling results.



Appendix 2 - Curricula Vitae

### KEY EXPERIENCE:

Jethro is a Chartered Environmentalist and Director of Redmore Environmental with specialist experience in the air quality and odour sectors. His key capabilities include:

- Production and management of Air Quality, Dust and Odour Assessments for a wide-range of clients from the retail, residential, infrastructure, commercial and industrial sectors.
- Production and co-ordination of Environmental Permit applications for a variety of industrial sectors.
- Detailed dispersion modelling of road vehicle and industrial emissions using ADMS-Roads, ADMS-5, AERMOD-PRIME and BREEZE-ROADS. Studies have included impact assessment of ground level pollutant and odour concentrations and assessment of suitability of development sites for proposed end-use.
- Project management and co-ordination of Environmental Impact Assessments and scoping reports for developments throughout the UK.
- Provision of expert witness services at Planning Inquiries.
- Design and project management of pollutant monitoring campaigns.
- Co-ordination and management of large-scale multi-disciplinary projects and submissions.

Provision of expert advice to local government and international environmental bodies, as well as involvement in production of industry guidance.

### SELECT PROJECTS SUMMARY:

#### Industrial and Agricultural

Discovery Park, Sandwich - Air Quality Assessment including dispersion modelling of gas fired steam generating boilers in support of a Medium Combustion Plant (MCP) Environmental Permit Application.

St Thomas House, Ellesmere Port - Air Quality Assessment including dispersion modelling of two biomass boilers firing wood pellets.

Herriard Anaerobic Digester - H1 Screening Assessment in accordance with Environment Agency guidance.

Halls Farm, Bude - Ammonia and Odour Assessments in support of a proposed farm expansion, including the construction of a cattle slurry lagoon and livestock housing

London Luton Airport - Air Quality Assessment including dispersion modelling of gas fired boilers in support of a MCP Environmental Permit Application.

Rectory Farm, Aldborough - Odour Assessment in support of the development of livestock housing.

Ashfields, Tilbury - Dust Assessment in support of the extraction of Pulverised Fuel Ash associated with the former Tilbury Power Station.

Poplar Farm, Bedfield - Dust Assessment and Management Plan for an aggregate processing facility.

Crown Chicken, Kenninghall - Air Quality, Odour and Dust Environmental Impact Assessment (EIA) in support of a farm expansion.

Newport Chalk Pit - Air Quality Assessment in support of a recycling and restoration project.

#### Residential

Jack Chase Way, Caister - Air Quality EIA in support of a planning application for circa 725 dwellings.

New Road, Tintwistle - Odour Assessment including dispersion modelling of the Tintwistle Sewage Treatment Works in order to determine suitability of adjacent land for residential use

St Nicholas Circle, Leicester - Air Quality Assessment including dispersion modelling of road traffic sources to determine suitability of the site for student accommodation.

Land East and West of A140, Long Stratton - Air Quality EIA for a large scale residential development.

Meadley Square, Knaresborough - Odour Assessment including site surveys and a risk assessment to determine potential for loss of amenity to future occupants due to adverse odours generated by an adjacent takeaway.

Main Street, Port Rush - Kitchen Odour Impact Assessment in support of a proposed restaurant with residential apartments above

Commercial and Retail

Downtown Grantham Designer Outlet - Air Quality EIA in support of the development of a retail outlet

North Acton Road, London - Air Quality Assessment in support of the development of a seven storey building to include a café and commercial floor space.

Great Homer Street, Liverpool - Investigative Odour Survey at an existing McDonalds restaurant.

Ashdown Business Park, Kent - Air Quality Assessment in support of a Premier Inn Hotel and Drive-Thru Costa Coffee.

Sandbrook Park, Rochdale - Air Quality Assessment in support of 14 business/industrial units.

# EMILY MACEY

## Senior Air Quality Consultant



BSc (Hons), MSc, MEnvSc, MIAQM

Tel: 0161 706 0075 | Email: emily.macey@red-env.co.uk

### KEY EXPERIENCE:

Emily is a Senior Environmental Consultant with specialist experience in the air quality sector. Her key capabilities include:

- Production of Air Quality Assessments in accordance with Department for Environment, Food and Rural Affairs (DEFRA) methodologies for a range of residential, commercial and industrial sectors.
- Detailed dispersion modelling of road vehicle exhaust emissions using ADMS-Roads. Studies have included assessment of road traffic exhaust emissions on sensitive receptors and exposure of new residents to poor air quality.
- Advanced canyon modelling to evaluate the impact of altered urban topography on air quality in built up areas.
- Assessment of construction dust impacts from a range of development sizes.
- Definition of baseline air quality and identification of sensitive areas across the UK.
- Production of air quality mitigation strategies specifically tailored to address issues at individual sites.
- Air quality monitoring at industrial sites to quantify pollutant concentrations
- Odour surveys to assess amenity and suitability of sites for potential future development for residential use.

### SELECT PROJECTS SUMMARY:

Bowlers Yard, Manchester

Air Quality Assessment in support of an eleven storey residential development to provide circa 65 units on land known as Bowlers Yard, Manchester. The site was located in an Air Quality Management Area (AQMA) and concerns were raised regarding the exposure of future occupants to poor air quality due to road traffic emissions. Detailed dispersion modelling was undertaken using ADMS-roads to assess PM<sub>2.5</sub>, PM<sub>10</sub> and NO<sub>2</sub> concentrations across the site. Results indicated that pollution levels were below the air quality objectives across the development.

Freemasons Arms Hotel, Heywood

Air Quality Assessment to support a residential-led development in an AQMA. Detailed dispersion modelling was undertaken with the inclusion of advanced canyon modelling to evaluate the impact of the urban topography within the locality on the dispersion of traffic related pollutants. Predicted concentrations of NO<sub>2</sub> were found to exceed air quality criteria at the building façade fronting Market Place at first floor level. As such, mitigation was specified for the affected units to ensure future residents would not be exposed to poor air quality.

Griffin Road, London

Air Quality Assessment in support of a residential development located in an AQMA. Detailed dispersion modelling was undertaken using ADMS-roads to assess PM<sub>10</sub> and NO<sub>2</sub> concentrations across the site. Results indicated that pollution levels were classified as APEC - A in accordance with the London Councils Air Quality and Planning Guidance.

High Street, Dudley

Odour Impact Assessment in support of a proposed residential-led development. Due to the location of the site, being above an existing hot food takeaway, odour surveys were required to assess the level of odour across the development. A risk assessment was also undertaken in accordance with the relevant odour guidance. An appropriate ventilation system was identified on the basis of the assessment results.

East Common Lane, Selby

Air Quality Assessment in support of an industrial development on land associated with Access 63 Business Park, East Common Lane Selby. Due to the size of the development it was possible that traffic generated from the scheme may cause negative impacts on sensitive receptors nearby. NO<sub>2</sub> and PM<sub>10</sub> concentrations were quantified at specific receptor points to ensure there would be no significant increases in pollution levels. Results revealed negligible impacts.

Wharton Road, Winsford

Air Quality Assessment in support of a residential development of circa 138 units on land off Wharton Road, Winsford. Using sensitive receptors, located in areas where increased road traffic may affect NO<sub>2</sub> concentrations, a comparison was made between overall concentrations with and without the development in place. Results revealed pollutant concentrations were below the relevant standards across the site and impacts not significant.



## **APPENDIX 8**

### Dust Emissions Management Plan



# DUST EMISSIONS MANAGEMENT PLAN, V1

**for the Storage and Treatment of Wastes at**

**Great Central Way, Wembley, London, NW10 0UZ**

**Report prepared on behalf of:**  
Sewells Reservoir Construction Limited



**Report Date:**  
November 2024

This Dust Emissions Management Plan was prepared by PDE Consulting Limited on behalf of Sewells Reservoir Construction Limited



## Dust Emissions Management Plan – Revision History

The following revision history sheet will be completed to detail any issued changes to this documentation:

Version No.	Version Date	Description
Original	November 2024	Original Dust Emissions Management Plan (DMP) produced in support of Permit Variation Application.

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Drainage Strategy	Drawing No. DR-C-2000 P02	Scale: 1:500@A1

## APPENDICES

Appendix 1	Potentially Sensitive Receptor Locations
Appendix 2	Accident / Incident Report Form
Appendix 3	Dust Complaint Form
Appendix 4	Dust Monitoring Check Sheet
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# 1. INTRODUCTION

## Scope

- 1.1 This Dust Emissions Management Plan (DEMP) has been prepared by PDE Consulting Limited (the 'Agent') on behalf of Sewells Reservoir Construction Limited (the 'Operator') to support an application to vary an environmental permit for a waste facility located at Great Central Way, Wembley, London, NW10 0UZ (the "Site").
- 1.2 Standard rules environmental permit No. EPR/LB3101LL was issued to the Operator on 20 June 2022. It authorises standard rules set SR2009 No 5: inert and excavation waste transfer station below 250,000 tonnes per annum. Under the standard rules permit, wastes can be bulked up for disposal or recovery elsewhere and can be manually sorted or separated for recovery, but the rules do not allow any waste treatment activities such as screening and crushing.
- 1.3 It is proposed to vary the standard rules permit to a bespoke permit. The bespoke application will allow the following additional activities:
  - Crushing and screening of wastes;
  - An increase in waste throughputs to 500,000 tonnes per annum;
  - Add three additional waste types only.
- 1.4 The Site is located in the London Borough of Brent (LBoB) within the Brent Air Quality Management Area (AQMA) which has been declared for Particulate Matter PM<sub>10</sub> (24-Hour Mean) and Nitrogen Dioxide (NO<sub>2</sub>) (Annual Mean).
- 1.5 The permit application is for storage and physical treatment of wastes to produce soil, soil substitutes and aggregate. Without any abatement controls the Site has a low potential for dust emissions. This is a new waste activity, and the Site infrastructure has been specifically designed to reduce emissions.
- 1.6 This report provides details of the mitigation measures in place to mitigate fugitive dust emissions from the Site causing pollution. It has been completed in accordance with the following EA guidance:
  - <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit>;
  - <https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities>;
  - Technical Guidance Note (Monitoring) M17. Monitoring Particulate Matter in Ambient Air around Waste Facilities. Environment Agency. Version 2, July 2013; and
  - Example Dust & Particulate Emissions Management Plan (version 10).

## Site Location and Setting

- 1.7 The Site is located in the borough of Wembley approximately 300 m east of Brent, approximately 800 m south of Neasden and approximately 1.8 km east of Wembley Stadium. It is centred at National Grid Reference (NGR) TQ 213 852 as shown on Drawing No. 0100 v3. It covers an area of approximately 0.8 hectares. The Site is accessed off Great Central Way. It is identified as Land of Strategic Industrial Importance.
- 1.8 The Site is bound to the north by BCC van hire. To the northeast is Neasden Underground Station. Towards the east of the Site is the mainline railway, followed by industrial uses including Glynn's Skip Hire, Hardcrete, EMR Neasden, and NSX Autos. To the south is an aggregate depot also operated by SRC then a traveller site at Lynton Close, followed by further residential uses along Yeats Close, and Bridge Road allotment. Towards the southwest is Selco Builders Warehouse, Dog Lane allotment and further industrial estate uses. To the west of the Site are industrial estate uses, which is understood to also include residential dwellings at 18 Iron Bridge Close.
- 1.9 The entire Site is fenced and has lockable gates to prevent unauthorised access. Behind the western fence that separates the Great Central Way pedestrian path and the Site runs a greened buffer zone. This zone provides a green buffer between the site and the road consisting of earth banking and some partially developed trees.
- 1.10 A 7.5 m boundary wall will extend along the whole of the northern and western Site boundary to ensure the Site is effectively screened from existing sensitive properties.
- 1.11 It is also proposed to install a continuous gabion wall along the full length of the western Site boundary. The gabion wall, which will be positioned behind an enhanced green buffer zone, is to be filled with graded stones to provide a stratified elevation with differing bands of colour and stone size.
- 1.12 In addition, a green wall trellis support system will be attached to the metal façade of Building B5. The fence line, greened boundary, gabion wall and green wall trellis behind Building B5 are shown on Drawing No. 106.

## Implementing the DEMP

- 1.13 The Site Manager, reporting to the Technically Competent Manager (TCM), will ensure that the procedures in this DEMP are adhered to.
- 1.14 The Site Manager will have the authority to modify or stop operations to reduce emissions on a temporary or permanent basis until the risk of emissions has subsided.
- 1.15 The Site Manager will ensure that all members of staff are aware of the dust management procedures.
- 1.16 Staff at all levels will receive the necessary training and instruction in their duties relating to the control of all operations and the potential sources of dust emissions.
- 1.17 This document will form part of the Site specific Environmental Management System (EMS) for the waste operation. A copy of the EMS will be kept on Site in the Site office.

## **Review of the DEMP**

1.18 This DEMP will be reviewed as follows:

- When changes are made to the Site, operations or equipment that affect the activities covered by the permit;
- Whenever an application is made to change ('vary') the permit;
- After any accident, complaint or breach of the permit; and
- If a new environmental problem or issue is encountered, and the Operator has implemented new measures to control it.

1.19 Any revisions or changes will be logged in a revision history table at the beginning of the document.



## 2. WASTE OPERATIONS (SOURCE)

- 2.1 It is proposed to vary the standard rules permit to a bespoke permit to allow the crushing and screening of construction and demolition wastes to be undertaken on the Site. Waste will be delivered to Site in covered HGV's and stockpiled before being treated to produce soil, soil substitutes and aggregates only.
- 2.2 It is proposed that a dedicated covered area is constructed close to the northern boundary of the Site. It is labelled as Building B5 on Drawing No. 0100 v3. The dedicated covered area will have solid façades, constructed using steel cladding along the northern and western sides and will be fully open on the eastern and southern sides of the Site which face into the Site, to allow access. Cross sections through the dedicated covered storage area are shown on Drawing No. 106 v3 as sections E5 and E6.
- 2.3 Wastes that are imported to the Site to be treated will be tipped into separate stockpiles in the dedicated covered area prior to treatment. Stockpiles of wastes will be a maximum of 6 m high.
- 2.4 The crusher and screen used to process recycled materials will operate within the dedicated covered area. Two excavators will operate in this area to load the plants and a loading shovel would work in this area and outside, managing the recycled materials, loading HGV's, and loading aggregate trains when required.
- 2.5 Processed materials will be stored outside adjacent to the covered area as shown on Drawing No. 0100 v3 prior to being exported from Site by road or potentially loaded back onto the trains for distribution. The processed waste storage area will have 7.5 m tall bay walls to the south and west. Stockpiles of processed aggregate will be a maximum of 6 m high.
- 2.6 Clay based wastes are imported to Site via HGV's and stored in Area Y2 shown on Drawing No. 0100 v3 for loading onto trains. These clay stockpiles will be a maximum of 4 m high. This activity is ongoing in accordance with the standard rules permit. These wastes will not be treated on Site.
- 2.7 It is proposed that the maximum annual throughputs of wastes are increased to 500,000 tonnes. The maximum amount of waste that will be stored on Site at any one time will be 25,000 tonnes.
- 2.8 No changes to the operational hours are proposed, with the existing operating hours of between 06:00 to 20:00 hours daily and trains permitted to arrive and offload at any point over a 24 hour period retained.

### **Waste Acceptance Procedure**

#### Waste Deliveries

- 2.9 All wastes will be imported to Site by road in HGV's either by the Operator's own vehicles or by third party waste contractors. The Operator's HGV's meet Euro 5 or 6 emission ratings. The HGV's are loaded at the construction sites and therefore the driver is able to visually inspect the waste prior to, and as it is being loaded. If any waste appears to be particularly dusty, the driver will request that it is dampened as it is being loaded.

- 2.10 For all waste delivered by the Operator's vehicles, the source will be known as each customer will be booked into the database. At the time of ordering a collection, the customer is made aware of the waste that can be collected by the company. All third-party users are made aware of the waste acceptance procedures.
- 2.11 All waste deliveries will be booked with the Site. As part of the booking procedure, details relating to the source of the waste will be noted. If there is any doubt about the nature of the source, based on the site description, further information will be required including Site Reports and chemical analysis.

#### On Site Checks

- 2.12 All deliveries will be sheeted until instructed to un-sheet by the Site staff. This will take place after the vehicle has been weighed and the driver provided directions to the unloading area. The vehicle will remain sheeted for as long as possible. Therefore, if there is a queue, the driver will only un-sheet when ready to discharge. This will ensure that vehicles are sheeted as they travel through the Site.
- 2.13 A check of the load will be made by the Site staff on arrival and during deposit by the Site operatives by visual assessment. The contents of the load will be checked against the Waste Transfer Note. If the load is visually different to the description, the operator's office staff will contact the customer to validate the changes.
- 2.14 If the delivery driver is not employed by the Operator, then the written description shall be changed on the waste transfer note by the driver to correct the description. The waste producer will be notified. Site staff will check the environmental permit to validate that the description given is listed on the permit. Once accepted, the driver will be directed to the dedicated covered area to unload the material.
- 2.15 Recyclable soil and stones (EWC 17 05 04) will be stocked to create 6F4 material. Concrete (EWC code 17 01 01) will be stockpiled to create type 1 crushed concrete. Concrete (EWC code 17 01 07) will also be stockpiled with road planings (EWC code 17 03 02) and treated to produce 6F5 material.

#### Waste Types

- 2.16 The waste types to be stored and treated on Site are listed in Table 1 below.

**Table 1: Waste Types**

Waste code	Description	Exclusions
<b>17 01</b>	<b>Concrete, bricks, tiles and ceramics</b>	
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	
<b>17 02</b>	<b>Wood, glass and plastic</b>	
17 02 02	Glass	
<b>17 03</b>	<b>Bituminous mixtures, coal tar and tarred products</b>	
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01	
<b>17 05</b>	<b>Soil (including excavated soil from contaminated sites), stones and dredging spoil</b>	
17 05 04	Soil and stones other than those mentioned in 17 05 03	
17 05 08	Track ballast other than those mentioned in 17 05 07	
<b>17 09</b>	<b>Other construction and demolition wastes</b>	
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03.	
<b>19 12</b>	<b>Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>	
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.	Waste aggregate generated from the recycling of metals only.
<b>20 02</b>	<b>Garden and park wastes (including cemetery waste)</b>	
20 02 02	Soil and stones	

2.17 Wastes shall only be accepted at the Site if:

- It is of a type listed in the permit;
- It does not consist solely or mainly of dusts, powders or loose fibres;
- It is not in a form which is either sludge or liquid;
- It conforms to the description in the documentation supplied by the producer and holder through the accompanying waste transfer note;
- Its chemical, physical and biological characteristics make it suitable for its intended treatment;
- Any excavated soil from potentially contaminated sites has been shown by prior chemical analysis and assessment to be suitable for the intended use without significant risk of pollution; and
- It is visually inspected on arrival and before it enters the treatment process to ensure that it complies with the permit.

2.18 Any waste that does not comply with the above shall be rejected and shall be:

- Removed from the Site; or
- Moved to a designated quarantine area pending removal.



- 2.19 The operator shall maintain and implement a system which ensures that a record is made of the quantity, characteristics, date of delivery and, where practicable, origin of any waste that is received for disposal or recovery and of the identity of the producer, or in the case of multiple collection vehicles, of the collector of such waste. Any information regarded by the operator as commercially confidential shall be clearly identified in the record.
- 2.20 Anybody having responsibility for approving waste streams at the Site must have a thorough understanding of the WAP.
- 2.21 Waste imported to the Site will be subjected to a series of treatment activities with associated storage, all of which are undertaken with dust suppression available, either built into the treatment plant or via dust suppression cannons. In general, the activities with the potential to generate and / or release dust and particulate matter comprise the following:
- Fugitive emissions from vehicle movements on Site and on the public highway;
  - Loading and unloading of waste material;
  - Movement of waste materials around the Site;
  - Treatment of waste by crushing and screening, including wastes dropping from conveyors into stockpiles;
  - Waste stockpiles;
  - All Site surfaces (including roads); and
  - Exhaust emissions.

### Plant and Machinery

- 2.22 NO<sub>2</sub> gas is a by-product of internal combustion engines and the Site uses several items of plant with internal combustion engines. Table 2 lists the type, model and emission ratings for the mobile plant and equipment to be used on Site.

**Table 2: List of Plant and Equipment**

Description	Make	Model	Emissions Rating
2 x excavators	Komatsu	FN84 PC290LC	STAGE IV
1 x screener	Finlay	FN139 595	STAGE IIIB
1 x crusher	Kleemann	MC110	STAGE IIIA
1 x loading shovel	Volvo	FN172 L150H	STAGE V

- 2.23 All plant and equipment will be maintained in accordance with the manufacturer's recommendations. All Site based plant will be checked prior to use. Each item of plant contains a Vehicle Defect Form. The operative must complete this form prior to using the machine. Any defects will be recorded on the form and reported to the Transport Manager. Some defects will not prevent the vehicle being used but will be included on the next round of maintenance. If the defect prevents safe use of the machine, it will not be used until repaired. The Operator maintains a list of hire companies in the event that additional machines are required.
- 2.24 The replacement strategy for the Operator is to provide efficient, modern machinery. The modern plants typically meet the lowest emission standard.

- 2.25 The Non-Road Mobile Machinery will be operated when required. If the plant is not being used, the engine will be switched off. For vehicles waiting to load or unload, the drivers will be encouraged to switch off their engines. All company drivers are informed about anti-idling throughout their working day.

### **Surfacing and Drainage**

- 2.26 The Site is surfaced in concrete. The proposed drainage strategy intends to collect runoff from roofs on the permitted Site and the adjacent aggregate depot (including B5 shown on Drawing No. 0131 v1) via a series of rainwater pipes and store it in one existing and two new 30,000 litre tanks. A new water storage tank will be installed in the aggregate recycling area shown as B8 on Drawing No. 0131 v1.
- 2.27 Surface water runoff will be reused in above ground dust suppression systems with an overflow discharging into a below ground drainage network, if required. Surface water runoff will be treated by a Hydro-International Downstream Defender Select Vortex, or similar. Surface water run-off from the Site will discharge into an existing Thames Water sewer (manhole: TW3203) at a discharge rate of 2.5 l/s, with attenuation provided in a concrete tank.
- 2.28 According to the Flood Risk and Drainage Strategy (JNP Group Consulting Engineers, January 2024) produced to support the planning application, Thames Water have confirmed the surrounding network has adequate capacity.

### **Dust Suppression Systems**

- 2.29 Dust suppression will be achieved by the installation of a system to target key operational areas, and to ensure that stockpiles are within the range of the suppression points.
- 2.30 It is proposed that three mobile atomising dust suppression cannons are installed around the covered waste treatment and storage area as shown on Drawing No. 0100 v3.
- 2.31 The dust cannons will be the following model: <https://bosstek.com/products/cannons/db-30/>. They have a reach of 30 m and can oscillate 359 degrees.
- 2.32 The dust canons will provide full coverage of the waste storage and recycling activity. Drawing No. 0100 v3 shows the arc of influence of each canon and how they will overlap. The dust suppression system will be maintained in accordance with the manufacturer's specification and will include a call-out for any repairs.
- 2.33 The crushing and screening units have built-in pumps that spray the material as it passes along the conveyors. The sprays will be used during treatment operations.
- 2.34 In Area Y2 where clay based wastes are stored before being loaded on to trains, it is not possible to use dust cannons as Network Rail rules prohibit mist spray onto the railway line. Therefore, a series of sprinklers with a 5 m radius spray will be installed along the whole length of the waste storage area. The zone of influence of the sprinklers is shown on Drawing No. 0100 v3.

- 2.35 The dust suppression systems will be activated during loading, unloading and processing activities. Therefore, dust should not be generated during these activities. Site operatives will ensure that dust suppression measures are activated prior to these activities commencing.
- 2.36 The dust suppression system will be checked daily (refer to daily housekeeping checklist in Appendix 5). If any of the suppression points are not working, this will be reported immediately to the Site Manager and arrangements will be made to repair the point immediately.
- 2.37 In the unlikely event that the entire dust suppression system fails, the Site Manager will make arrangements for repair and decide on the best course of action depending on weather conditions. If the weather conditions mean that dust cannot be controlled within the permit boundary, the Site Manager will have to provide interim dust suppression measures or will cease waste handling operations until the weather conditions change or the system has been repaired. Interim measures could include hiring mobile dust suppression units for a temporary period.
- 2.38 In the event of complaints being received, the complaint procedure provided in Section 7 will be implemented.
- 2.39 Harvested rainwater will be used where possible in the dust suppression systems. The proposed water storage tanks can be topped up with mains water if required. As the Site has a mains water supply then there should be a continual supply of water that will not be impacted by water shortage or drought.

### **Housekeeping**

- 2.40 The main potential source of dust emissions will be from the waste storage and treatment areas. All of these areas are covered by the dust suppression system, as shown on Drawing No. 0100 v3. Parts of the access road are not covered by the dust suppression system. These areas will be kept dampened using the tractor and bowser, twice a day.
- 2.41 Housekeeping procedures will be in place for the regular inspection and maintenance of the recycling area and associated infrastructure, including Site surfacing, plant and dust suppression units.
- 2.42 Inspections will pay particular attention to signs of damage, deterioration and leakage. Records will be kept detailing action taken. Any identified faults will be repaired as soon as practicable.
- 2.43 All vehicles manoeuvring at the Site will be controlled by a banksman. The banksman will be trained to check vehicle wheels before leaving Site and for checking the cleanliness of the Site. Staff in the weighbridge office will be able to visually inspect the front access area. If they notice dust being raised from vehicles, they will inform the Site Manager to arrange for this area to be mechanically swept.
- 2.44 As a minimum, a road sweeper will clean the highway outside the Site and the Site itself twice per day, once in the morning and once in the afternoon. A sweeper will be on call throughout the day and will be called as and when required.



- 2.45 As part of the daily housekeeping practices, an initial and final Site inspection is completed at the start and end of each working day to check that the Site is in a condition that has a low potential to release dust. The daily housekeeping checklist is presented in Appendix 5.

### 3. METEOROLOGY AND EXISTING AIR QUALITY (PATHWAY)

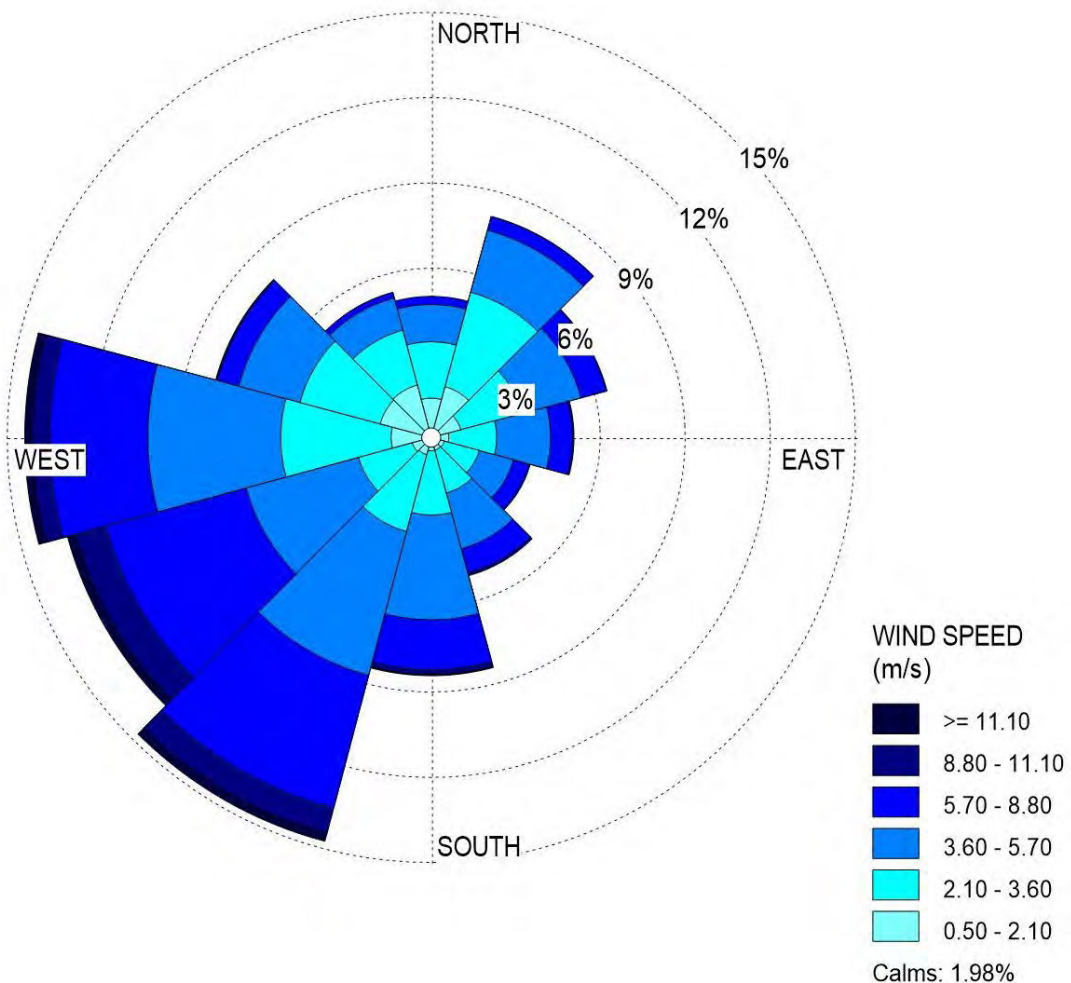
#### **Meteorology**

- 3.1 Unlike many other atmospheric pollutants, the generation of fugitive dust is particularly dependent upon weather conditions and the nature of the operations.
- 3.2 The prevailing meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site specific, microclimatic conditions. The most significant meteorological factor is the predominant wind direction and wind speeds. Consequently, data has been collected regarding the predominant wind speeds and directions appropriate to the Site.

#### Local Wind Speeds and Directions

- 3.3 Wind speed and direction data have been obtained from the Heathrow Airport observing station for the period 2016 to 2020.
- 3.4 Heathrow Airport is located approximately 19 km south-west of the Site. According to the Air Quality Assessment (Redmore Environmental, August 2024) (AQA), the location and measurements taken at the observing station are appropriate for characterisation of the wind climate at the Site.
- 3.5 The prevailing wind direction at the Site is from the west through south-west. Winds from the north and east are relatively infrequent, which is indicative of conditions throughout the majority of the UK.
- 3.6 Wind speed and direction data from the observing station are presented in the wind rose in Figure 1 which has been reproduced from the AQA.

**Figure 1: Hourly Mean Wind Rose, Heathrow, London 2008-2017**



### Air Quality Management Areas

- 3.7 According to <https://uk-air.defra.gov.uk>, since December 1997 each local authority in the UK has been carrying out a review and assessment of air quality in their area. This involves measuring air pollution and trying to predict how it will change in the next few years. The aim of the review is to make sure that the national air quality objectives will be achieved throughout the UK by the relevant deadlines. These objectives have been put in place to protect people's health and the environment.
- 3.8 If a local authority finds any places where the objectives are not likely to be achieved, it must declare an AQMA there. As stated previously, the Site is located within the Brent AQMA.
- 3.9 The Brent AQMA, which was declared in December 2006, covers the entire area south of the North Circular Road and all housing, schools and hospitals along the North Circular Road, Harrow Road, Bridgewater Road, Ealing Road, Watford Road, Kenton Road, Kingsbury Road, Edgware Road, Blackbird Hill, Forty Lane, Forty Avenue and East Lane.
- 3.10 The source of the existing air pollution is '*road transport unspecified*'. The pollutants declared are Particulate Matter PM<sub>10</sub> (24-Hour Mean) and Nitrogen Dioxide (NO<sub>2</sub>) (Annual Mean).



## Air Quality Focus Areas

- 3.11 It is understood that Air Quality Focus Areas (AQFA) have been designated throughout London in locations where the annual mean Air Quality Objective (AQO) for NO<sub>2</sub> is exceeded and there is a high level of human exposure. They were defined to address concerns raised by boroughs within the Local Air Quality Management (LAQM) review process and forecasted air pollution trends.
- 3.12 It is stated in the AQA that:
- “Review of the London Atmospheric Emissions Inventory (LAEI)<sup>16</sup> indicated the closest AQFAs to the site are located approximately 82m east and 335m north of the boundary and cover the A406 North Circular from Stonebridge Park to Gresham Road and Neasden Junction including Neasden Lane/Dudden Hill, respectively”.*
- 3.13 The AQFA's have been considered throughout the AQA and the AQFA locations are shown on Figure 2 in the AQA.

## London Borough of Brent Air Quality Action Plan

- 3.14 The aims of the LBoB Air Quality Action Plan 2017 – 2022 are split into the following key themes:
- Cleaner Transport;
  - Public Health and Community Engagement;
  - Exposure Reduction Measures; Emissions from New Developments and Buildings; and
  - Delivery Servicing and Freight.
- 3.15 Action 13 provides for limiting the impact of new development using planning controls by requiring that all new development have no additional impact on local air pollution as a minimum requirement. This is to be achieved by a percentage increase in the number of developments that are air quality neutral.
- 3.16 The LBoB operates three automatic monitoring stations at roadside sites and one at an industrial site with the AQMA. The LBoB monitors annual mean NO<sub>2</sub> concentrations using passive diffusion tubes at 45 sites throughout the Borough. In 2022, diffusion tubes were set up to include 43 roadside locations and two background locations.
- 3.17 The nearest LBoB monitoring station (reference BT5) to the Site is located at Xbert's Skips Storage Yard on Neasden Lane on the opposite side of the railway approximately 125 m to the east of the Site. It is used to measure PM<sub>10</sub> and NO<sub>2</sub>. Between 2019 and 2022, the AQO's for PM<sub>10</sub> and NO<sub>2</sub> were not exceeded at this monitoring location.
- 3.18 The LBoB monitoring station (reference BT4) located at Ikea some 370 m to the west of the Site, is also used to measure PM<sub>10</sub> and NO<sub>2</sub>. Between 2019 and 2022, the AQO for PM<sub>10</sub> was not exceeded at this monitoring location. The AQO for NO<sub>2</sub> was exceeded each year with a steady decrease from 63.0 µg/m<sup>3</sup> in 2019 to 43.2 µg/m<sup>3</sup> in 2022.) compared to the AQO of 40 µg/m<sup>3</sup>. As the monitoring station is positioned at a roadside location within an AQMA, elevated results are expected.

## Conclusions of the Air Quality Assessment

- 3.19 An AQA has been produced to support the planning application and the environmental permit application. The planning application includes the proposed waste activity and the aggregate depot to the south of the green line permit boundary.
- 3.20 The AQA concludes that:
- 3.21 *“The risk of potential effects as a result of fugitive dust emissions from the facility during the operational phase was assessed using the IAQM methodology<sup>1</sup>. This included consideration of the Source Emission potential, Pathway Effectiveness and sensitivity of relevant receptors in the vicinity of the site. The results of the assessment indicated the overall effects as a result of the development were predicted to be **not significant**”, and*
- 3.22 *“Potential emissions from the development were assessed in order to determine compliance with the air quality neutral requirements of the London Plan<sup>2</sup>. Based on the assessment results, the development was considered to be air quality neutral”.*

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<sup>1</sup> Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1, IAQM, 2016

<sup>2</sup> The London Plan March 2021, GLA, 2021.

## 4. POTENTIAL SENSITIVE RECEPTORS

- 4.1 Sensitive receptors include, but are not limited to, environmental habitat sites, hospitals, schools, protected species sites, childcare facilities, elderly housing and convalescent facilities. These are areas where the occupants are more susceptible to the adverse effects of exposure to high levels of dust and particulates.
- 4.2 The distance from the source to the receptor location plays an important role in the potential impact experienced as airborne dust, dust deposition rates, and detection concentrations fall off rapidly with increasing distance from the source. The very largest dust particles usually only travel 10 m to 20 m before being deposited and the vast majority of dust is deposited within 100 m of the source.
- 4.3 The plan in Appendix 1 shows the Site and the broad location of the main sensitive receptors within 1 km. Table 3 provides a description of those receptors and the distance and direction from the Site. The distance has been measured from the nearest permit boundary, as this is the point at which fugitive emissions would leave the Site. For this exercise the nearest receptors by type have been identified. Much of the neighbouring land use is industrial / commercial which is considered to be a less sensitive receptor.

**Table 3: Potentially Sensitive Receptor Locations**

Ref No.	Description of Receptor	Direction from Proposed Permit Boundary	Distance from Proposed Permit Boundary (m)
1	Great Central Way	West	0
2	Railway line	East	20
3	18 Iron Bridge Close - apartments	West	20
4	North Brent School	Southeast	120
5	Houses on Neasden Lane	East	120
6	Permanent traveller camp on Lynton Close	South	130
7	Flats on Wharton Close	Southeast	130
8	North Circular Road	West	170
9	Houses on Yeats Close	South	180
10	Flats at Beacon House	East	195



11	Houses on Brendon Avenue	North	200
12	Houses on Southview Avenue	Northwest	200
13	Tesco Extra Superstore	West	225
14	Dog Lane Allotment Gardens	Southwest	230
15	Houses on the North Circular Road.	Northwest	270
16	North View Primary School	North	275
17	Houses on Woodheyes Road	Southwest	325
18	Ikea Superstore	West	370
19	St Marys Primary School	South / Southeast	390
20	The College of North West London	East	390
21	Manor School Early Years Centre	Southwest	460
22	Mitchell Brook Primary School & Gibbons Recreation Ground.	Southwest	470
23	Houses on Raphael Way	West	660
24	Gladstone Park	Northeast	675
25	St Patricks Church and Phoenix Arch School	West	710
26	Swaminarayan Mandir, Hindu temple	Southwest	800
27	Leopold Gwenneth Rickus Primary School and Brentfield Open Space	South / Southwest	800
28	Brentfield Primary School	Southwest	940

- 4.4 The closest residential properties on Iron Bridge Close are not downwind of the prevailing wind direction, and it is stated in Table 19 in the AQA that potentially dusty winds (which are defined in the AQA as “winds with a speed greater than 5m/s and precipitation levels of less than 0.2mm”) occur towards these properties just 3.4 % of the time. The pathway for dust emissions towards the residential properties on Iron Bridge Close will be effectively blocked by the proposed 7.5 m high perimeter wall.
- 4.5 The majority of the potentially sensitive receptors in Table 3 are too far from the Site to be impacted by nuisance dust. The mitigation and management measures set out will minimise dust emissions impacting on any nearby sensitive receptors.

## Other Dust / Particulate Emitting Operators

- 4.6 It is also important to note other potential sources of dust emissions in this industrial locality, examples of which are summarised in Tables 4 and 5.

**Table 4: Other Dust Emitting Operators – Licensed Waste Sites**

Company/ Permit No	Address	Type of Business	Distance from Permit Boundary (m)	Direction from Permit Boundary
European Metal Recycling Limited/ EPR/HB3602LF.	Mitre Works, Neasden Lane, London, NW10 2UG	Metal Recycling Site	50	North East
William Fry and Co Limited/ EPR/SP3393EP/A001	Neasden Goods Depot, Neasden Lane, Neasden, London, NW10 2UG	Metal Recycling Site	50	South east
X – Bert Haulage Limited/ EPR/GB3507KW.	Neasden Goods Yard, Neasden Lane, Wembley, London, NW10 2UG	Household, commercial and industrial waste transfer station	75	North East
X - Bert Haulage Limited/ EPR/ZP3497NS.	Unit 6 Neasden Goods Yard, Neasden Lane, London, NW10 2UG	Household, commercial and industrial waste transfer station	75	East
Powerday Plc/ WML No POW001.	Transfer Station, Neasden Goods Yard, Neasden Lane, London, NW10 2UG	Household, commercial and industrial waste transfer station	85	East
L & B Haulage & Civil Eng. Contractors/ WML No. LBH001	Hannah Close, Great Central Way, Neasden, London, NW10 0UX	Household, commercial and industrial waste transfer station	330	North
Ferns Surfacing Limited/ PR/EB3402KL	Drury Way, Wembley, London, NW10 0JJ	Physical Treatment Facility	450	North west

**Table 5: Other Dust Emitting Operators – Non – Waste Activities**

Company	Address	Type of business	Distance from Site (m)	Direction
Procon Readymix Limited	Great Central Way, Neasden, London, NW10 0LD	Concrete and mortar plant activities	265	West
Capital Concrete	Dury Way, Neasden, NW10 0JJ	Concrete and mortar plant activities	490	North West

- 4.7 As well as the potential sources of emissions described above, vehicle movements associated with the operations of these businesses are likely to produce fugitive emissions from vehicle movements and point source emissions from exhausts.

## 5. MITIGATION MEASURES

- 5.1 In accordance with EA guidance, Table 6 presents the source pathway receptor model for the Site.

**Table 6: Source-Pathway-Receptor Routes**

Source	Pathway	Receptor	Type of impact	Where relationship can be interrupted
Mud	Tracking dust on wheels and vehicles, then mud dropping off wheels / vehicles when dry	Receptor Numbers 1 and 8 in Table 3.	Visual soiling, also consequent resuspension as airborne particulates	<p>Vehicles will not travel on un-made ground.</p> <p>Regular checks on the tyres of vehicles leaving the Site.</p> <p>Use of road sweeper daily when the Site is operational.</p>
Debris	Falling off HGV's	Receptor Numbers 1 and 8 in Table 3.	Visual soiling, also consequent resuspension as airborne particulates	<p>HGV's importing or exporting materials from the Site will be sheeted.</p> <p>Use of road sweeper daily when the Site is operational.</p>
Tipping, storage, and treatment of wastes	Atmospheric dispersion	All receptors in Table 3.	Visual soiling and airborne particulates	<p>Minimise source strength by means of low drop heights, profiling and shielding of piles from wind whipping.</p> <p>Maximise containment. Direct openings in buildings away from most sensitive receptors.</p> <p>Minimise source strength by misting / water / barrier techniques.</p>
Vehicle exhaust emissions	Atmospheric dispersion	All receptors in Table 3.	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength.
Non road going machinery exhaust emissions	Atmospheric dispersion	All receptors in Table 3.	Airborne particulates	Regulatory controls and best-practice measures to minimise source strength.

- 5.2 Table 7 provides details of mitigation measures to be employed at the Site to break the source-pathway-receptor model at the Site.
- 5.3 The mitigation measures proposed include preventative and remedial measures forming the Site-specific contingency plan to be utilised during dry conditions which will break the potential source-pathway-receptor linkages identified at the Site. The measures identified in Table 7 will be used whenever the Site is operational.



**Table 7: Mitigation Measures**

Abatement Measure	Description / Effect	Overall Consideration and Implementation
Enclosure within a building	Creating a solid barrier between the source of dust and particulates and receptors is likely to be the most effective control measure.	<p>For practical operational reasons, full enclosure is not proposed and not deemed necessary by the Operator to control emissions within the permit boundary. EA guidance on Appropriate Measures provides that <i>"A partially enclosed building may be an appropriate measure on its own, or together with other appropriate measures, depending on the site-specific circumstances"</i>.</p> <p>Construction and demolition wastes to be imported to Site for treatment will be stored and treated in a dedicated covered area with a roof and two walls.</p> <p>The dedicated covered area will have solid façades, constructed using steel cladding along the northern and western sides and will be fully open on the eastern and southern sides, which face into the Site, to allow access.</p> <p>A 7.5 m boundary wall will extend along the whole of the northern and western Site boundaries to provide a solid barrier between the Site and the closest sensitive receptors.</p>
Negative pressure extraction / Dust Extraction Systems	Within enclosed buildings, controlled extraction can be undertaken to ensure a constant negative pressure relative to the outside air.	As the dedicated covered area is open on two sides, these measures are not necessary
Site / process layout in relation to receptors	Locating particulate emitting activities at a greater distance and downwind from receptors may reduce receptor exposure, provided that emissions from the source are not dispersed over significant distances.	<p>Working plans have been designed to minimise double handling of material on Site.</p> <p>There is one access point to the Site.</p> <p>Incoming wastes for treatment will be placed in stockpiles undercover next to the crusher / screener and only moved when they are transferred to the treatment plant.</p> <p>As stated above, wastes will be stored and treated in a dedicated covered area with a roof and two walls.</p> <p>The closest residential properties on Iron Bridge Close are not downwind of the prevailing wind direction, and potentially dusty winds occur towards these properties just 3.4 % of the time.</p> <p>The pathway for dust emissions towards the residential properties on Iron Bridge Close will be effectively blocked by the proposed 7.5 m high perimeter wall.</p>
Site speed limit, 'no idling' policy and minimisation of vehicle movements on	Reducing vehicle movements and idling will reduce emissions from vehicles. Enforcement of the speed limit will	<p>The Site speed limit of 10mph will be enforced. The Site also operates a one-way system.</p> <p>Drivers observed to be travelling above the speed limit will be subject to disciplinary action.</p>

Site.	reduce re-suspension of particulates by vehicle wheels.	<p>Banksman will be used to ensure the efficient flow of traffic and minimise waiting times and reduce unnecessary vehicle manoeuvring.</p> <p>Vehicles will switch off engines if not being used, or if waiting times are delayed.</p>
Minimising drop heights for waste.	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds.	The drop heights from the crushing and screening equipment, which will be operated undercover, will be 4.25m.
Good house-keeping	Having a consistent, regular housekeeping regime that is supported by management, will ensure Site is regularly checked and issues remedied to prevent and remove dust and particulate build up.	<p>Housekeeping procedures will be in place for the regular inspection and maintenance of the recycling area and associated infrastructure, including Site surfacing, plant and dust suppression units.</p> <p>A road sweeper will clean the highway outside the Site and the Site itself twice per day, once in the morning and once in the afternoon. A road sweeper will be on call throughout the day and will be called as and when required.</p> <p>The daily housekeeping inspection checklist is presented in Appendix 5.</p>
Sheeting of vehicles	Prevents the escape of debris, dust and particulates from vehicles as they travel.	All incoming loads will be un-sheeted once instructed by the Site foreman and only when ready to discharge. All vehicles carrying materials must be sheeted before leaving the Site.
Installed wheel wash / Hosing of vehicles on exit	Removes mud from the wheels and lower parts of vehicles	<p>Not proposed.</p> <p>The whole Site is surfaced therefore non-road vehicles will not travel on unmade ground nor will they travel over stockpiles.</p>
Ceasing operation during high winds and / or prevailing wind direction	Mobilisation of dust and particulates is likely to be greater during periods of strong winds and hence ceasing operation at these times may reduce peak pollution events.	In the extremely unlikely event that the dust control measures prove ineffective at stopping dust leaving the Site, waste handling activities will temporarily cease until such a time that dust can prove to be controlled within the Site.
Easy to clean concrete impermeable surfaces	Creating an easy to clean impermeable surface within the site and on site haul roads. This should reduce the amount of dust and particulate generated at ground level by vehicles and site activities.	<p>The entire Site is surfaced in concrete.</p> <p>The Site surfacing allows easy cleaning and prevents wind-whipping.</p> <p>There are regular inspections and maintenance of surfaced areas.</p> <p>Vehicles delivering wastes to the Site will not travel on un-made ground.</p>

Minimisation of waste storage heights and volumes on site	Minimising the height at which waste is handled should reduce the distance over which debris, dust and particulates could be blown and dispersed by winds.	<p>A maximum volume of 25,000 tonnes of wastes will be stored on Site at any one time.</p> <p>The maximum stockpile heights will be 6 m for the wastes to be treated, 6 m for the treated aggregate stockpiles and 4 m for the clay stockpiles.</p> <p>All machine operators are trained to handle waste carefully and to minimise drop heights when transferring waste. This includes loading processing plant and loading vehicles.</p>
Appropriate sizing of operations (waste throughput, vehicle size, operational hours)	Managing the amount of activity on Site as well as associated traffic movements will result in reduced emissions and reduced re-suspension of particulates from a site.	<p>The operation has been sized appropriately, with particular regard to dust, noise and vehicle movements.</p> <p>Annual throughputs will be limited to 500,000 tonnes per annum.</p> <p>Operating hours will be limited to those referenced in Section 2.8.</p>
<b>Remedial Measures</b>		
Netting / micro netting around equipment and / or Site perimeter.	Erecting netting around equipment / Site perimeter that could give rise to large amounts of dust and particulates may be effective within the site boundary and prevent their dispersion off-site / their re-suspension within the site.	Not proposed, refer to Row 1 for mitigation measures which include solid barriers between the Site and the closest sensitive receptors.
Use of a road sweeper	<p>Sweeping is effective in managing larger debris, dust and particulates.</p> <p>Road sweeping vehicles damp down dust and particulates whilst brushing and collecting dust and particulates from the road surface, particularly at the kerbside.</p>	<p>A road sweeper will clean the highway outside the Site and the Site itself twice per day, once in the morning and once in the evening.</p> <p>A road sweeper will also be on call throughout the day and will be called as and when required.</p>
Water suppression with mist sprays and sprinklers.	<p>Installation of mist sprays around sites, at building entrances / exits.</p> <p>Damping down of dust and particulates, therefore, reducing emissions from site.</p>	<p>It is proposed that three dust canons are installed around the covered waste treatment and storage area. The dust canons will provide full coverage of the waste storage and recycling activity.</p> <p>It is proposed that sprinklers are installed along the full length of the clay based wastes storage area. They have a reach of 5 m will provide full coverage of the clay waste storage area.</p> <p>The conveyors on the screener and crusher will be fitted with spray bars.</p>



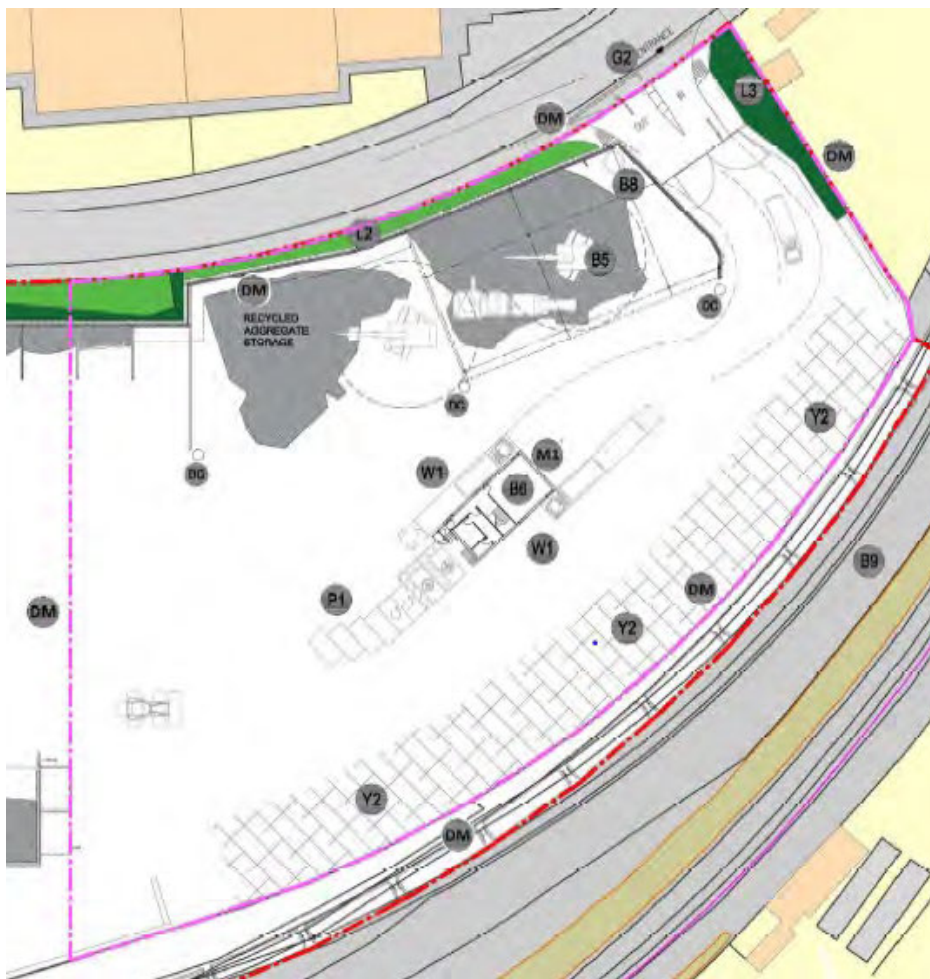
Dust and particulate monitor with trigger alarm.	Installation of a dust and particulate monitor with specified alarm trigger level can alert site staff when short-term particulate concentrations are elevated in order that site practices can be reviewed or application of mitigation measures increased.	<p>A laser-light scattering instrument will be installed on the roof of the Site office to provide real-time monitoring of different size fractions of particle including PM<sub>10</sub>.</p> <p>The instrument will continuously record data and therefore any peak episodes would be recorded. The system will provide alerts by e-mail or text message when the proposed action level has been exceeded.</p> <p>Refer to Section 6 for further details.</p>
Good Site Management	Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.	All staff.
Staff training	Provide training to the site personnel on dust mitigation.	All staff.
Communication and report handling	Maintain good communication to help alleviate anxieties between the Operator and the surrounding communities.	All reports will be followed up by the Environment team and any findings of the investigation feedback.

## 6. DUST MONITORING

### Visual Dust Monitoring

- 6.1 During all Site operations continuous visual monitoring for emissions of particulate matter shall be undertaken by suitably trained Site personnel. In addition to the continuous visual monitoring a specific routine monitoring schedule will be undertaken comprising visual monitoring at six specific on-Site locations at least once per day while the Site is operational. The on-Site monitoring locations are labelled as DM on Figure 2.

**Figure 2: Dust Monitoring Locations**



- 6.2 The results of the on-Site monitoring of visible dust will be recorded on the visual monitoring checklist presented at Appendix 4 of this DEMP. The forms will be kept on-Site for Senior Management to review at any time.
- 6.3 A record of the weather conditions will be made on a daily basis, noting any changes during the day that may affect the dust management response (for example, increased wind strength, rain).

## Optical Dust Monitoring

- 6.4 Alongside the proposed visual monitoring, optical monitoring will also be undertaken. This will involve real-time monitoring using a laser-light scattering instrument.
- 6.5 The instrument will be a Dust Sentry model from Campbell Associates. The Dust Sentry provides continuous real-time monitoring of particulate matter (including PM<sub>10</sub>) producing accurate, defensible data, accessible anywhere. The Dust Sentry is an air quality monitoring system featuring cutting-edge software, purpose-built for the outdoors. It will be serviced and calibrated in accordance with the manufacturer's recommendations.
- 6.6 The instrument will continuously record data and therefore any peak episodes would be recorded. The system will provide alerts by e-mail or text message to the Site Manager (or his nominee) when the Action Level has been exceeded. This will allow the Site Manager to review the Site operations to establish the cause of the exceedance. There may be external sources that have contributed to the exceedance, for example the external sources listed in 4 and 5.
- 6.7 The position of the meter is indicated on Figure 2 as M1. It will be located on the office roof which will provide an unobstructed position, that is remote from vehicles. The unit can also have a power supply from the office. This is considered to be a secure location.
- 6.8 For monitoring particulate matter around construction and demolition sites, TGN M17 recommends a site Action Level of 250 µgm<sup>3</sup> averaged over a 15 minute period<sup>3</sup>. This is for construction sites but the guidance goes on to say that this is a useful starting point for setting Action Levels around waste facilities. However, it is proposed to measure the background level prior to recycling operations commencing to ensure that this level will be achievable.
- 6.9 The system will also measure wind speed and direction, which will allow a correlation between the dust measured and the direction of the source in relation to the meter. Whilst the data is recorded continuously, it is proposed to carry out a monthly review in the first 12 months. This will confirm whether or not the mitigation measures are effective. After 12 months, an annual review will be carried out. This will be used to review the data and formally assess the effectiveness of the suppression system. This will also consider the need for continued optical monitoring, or for reducing the frequency of reviews. This will be agreed with the EA prior to implementation.
- 6.10 Any action level exceedance as alerted to the Site Manager will be investigated. The reason for the peak may be easily attributable to an event on Site; for example a dust suppression unit was not working, or a higher drop height lead to a localised release of dust. These measures would be dealt with through tool-box training exercises.
- 6.11 If the trigger level is exceeded again, this may require a more detailed investigation which could identify a gap in the dust suppression system which is leading to repeat dust emissions leaving the Site boundary. The Site Manager will report these findings to senior management and increase the level of dust suppression accordingly.



- 6.12 The Operator will commission an air quality consultant to review the data and provide further advice on mitigation to be implemented. This may require this DEMP to be updated accordingly.
- 6.13 The Site Manager will report to the Site Management Team on a monthly basis. As part of this meeting, the Site Manager will report on matters relating to the Site activities including dust management and effectiveness of the suppression system. The Site Management Team will set out if further monitoring is required and / or that the DEMP needs to be reviewed.

## 7. REPORTING AND COMPLAINTS PROCEDURE

### Contingency Plan

- 7.1 Adverse weather conditions that could cause dust emissions from the Site, such as prolonged dry periods, would be managed via the mitigation measures in Table 7, the Dust Action Plan and the complaints procedure.
- 7.2 The routine mitigation measures in Table 7 already include cleaning the Site with a road sweeper and the use of dust cannons and sprinklers to suppress nuisance dust. The Site has a mains water supply which will be used for dust suppression purposes along with harvested rainwater. Adequate water will be available if additional water is required for dust suppression in the future.
- 7.3 In periods of prolonged dry weather dust monitoring will be increased and it may be necessary to wet surfaces and stockpiles and clean the Site on a more regular basis. The proposed dust management measures in this DEMP will continue to be effective.
- 7.4 In the extremely unlikely event that insufficient water supply is available to provide effective dust suppression, and dust suppression is required, waste handling activities will temporarily cease until such a time that an adequate water supply can be restored.
- 7.5 If the wind speed and / or direction means that dust emissions cannot be controlled with the Site waste processing operations will cease until the weather conditions change.

### Dust Action Plan

- 7.6 In the event that any dust or particulates arising from the Site are released outside the Site boundary in such quantities or concentrations that they are likely to cause pollution of the environment or harm to human health, the actions specified below will be implemented:
  - The Site Manager or his nominee will be informed immediately;
  - The source will be identified and damped down;
  - If the source is a particular waste stream, consideration will be given to suspending acceptance of that waste until appropriate measures are in place to control the release of nuisance emissions from the waste; and
  - If deemed necessary, the Site Manager will instruct the suspension of any operation causing visible dust emissions until such time as the situation has been resolved.

### Following a Complaint

- 7.7 Following receipt of a complaint regarding dust, all dusty operations may be ceased, and the following actions should be taken:
  - The complaint must be investigated fully as soon as possible and the source of the dust identified;
  - Following identification of the dust source, suitable remediation measures will be employed as detailed above;
  - Once the dust source has been identified and mitigated, operations can be resumed;

- If the identified source of dust is deemed to require more thorough investigation or remediation i.e. the source of the dust is not immediately apparent, then dusty operations will be suspended until such a time as it has been identified;
- A record of the complaint together with the remediation actions and a completed Incident Report form will be kept on Site and will be available for review at any time should Senior Management, Local Council or EA request them; and
- If the complainant has requested feedback, then this will be provided once the issue has been resolved.

- 7.8 Whether a single or multiple complaints are received, the above procedure will be followed.
- 7.9 If three complaints are received about the same issue, then the activity causing the complaint will be stopped until further investigations are undertaken.
- 7.10 In accordance with standard permit conditions, the EA shall be notified without delay following the detection of any significant adverse environmental effects.
- 7.11 All dust complaints will be discussed with Senior Management and appropriate actions taken to make any necessary improvements.
- 7.12 Reporting forms for incidents and complaints are presented in Appendices 2 and 3.

### **Community Engagement**

- 7.13 The Operator is conscious of the potential impact on the environment of its activities and strives to manage and minimise those impacts. They recognise the importance of community engagement and strives to build a positive working relationship with local residents and businesses across all of its sites. Contact details for the Site are displayed on the signage at the Site entrance.



## DRAWINGS

Ground level – Permit Plan

Drawing No. 0100 v3

Scale 1:500@A3

Roof level – Permit Plan

Drawing No. 0131 v1

Scale 1:500@A3

Site Sections 3, 5 and 6

Drawing No. 106 v3

Scale: 1:200@A1

Drainage Strategy

Drawing No. DR-C-2000 P02

Scale: 1:500@A1

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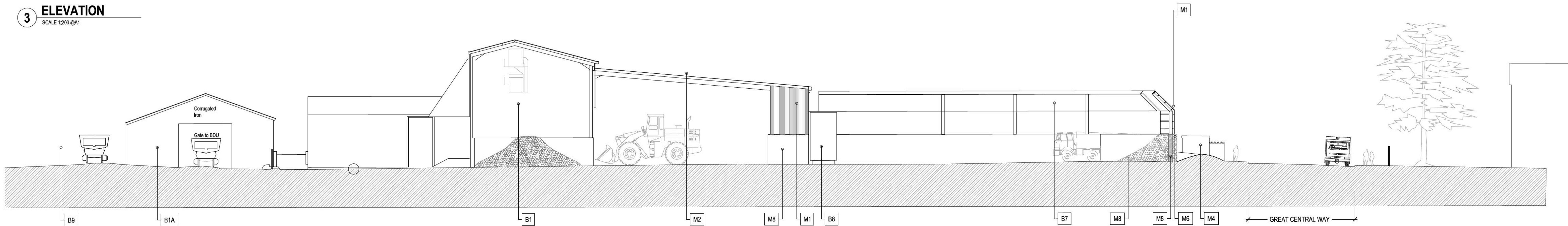




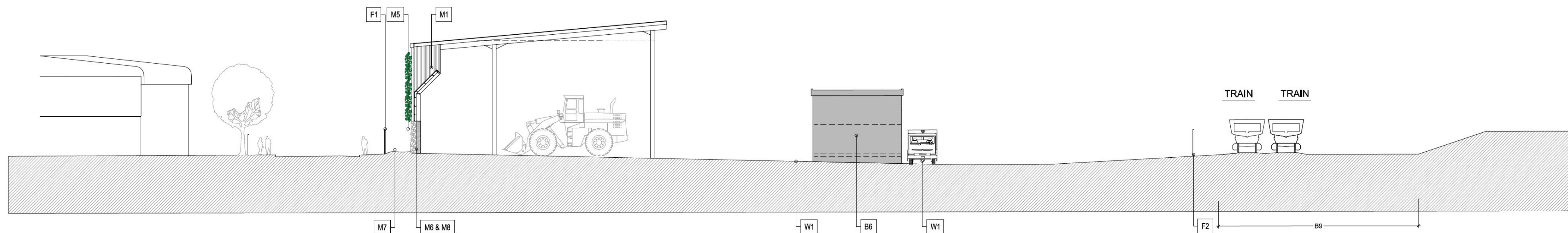




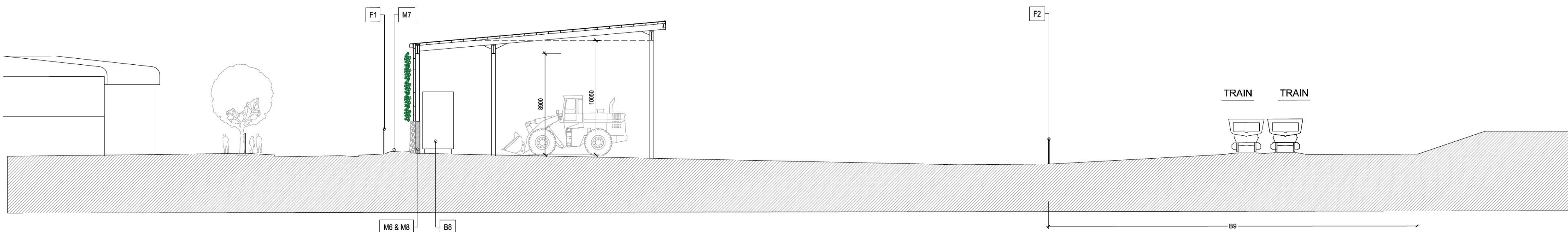
### 3 ELEVATION



**5 ELEVATION**  
SCALE 1:200 @A1



**6 ELEVATION**  
SCALE 1:200 @A1

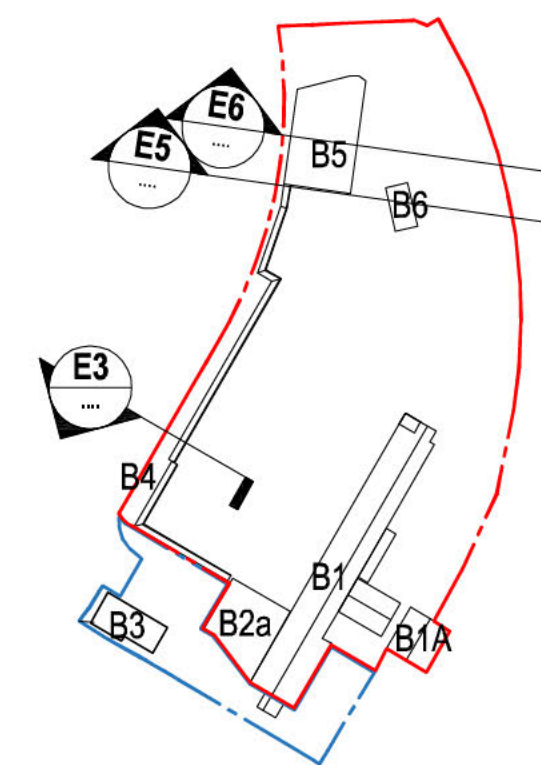


## Materials Key

- M1 - Corrugated metal cladding - Polyester powder coated
- M2 - Corrugated metal roofing - Polyester powder coated
- M3 - Metal Gutter - Polyester powder coated
- M4 - Metal RWP- Polyester powder coated
- M5 - Green Wall - Support system fixed through to cladding subframe
- M6 - Gablon Wall - and concrete containment wall  
wall to contain environmental intensification pockets
- M7 - Planted - green planted boundary zone
- M8 - Precast concrete containment walls
- M9 - Stored aggregates

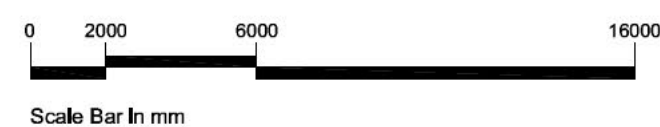
## Element Key

- B1 - Existing Aggregates storage building 'Toastrack'
- B1a - Existing Aggregates delivery building for Bottom Dumping rail carriages 'BDU' building
- B2a - New roof and rebuilt aggregates storage building
- B3 - Existing network rail building
- B4 - Existing substation
- B5 - New aggregates processing area - under new roof
- B6 - New prefabricated Office and welfare building
- B7 - Boundary containment fence
- B8 - Water tank storage new
- B9 - Rail sidings
- W1 - Welghbridge
- G1 - Existing gates
- G2 - New gates for entrance to site
- Y1 - Main yard circulation retained
- Y2 - Aggregate transfer zone - 12m zone kept for loading of trains with clam shell picker
- Y3 - Lorry charging bays
- Y4 - External aggregates store zone behind new rc containment walls
- F1 - Fence retained to road
- F2 - Fence retained to rail sidings
- F3 - Fence wall to Lynton Close
- L1 - Greened boundary zone 1
- L2 - Greened boundary zone 2
- L3 - Greened boundary zone 3



**Notes:**  
Do not scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor and any discrepancies reported to BJR immediately.

S	R	Date	Description
S3	3	06.02.24	ISSUED FOR PLANNING SUBMISSION DWG TITLE NAME REVISED



© Copyright 2024 of B3R Architects Limited, 18 Hatton Place, London EC1N 8RU, T: +44 (0) 20 7611 5223  
By: CM Date: 06.02.24 Time: 17:44 G:\Projects\19280\CA\p\0106.dwg

<b>Client:</b>	SRC Group Holdings Ltd
<b>Project Title:</b>	Charrington Sidings
<b>Status:</b>	<b>Stage:</b>
PLANNING	S3

Drawing Title:  
SITE SECTIONS 3, 5 & 6

Project No:  
19280

Drawing No: Revision:  
106 3



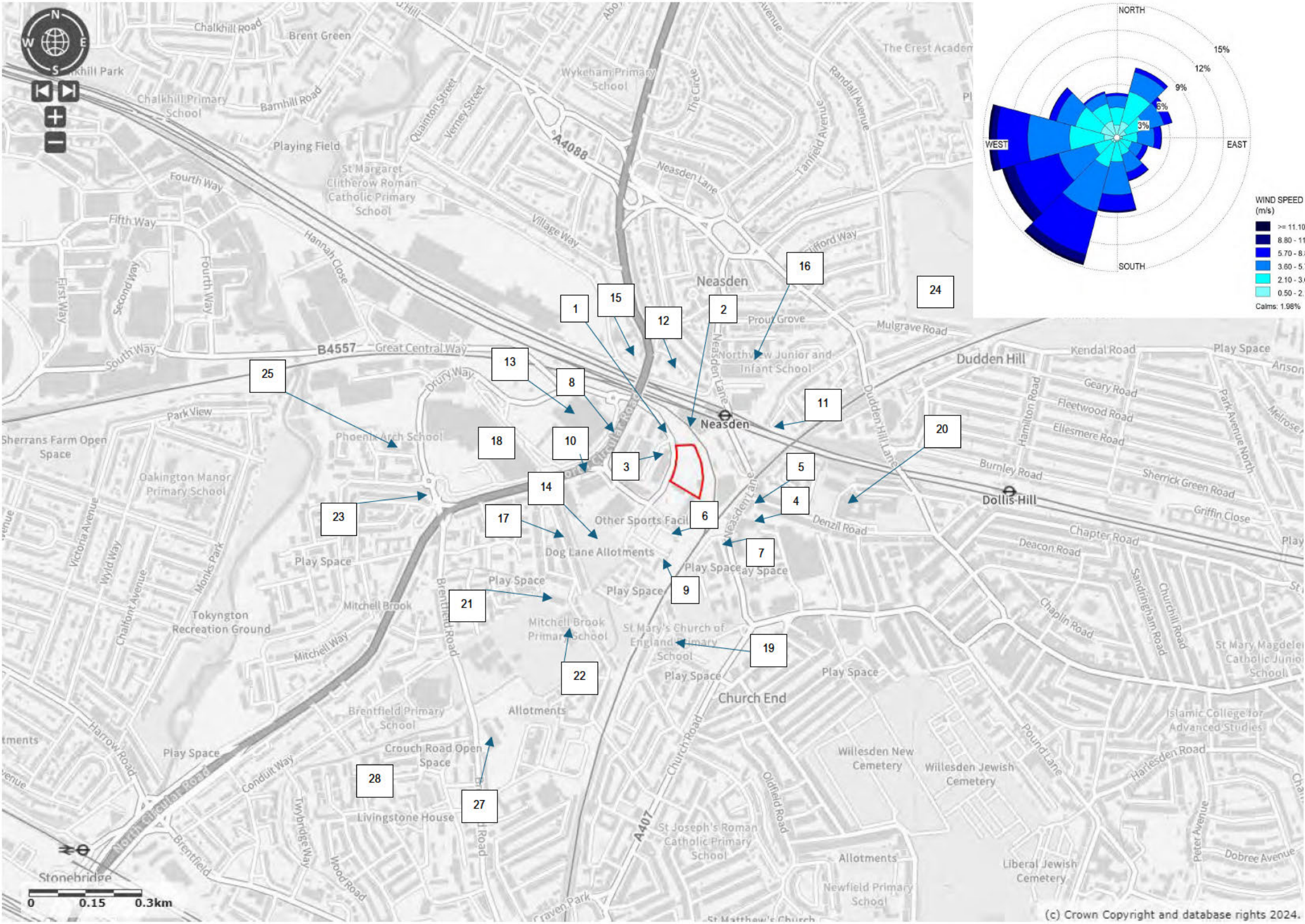




## Appendix 1

### Potentially Sensitive Receptor Locations





## APPENDIX 2

Accident / Incident Report Form

### **Accident (and Incident) Record**

**Record of accidents, other incidents or near misses**

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any <b>significant pollution</b> or <b>environmental damage</b> to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? If so what?	
If there was, then you must take steps to prevent further damage and notify the Environment Agency on <a href="tel:0800807060">0800 807060</a> and any other relevant regulators <b>ASAP</b> . Have you done so? Yes / No	Who did you phone?  At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No  What date did you contact?
Please print your name and sign	

Continue on a separate sheet if you do not have enough room.

Keep the completed form in the file to discuss with your auditors or regulators when they visit.



## APPENDIX 3

Dust Complaint Form

**DUST COMPLAINT FORM**

<b>Customer Name:</b>	<b>Address:</b>
<b>Customer Contact:</b>	
Tel. No.:	

<b>Complaint Ref. No.</b>	<b>Date:</b>
---------------------------	--------------

<b>Complaint Details &amp; Root Cause</b>
<b>Signed:</b> .....
<b>Date</b>

<b>Investigation Details:</b>	
<b>Investigation by:</b> .....	<b>Position:</b> .....
<b>Times Start:</b> .....	<b>Finish:</b> .....
<b>Weather Conditions:</b> .....	

<b>Environment Agency Feedback:</b>
<b>Public Recommendation / Feedback</b>

## Appendix 4

Dust Monitoring Check Sheet



### Daily Dust Monitoring Inspection

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Weather Conditions						
Dust Suppression in use						
Do site surfaces need damping down?						
Do stockpiles need damping down?						
Are there visible dust emissions across the permit boundary?						

Comments from Site Supervisor
-------------------------------

Print Name..... Signed..... Date.....

## Appendix 5

Housekeeping Check Sheet

## Daily Housekeeping Checklist

**Week Commencing:** \_\_\_\_\_

Checkpoints:	M	T	W	T	F	S
Is the site secure (no evidence of trespassing)?						
Condition of recycling area satisfactory - surface integrity, spillages, debris						
Are all wastes for treatment stored in the dedicated covered storage area?						
Are waste storage heights and volumes compliant with the permit?						
Is all plant (fixed & mobile) managed to ensure it is operating to minimise the generation of dust.						
Check drop heights from plant and equipment are not causing dust emissions						
Check dust mitigation in use on crusher/ screener.						
Check dust canons are functioning correctly						
Is all plant (fixed & mobile) managed to ensure it is operating to minimise the generation of noise.						
Has the road sweeper swept the public highway and Site surfaces. <ul style="list-style-type: none"> <li>• am</li> <li>• pm</li> </ul>						
Has site operated without any complaints received?						
Has the Site been left tidy at the end of the working day?						



Details of any remediation actioned:	
Any other comments.	
Name:	Signature:

## APPENDIX 9

### Noise Impact Assessment

**NOISE ASSESSMENT  
PERMIT APPLICATION**

**CHARRINGTON SIDINGS, NEASDON**

**SRC GROUP**

**OCTOBER 2024**

LF Acoustics Ltd  
Pond Farm  
7 High Street  
Pulloxhill, Beds  
MK45 5HA

t: 01525 888046  
e: [mail@lfacoustics.co.uk](mailto:mail@lfacoustics.co.uk)

Registered in England  
Company Reg: 8434608



## NOISE ASSESSMENT PERMIT APPLICATION

### CHARRINGTON SIDINGS, NEASDON

SRC GROUP

OCTOBER 2024

Revision	Prepared By	Date
1.1	L Jephson BEng (Hons) MIOA	29/10/24
1.0	L Jephson BEng (Hons) MIOA	25/9/24

This report has been prepared using all reasonable skill and care within the resources and brief agreed with the client. LF Acoustics Ltd accept no responsibility for matters outside the terms of the brief or for use of this report, wholly or in part, by third parties.

## **Contents**

1.	Introduction	1
2.	Standards	2
3.	Development Proposals	6
4.	Baseline Conditions	9
5.	Calculation and Assessment of Noise Levels	14
6.	Summary	17

References

Figures

Appendices

## **1. Introduction**

LF Acoustics Ltd have been appointed to prepare a noise assessment to support an Environmental Permit application for the redevelopment of Charrington Sidings Ltd.

The site is categorised by Brent as Land of Strategic Industrial Importance (SIL) and is operated by SRC Aggregates to receive and distribute aggregates within the construction industry in and around London. The site incorporates a rail siding, where aggregates are brought in by train, stocked, and distributed by HGV. In addition, the site is also used periodically for the recycling of construction materials.

There is an environmental permit covering the site at the present times, which includes the operation of the rail head, which is outside of the permit boundary and will remain unchanged. On this basis, no further consideration of the rail head has been made within this assessment.

SRC are seeking to redevelop the site, increasing the throughput of the site. A dedicated screening and crushing area is proposed to be installed under a covered area to process recycled construction materials, which will require a variation to the existing permit.

The following section of this report provides a summary of the principal standards and guidance applicable to this type of development. Section 3 provides a summary of the main development proposals. A description of the surrounding noise sensitive receptors and the results of a baseline noise monitoring exercise carried out to establish the prevailing background noise levels are presented in Section 4. Section 5 details the calculations, assessment, and mitigation measures, which would be adopted within the construction and future operation. Finally, Section 6 provides a summary of the assessment.

This report has been prepared by L Jephson B(Eng) Hons MIOA, Director of LF Acoustics Ltd.



## 2. Standards

A description of the noise units referred to in this report is provided in Appendix A.

### 2.1. National Planning Policy Framework

The National Planning Policy Framework (NPPF) revised in December 2023 [1], sets out the Government's planning policies for England and how these should be applied. It provides a framework upon which locally prepared plans for housing and other development can be produced.

The purpose of the planning system is to contribute to the achievement of sustainable development and at the heart of the Framework is a presumption in favour of sustainable development.

With regards noise, local planning policies and decisions should contribute to and enhance the natural and local environment by:

- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels noise pollution.
- mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development (including cumulative effects) – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

Reference is made within the NPPF to the Noise Policy Statement for England [2] (NPSE), which sets out the long term vision of the Government noise policy. Further information has been provided on the assessment of noise within recent Planning Practice Guidance, published in March 2014 and available on the Government planning web site. Whilst this guidance does not provide any objective criteria upon which to base noise assessments, the guidance provides a description of the relevant Effects Levels identified within the NPPF and NPSE and this is reproduced in Table 2.1.

Perception	Examples of Outcomes	Increasing Effect Level	Action
<b>Not noticeable</b>	No Effect	No Observed Effect (NOEL)	No specific measures required
<b>Noticeable and not intrusive</b>	Noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life.	No Observed Adverse Effect	No specific measures required
		Lowest Observed Adverse Effect Level (LOAEL)	
<b>Noticeable and intrusive</b>	Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life.	Observed Adverse Effect	Mitigate and reduce to a minimum
		Significant Observed Adverse Effect Level (SOAEL)	
<b>Noticeable and disruptive</b>	The noise causes a material change in behaviour and/or attitude, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	Significant Observed Adverse Effect	Avoid
<b>Noticeable and very disruptive</b>	Extensive and regular changes in behaviour and/or an inability to mitigate effect of noise leading to psychological stress or physiological effects, e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm, e.g. auditory and non-auditory	Unacceptable Adverse Effect	Prevent

**Table 2.1 Significance Criteria**

## 2.2. British Standard BS 4142

BS 4142 [3] is the British Standard for rating and assessing noise of a commercial or industrial nature upon occupants of existing or proposed residential premises. Whilst not directly applicable to the proposals, the Standard provides a useful tool in assessing the potential for adverse impacts.

BS 4142 is a comparative standard in which the estimated noise levels from the proposed development are compared to the representative / typical background noise level from existing uses.

BS 4142 relates the likelihood of adverse impacts to the difference between the Rating Level of the noise being assessed and the background noise level.

The background noise level is the  $L_{A90}$  noise level, usually measured in the absence of noise from the source being assessed, but may include other existing industrial or commercial sounds. The background noise levels should generally be obtained from a series of measurements each of not less than 15 minute duration.

The Rating Level of the noise being assessed is defined as its  $L_{Aeq}$  noise level (the 'specific noise level'), with the addition of appropriate acoustic corrections should the noise exhibit a marked impulsive and/or tonal component, or should the noise be irregular enough in character to attract attention. The extent of the correction is dependent upon the degree of tonality or character in the noise and is determined either by professional judgement, where the plant is not operational at present, or by measurement.

During the daytime, the specified noise levels are determined over a reference time interval of 1 hour, with a 15 minute assessment period adopted at night.

If the Rating Level of the noise being assessed exceeds the background level by 10 dB or more BS 4142 advises that there is likely to be an indication of a significant adverse impact, depending upon context. A difference between background level and Rating Level of around 5 dB is likely to be an indication of an adverse impact, depending upon context. The lower the Rating Level is, relative to the background noise level, the less likely the specific source will have an adverse or significant adverse impact. Where the Rating Level does not exceed the background noise level is an indication of a low impact, depending upon context.

The assessment method outlined above is intended for the assessment of external noise levels and is not intended to assess the extent of impact at internal locations.

Where the initial assessment of impact, based upon and assessment of the external noise levels, needs to be modified due to the context, all pertinent factors should be taken into account, including:

- The absolute level of sound;
- Where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background; and
- The sensitivity of the receptor and whether the premises will already incorporate measures to ensure good internal and/or external acoustic conditions.

### 2.3. Environment Agency Guidelines

The existing Environmental Permit for the site will need to be varied to include the proposed operations.

The Environment Agency (EA) have published guidance on the requirements for noise assessments for permit applications [4] and require an assessment of the noise levels associated with the proposed permitted operations.

The guidance requires the use of BS 4142 to quantify the level of environmental noise impact from industrial processes.

Whilst the guidance requires the use of BS 4142 to assess potential impacts, the EA assessment methodology differs from that within BS 4142 and following criteria to be considered:



#### *Unacceptable level of audible or detectable noise*

This level of noise means that significant pollution is being, or is likely to be, caused at a receptor (regardless of whether you are taking appropriate measures).

You must take further action or you may have to reduce or stop operations. The environment agencies will not issue a permit if you are likely to be operating at this level.

The closest corresponding BS 4142 descriptor is 'significant adverse impact' (following consideration of the context).

#### *Audible or detectable noise*

This level of noise means that noise pollution is being (or is likely to be) caused at a receptor.

Your duty is to use appropriate measures to prevent or, where that is not practicable, minimise noise. You are not in breach if you are using appropriate measures. But you will need to rigorously demonstrate that you are using appropriate measures.

The closest corresponding BS 4142 descriptor is 'adverse impact' (following consideration of the context).

#### *No noise, or barely audible or detectable noise*

This level of noise means that no action is needed beyond basic appropriate measures or BAT.

The closest corresponding BS 4142 descriptor is 'low impact or no impact' (following consideration of context).

Low impact does not mean there is no pollution. However, if you have correctly assessed it as low impact under BS 4142, the environment agencies may decide that taking action to minimise noise is a low priority. Note that BS 4142 is unlikely to be the appropriate methodology on its own to assess low frequency noise.

In undertaking the assessment and deriving the rating level of noise, the EA guidance specifies "where the sound is neither impulsive nor tonal, but you can readily distinguish it against the usual residual acoustic environment, the environment agencies will expect you to apply a minimum character correction of +3 decibels (dB) 'other'. This is unless you can robustly justify that you do not need such a correction."

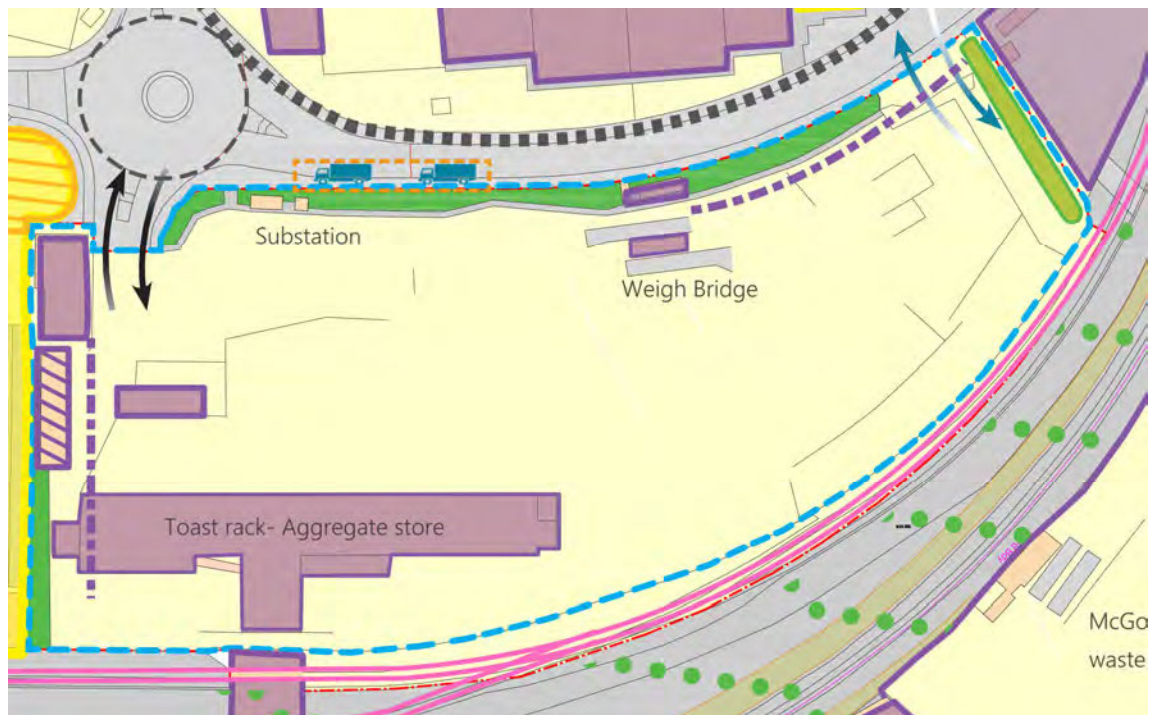
### 3. Development Proposals

#### 3.1. Existing Operations

The site has operated for many years.

The site operates between 6:00 – 20:00 hours, with trains permitted to arrive and offload at any point over a 24-hour period.

The current site layout is indicated below.



The main part of the site incorporates a rail siding, which runs along the southern boundary of the site. Aggregate trains arriving from the main line pass the site and are reversed into the siding, where they are offloaded in an offloading building, discharging into a hopper beneath the rails, with the materials conveyed to the main storage building (Building 1, the Toast Rack) and stocked in bays. The train movements are permitted on a 24-hour basis and presently arrive around 5:30 in the morning and need to be offloaded over a 4½ hour window. During the offloading period, the train is slowly moved through the offloading building, unloading one waggon at a time.

The stocked materials within the bays are then loaded onto HGVs throughout the day, using a loading shovel, and transported to projects around the Capital.

The eastern area of the site, which is within the permitted area, previously housed tarmac and concrete batching plants, which were removed 2 – 3 years ago.

The eastern area of the site is presently used to stockpile construction materials for recycling, with mobile plant operating externally in this area.

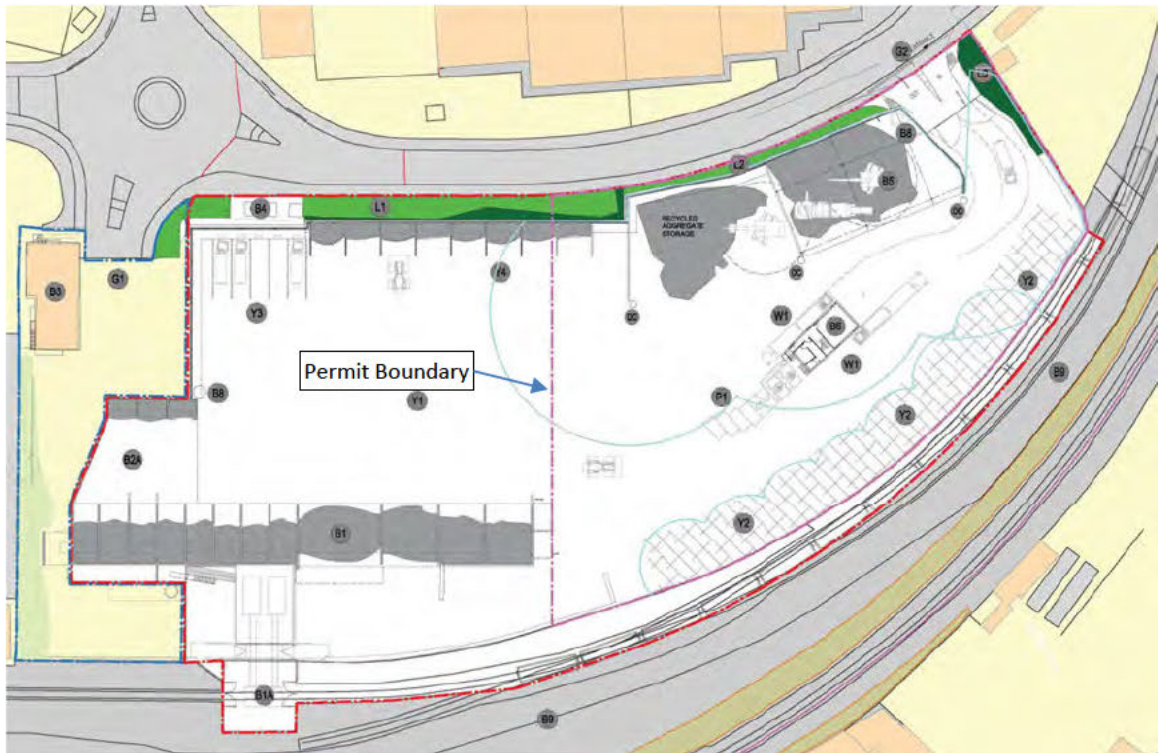
HGVs presently access the site from the roundabout to the north-west of the site, with vehicles travelling either north or east onto the A406. At present, based upon recent traffic surveys, there were 52 HGVs recorded on a typical weekday.

### 3.2. Proposed Operations

It is proposed to increase the throughput of the site, both in terms of aggregate and recycled materials.

No changes to the operational hours are proposed, with the existing operating hours of between 6:00 – 20:00 hours and trains permitted to arrive and offload at any point over a 24-hour period retained.

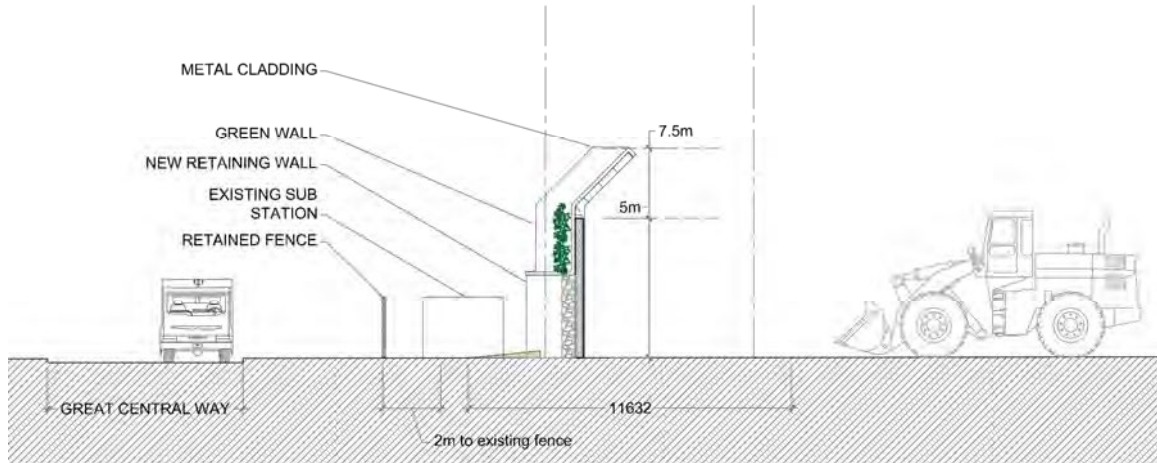
The proposed site layout is indicated below.



The existing Building 1 (the Toast Rack) will be extended to incorporate an additional stock bay. A new covered area will be constructed at the western end of Building 1 to provide further stock bays. Additional stock bays are proposed to be installed along the northern site boundary.

The northern stock bays would be constructed with a push wall at the lower part, with a solid wall above to a height of 7.5 metres above the ground. The boundary wall would extend along the whole of the northern and western boundaries to ensure the site was effectively screened from existing noise sensitive properties, as indicated below.





No amendments are proposed to the aggregate train offloading, with the trains brought into the siding and offloaded through the offloading building. As discussed previously, no further assessment of the noise from the train operations has been made within this assessment.

A dedicated covered area is proposed within the north-eastern corner of the site. The covered area would have solid façades, constructed using steel cladding along the northern and eastern sides and would be fully open on the western and southern sides, to allow access.

A crusher and screen would be used to process recycled materials would operate within the screened area. This plant was operating at the time of the noise surveys on a temporary basis. Two excavators would also operate in this area to load the plants. A loading shovel would work in this area and outside, managing the recycled materials, loading HGVs, and loading aggregate trans when required.

The proposed operations would also require the use of an additional loading shovel to handle the aggregates and load vehicles.

A new site access will be created at the eastern end of the site, with vehicles able to turn left and right onto the existing road. It is proposed to increase the number of vehicle movements to up to 150/160 HGV movements two-way trips to the site per day. Provision will be made for charging 5 electric HGVs on site, which would work within a 10-mile radius of the site. Once the technology is available, these vehicles are anticipated to cover 50 of the proposed loads per day.

## 4. Baseline Conditions

### 4.1. Site Location and Identification of Noise Sensitive Receptors

The site is located within an industrial area and is categorised within Brent as Land of Strategic Industrial Importance (SIL).

There are a small number of noise sensitive properties, identified, which have been considered within the assessment, as follows:

- The Gypsy and Traveller site located to the south-west along Lynton Close;
- Residential properties within the Unit 18 located to the north-west on Iron Bridge Close. The unit has recently been converted to form a number of residential flats.
- Properties to the south-east of the railway line, along Wharton Close and Neasdon Lane. These properties are some distance from the site, beyond the railway, with noise levels at these properties also influenced by road traffic noise and noise from the existing metal recycling facility.

There is a metal recycling facility presently located on the land to the east of the application site, operated by European Metals Recycling. This land forms part of the Neasdon Stations Growth Area, with residential development proposed in this area. Any residential development proposed would need to take account of noise attributable the presently permitted operations carried out within Carrington Sidings within the design of the development.

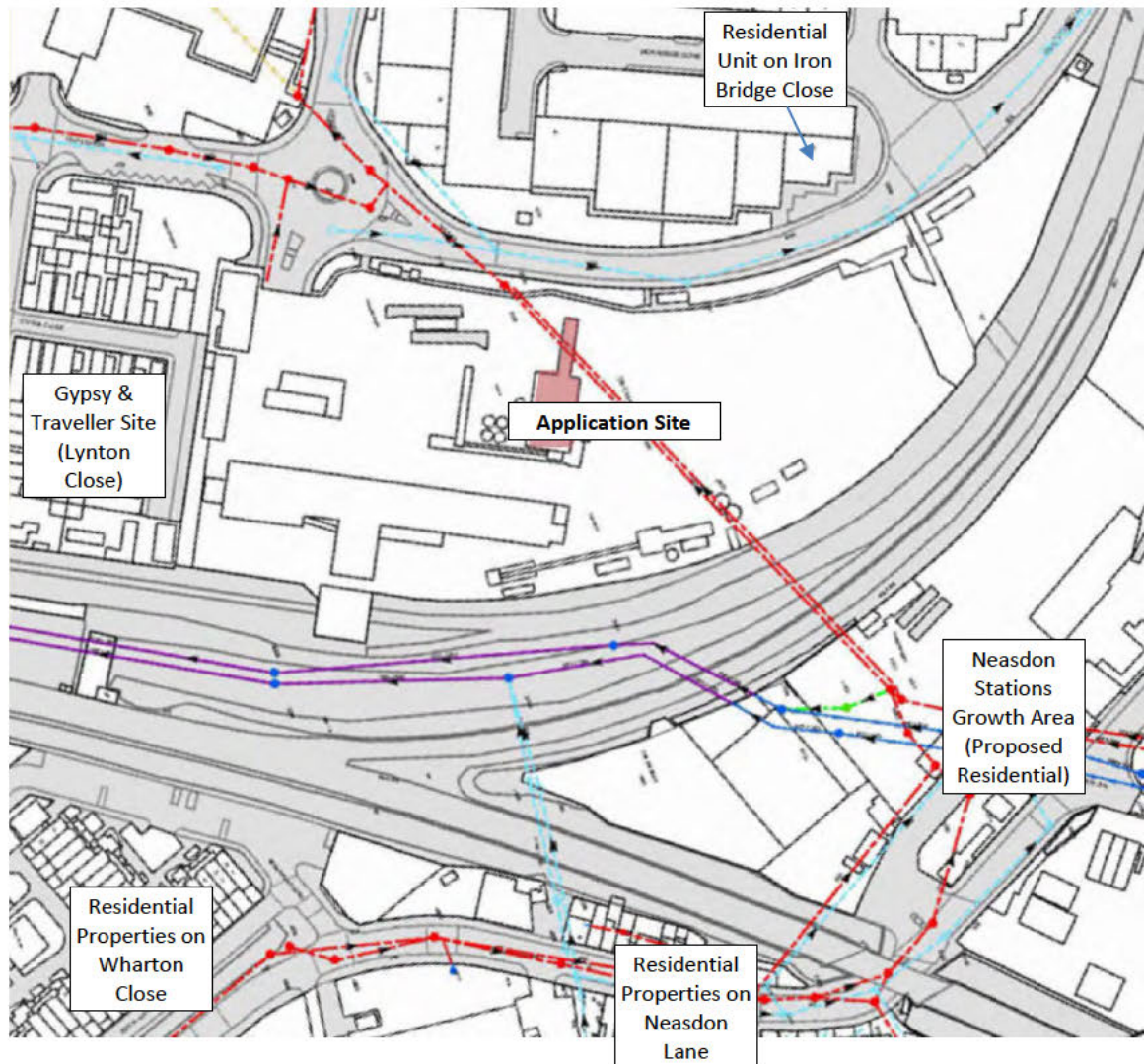
With regards to the recently developed flats within Unit 18, Iron Bridge Close, the design of the flats needed to take account of noise from the surrounding land uses, which principally included road traffic noise and noise from the operations within the Application Site. The planning permission for the development (Application Ref. 18/0356) contained conditions relating to the requirement for sound insulation and the provision of acoustically treated mechanical ventilation. A noise assessment was prepared upon which the mitigation strategy was prepared (Application Ref. 19/1620 & 19/2654). The report indicated the following typical noise levels at the property, which were noted to be principally attributable to road traffic:

- Daytime (07:00 – 23:00 hours) – 74 dB  $L_{Aeq, T}$  / 58 dB  $L_{A90}$ ;
- Night-time (23:00 – 07:00 hours) – 69 dB  $L_{Aeq, T}$  / 52 dB  $L_{A90}$ .

The prepared assessment took account of noise from operations within the Application Site, which were calculated to be 69 dB  $L_{Aeq, T}$  at the façades of the proposed flats.

High specification acoustic glazing and mechanical ventilation have been installed within the flats to ensure an acceptable noise environment is maintained with regards to the requirements of BS 8233.

The locations of the noise sensitive receptors considered within this assessment are indicated below.



#### 4.2. Baseline Noise Monitoring

Unattended noise surveys were carried out between 6 – 13 November 2023 to establish the current noise levels associated with the operation of the site and general baseline noise levels at the site boundaries adjacent to the potentially most affected noise sensitive receptors.

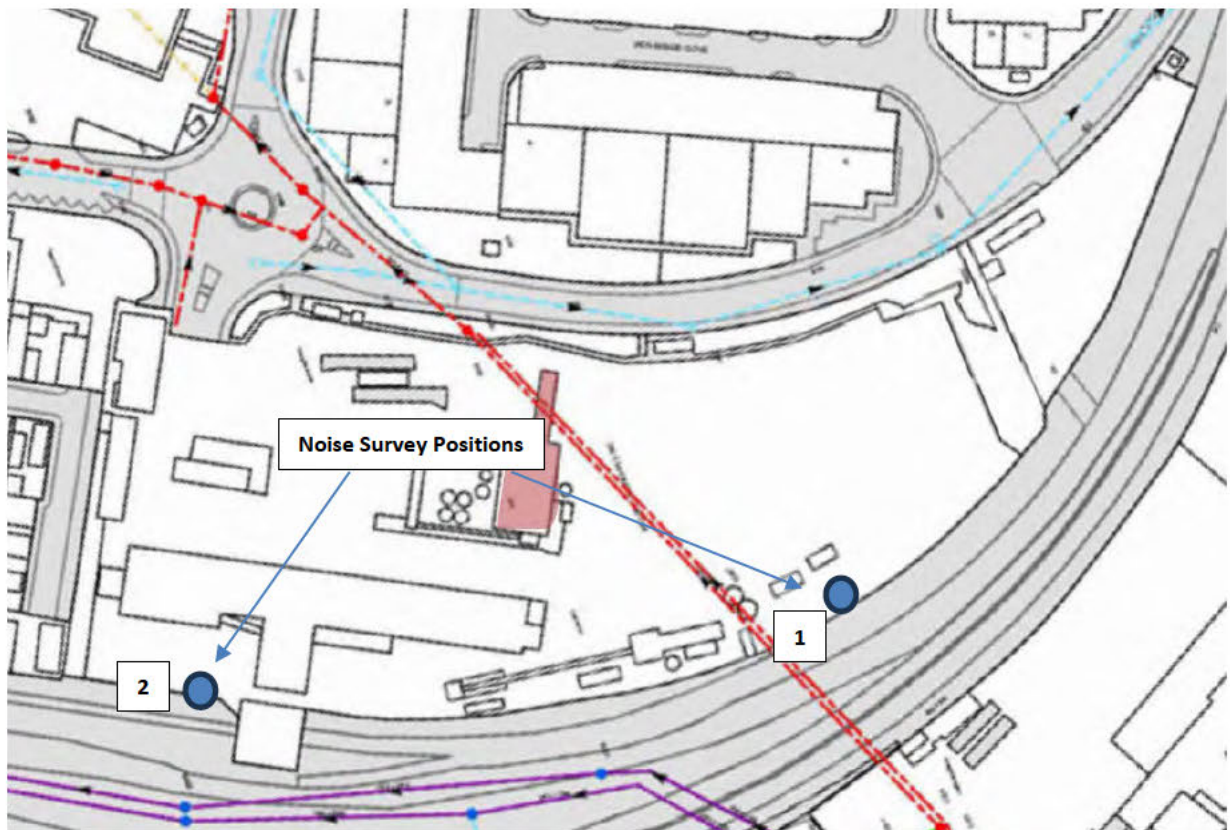
A SvanTek SV971A and a Rion NL-52 Class 1 Sound Level Analysers were used for the exercise, which were field calibrated before and after the exercise using a Class 1 Acoustic Calibrator, with no drift observed between the two calibrations. The instruments had been laboratory calibrated in accordance with National Standards within the previous 24 months, as indicated below.

Instrument	Serial No.	Calibration Date	Laboratory / Certificate No.
Rion NL-52 Class 1 SLM (Position 1)	00231655	21/4/23	AcSoft – 1505168-2
Rion NC-74 Class 1 Acoustic Calibrator	35125830	5/9/23	AcSoft – 1506421-2
SvanTek SV971A (Position 2)	131654	15/2/23	AcSoft – 1504083-1
SvanTek SV33B Class 1 Acoustic Calibrator	125822	15/2/23	AcSoft – 1504083-2

**Table 4.1 Instrumentation Calibration Details**



The sound level meters were placed along the site boundaries adjacent to the rail head, as indicated below.



Position 1 was selected to ascertain the noise levels associated with the general operations and train movements along the boundary adjacent to the proposed Growth Area. Noise levels monitored during the daytime periods were generally attributable to site operations (which included screening and crushing operations which were being undertaken on a temporary basis at the time of the survey), with the train delivery, which occurred on Thursday and Friday morning during the survey, also a main source of noise. At times when the site was not operational (evenings and overnight), noise levels were noted to be attributable to other surrounding land uses and principally road traffic noise.

Position 2 was selected to evaluate noise levels attributable to the aggregate deliveries. Generally, noise levels within this area of the site were not influenced by the site operations, as the conveyors only operate during a train delivery (which occurred during the early morning period on Thursday and Friday). At other times, the noise levels were attributable to noise from other surrounding land uses,

Both meters were configured to record over 15-minute periods during the survey, in accordance with the guidance within BS 4142.

Weather conditions were monitored during the survey and remained generally dry, with either calm conditions or light winds throughout, thus suitable for undertaking an environmental noise survey. A summary of the weather conditions is provided in Table 4.2 below.

Date		Conditions	Wind Strength	Wind Direction
Monday	6/11/23	Fine & Dry	0 – 2 m/s	W
Tuesday	7/11/23	Fine & Dry	0 – 2 m/s	W
Wednesday	8/11/23	Generally dry with light rain shower pm	0 – 2 m/s	NE am / NW pm
Thursday	9/11/23	Generally Dry	0 – 2 m/s	W
Friday	10/11/23	Fine & Dry	0 – 2 m/s	NW
Saturday	11/11/23	Fine & Dry	0 – 1 m/s	NW
Sunday	12/11/23	Fine & Dry	1 m/s am increasing to 2 – 3 m/s pm	SE turning W
Monday	13/11/23	Fine & Dry	0 – 2 m/s	W

**Table 4.2 Summary of Weather Conditions**

The results obtained during the surveys are presented graphically in Appendices B and C.

In addition to the noise sources identified above, higher noise levels were observed for short duration during evening periods. An inspection of the audio recordings noted that these were associated with fireworks.

The measured noise levels have been subsequently analysed to derive the noise levels attributable to the presently permitted site operations at each position. The data has also been analysed to ascertain the prevailing background noise levels during daytime periods when the site was not audible (principally Position 2) and for periods when the site was not operational (principally during the evenings and overnight).

#### 4.2.1. Results and Analysis of Noise Measurements Obtained at Position 1

As indicated previously, this location was positioned along the railway boundary adjacent to the area being used at the time to process recycled materials, utilising a screen and crusher, with noise levels during the daytime period principally influenced by the operation of the plant. Two aggregate trains arrived and unloaded at the site during the survey period, between 05:45 – 08:15 on Thursday and 05:30 – 08:30 on Friday.

Noise levels attributable to the temporary processing operations, were noted to be typically between 74 – 75 dB  $L_{Aeq,T}$ , attributable to the operation of the screen and crusher, which were operating between 20 – 30 metres from the monitoring position. During these periods noise levels were also influenced by the operation of the excavators loading the plant and the loading shovel operating in the area.

The aggregate train deliveries are typically made during the early morning period. The train is reversed into the siding and the waggons gradually brought through the offloading building where they are unloaded. This operation requires the train to move every few minutes. Noise levels during these periods are principally influenced by the noise from the loco idling, couplings between the waggons as the train moves, and squealing brakes on the waggons. The analysis of the noise levels associated with this operation indicated a typical level of 68.8 dB  $L_{Aeq,T}$  during the offloading period, which was measured at a distance of approximately 5 metres from the tracks.

Other sources of noise observed at this location were noted to include road traffic noise on the surrounding road network and noise from other industrial land uses, primarily to the metals recycling facility on the opposite side of the railway line.

The data has also been analysed to determine the prevailing noise levels when the site was not operating. On this basis, the analysis was based principally on the period prior to the start of site operations within the mornings, after the plant stopped working around 16:30 hours, and at the weekend. The early morning (06:00 – 07:00) and evening (19:00 – 20:00) periods were also included within the analysis, as the data indicated noise levels equivalent to the general daytime levels at this time. The analysis indicated the following levels:

- Normal site operational hours - 56 dB  $L_{Aeq, 12 \text{ hr}}$  / 54 dB  $L_{A90}$  daytime (06:00 – 20:00); and
- Night-time aggregate trains - 52 dB  $L_{Aeq, 8 \text{ hr}}$  / 49 dB  $L_{A90}$  night-time (23:00 – 07:00).

#### 4.2.2. Results and Analysis of Noise Measurements Obtained at Position 2

This monitoring position was located adjacent to the offloading building and to the rear of the toast rack building.

Generally, during the daytime periods noise attributable to the operation of the site was not audible at this location, with the noise levels monitored attributable to other surrounding land uses, which included vehicle and rail movements, and noise from other surrounding industrial land uses.

Noise levels monitored during the period of the train unloading during Thursday and Friday mornings indicated that the main source of noise was attributable to the train moving through the offloading building, with noise from the couplings between the waggons and brake squeal clearly audible. The offloading activities within the building had minimal influence on the measured noise levels. The measurements during the offloading operations, which were obtained approximately 7 metres from the tracks, indicated a level of between 67.3 – 68.2 dB  $L_{Aeq,T}$ .

The results obtained at this location have been principally analysed to determine the prevailing noise levels, which indicated the following:

- Normal site operational hours - 54 dB  $L_{Aeq, 12 \text{ hr}}$  / 50 dB  $L_{A90}$  daytime (06:00 – 20:00); and
- Night-time aggregate trains - 51 dB  $L_{Aeq, 8 \text{ hr}}$  / 47 dB  $L_{A90}$  night-time (23:00 – 07:00).



## **5. Calculation and Assessment of Noise Levels**

### **5.1. Introduction**

As discussed, the site is presently operational, with the principal proposal to increase the throughput of the site, whilst continuing to operate within the present working hours.

It is considered that the present operations, represent the baseline situation, with noise levels from the current operations generating acceptable noise levels at the neighbouring noise-sensitive properties.

The proposals seek to provide additional aggregate storage facilities and the provision of a screened and covered area for the processing of recycled aggregates. A boundary wall is also to be provided along the western and northern operational boundaries, which would screen the site from the closest noise sensitive receptors.

Calculations of the operational noise levels have therefore been prepared on the basis of the presently permitted layout and site operations, and the proposed layout with future operational assumptions. The calculations have been prepared for the general site operations, which are those which would change under the current proposals.

### **5.2. Calculation of Noise Levels from Operation of the Site**

Noise levels associated with the operation of the site have been calculated using the SoundPlan Computer modelling package, which implements the prediction methodology from ISO-9613-2.

The modelling has taken account of the current and proposed development layout and location of the neighbouring residential properties. Ground heights have been evaluated from LiDAR mapping, with the heights for the on-site buildings and mitigation obtained from the planning drawings.

Noise levels have been calculated on the basis of the plant fully operational, both for the current (which included the temporary operations to compare with the monitoring results) and proposed situations.

For the purposes of the general site operation, the following plant has been assumed:

- 1 x loading shovel working in the aggregate storage area;
- 1 x loading shovel working alongside the recycled aggregates processing area within the northern part of the site;
- 1 x screening plant;
- 1 x crusher;
- 2 x excavators loading the processing plants;
- 5 x HGV per hour (10 movements per hour).

The same plant has been assumed for the proposed situation, with an additional loading shovel working in the aggregate storage area, and with the processing plants and excavators working within the new covered area within the northern part of the site. HGV movements have been assumed to increase to 15 vehicles per hour (30 movements per hour).

The source terms used within the modelling are provided within Appendix D.

Uncertainties within the modelling have been minimised by utilising noise levels measured from the plant operating on site, wherever possible, and by assuming the plant fully operational.

### 5.3. Assessment of Noise Levels Attributable to General Site Operations

The calculated noise levels associated with the general site operations are presented on Figure 1 for the existing situation and Figure 2 for the proposed situation. Figure 3 indicates the change in noise levels between the proposed and current operations. The results summarised in the table below.

Location	Calculated Noise Levels [dB L <sub>Aeq,T</sub> ]		Noise Change [dB]
	Existing	Proposed	
Lynton Close (NW Corner)	43.8	42.9	-1.1
Lynton Close (NE Corner)	44.5	41.9	-2.6
New Apartments on Iron Bridge Close	66.5	55.5	-11.0
Dwellings on Neasden Lane	39.6	40.6	+1.0
Dwellings on Wharton Close	55.8	55.2	-0.6
Neasdon Stations Growth Area	64.8	65.2	+0.4

**Table 5.1 Calculated Noise Levels – General Site Operations**

It is clear from the table above, that the proposed changes to the site, which would incorporate substantial boundary mitigation would result in a clear reduction in operational noise levels at the closest noise sensitive properties and a negligible change in noise levels at other surrounding properties.

An assessment of the future normal operational noise levels has been made in accordance with the BS 4142 methodology at the closest noise sensitive receptors (Lynton Close and Iron Bridge Close) to evaluate the potential for adverse impacts.

	Location / Assessment Period	
	Lynton Close	Iron Bridge Close
	Daytime	Daytime
Specific Noise Level	43	56
Acoustic Feature Correction	+3	+3
Rating Level	46	59
Background Noise Level [dB L <sub>A90</sub> ]	50	58
Excess of Rating Over Background Level	-4	+1
Likelihood of Impact	Indication of Low Impact	Indication of Low Impact

**Table 5.2 Initial BS 4142 Assessment – Normal Site Operations**

The initial BS 4142 assessment above indicates that with the proposed layout, noise levels attributable to the normal operations would be reduced to a standard where adverse noise impacts were unlikely. This would provide a clear benefit to the occupants of these properties.

Considering an assessment against the specific EA guidance, the assessment above would indicate a level corresponding with barely audible or detectable noise. This level of noise would be low and ensure that the operation of the site would generate acceptable levels of noise.

In summary, the proposed changes to the site would provide additional mitigation between the plant operating on site and the closest, potentially most affected, neighbouring properties. This would result in a noticeable reduction in noise levels compared to the presently permitted operations and thus ensure any potential adverse impacts were both reduced and minimised.



## 6. Summary

LF Acoustics Ltd were appointed to prepare a noise assessment to support a planning application for the redevelopment of Charrington Sidings Ltd.

The site is categorised by Brent as Land of Strategic Industrial Importance (SIL) and is operated by SRC Aggregates to receive and distribute aggregates within the construction industry in and around London. The site incorporates a rail siding, where aggregates are brought in by train, stocked, and distributed by HGV.

SRC are seeking to redevelop the site, increasing the throughput of the site. A dedicated screening and crushing area is proposed under a covered area to process recycled construction materials, which will require a variation to the existing environmental permit for the site.

A baseline noise monitoring exercise was undertaken to establish the noise levels associated with the operations presently being carried out on the site. The results of the monitoring exercise have been used to prepare an assessment of the future noise levels.

The proposals include a substantial screen wall along the site boundaries closes to the potentially most affected properties. The assessment concluded that the proposals would result in a noticeable reduction in noise levels at the neighbouring properties and would provide a closer benefit in reducing the potential adverse impacts associated with the operation of the site, compared to the present operations.

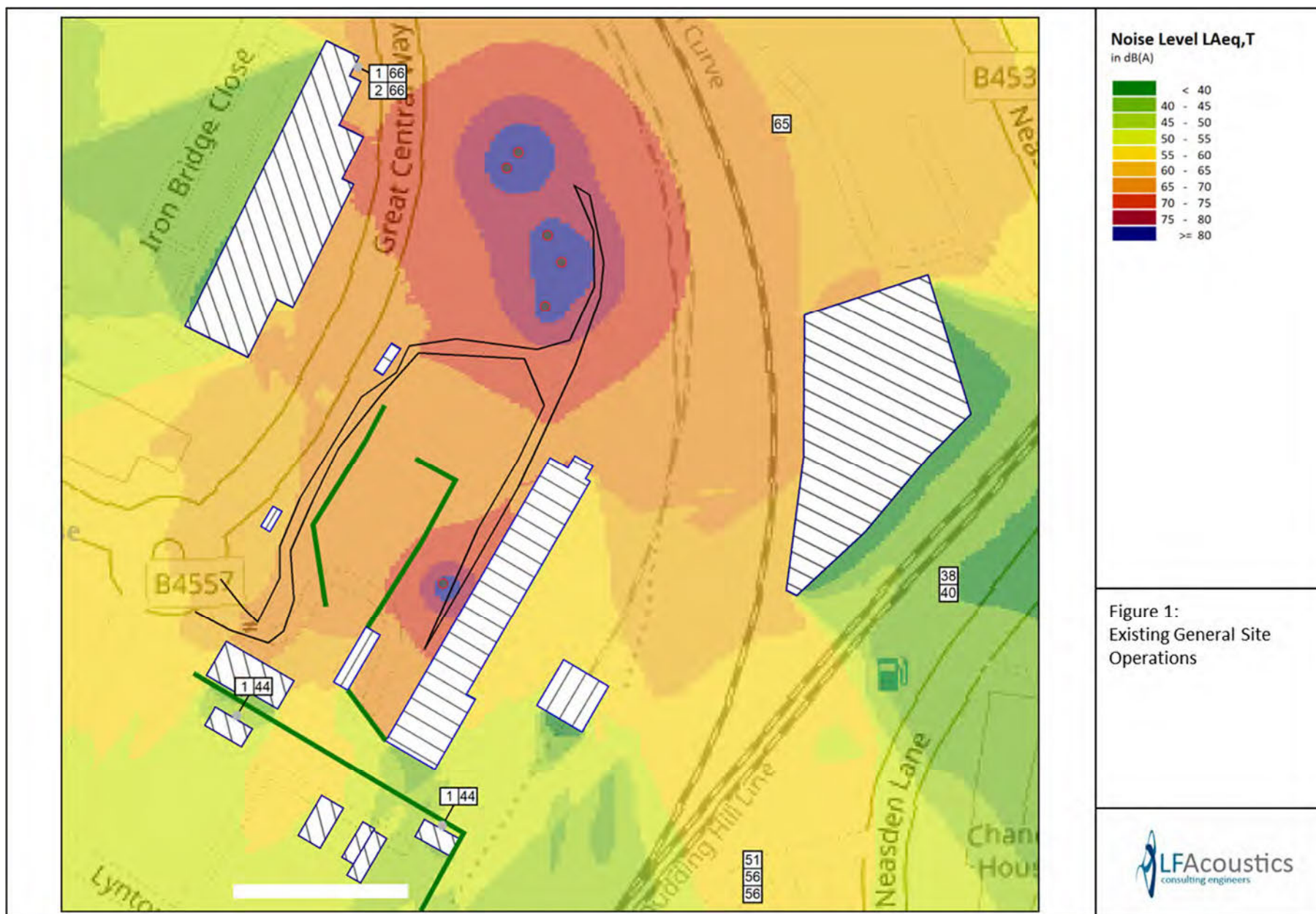
The proposals would ensure that the noise levels attributable to the operation of the site would result in barely audible levels of noise above the existing noise climate at the surrounding residential properties and would ensure acceptable noise levels were generated in accordance with the EA guidance.

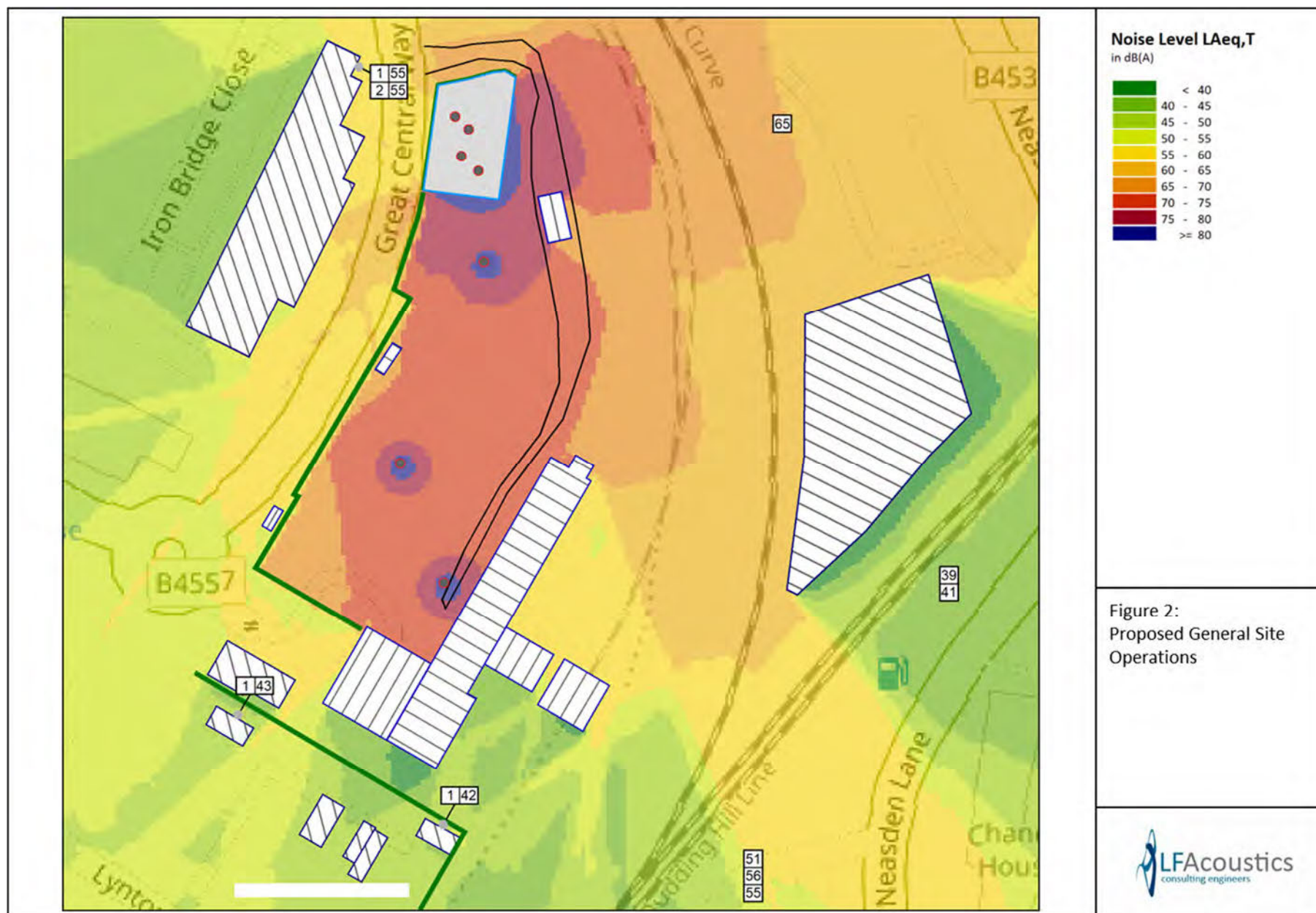
## References

1. Department for Levelling Up, Housing & Communities and Local Government. National Planning Policy Framework. December 2023.
2. Department for Communities and Local Government. Noise Policy Statement for England. 2010.
3. British Standards Institute. Methods for Rating and Assessing Industrial and Commercial Sound. BS 4142:2014 + A1:2019.
4. Environment Agency. Noise and Vibration Management: Environmental Permits. Updated 31 January 2022.

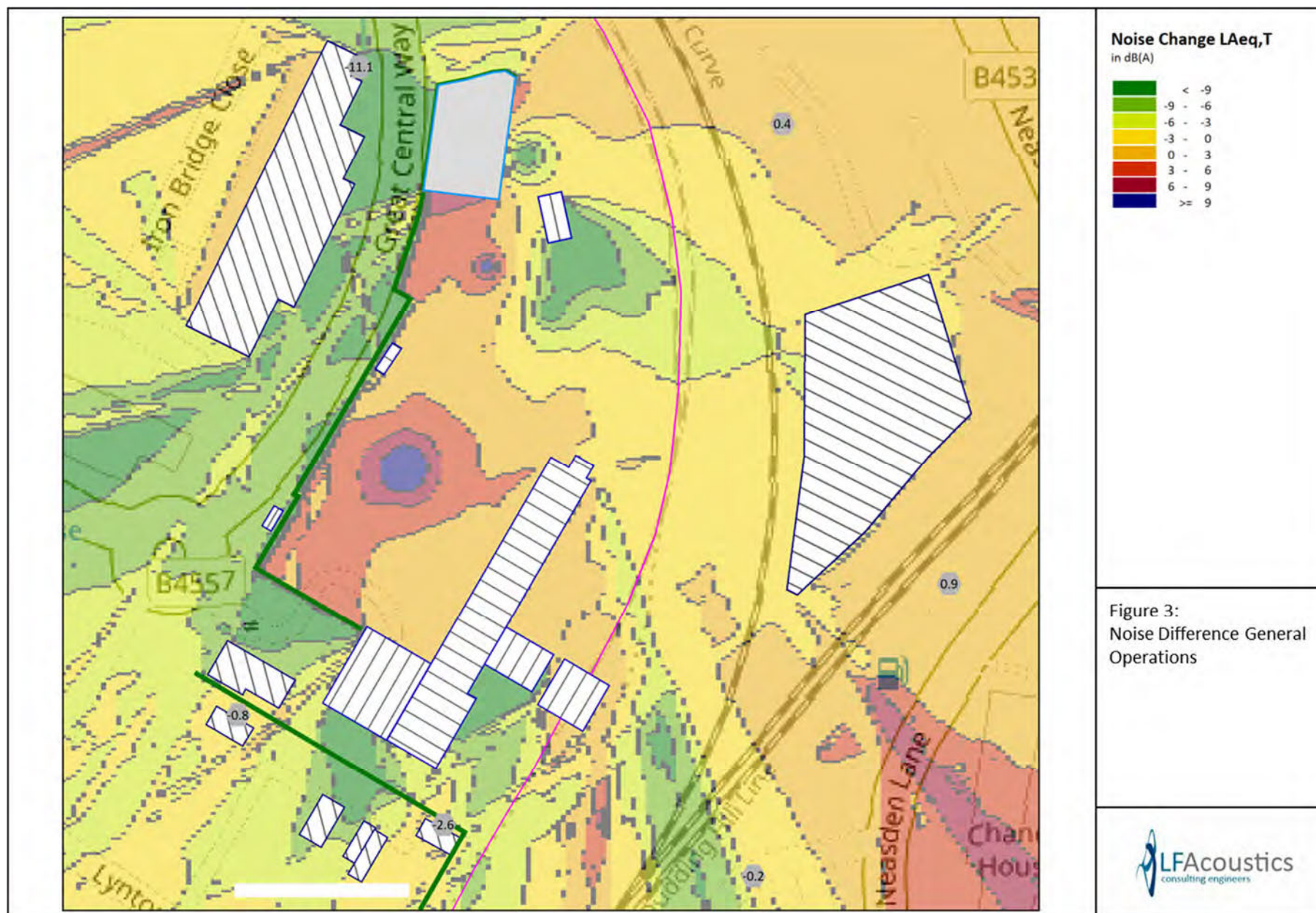
## Figures













## **Appendix A**

### **Noise Units**

#### *Decibels (dB)*

Noise can be defined as unwanted sound. Sound in air can be considered as the propagation of energy through the air in the form of oscillatory changes in pressure. The size of the pressure changes in acoustic waves is quantified on a logarithmic decibel (dB) scale firstly because the range of audible sound pressures is very great, and secondly because the loudness function of the human auditory system is approximately logarithmic.

The dynamic range of the auditory system is generally taken to be 0 dB to 140 dB. Generally, the addition of noise from two sources producing the same sound pressure level, will lead to an increase in sound pressure level of 3 dB. A 3 dB noise change is generally considered to be just noticeable, a 5 dB change is generally considered to be clearly discernible, and a 10 dB change is generally accepted as leading to the subjective impression of a doubling or halving of loudness.

#### *A-Weighting*

The bandwidth of the frequency response of the ear is usually taken to be from about 18 Hz to 18,000 Hz. The auditory system is not equally sensitive throughout this frequency range. This is taken into account when making acoustic measurements by the use of A-weighting, a filter circuit which has a frequency response similar to the human auditory system. All the measurement results referred to in this report are A-weighted.

#### *Units Used to Describe Time-Varying Noise Sources ( $L_{Aeq}$ , $L_{A90}$ and $L_{Amax}$ )*

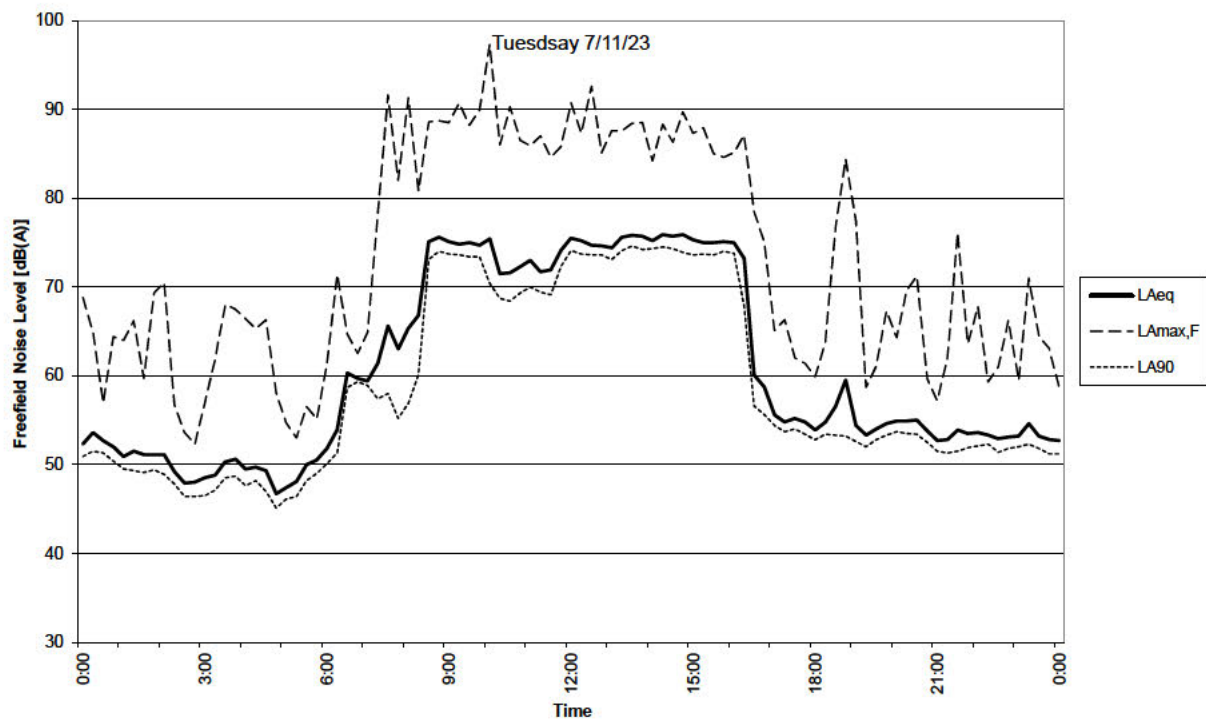
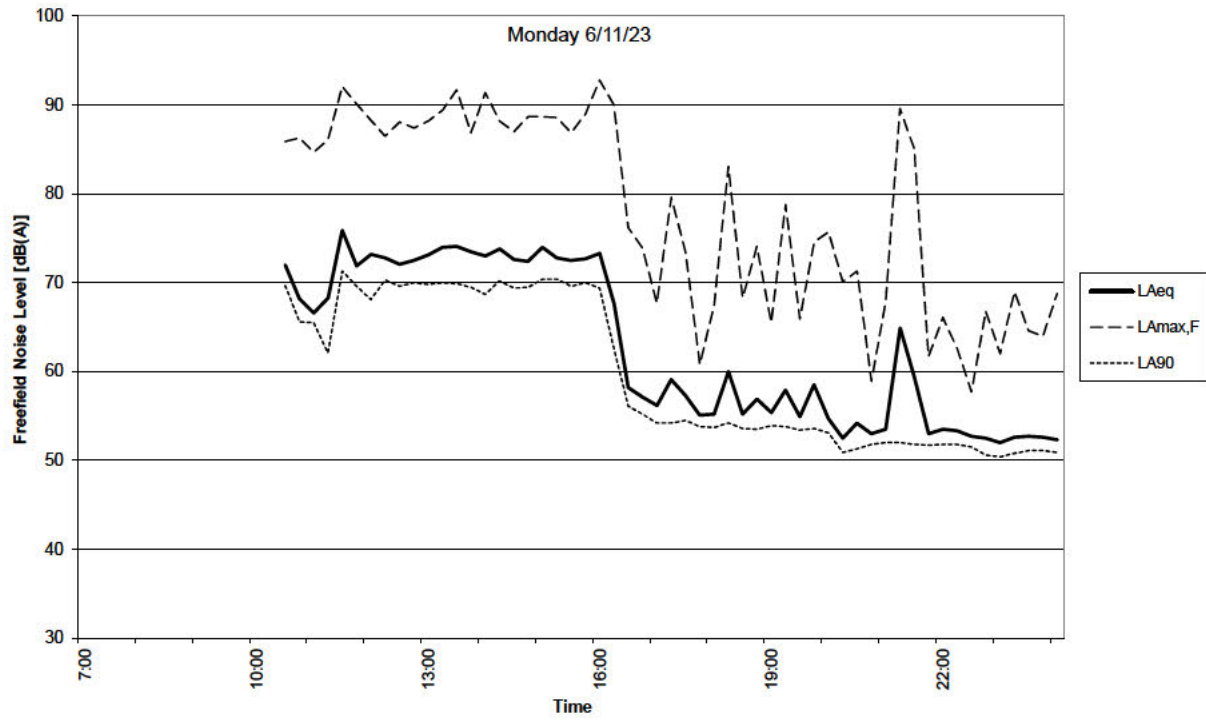
Instantaneous A-weighted sound pressure level is not generally considered as an adequate indicator of subjective response to noise because levels of noise usually vary with time.

For many types of noise the Equivalent Continuous A-Weighted Sound Pressure Level ( $L_{Aeq,T}$ ) is used as the basis of determining community response. The  $L_{Aeq,T}$  is defined as the A-weighted sound pressure level of the steady sound which contains the same acoustic energy as the noise being assessed over a specific time period, T.

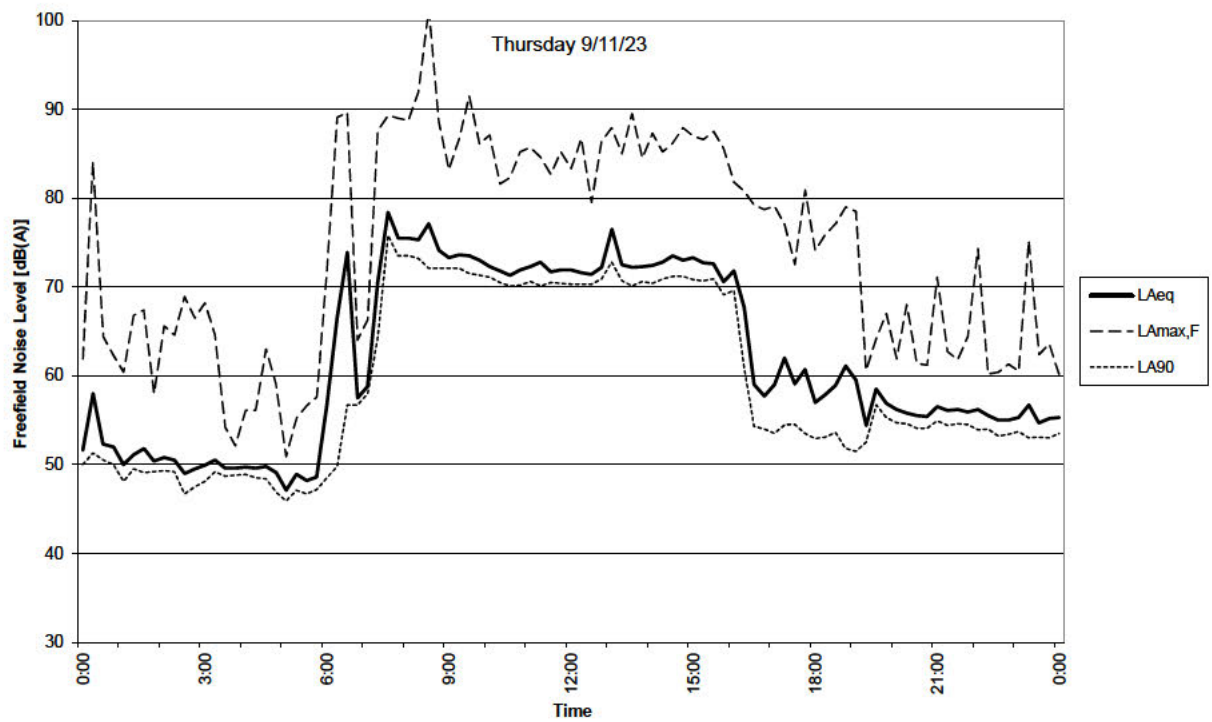
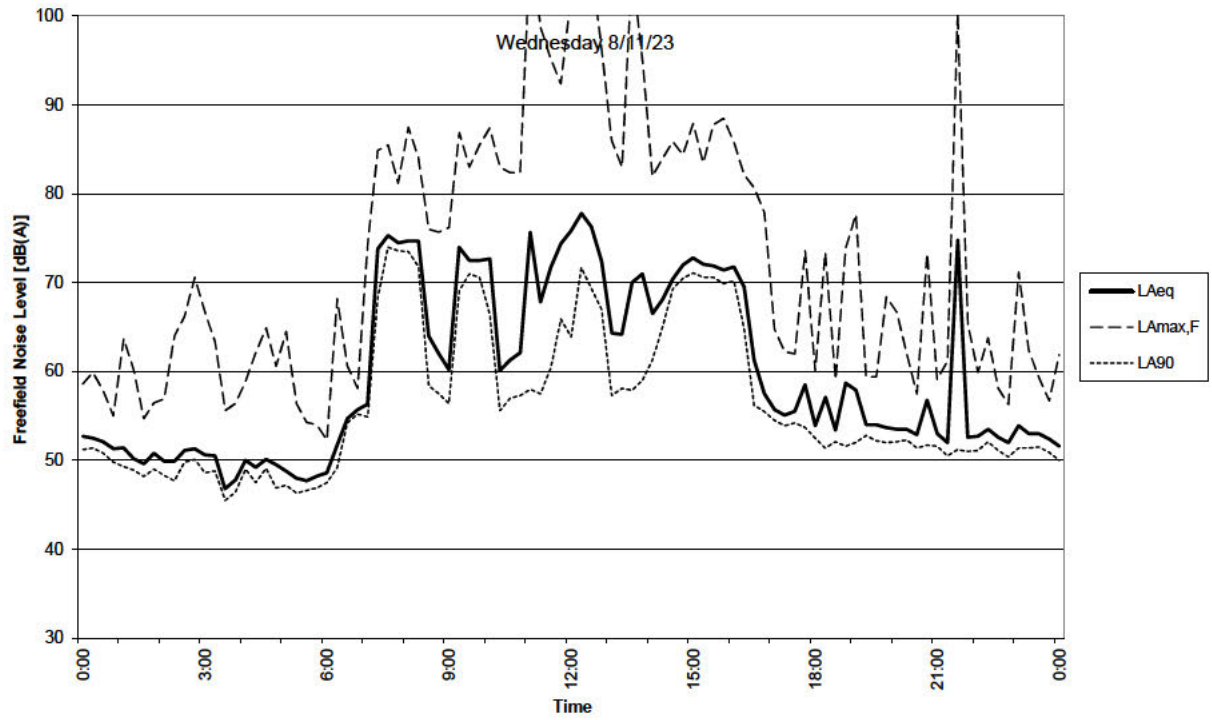
The  $L_{A90}$  is the noise level exceeded for 90% of the measurement period. It is generally used to quantify the background noise level, the underlying level of noise which is present even during the quietest part of the measurement period.

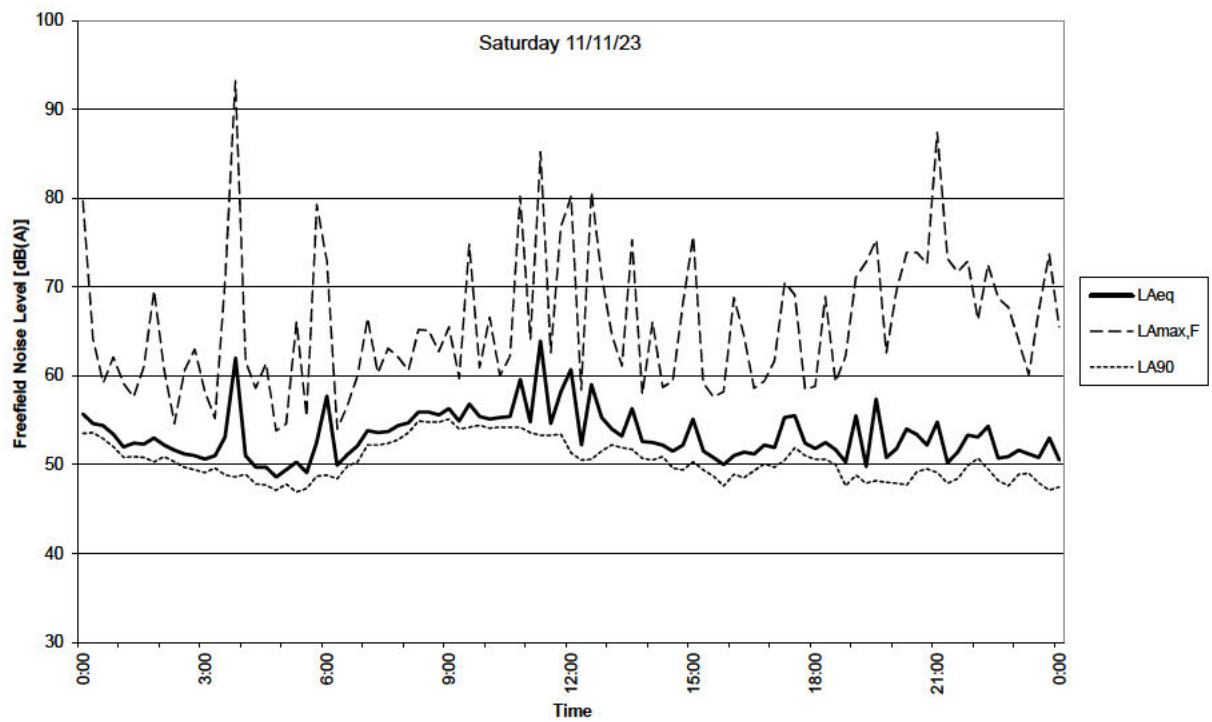
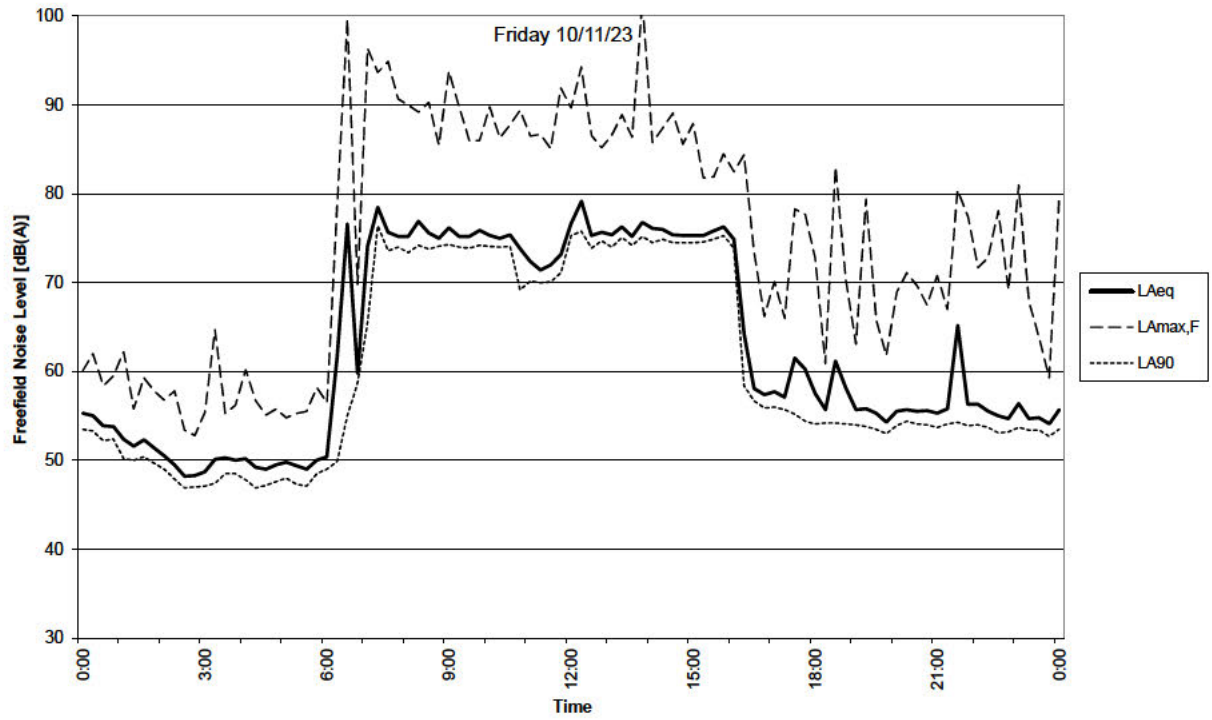
The  $L_{Amax}$  is the maximum value that the A-weighted sound pressure level reaches during a measurement period.  $L_{Amax,F}$ , or Fast, is averaged over 0.125 of a second.

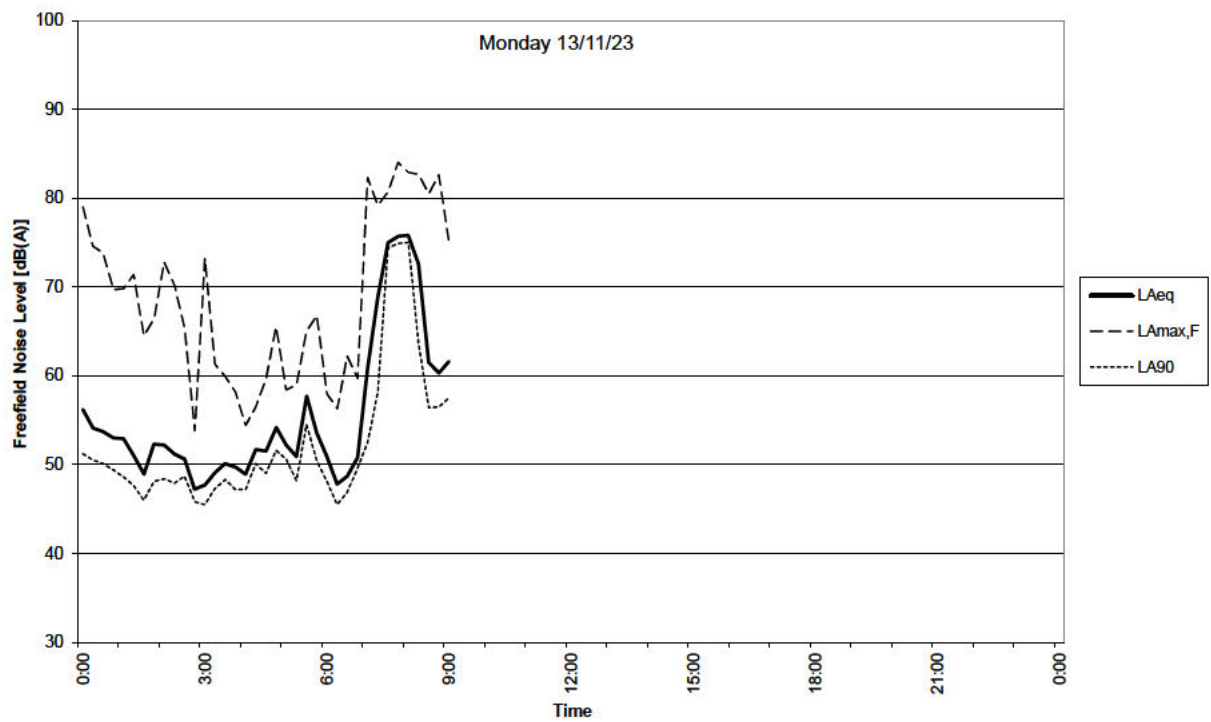
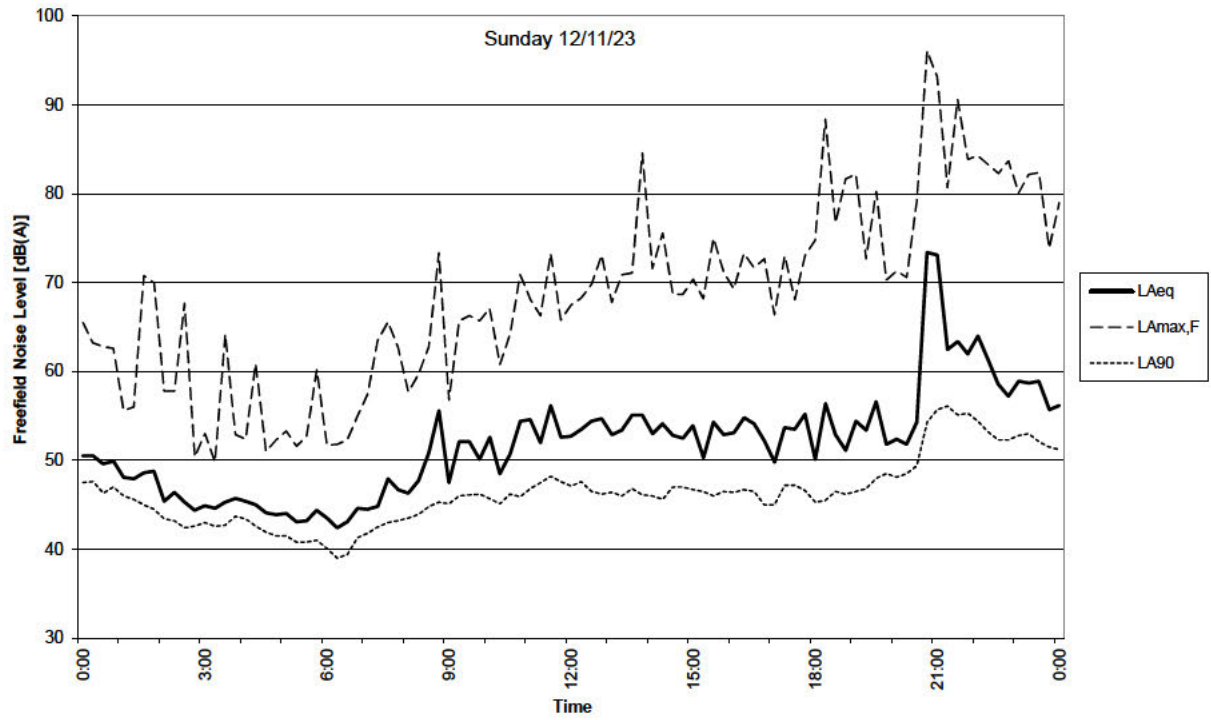
**Appendix B**  
**Results of Unattended Noise Survey**  
**Position 1 – North-Eastern Boundary**









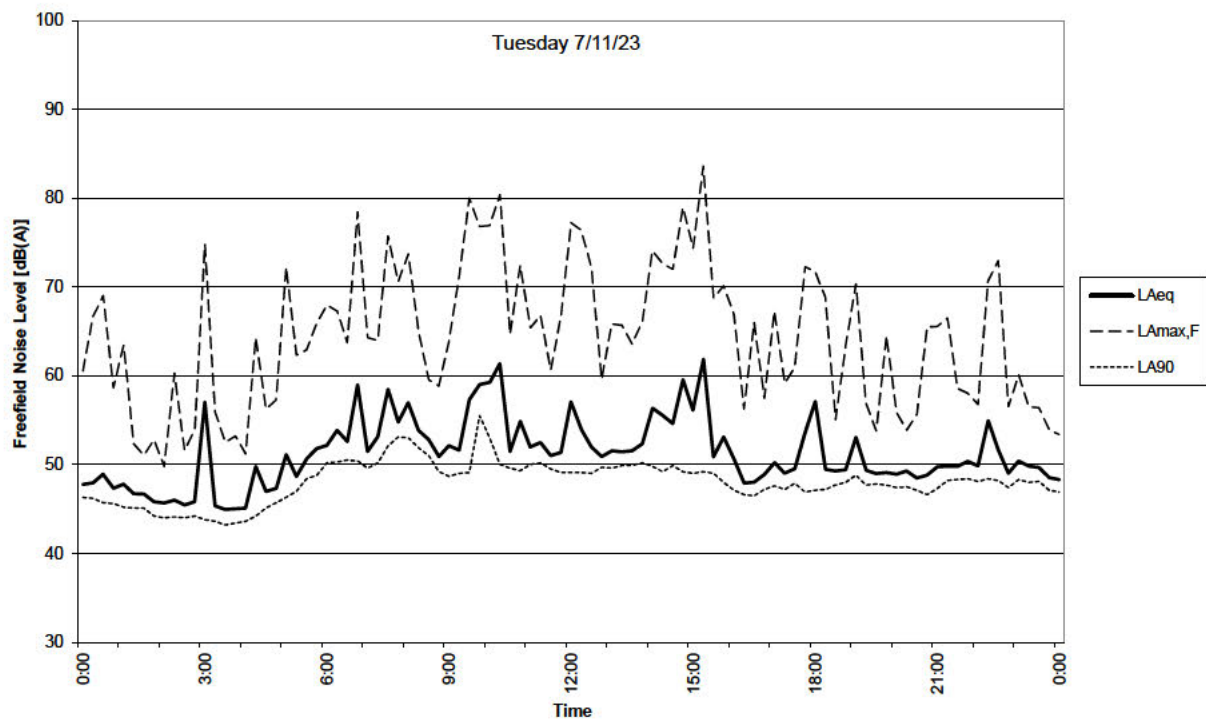
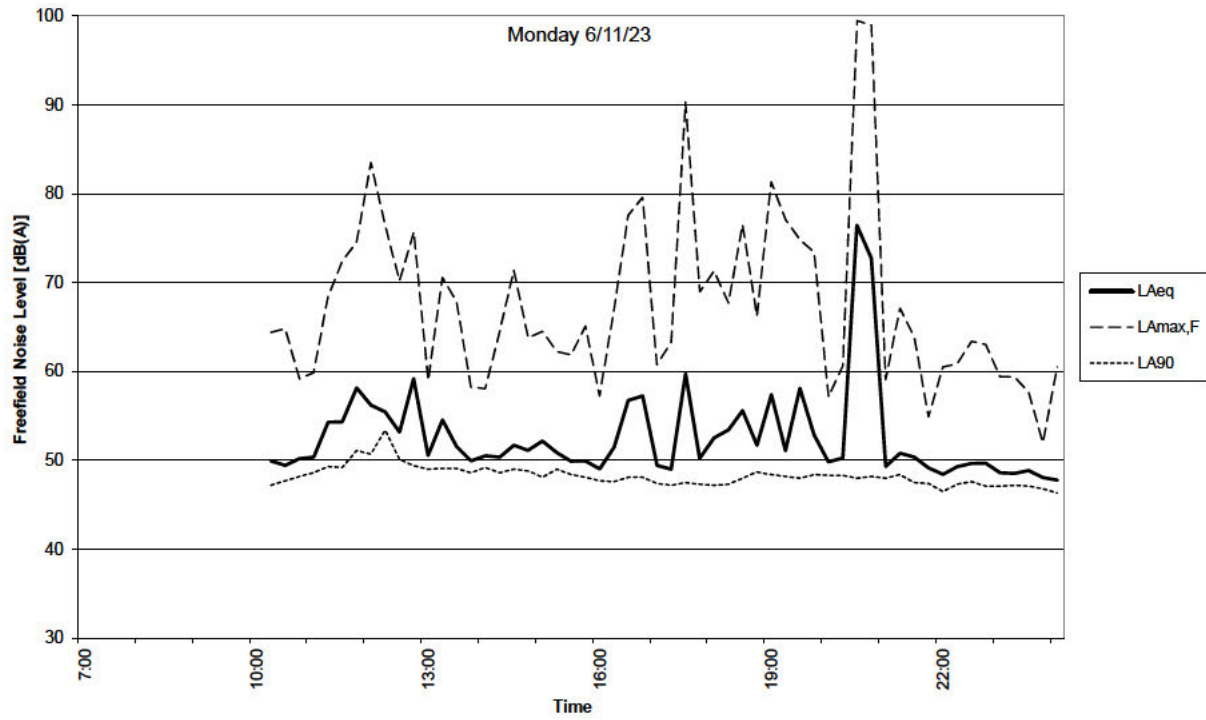


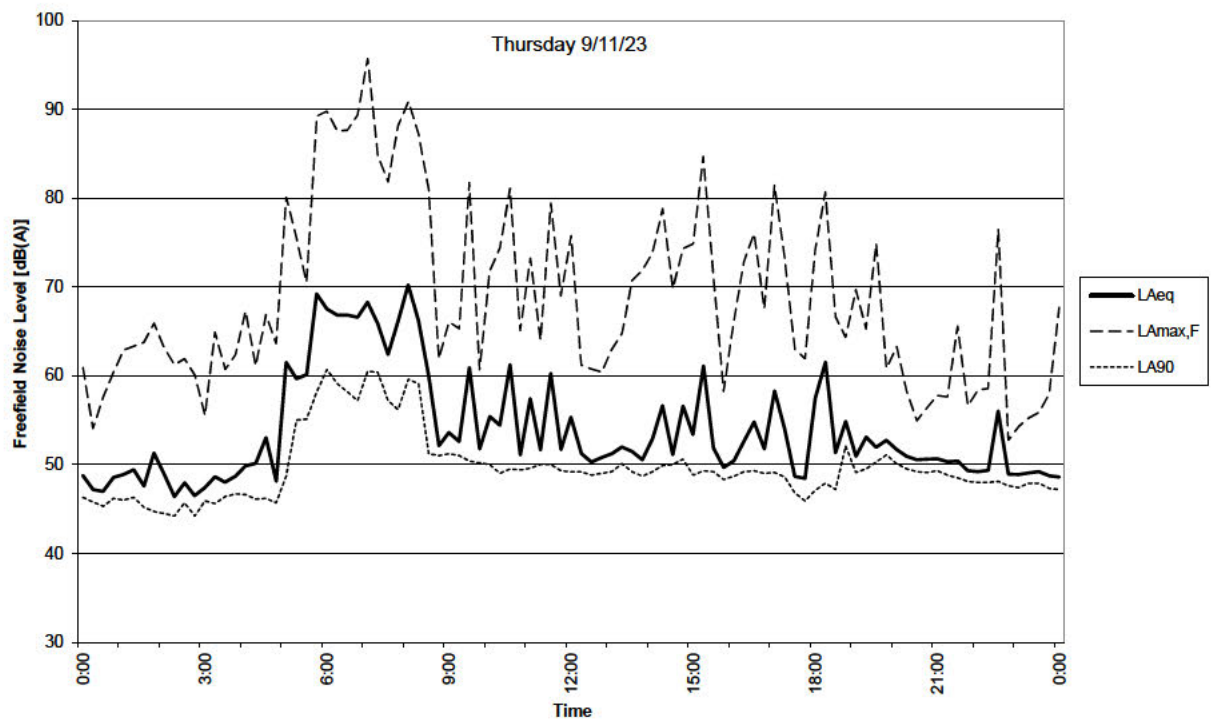
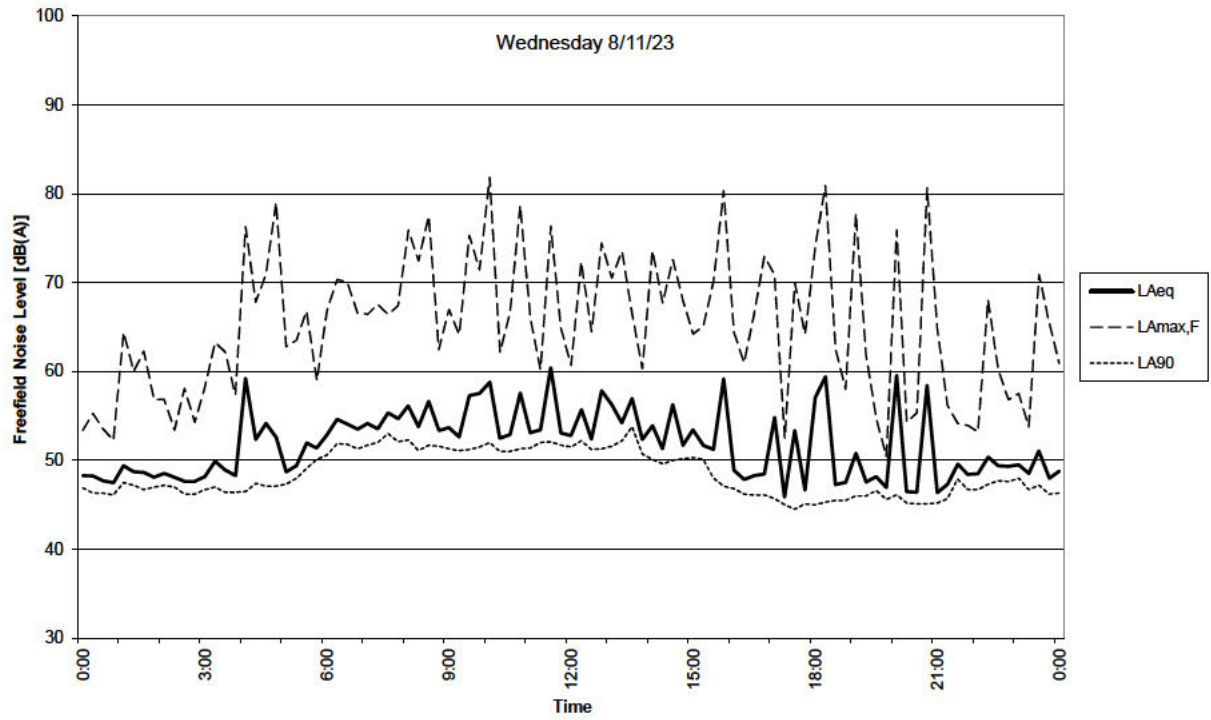


## **Appendix C**

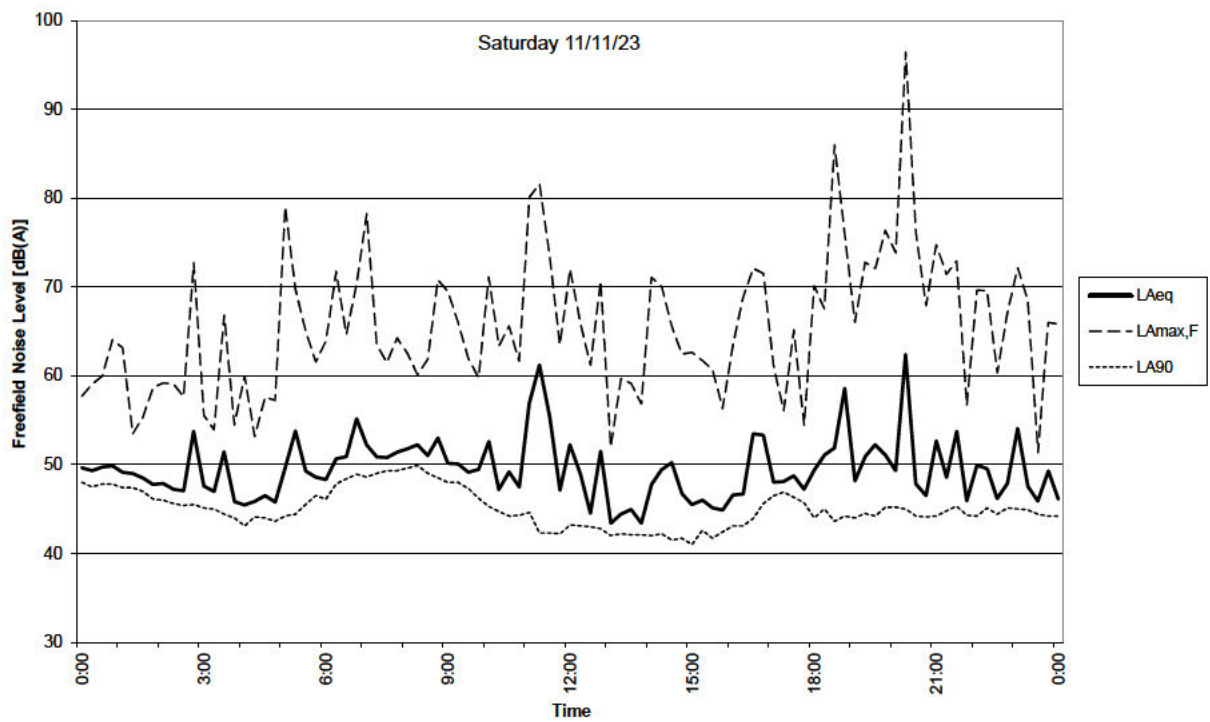
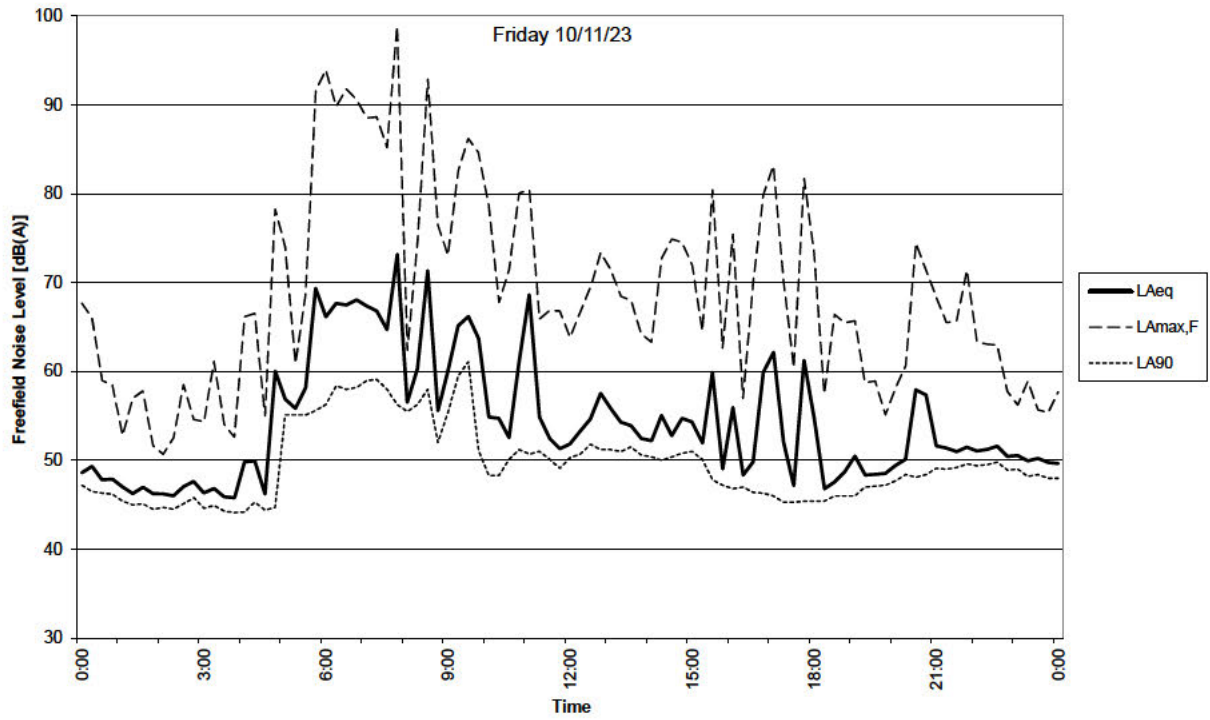
### **Results of Unattended Noise Survey**

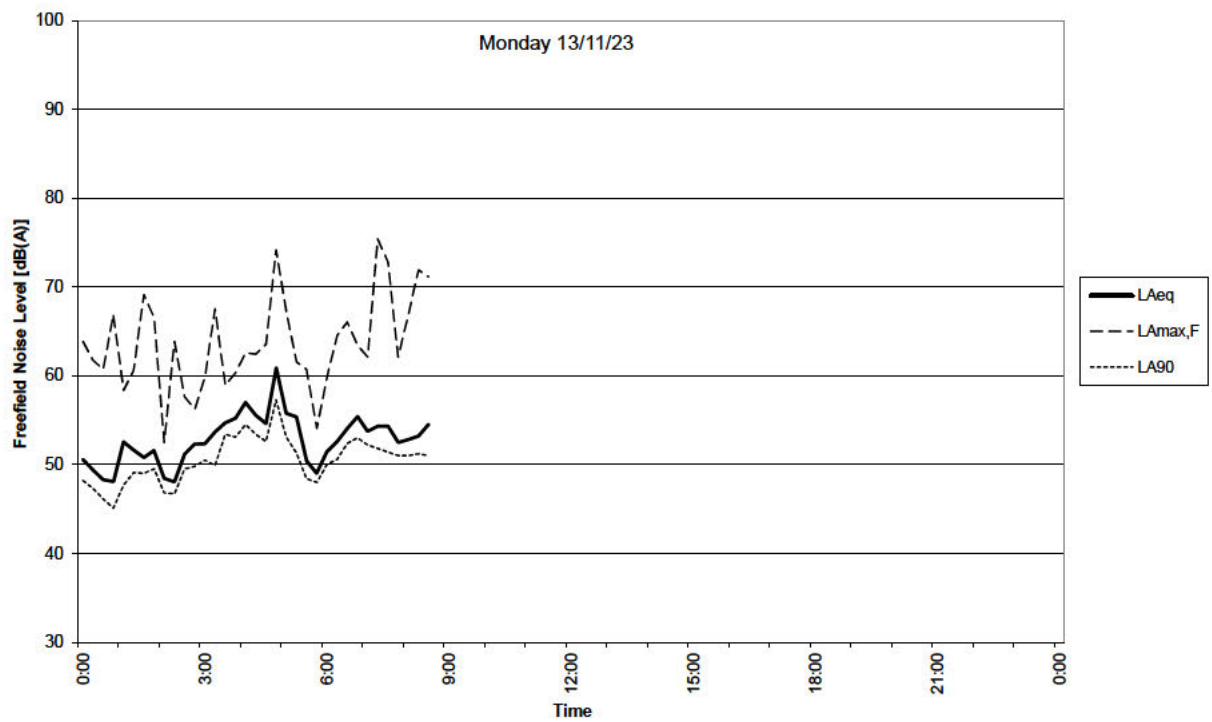
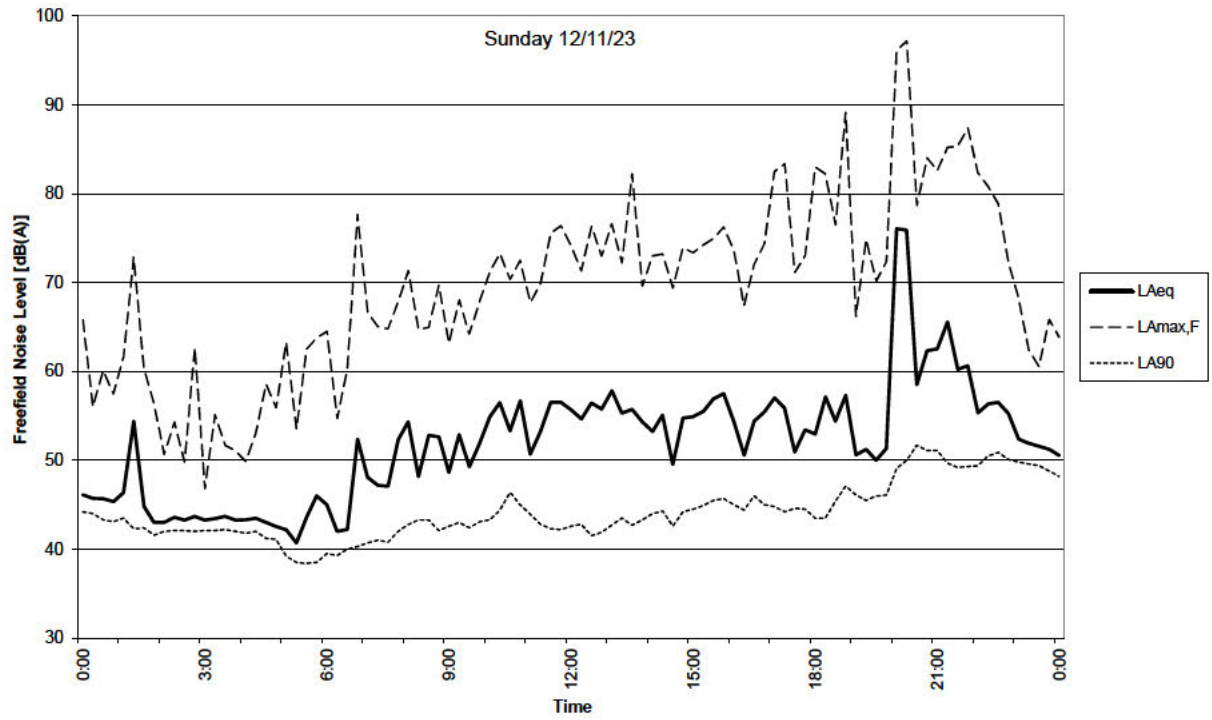
#### **Position 2 – South-Western Boundary Adjacent to Offloading Building**











## **Appendix D**

### **Noise Source Terms Used in SoundPlan Modelling**



## Great Central Way

Emis91.abs - SoundPLAN Emission Library

No.	Ementname	Unit	63 Hz	125 Hz	250 Hz	500 Hz	1k Hz	2k Hz	4k Hz	Sum
2	HGV on Access 040221	dB(A)/ Lw/unit	66.5	81.4	86.8	89.1	92.9	91.4	88.4	103.0
			74.7	86.8	89.9	89.7	95.3	91.6	86.6	
			76.6	87.7	90.8	91.2	93.6	90.8	84.8	
3	683 SuperTrak	dB(A)/ Lw/unit	73.0	83.7	88.9	94.4	98.1	96.6	94.9	107.9
			77.7	89.9	90.3	99.6	98.1	96.9	93.8	
			80.9	88.8	92.4	97.5	96.3	96.9	92.4	
4	CAT966 Loading	dB(A)/ Lw/unit	68.1	79.4	82.1	86.4	92.3	91.3	86.1	101.1
			79.6	81.6	85.3	90.9	92.3	89.4	83.0	
			81.3	81.1	84.0	90.5	92.2	88.7	80.0	
5	Kleeman MobiCat MC110i Crusher	dB(A)/ Lw/unit	74.9	87.7	89.8	98.1	97.6	95.7	92.4	107.7
			83.1	90.2	92.6	96.4	98.4	95.3	93.1	
			86.2	90.0	95.9	96.8	97.6	94.6	90.3	
6	Volvo EC380 Digging & Loading	dB(A)/ Lw/unit	67.6	76.2	78.2	93.4	91.4	90.5	84.9	100.9
			76.2	80.4	85.9	91.8	91.1	87.0	82.7	
			74.0	77.3	85.6	90.5	90.0	87.4	79.1	

## **Appendix E**

### **Calculation Details**

## Great Central Way Mean propagation Leq - Existing General Site

10

Source	Source type	Time slice	L'w dB(A)	Lw dB(A)	I or A m,m²	S m	Adiv dB	Agr dB	Abar dB	Aatm dB	Ls dB(A)	dLw dB	Lr dB(A)	
Receiver Iron Bridge Close FI GF LAeq,T dB(A) LAeq,T 66.2 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		90.88	-50.2	1.8	0.0	-0.5	52.2	0.0	52.2	
Excavator	Point	LAeq,T	100.9	100.9		53.82	-45.6	1.7	0.0	-0.3	56.7	0.0	56.7	
Excavator	Point	LAeq,T	100.9	100.9		75.84	-48.6	1.6	0.0	-0.4	53.6	0.0	53.6	
HGV Movements	Line	LAeq,T	61.2	89.2	618.7	112.92	-52.0	1.9	-1.9	-0.6	37.1	7.0	44.1	
Loading Shovel	Point	LAeq,T	101.1	101.1		156.37	-54.9	2.4	-15.1	-0.4	46.4	0.0	46.4	
Loading Shovel	Point	LAeq,T	107.7	107.7		84.33	-49.5	1.7	0.0	-0.5	59.3	0.0	59.3	
Screening Plant	Point	LAeq,T	107.9	107.9		54.29	-45.7	1.9	0.0	-0.4	63.8	0.0	63.8	
Receiver Iron Bridge Close FI F 1 LAeq,T dB(A) LAeq,T 66.5 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		90.93	-50.2	2.1	0.0	-0.5	52.5	0.0	52.5	
Excavator	Point	LAeq,T	100.9	100.9		53.89	-45.6	2.0	0.0	-0.3	57.0	0.0	57.0	
Excavator	Point	LAeq,T	100.9	100.9		75.90	-48.6	2.0	0.0	-0.4	53.9	0.0	53.9	
HGV Movements	Line	LAeq,T	61.2	89.2	618.7	112.96	-52.1	1.9	-1.8	-0.6	37.2	7.0	44.2	
Loading Shovel	Point	LAeq,T	101.1	101.1		156.38	-54.9	2.0	-5.5	-0.7	47.3	0.0	47.3	
Loading Shovel	Point	LAeq,T	107.7	107.7		84.39	-49.5	2.0	0.0	-0.5	59.6	0.0	59.6	
Screening Plant	Point	LAeq,T	107.9	107.9		54.32	-45.7	2.2	0.0	-0.4	64.0	0.0	64.0	
Receiver Neasdon Lane FI GF LAeq,T dB(A) LAeq,T 37.9 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		146.15	-54.3	2.4	-20.9	-0.4	27.9	0.0	27.9	
Excavator	Point	LAeq,T	100.9	100.9		181.15	-56.2	2.3	-20.9	-0.5	25.7	0.0	25.7	
Excavator	Point	LAeq,T	100.9	100.9		158.60	-55.0	2.2	-21.2	-0.4	26.4	0.0	26.4	
HGV Movements	Line	LAeq,T	61.2	89.2	618.7	156.86	-54.9	2.3	-21.9	-0.5	14.5	7.0	21.5	
Loading Shovel	Point	LAeq,T	101.1	101.1		150.92	-54.6	2.4	-24.3	-0.7	23.9	0.0	23.9	
Loading Shovel	Point	LAeq,T	107.7	107.7		150.25	-54.5	2.2	-20.6	-0.4	34.3	0.0	34.3	
Screening Plant	Point	LAeq,T	107.9	107.9		182.06	-56.2	2.3	-21.3	-0.7	32.1	0.0	32.1	
Receiver Neasdon Lane FI F 1 LAeq,T dB(A) LAeq,T 39.6 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		146.17	-54.3	2.0	-19.1	-0.3	29.4	0.0	29.4	
Excavator	Point	LAeq,T	100.9	100.9		181.17	-56.2	1.9	-18.6	-0.4	27.7	0.0	27.7	
Excavator	Point	LAeq,T	100.9	100.9		158.63	-55.0	1.9	-19.1	-0.4	28.4	0.0	28.4	
HGV Movements	Line	LAeq,T	61.2	89.2	618.7	156.88	-54.9	1.9	-20.3	-0.4	15.8	7.0	22.8	
Loading Shovel	Point	LAeq,T	101.1	101.1		150.93	-54.6	2.0	-24.3	-0.7	23.6	0.0	23.6	
Loading Shovel	Point	LAeq,T	107.7	107.7		150.27	-54.5	1.9	-18.7	-0.3	35.9	0.0	35.9	
Screening Plant	Point	LAeq,T	107.9	107.9		182.06	-56.2	2.1	-19.0	-0.5	34.4	0.0	34.4	
Receiver Neasdon Station Growth Area FI GF LAeq,T dB(A) LAeq,T 64.8 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		89.30	-50.0	2.1	0.0	-0.5	53.1	0.0	53.1	
Excavator	Point	LAeq,T	100.9	100.9		83.13	-49.4	2.0	0.0	-0.4	53.1	0.0	53.1	
Excavator	Point	LAeq,T	100.9	100.9		77.51	-48.8	2.0	0.0	-0.4	53.7	0.0	53.7	
HGV Movements	Line	LAeq,T	61.2	89.2	618.7	115.59	-52.3	2.0	-0.2	-0.6	38.6	7.0	45.5	
Loading Shovel	Point	LAeq,T	101.1	101.1		170.58	-55.6	2.0	0.0	-0.9	47.2	0.0	47.2	
Loading Shovel	Point	LAeq,T	107.7	107.7		77.73	-48.8	1.9	0.0	-0.5	60.5	0.0	60.5	
Screening Plant	Point	LAeq,T	107.9	107.9		79.02	-48.9	2.2	0.0	-0.6	60.6	0.0	60.6	
Receiver Traveller Site E FI GF LAeq,T dB(A) LAeq,T 44.5 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		158.06	-55.0	2.3	-22.5	-0.5	30.0	0.0	30.0	
Excavator	Point	LAeq,T	100.9	100.9		197.33	-56.9	2.5	-22.7	-0.6	32.7	0.0	32.7	
Excavator	Point	LAeq,T	100.9	100.9		179.01	-56.0	2.4	-22.4	-0.6	33.0	0.0	33.0	
HGV Movements	Line	LAeq,T	61.2	89.2	618.7	103.79	-51.3	1.9	-14.4	-0.4	25.8	7.0	32.8	
Loading Shovel	Point	LAeq,T	101.1	101.1		72.35	-48.2	2.0	-24.0	-0.3	30.6	0.0	30.6	
Loading Shovel	Point	LAeq,T	107.7	107.7		171.97	-55.7	2.3	-22.0	-0.5	35.8	0.0	35.8	
Screening Plant	Point	LAeq,T	107.9	107.9		202.52	-57.1	2.5	-22.9	-0.9	42.1	0.0	42.1	
Receiver Traveller Site W FI GF LAeq,T dB(A) LAeq,T 43.8 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		152.96	-54.7	2.4	-18.3	-0.3	31.9	0.0	31.9	
Excavator	Point	LAeq,T	100.9	100.9		182.28	-56.2	2.4	-18.6	-0.4	30.8	0.0	30.8	
Excavator	Point	LAeq,T	100.9	100.9		170.74	-55.6	2.3	-18.4	-0.4	31.9	0.0	31.9	
HGV Movements	Line	LAeq,T	61.2	89.2	618.7	65.38	-47.3	1.9	-19.4	-0.1	25.8	7.0	32.8	
Loading Shovel	Point	LAeq,T	101.1	101.1		73.07	-48.3	1.9	-20.6	-0.2	36.4	0.0	36.4	
Loading Shovel	Point	LAeq,T	107.7	107.7		166.48	-55.4	2.3	-17.7	-0.3	39.1	0.0	39.1	
Screening Plant	Point	LAeq,T	107.9	107.9		188.18	-56.5	2.4	-19.1	-0.5	37.1	0.0	37.1	

LF Acoustics

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## Great Central Way Mean propagation Leq - Existing General Site

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Source	Source type	Time slice	L'w dB(A)	Lw dB(A)	I or A m,m²	S m	Adiv dB	Agr dB	Abar dB	Aatm dB	Ls dB(A)	dLw dB	Lr dB(A)	
Receiver Wharton Close FI GF LAeq,T dB(A) LAeq,T 50.9 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		181.26	-56.2	2.7	-5.3	-0.9	41.4	0.0	41.4	
Excavator	Point	LAeq,T	100.9	100.9		224.06	-58.0	2.6	-5.0	-1.0	39.4	0.0	39.4	
Excavator	Point	LAeq,T	100.9	100.9		201.10	-57.1	2.5	-5.4	-0.8	40.1	0.0	40.1	
HGV MOvements	Line	LAeq,T	61.2	89.2	618.7	160.11	-55.1	2.3	-13.2	-0.8	23.4	7.0	30.4	
Loading Shovel	Point	LAeq,T	101.1	101.1		127.42	-53.1	2.1	-23.5	-0.5	26.1	0.0	26.1	
Loading Shovel	Point	LAeq,T	107.7	107.7		192.22	-56.7	2.5	-5.6	-0.9	47.0	0.0	47.0	
Screening Plant	Point	LAeq,T	107.9	107.9		227.57	-58.1	2.6	-5.1	-1.4	46.0	0.0	46.0	
Receiver Wharton Close FI F 1 LAeq,T dB(A) LAeq,T 55.8 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		181.29	-56.2	2.0	0.0	-0.9	46.0	0.0	46.0	
Excavator	Point	LAeq,T	100.9	100.9		224.08	-58.0	2.3	0.0	-1.0	44.3	0.0	44.3	
Excavator	Point	LAeq,T	100.9	100.9		201.12	-57.1	2.1	0.0	-0.9	45.1	0.0	45.1	
HGV MOvements	Line	LAeq,T	61.2	89.2	618.7	160.17	-55.1	1.9	-7.8	-1.0	28.0	7.0	35.0	
Loading Shovel	Point	LAeq,T	101.1	101.1		127.44	-53.1	2.0	-23.4	-0.5	26.2	0.0	26.2	
Loading Shovel	Point	LAeq,T	107.7	107.7		192.25	-56.7	2.0	0.0	-1.0	52.0	0.0	52.0	
Screening Plant	Point	LAeq,T	107.9	107.9		227.58	-58.1	2.3	0.0	-1.4	50.7	0.0	50.7	
Receiver Wharton Close FI F 2 LAeq,T dB(A) LAeq,T 55.7 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		181.35	-56.2	2.0	0.0	-0.9	46.0	0.0	46.0	
Excavator	Point	LAeq,T	100.9	100.9		224.13	-58.0	1.9	0.0	-1.0	43.8	0.0	43.8	
Excavator	Point	LAeq,T	100.9	100.9		201.18	-57.1	1.9	0.0	-0.9	44.9	0.0	44.9	
HGV MOvements	Line	LAeq,T	61.2	89.2	618.7	160.24	-55.1	1.9	-7.8	-0.9	28.3	7.0	35.3	
Loading Shovel	Point	LAeq,T	101.1	101.1		127.51	-53.1	2.1	-23.3	-0.5	26.2	0.0	26.2	
Loading Shovel	Point	LAeq,T	107.7	107.7		192.31	-56.7	1.9	0.0	-1.0	51.9	0.0	51.9	
Screening Plant	Point	LAeq,T	107.9	107.9		227.62	-58.1	2.2	0.0	-1.4	50.5	0.0	50.5	

LF Acoustics

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## Great Central Way Mean propagation Leq - Proposed General Site

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Source	Source type	Time slice	L'w dB(A)	Lw dB(A)	I or A m,m²	S m	Adiv dB	Agr dB	Abar dB	Aatm dB	Ls dB(A)	dLw dB	Lr dB(A)
Receiver Iron Bridge Close FI GF LAeq,T dB(A) LAeq,T 55.1 dB(A)													
Crusher	Point	LAeq,T	101.1	101.1	419.6	119.28	-52.5	2.0	-20.0	-0.4	33.8	0.0	33.8
Crusher	Point	LAeq,T	101.1	101.1		69.35	-47.8	1.9	-12.7	-0.2	42.5	0.0	42.5
Excavator	Point	LAeq,T	100.9	100.9		32.38	-41.2	1.9	-23.4	-0.1	38.5	0.0	38.5
Excavator	Point	LAeq,T	100.9	100.9		40.62	-43.2	1.8	-22.7	-0.2	47.0	0.0	47.0
HGV Movements	Line	LAeq,T	61.2	87.5		61.52	-46.8	1.9	-2.1	-0.2	41.1	11.8	52.8
Loading Shovel	Point	LAeq,T	101.1	101.1		156.37	-54.9	2.4	-18.8	-0.5	38.4	0.0	38.4
Loading Shovel	Point	LAeq,T	107.7	107.7		47.38	-44.5	1.8	-21.8	-0.2	43.0	0.0	43.0
Screening Plant	Point	LAeq,T	107.9	107.9		37.85	-42.6	2.0	-23.4	-0.2	44.3	0.0	44.3
Receiver Iron Bridge Close FI F 1 LAeq,T dB(A) LAeq,T 55.3 dB(A)													
Crusher	Point	LAeq,T	101.1	101.1	419.6	119.30	-52.5	2.0	-19.4	-0.4	35.9	0.0	35.9
Crusher	Point	LAeq,T	101.1	101.1		69.41	-47.8	2.1	-12.5	-0.2	42.9	0.0	42.9
Excavator	Point	LAeq,T	100.9	100.9		32.48	-41.2	2.1	-23.4	-0.1	38.7	0.0	38.7
Excavator	Point	LAeq,T	100.9	100.9		40.70	-43.2	2.1	-22.6	-0.2	46.7	0.0	46.7
HGV Movements	Line	LAeq,T	61.2	87.5		61.68	-46.8	2.0	-2.1	-0.2	41.2	11.8	53.0
Loading Shovel	Point	LAeq,T	101.1	101.1		156.38	-54.9	2.0	-18.1	-0.4	40.5	0.0	40.5
Loading Shovel	Point	LAeq,T	107.7	107.7		47.46	-44.5	2.0	-21.8	-0.2	43.2	0.0	43.2
Screening Plant	Point	LAeq,T	107.9	107.9		37.87	-42.6	2.2	-23.3	-0.2	44.5	0.0	44.5
Receiver Neasdon Lane FI GF LAeq,T dB(A) LAeq,T 38.7 dB(A)													
Crusher	Point	LAeq,T	101.1	101.1	419.6	167.81	-55.5	2.5	-23.0	-0.6	26.3	0.0	26.3
Crusher	Point	LAeq,T	101.1	101.1		168.94	-55.5	2.6	-20.5	-0.4	29.0	0.0	29.0
Excavator	Point	LAeq,T	100.9	100.9		203.17	-57.1	2.5	-21.7	-0.6	26.4	0.0	26.4
Excavator	Point	LAeq,T	100.9	100.9		193.83	-56.7	2.4	-21.7	-0.6	28.1	0.0	28.1
HGV Movements	Line	LAeq,T	61.2	87.5		152.95	-54.7	2.3	-22.1	-0.5	13.2	11.8	25.0
Loading Shovel	Point	LAeq,T	101.1	101.1		150.92	-54.6	2.4	-24.3	-0.7	25.0	0.0	25.0
Loading Shovel	Point	LAeq,T	107.7	107.7		187.06	-56.4	2.5	-21.5	-0.6	31.6	0.0	31.6
Screening Plant	Point	LAeq,T	107.9	107.9		197.54	-56.9	2.4	-22.0	-0.8	34.7	0.0	34.7
Receiver Neasdon Lane FI F 1 LAeq,T dB(A) LAeq,T 40.6 dB(A)													
Crusher	Point	LAeq,T	101.1	101.1	419.6	167.82	-55.5	2.0	-22.5	-0.5	26.9	0.0	26.9
Crusher	Point	LAeq,T	101.1	101.1		168.96	-55.5	2.0	-18.5	-0.4	30.7	0.0	30.7
Excavator	Point	LAeq,T	100.9	100.9		203.18	-57.1	2.2	-19.5	-0.5	28.5	0.0	28.5
Excavator	Point	LAeq,T	100.9	100.9		193.84	-56.7	2.1	-19.6	-0.5	30.4	0.0	30.4
HGV Movements	Line	LAeq,T	61.2	87.5		152.97	-54.7	1.9	-20.6	-0.4	14.7	11.8	26.4
Loading Shovel	Point	LAeq,T	101.1	101.1		150.93	-54.6	2.0	-24.3	-0.7	25.1	0.0	25.1
Loading Shovel	Point	LAeq,T	107.7	107.7		187.08	-56.4	2.0	-19.7	-0.5	33.1	0.0	33.1
Screening Plant	Point	LAeq,T	107.9	107.9		197.54	-56.9	2.1	-19.8	-0.6	37.1	0.0	37.1
Receiver Neasdon Station Growth Area FI GF LAeq,T dB(A) LAeq,T 65.2 dB(A)													
Crusher	Point	LAeq,T	101.1	101.1	419.6	152.89	-54.7	2.0	0.0	-0.8	48.8	0.0	48.8
Crusher	Point	LAeq,T	101.1	101.1		98.38	-50.9	2.0	-11.1	-0.3	49.9	0.0	49.9
Excavator	Point	LAeq,T	100.9	100.9		97.80	-50.8	1.9	0.0	-0.5	54.1	0.0	54.1
Excavator	Point	LAeq,T	100.9	100.9		96.36	-50.7	2.0	0.0	-0.5	53.8	0.0	53.8
HGV Movements	Line	LAeq,T	61.2	87.5		91.12	-50.2	1.9	-0.3	-0.5	39.0	11.8	50.8
Loading Shovel	Point	LAeq,T	101.1	101.1		170.58	-55.6	2.0	0.0	-0.9	48.7	0.0	48.7
Loading Shovel	Point	LAeq,T	107.7	107.7		91.88	-50.3	1.9	0.0	-0.5	60.6	0.0	60.6
Screening Plant	Point	LAeq,T	107.9	107.9		93.65	-50.4	2.1	0.0	-0.7	61.1	0.0	61.1
Receiver Traveller Site E FI GF LAeq,T dB(A) LAeq,T 41.9 dB(A)													
Crusher	Point	LAeq,T	101.1	101.1	419.6	108.76	-51.7	2.0	-23.4	-0.4	28.7	0.0	28.7
Crusher	Point	LAeq,T	101.1	101.1		168.64	-55.5	2.4	-22.8	-0.6	26.9	0.0	26.9
Excavator	Point	LAeq,T	100.9	100.9		211.82	-57.5	2.6	-22.9	-0.7	29.2	0.0	29.2
Excavator	Point	LAeq,T	100.9	100.9		200.09	-57.0	2.5	-22.9	-0.6	29.5	0.0	29.5
HGV Movements	Line	LAeq,T	61.2	87.5		129.30	-53.2	2.0	-23.7	-0.5	15.1	11.8	26.8
Loading Shovel	Point	LAeq,T	101.1	101.1		72.35	-48.2	2.0	-24.0	-0.3	31.5	0.0	31.5
Loading Shovel	Point	LAeq,T	107.7	107.7		195.85	-56.8	2.5	-22.3	-0.6	37.0	0.0	37.0
Screening Plant	Point	LAeq,T	107.9	107.9		208.11	-57.4	2.5	-23.1	-0.9	37.6	0.0	37.6
Receiver Traveller Site W FI GF LAeq,T dB(A) LAeq,T 42.9 dB(A)													
Crusher	Point	LAeq,T	101.1	101.1		89.40	-50.0	1.9	-20.6	-0.2	34.3	0.0	34.3

LF Acoustics

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## Great Central Way Mean propagation Leq - Proposed General Site

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Source	Source type	Time slice	L'w dB(A)	Lw dB(A)	I or A m,m²	S m	Adiv dB	Agr dB	Abar dB	Aatm dB	Ls dB(A)	dLw dB	Lr dB(A)	
Crusher	Point	LAeq,T	101.1	101.1		153.97	-54.7	2.4	-20.0	-0.4	31.3	0.0	31.3	
Excavator	Point	LAeq,T	100.9	100.9		190.29	-56.6	2.5	-21.3	-0.5	28.7	0.0	28.7	
Excavator	Point	LAeq,T	100.9	100.9		179.97	-56.1	2.4	-20.8	-0.5	29.9	0.0	29.9	
HGV Movements	Line	LAeq,T	61.2	87.5	419.6	130.76	-53.3	2.0	-20.8	-0.4	17.9	11.8	29.6	
Loading Shovel	Point	LAeq,T	101.1	101.1		73.07	-48.3	1.9	-22.7	-0.3	34.2	0.0	34.2	
Loading Shovel	Point	LAeq,T	107.7	107.7		177.84	-56.0	2.4	-19.3	-0.4	38.2	0.0	38.2	
Screening Plant	Point	LAeq,T	107.9	107.9		188.18	-56.5	2.4	-20.9	-0.7	35.6	0.0	35.6	
Receiver Wharton Close FI GF LAeq,T dB(A) LAeq,T 50.5 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		162.28	-55.2	2.5	-21.0	-0.4	28.5	0.0	28.5	
Crusher	Point	LAeq,T	101.1	101.1		200.42	-57.0	2.8	-19.0	-0.4	27.4	0.0	27.4	
Excavator	Point	LAeq,T	100.9	100.9		243.97	-58.7	2.7	-14.1	-0.6	37.9	0.0	37.9	
Excavator	Point	LAeq,T	100.9	100.9		232.33	-58.3	2.6	-16.2	-0.5	37.2	0.0	37.2	
HGV Movements	Line	LAeq,T	61.2	87.5	419.6	171.04	-55.7	2.3	-10.0	-0.9	23.7	11.8	35.5	
Loading Shovel	Point	LAeq,T	101.1	101.1		127.42	-53.1	2.1	-23.5	-0.5	27.4	0.0	27.4	
Loading Shovel	Point	LAeq,T	107.7	107.7		226.31	-58.1	2.7	-5.6	-1.1	45.6	0.0	45.6	
Screening Plant	Point	LAeq,T	107.9	107.9		238.92	-58.6	2.7	-5.3	-1.4	47.7	0.0	47.7	
Receiver Wharton Close FI F 1 LAeq,T dB(A) LAeq,T 55.5 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		162.29	-55.2	2.0	-20.4	-0.4	28.9	0.0	28.9	
Crusher	Point	LAeq,T	101.1	101.1		200.44	-57.0	2.2	-11.6	-0.6	34.1	0.0	34.1	
Excavator	Point	LAeq,T	100.9	100.9		243.98	-58.7	2.5	-4.2	-1.0	44.0	0.0	44.0	
Excavator	Point	LAeq,T	100.9	100.9		232.34	-58.3	2.4	-5.9	-0.8	43.2	0.0	43.2	
HGV Movements	Line	LAeq,T	61.2	87.5	419.6	171.12	-55.7	2.0	-4.5	-1.0	28.6	11.8	40.4	
Loading Shovel	Point	LAeq,T	101.1	101.1		127.44	-53.1	2.0	-23.3	-0.5	27.8	0.0	27.8	
Loading Shovel	Point	LAeq,T	107.7	107.7		226.33	-58.1	2.3	0.0	-1.2	50.8	0.0	50.8	
Screening Plant	Point	LAeq,T	107.9	107.9		238.92	-58.6	2.4	0.0	-1.4	52.5	0.0	52.5	
Receiver Wharton Close FI F 2 LAeq,T dB(A) LAeq,T 55.2 dB(A)														
Crusher	Point	LAeq,T	101.1	101.1		162.35	-55.2	2.0	-19.8	-0.4	29.6	0.0	29.6	
Crusher	Point	LAeq,T	101.1	101.1		200.49	-57.0	2.0	-11.4	-0.6	34.1	0.0	34.1	
Excavator	Point	LAeq,T	100.9	100.9		244.02	-58.7	1.9	-4.0	-1.0	43.5	0.0	43.5	
Excavator	Point	LAeq,T	100.9	100.9		232.38	-58.3	1.9	-5.7	-0.8	42.7	0.0	42.7	
HGV Movements	Line	LAeq,T	61.2	87.5	419.6	171.19	-55.7	1.9	-4.6	-1.0	28.7	11.8	40.4	
Loading Shovel	Point	LAeq,T	101.1	101.1		127.51	-53.1	2.1	-23.2	-0.5	28.2	0.0	28.2	
Loading Shovel	Point	LAeq,T	107.7	107.7		226.37	-58.1	1.9	0.0	-1.2	50.3	0.0	50.3	
Screening Plant	Point	LAeq,T	107.9	107.9		238.95	-58.6	2.2	0.0	-1.4	52.2	0.0	52.2	

LF Acoustics

2



## **APPENDIX 10**

### Noise Management Plan



# NOISE MANAGEMENT PLAN, V1

for the Physical Treatment of Wastes  
at

Great Central Way, Wembley,  
London, NW10 0UZ

**Report prepared on behalf of:**  
Sewells Reservoir Construction Limited



**Report Date:**  
November 2024

This Noise Management Plan was prepared by PDE Consulting  
Limited on behalf of Sewells Reservoir Construction Limited



## Noise Management Plan - Revision History

The following revision history sheet will be completed to detail any issued changes to this documentation:

Version No.	Version Date	Description
Original	November 2024	Original Noise Management Plan (NMP) produced in support of Permit Variation Application.

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## DRAWINGS

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## APPENDICES

Appendix 1	Potentially Sensitive Receptor plan
Appendix 2	Incident Report Form
Appendix 3	Noise Complaint Form

# 1. INTRODUCTION

## Background

- 1.1 This Noise Emissions Management Plan (DEMP) has been prepared by PDE Consulting Limited (the 'Agent') on behalf of Sewells Reservoir Construction Limited (the 'Operator') to support an application to vary an environmental permit application for the permitted waste operations undertaken at Great Central Way, Wembley, London, NW10 0UZ (the "Site").
- 1.2 Standard rules environmental permit No. EPR/LB3101LL was issued to the Operator on 20 June 2022. It authorises standard rules set SR2009 No 5: inert and excavation waste transfer station below 250,000 tonnes per annum. Under the standard rules permit, wastes can be bulked up for disposal or recovery elsewhere and can be manually sorted or separated for recovery but the rules do not allow any waste treatment activities such as screening and crushing.
- 1.3 It is proposed to vary the standard rules permit to a bespoke permit. The bespoke application will allow the following additional activities:
  - Crushing and screening of wastes;
  - An increase in waste throughputs to 500,000 tonnes per annum;
  - Add three additional waste types only.
- 1.4 The Site is located in Wembley approximately 300 m east of Brent, approximately 800 m south of Neasden and approximately 1.8 km east of Wembley Stadium. It is centred at National Grid Reference (NGR) TQ 213 852 as shown on Drawing No. 0100 v3. It covers an area of approximately 0.8 hectares. The Site is accessed off Great Central Way. It is located in a Strategic Industrial Location.

## Regulatory Requirements

- 1.5 The standard noise condition for environmental permits requires that:

*"Emissions from the activities shall be free from noise at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable, to minimise, the noise and vibration."*
- 1.6 This condition requires an operator to take appropriate measures to prevent or minimise noise. The measures required need to be what are reasonable, good practice and balances the costs and benefits to prevent or minimise noise.
- 1.7 Guidance on the Environment Agency (EA) website ([www.gov.uk](http://www.gov.uk)) states that the following measures must be considered to prevent and minimise noise emissions:
  - Factor noise levels in to your plant design, and your plans for maintaining and operating your plant;
  - Position noisy operations (that increase the noise in any area above background noise) away from delivery or vehicle routes;



- Use noise reduction equipment like balancing fans and fixing loose covers on noisy operations;
  - Isolate noisy operations through measures like acoustic enclosures, silencers, closed doors and walls;
  - Avoid noisy work during evenings and weekends;
  - Switch off your entire plant, or specific vehicles, ventilation units and equipment, when they're not in use;
  - Tell the EA and neighbours about any temporary work alterations that could cause significant noise; and
  - Don't carry out such work on weekends or evenings after 5pm.
- 1.8 The same guidance also states that if complaints are received, noise levels must be monitored at different locations and times on Site to identify the problem and / or stop that activity until sufficient mitigation measures have been developed.
- 1.9 This NMP has been produced in accordance with EA guidance document Integrated Pollution Prevention and Control (IPPC), Horizontal Guidance note for Noise, Part 2 - Noise Assessment and Control (version 3, June 2004).
- 1.10 The guidance describes the hierarchy for the control of noise emissions as follows:
- **Prevent** generation of noise at source by good design and maintenance.
  - **Minimise or contain** noise at source by observing good operational techniques and management practice.
  - **Use physical barriers or enclosures** to prevent transmission to other media.
  - **Increase the distance** between the source and receiver.
  - **Sympathetic timing** and control of unavoidably noisy operations.
- 1.11 A NMP must be written explaining how noise will be prevented and minimised and state if it is likely that noise will cause nuisance beyond the Site boundary.
- 1.12 The aim of this NMP is to:
- Ensure compliance with the mitigation measures proposed in section 4 of this report;
  - Formalise actions to be taken in the event of a noise complaint;
  - Ensure any noise complaints are dealt with effectively and a record maintained;
  - Investigate noise complaints and implement measures to prevent further occurrences; and
  - Inform continuing improvements to noise control and Site management and update the NMP reflecting such improvements.
- 1.13 This document will form part of the Site specific Environmental Management System (EMS) for the waste operation. A copy of the EMS will be kept on Site in the weighbridge office.
- 1.14 The responsibility for the implementation of the NMP will fall to the Site manager.
- 1.15 Staff at all levels will receive the necessary training and instruction in their duties relating to the control of all operations and the potential sources of noise emissions.

## 2. WASTE OPERATION

- 2.1 Waste will be delivered to Site in covered HGV's and stockpiled before being treated to produce soil, soil substitutes and aggregates only.
- 2.2 It is proposed that a dedicated covered area is constructed close to the northern boundary of the Site. The dedicated covered area is labelled as Building B5 on Drawing No. 0100 v3. The dedicated covered area will have solid façades, constructed using steel cladding along the northern and western sides and will be fully open on the eastern and southern sides which face into the Site, to allow safe access. Cross sections through the dedicated covered storage area are shown on Drawing No. 106 v3 as sections E5 and E6.
- 2.3 Wastes that are imported to the Site to be treated will be tipped into separate stockpiles in the dedicated covered area prior to treatment.
- 2.4 The crusher and screener used to process recycled materials will operate within the dedicated covered area. Two excavators would operate in this area to load the plants, and a loading shovel would work in this area and outside, managing the recycled materials, loading HGVs, and loading aggregate trans when required.
- 2.5 Processed materials will be stored outside adjacent to the covered area as shown on Drawing No. 0100 v3 prior to being exported from Site by road or potentially loaded back onto the trains. The processed wastes storage area will have 7.5 m tall bay walls to the south and west.
- 2.6 Clay based waste will be imported to Site via HGV's and stored in Area Y2 on the eastern side of the Site shown on Drawing No. 0100 v3 for loading onto trains. This activity is ongoing in accordance with the standard rules permit. These wastes will not be treated on Site.
- 2.7 It is proposed that the maximum annual throughputs of wastes are increased to 500,000 tonnes. The maximum amount of waste that will be stored on Site at any one time will be 25,000 tonnes.
- 2.8 No changes to the operational hours are proposed, with the existing operating hours of between 6:00 – 20:00 hours daily. Trains are permitted to arrive and offload at any point over a 24-hour period.
- 2.9 The entire Site is fenced and has lockable gates to prevent unauthorised access. Behind the western fence that separates the Great Central Way pedestrian path and the Site runs a greened buffer zone. This zone provides a green buffer between the Site and the road consisting of earth banking and some partially developed trees.
- 2.10 Enhanced security and mitigation measures include the construction of a 7.5 m high boundary wall which will extend along the whole of the northern and western Site boundaries to ensure the Site is effectively screened from potentially sensitive properties.
- 2.11 It is also proposed to install a continuous gabion wall along the full length of the western Site boundary. The gabion wall, which will be positioned behind an enhanced green buffer zone is to be filled with graded stones to provide a stratified elevation with differing bands of colour and stone size. The inclusion of the gabion wall also provides the opportunity to promote the intensification of habitat on the Site by treating it as a habitat/ shelter feature wall. A wide range of wildlife will be

supported through the inclusion of bee hotels, bumble bee boxes and hoverfly lagoons within the gabion frame.

- 2.12 In addition, a green wall trellis support system will be attached to the metal façade of Building B5. The fence line, greened boundary, gabion wall and green wall trellis behind Building B5 are shown on Drawing No. 106 v3.



### 3. SENSITIVE RECEPTORS

- 3.1 In terms of the surroundings, the Site is surrounded by a heavily urbanised area with numerous industrial buildings, roads, rail tracks and developed land on all sides of the Site. Towards the east of the Site is the mainline railway, followed by industrial uses including Glynn's Skip Hire, Hardcrete, EMR Neasden and NSX Autos. To the Northeast is Neasden Underground Station. A traveller site is located to the south at Lynton Close, followed by further residential uses along Yeats Close, and Bridge Road allotment. Towards the southwest is Selco Builders Warehouse, Dog Lane allotment and further industrial estate uses.
- 3.2 Potentially noise sensitive receptors within 500 m of the Site are presented in Table 1 and shown on a plan in Appendix 1.

**Table 1: Potentially Sensitive Receptor Locations**

Ref No.	Description of Receptor	Direction from Proposed Permit Boundary	Distance from Proposed Permit Boundary (m)
1	18 Iron Bridge Close – apartments	West	20
2	North Brent School	South East	120
3	Houses on Neasden Lane	East	120
4	Permanent traveller camp on Lynton Close	South	130
5	Flats on Wharton Close	South East	130
6	Houses on Yeats Close	South	180
7	Flats at Beacon House	East	195
8	Houses on Brendon Avenue	North	200
9	Houses on Southview Avenue	North West	200
10	Dog Lane Allotment Gardens	South West	230
11	Houses on the North Circular Road.	North West	270
12	North View Primary School	North	275
13	Houses on Woodheyes Road	South West	325
14	St Marys Primary School	South South East	390

15	The College of North West London	East	390
16	Manor School Early Years Centre	South West	460
17	Mitchell Brook Primary School & Gibbons Recreation Ground.	South West	470

- 3.3 The residential dwellings at 18 Iron Bridge Close are located approximately 20 m to the west of the permit boundary. According to the NIA, the design of the flats needed to take account of noise from the surrounding land uses, which principally included road traffic noise and noise from the permitted operations and adjacent aggregates depot. It is understood that the planning permission for the development (Application Ref. 18/0356) contained conditions relating to the requirement for sound insulation and the provision of acoustically treated mechanical ventilation.
- 3.4 The other receptors in Table 1 are more remote from the Site and there are numerous intervening noise sources in the heavily urbanised area.

### Conclusions of the Noise Impact Assessment

- 3.5 A comprehensive Noise Impact Assessment (NIA) (LF Acoustic Ltd, October 2024) has been produced to support the planning and permit application. The report presents the results of baseline surveys undertaken in November 2023.
- 3.6 The NIA concludes that:

*"The proposals would ensure that the noise levels attributable to the operation of the site would result in barely audible levels of noise above the existing noise climate at the surrounding residential properties and would ensure acceptable noise levels were generated in accordance with the EA guidance".*

## 4. MITIGATION MEASURES

4.1 The following measures will be employed to mitigate against potential noise emissions from the activities:

- Site operating plans have been designed to minimise materials handling and vehicle movements;
- Wates will be treated in a dedicated covered area with solid façades, constructed using steel cladding along the northern and western sides and will be fully open on the eastern and southern sides which face into the Site, to allow safe access;
- A 7.5 m high boundary wall will extend along the whole of the northern and western boundaries to ensure the site is effectively screened from existing noise sensitive properties
- Switching off plant and vehicles when not in use – no idling policy;
- All Site vehicles will be maintained in accordance with the manufacturer's instructions;
- Maintaining equipment specifically to reduce noise levels, for example fixing loose covers;
- Enclosure or abatement, for example acoustic enclosures and silencers;
- Timing – only undertaking waste operations during the times specified in Section 2.8;
- The employment of reduced drop heights;
- Reducing or stopping activities that are causing the noise until either the circumstances have changed or other appropriate measures have been put in place to allow the operations to re-commence without significant noise;
- Site speed limit, 'no idling' policy and minimisation of vehicle movements on Site; and
- Ensure regular maintenance of the access roads to repair 'pot holes' which serves to significantly reduce noise generated from empty vehicles.

4.2 The in-built design features to reduce noise emissions, additional mitigation measures highlighted above all and the findings from the NIA demonstrate that noise emissions from the Site are acceptable.

4.3 Furthermore, the above measures are considered reasonable, good practice and balance the costs and benefits to prevent and minimise noise.

### Noise Action Plan

4.4 In the unlikely event of a noise complaint, the following action plan will be followed:

- The complaint must be investigated fully and the source of the noise identified;
- Identified source(s) of the noise relating to the complaint will be ceased and / or additional mitigation provided;
- The Accident and Incident Record (Appendix 2 of this NMP) should be completed. Upon completion, this procedure ensures that the root cause has been identified; consideration has been given to prevent recurrence of root cause, the EA is notified if pollution has been caused and a written record exists;
- Once the source has been identified, mitigated and recorded, operations can be resumed;



- A record of the complaint together with the remediation actions and a completed Incident Report form will be kept on Site;
- A review of the Site specific mitigation measures detailed above will be undertaken.

4.5 Any noise complaints will be thoroughly investigated and noise complaint form (see Appendix 3) will be completed.

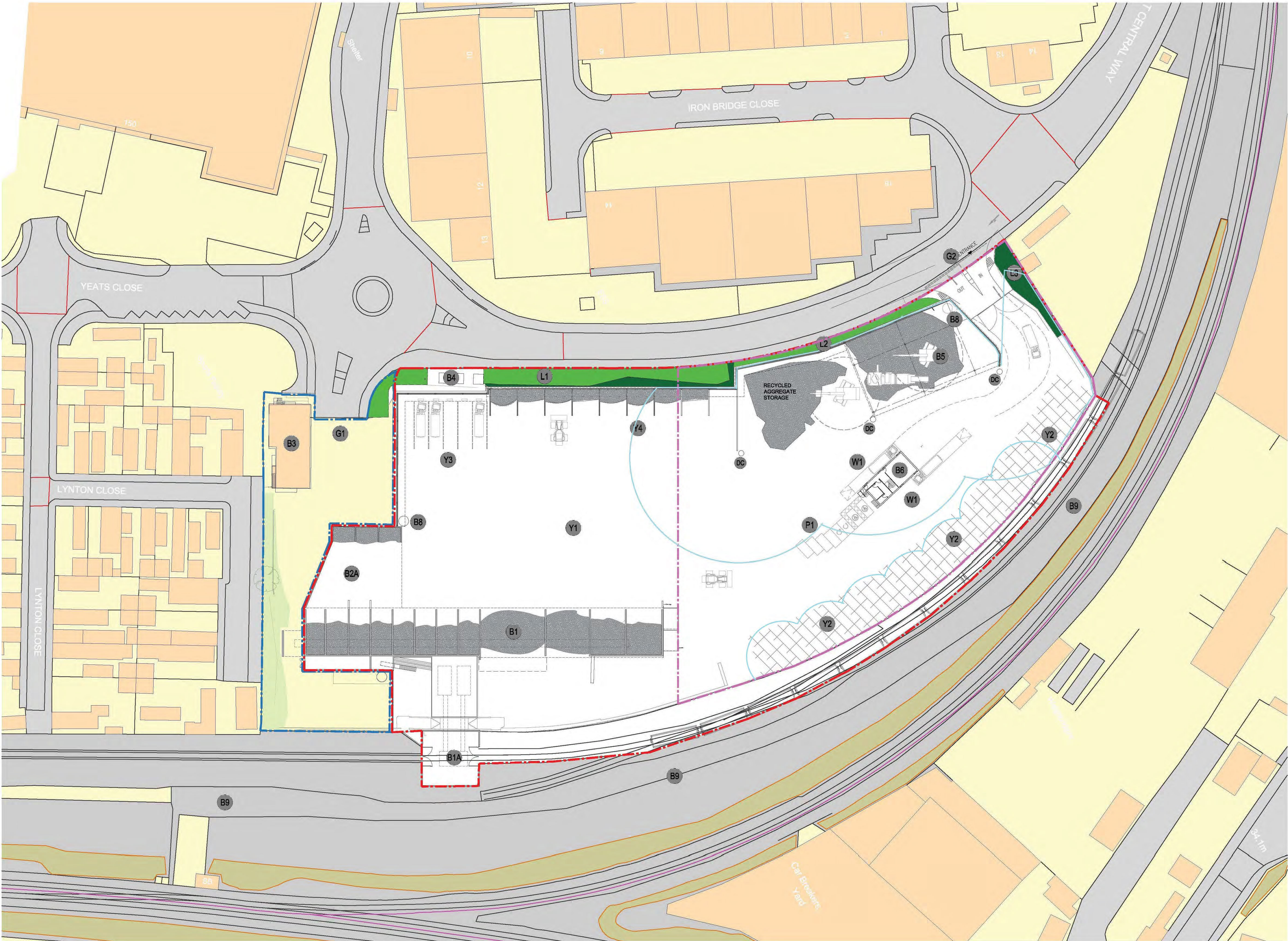
## DRAWINGS

Ground level – Permit Plan  
Site Sections 3, 5 and 6

Drawing No. 0100 v3  
Drawing No. 106 v3

Scale 1:500@A3  
Scale: 1:200@A1

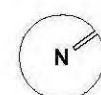




- Element Key
- B1 - Existing Aggregates storage building 'Toastrack'
  - B1a - Existing Aggregates delivery building for Bottom Dumping rail carriages 'BDU' building
  - B2a - New roof and rebuilt aggregates storage building
  - B3 - Existing network rail building
  - B4 - Existing substation
  - B5 - New aggregates processing area - under new roof
  - B6 - New prefabricated Office and welfare building
  - B7 - Boundary containment fence
  - B8 - Water tank storage new
  - B9 - Rail sidings
  - W1 - Weighbridge
  - G1 - Existing gates
  - G2 - New gates for entrance to site
  - Y1 - Main yard circulation retained
  - Y2 - Aggregate transfer zone - 12m zone kept for loading of trains with clam shell picker
  - Y3 - Lorry charging bays
  - Y4 - External aggregates store zone behind new rc containment walls
  - F1 - Fence retained to road
  - F2 - Fence retained to rail sidings
  - F3 - Fence wall to Lynton Close
  - L1 - Greened boundary zone 1
  - L2 - Greened boundary zone 2
  - L3 - Greened boundary zone 3
  - P1 - Parking Bikes and cars  
2 DDA, 2 charging, 4 standard parking bays
- DC DUST CANNON
- PERMIT BOUNDARY

Notes:  
No full scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor and any discrepancies reported to B3R immediately.

S	R	Date	Description
S3	3	18.07.24	ANNOUATION ADDED FOR WATER STORAGE TANKS B8 AGGREGATE STORAGE



0 5000 15000 40000

Scale Bar in mm

Client:  
SRC Group Holdings Ltd

Project Title:  
Charrington Sidings

Status:  
PLANNING

Stage:  
S3

Scale:  
1:500

Sheet:  
A1

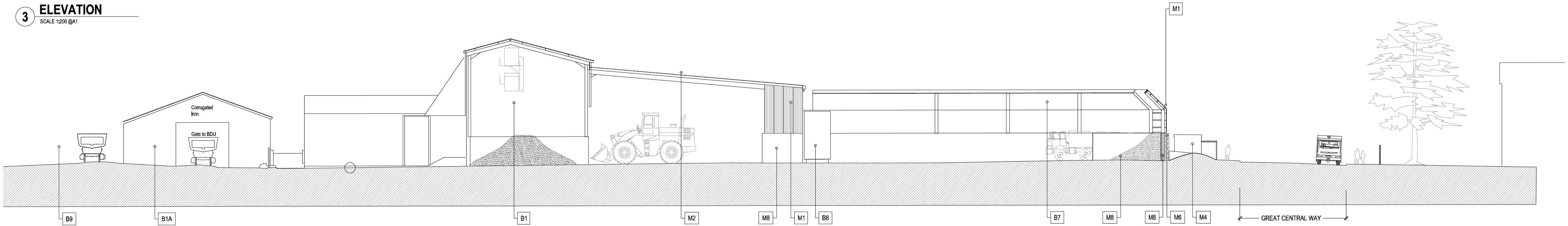
Drawing Title:  
GROUND LEVEL - PERMIT PLAN

Project No:  
19280

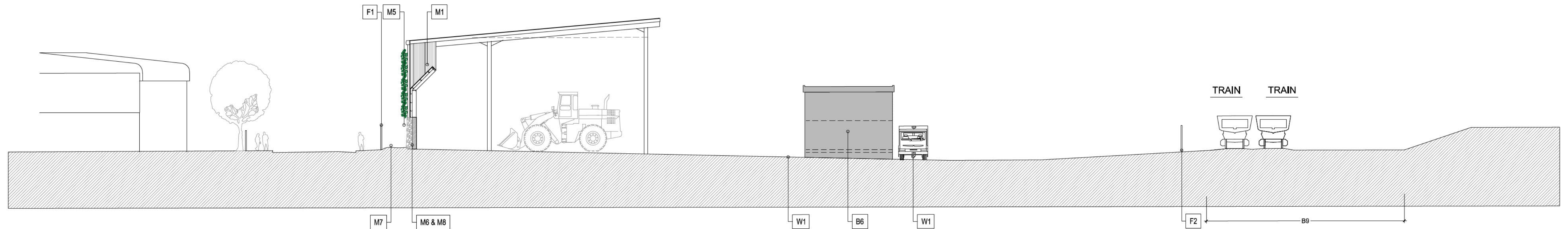
Drawing No: Revision:  
0100 3



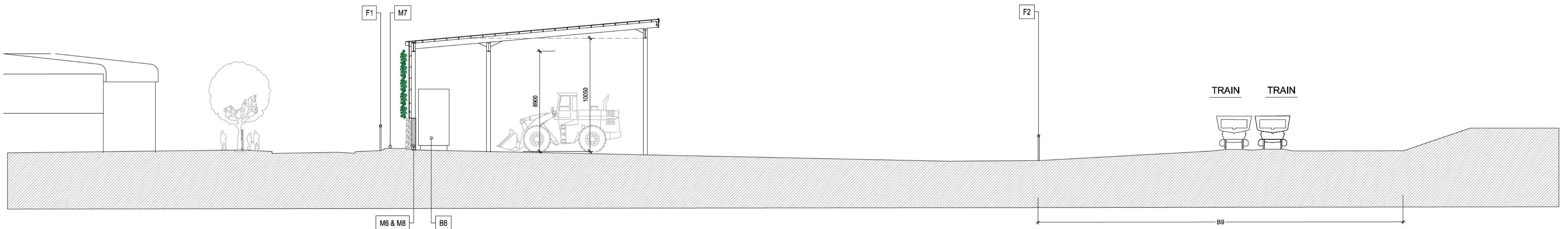
3 ELEVATION  
SCALE 1:200 @A1



5 ELEVATION  
SCALE 1:200 @A1



6 ELEVATION  
SCALE 1:200 @A1

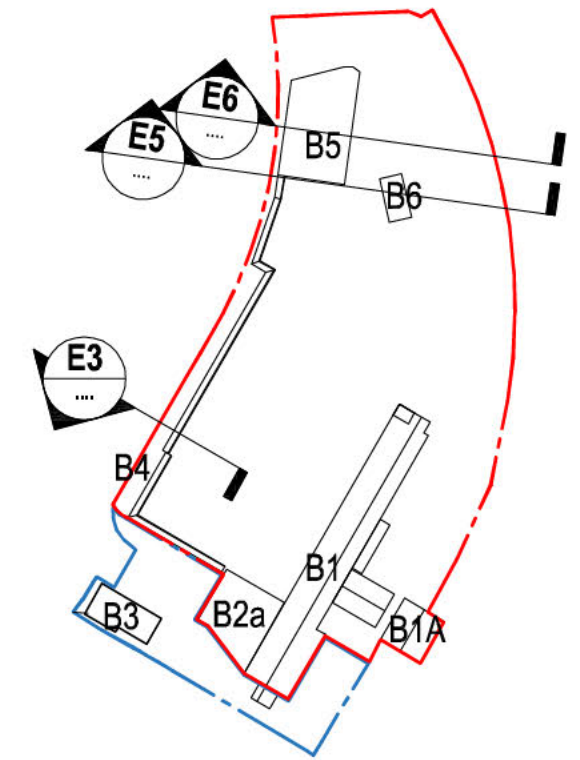


Materials Key

- M1 - Corrugated metal cladding - Polyester powder coated
- M2 - Corrugated metal roofing - Polyester powder coated
- M3 - Metal Gutter - Polyester powder coated
- M4 - Metal RWP- Polyester powder coated
- M5 - Green Wall - Support system fixed through to cladding subframe
- M6 - Gabion Wall - and concrete containment wall wall to contain environmental intensification pockets
- M7 - Planted - green planted boundary zone
- M8 - Precast concrete containment walls
- M9 - Stored aggregates

Element Key

- B1 - Existing Aggregates storage building 'Toastrack'
- B1a - Existing Aggregates delivery building for Bottom Dumping rail carriages 'BDU' building
- B2a - New roof and rebuilt aggregates storage building
- B3 - Existing network rail building
- B4 - Existing substation
- B5 - New aggregates processing area - under new roof
- B6 - New prefabricated Office and welfare building
- B7 - Boundary containment fence
- B8 - Water tank storage new
- B9 - Rail sidings
- W1 - Weighbridge
- G1 - Existing gates
- G2 - New gates for entrance to site
- Y1 - Main yard circulation retained
- Y2 - Aggregate transfer zone - 12m zone kept for loading of trains with dam shell picker
- Y3 - Lorry charging bays
- Y4 - External aggregates store zone behind new rc containment walls
- F1 - Fence retained to road
- F2 - Fence retained to rail sidings
- F3 - Fence wall to Lynton Close
- L1 - Greened boundary zone 1
- L2 - Greened boundary zone 2
- L3 - Greened boundary zone 3



Notes:  
Do not scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor and any discrepancies reported to B3R immediately.

S	R	Date	Description
S3	3	06.02.24	ISSUED FOR PLANNING SUBMISSION DWG TITLE NAME REVISED



Client:  
SRC Group Holdings Ltd  
Project Title:  
Charrington Sidings  
Status:  
PLANNING

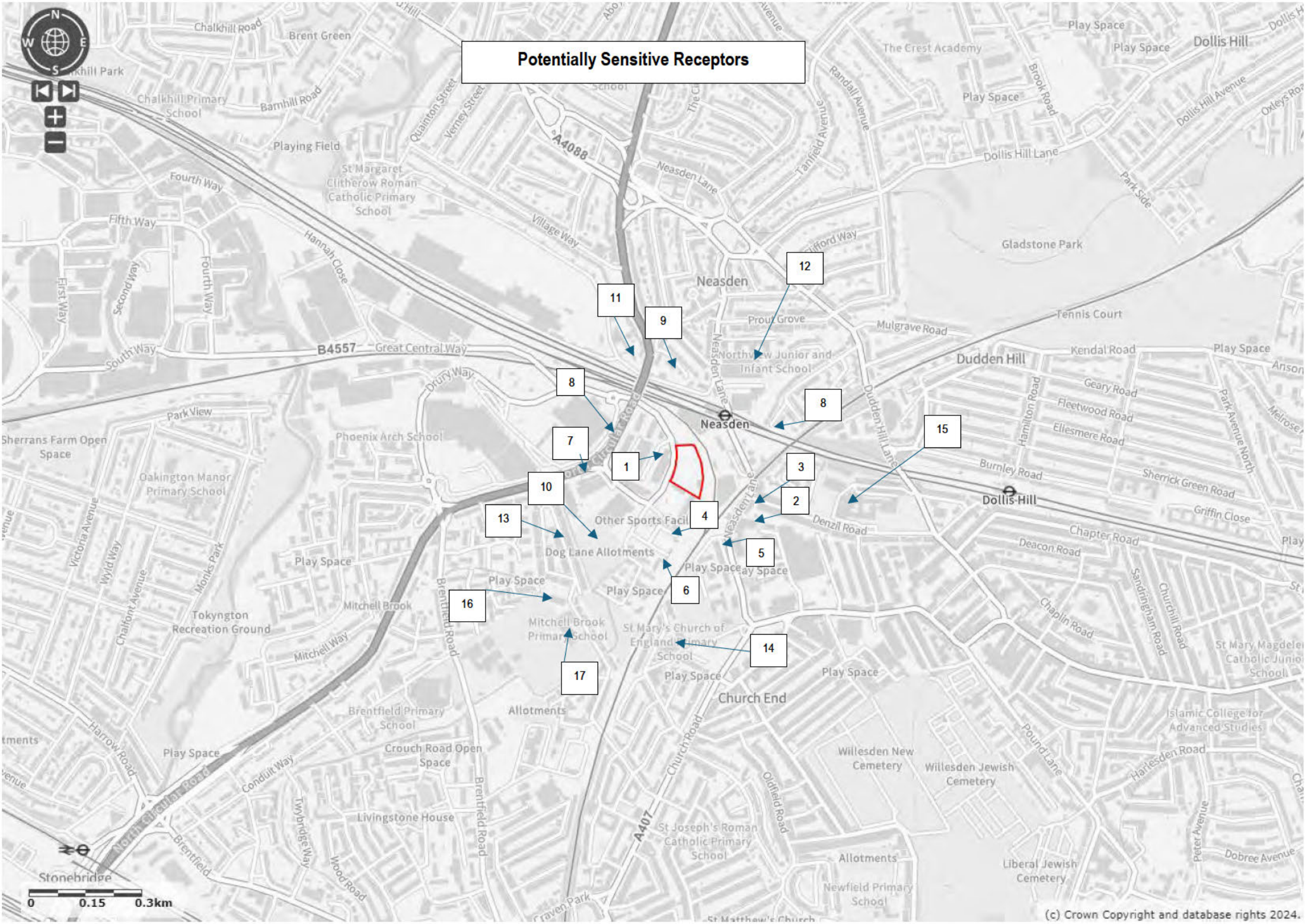
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S3  
Scale:  
1:200  
Sheet:  
A1

Drawing Title:  
SITE SECTIONS 3, 5 & 6  
Project No:  
19280  
Drawing No:  
106  
Revision:  
3



## APPENDIX 1

### Potentially Sensitive Receptor Plan





## APPENDIX 2

### Accident / Incident Record Form

## **Accident (and Incident) Record**

### **Record of accidents, other incidents or near misses**

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any <b>significant pollution</b> or <b>environmental damage</b> to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? If so what?	
If there was, then you must take steps to prevent further damage and notify the Environment Agency on <a href="tel:0800807060">0800 807060</a> and any other relevant regulators <b>ASAP</b> . <a href="#">Have you done so? Yes / No</a>	Who did you phone?  At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No  What date did you contact?
Please print your name and sign	

Continue on a separate sheet if you do not have enough room.

Keep the completed form in the file to discuss with your auditors or regulators when they visit.

## APPENDIX 3

### Noise Complaint Form



## COMPLAINT FORM

<b>Customer Name:</b>	<b>Address:</b>
<b>Customer Contact:</b>	
Tel. No.:	

<b>Complaint Ref. No.</b>	<b>Time and Date:</b>
---------------------------	-----------------------

<b>Complaint Description of Noise (hiss/hum/rumble/continuous/intermittent)</b>
<b>Any other previous known complaints relating to installation (all aspects, not just noise)</b>
<b>Potential noise sources that could give rise to the complaint</b>
<b>Action Taken</b>
<b>Signed:</b> ..... <b>Date:</b> .....

<b>Investigation Details:</b>	
<b>Investigation</b>	<b>by:</b> _____
_____	<b>Position:</b> _____
<b>Times</b>	<b>Finish:</b> _____
_____	<b>Start:</b> _____
<b>Weather Conditions: -</b>	
_____	

<b>Environment Agency Feedback:</b>
<b>Public Recommendation / Feedback</b>

## **APPENDIX 11**

### Environmental Risk Assessment

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management?
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	High	Medium	High	Permitted waste types are inert and non hazardous and do not include dusts, powders or loose fibres and have a low potential to produce bioaerosols, but the treatment activities will produce particulate matter so a high magnitude risk is estimated. The permitted level of throughput and potential size of the facility means there is potential for exposure if anyone is living or working close to the site (apart from the operator and employees). There is potential for increased dust generation from permitted activities during prolonged dry periods e.g. summer months. The Site is located in an industrial area, however an industrial unit 20m to the west of the site has been converted into residential dwellings. The Site is located in Brent Air Quality Management Area (AQMA) which has been delared for Particulate Matter PM10 and nitrogen dioxide.	The Air Quality Assessment (Redmore Environmental, August 2024) concludes that the risk of potential effects as a result of fugitive dust emissions from the facility were predicted to be not significant. In addition, the development was considered to be air quality neutral.  The mitigation measures and monitoring set out in the Dust Emissions Management Plan (PDE Consulting Ltd, November 2024) will be adhered to.	Low
Local human population	As above	Nuisance - dust on cars, clothing etc.	Air transport then deposition	High	Low	Medium	As above. Local residents often sensitive to dust.	As above.	Low
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Low	Low	Local residents often sensitive to litter, however permitted waste types have a very low litter potential.	As above. Appropriate measures include clearing litter arising from the activities from affected areas outside the site.	Very low



Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Medium	Medium	Medium	Road safety, local residents often sensitive to mud on roads.	As above. Appropriate measures include clearing waste, litter and mud arising from the activities from affected areas outside the site. As a minimum, a road sweeper will clean the highway outside the Site and the Site itself twice per day, once in the morning and once in the afternoon. A sweeper will be on call throughout the day and will be called as and when required.	Low
Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Low	Low	Local residents often sensitive to odour, however permitted waste types have a low odour potential and receptors are largely absent.	Standard permit conditions require that emissions shall be free from odour. If an issue is identified an odour management plan may be requested by the EA.	Very low
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Medium	Medium	Medium	Local residents often sensitive to noise and vibration. The Site is located in an industrial area, however an industrial unit 20m to the west of the site has been converted into residential dwellings.	A Noise Impact Assessment (NIA) (LF Acoustic Ltd, October 2024) and a Noise Management Plan (PDE Consulting Ltd, November 2023) have been produced. The NIA concludes that: <i>"the noise levels attributable to the operation of the site would result in barely audible levels of noise above the existing noise climate at the surrounding residential properties and would ensure acceptable noise levels were generated in accordance with the EA guidance"</i> .	Low
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	Low	Permitted wastes unlikely to attract scavenging animals and birds.	The EA can request an emissions management plan in the unlikely event that an issue develops.	Very low

## Wembley ERA v2

Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Permitted waste types unlikely to attract pests.	As above	Very low
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Low	Low	Low	Permitted waste types are inert and non hazardous so any waste washed off site will add to the volume of the local post-flood clean up workload, rather than the hazard. The Site is located in Flood Zone 1 (lowest risk). There are no surface water bodies on or adjacent to the site.	Standard permit conditions require a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances (will include flood risk management).	Very low
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Medium	Low	Low	Permitted waste types are inert and non hazardous therefore only a low magnitude risk is estimated	Site security measure will prevent unauthorised access.	Low
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, fire fighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	Low	Low	Permitted waste types do not include any flammable materials therefore a low magnitude risk is estimated.	Standard permit conditions require a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances (will include fire and spillages).	Low
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or fire fighters. Pollution of water or land.	As above.	Medium	Low	Low	As above.	As above (excluding comments on access to waste). Permitted activities do not include the burning of waste. Combustible wastes will not be stored or treated on the site.	Low
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Low	Low	Low	Permitted waste types do not include sludges or liquids therefore a low magnitude risk is estimated. No point source emissions to water are permitted. Surface water receptors on, or adjacent to the site are absent.	Liquids, such as fuels, shall be provided with secondary containment. Wastes from potentially contaminated sites require analysis.	Very low
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Low	Low	Low	Waste types are non-hazardous and inert so harm is likely to be temporary and reversible. Surface water receptors are absent.	As above	Very low

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Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Low	Low	Low	Watercourse must have medium / high flow for abstraction to be permitted, which will dilute contaminated run-off. Surface water receptors are absent.	According to the Emaphsite report there are no licensed surface water abstractions within 1km of the Site.	Very low
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Low	Low	Low	Permitted wastes unlikely to contaminate groundwater. The entire site is surfaced in concrete and has a sealed drainage system. Groundwater receptors are absent.	The site is underlain by the London Clay which is classed by the EA as unproductive strata. The site is not located in a groundwater source protection zone. According to the Emaphsite report there are no licensed groundwater abstractions within 1km of the Site.	Very low
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastro-intestinal illness.	Direct contact or ingestion	Low	Medium	Low	Permitted wastes unlikely to contaminate surface waters as receptors are absent.	Receptors are absent therefore no action required	Very low
Protected sites - European sites and Sites of Special Scientific Interest (SSSI)	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Low	Medium	Low	Waste operations may cause harm to and deterioration of nature conservation sites however receptors are absent. Brent Reservoir SSSI is located approximately 1.4 km to the north of the Site. In relation to the SSSI, it is stated in the Preliminary Ecological Assessment (PEA) (Three Shires Limited, May 2023) that: <i>"it is considered that the proposals will likely have no negative effect due to a lack of viable pathways and potentially a very small beneficial effect due to improved material storage, handling and transport. There will be no direct loss or damage of habitat following the development and the Site is not hydrologically connected to the SSSI and it is considerably outside the radius where airborne pollution could be considered to have any effect".</i>	There is no mechanism whereby emissions from the site could impact the Brent Reservoir SSSI.  There are no other SSSI's within 2 km of the Site.  There are no Ramsar sites or European sites within 2 km of the Site.	Very low



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Protected sites - Sites of Importance to Nature Conservation (SINC)	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Low	Medium	Low	<p>Waste operations may cause harm to and deterioration of nature conservation sites.</p> <p>Dudding Hill Loop SINC is adjacent to the east side of the Site and St Mary's Churchyard SINC, Willesden is situated approximately 330m south of the planning application boundary and is adjacent to the Dudding Hill Loop SINC.</p> <p>It is stated in the PEA that:  <i>"The development should be planned in such a way to minimise the impacts on the SINC from both light and noise to prevent any impacts on this wildlife corridor"</i>.</p> <p>Eight further SINC's identified as being within 2km of the planning application boundary were not further explored in the PEA due to a lack of ecological and physical connectivity to the Site.</p>	Good operational practises and adherence to the conditions in the planning permission and environmental permit will manage the potential impacts on the closest SINC's.	Very low
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