

Non-technical Summary to support an application to vary an existing bespoke installation permit and add a waste operation

Prepared on behalf of:

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ETL956/2025

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Abbreviations

AD Anaerobic digestion / digester

AQMA Air Quality Management Area

AW Ancient woodland

BAT Best Available Techniques

CCTV Closed circuit television

DEMP Dust & Emissions Management Plan

EA Environment Agency

ELV Emission limit value

EMS Environmental Management System

EP Emission Point

ETL Earthcare Technical Limited

EWC European Waste Catalogue

FPP Fire Prevention Plan

kW Kilowatt

LWS Local Wildlife Site

MCP Medium Combustion Plant

MCPD Medium Combustion Plant Directive

MW Megawatt

n/a Not applicable

NGR National Grid Reference

NTS Non-technical Summary

NVZ Nitrate Vulnerable Zone

PHI Priority Habitat Inventory

SCC Staffordshire County Council

SCR Site Condition Report

SPZ Source Protection Zone (for groundwater)

SSSI Site of Special Scientific Interest

TPA Tonnes per annum

1 Introduction

This Non-Technical Summary (NTS) has been prepared by Earthcare Technical Ltd (ETL) on behalf of Mill Farm Recycling Limited in support of an application to vary the existing bespoke installation environmental permit for open windrow composting in order to extend the permitted area and to add a new waste operation for the transfer and treatment of non-hazardous wood for Mill Farm, Stone Lane, Chebsey, Stafford, ST21 6NX, centred on National Grid Reference (NGR): SJ 85306 29458, herein termed 'the Site'. The plant is operated by Mill Farm Recycling Limited, herein termed 'the Operator'.

This NTS highlights the key control measures to minimise any potential environmental impacts from the site operations and signposts the reader to the key supporting documents for the permit variation application, which contain further detail.

2 Planning

The original planning permission for the site was issued by Staffordshire County Council (SCC) in 2003 and permitted the import of green waste to produce compost for use on the farm (Ref: S.02/14/467W). In 2005 and 2007 SCC granted extensions to the area of the site and the throughput also permitting use of the compost produced on other farms locally (Ref: S.05/02/467 W) and (Ref: S.07/02/467 W).

Further amendments to the site planning permission were granted by SCC (Refs: S.08/017/467 W & S.09/10/467 W). These related to the open windrow composting operation and the construction of three concrete compost storage pads.

In 2011 a planning application was made to SCC (Ref: S.11/03/467 W) to make temporary permissions permanent in place, to construct an anaerobic digestion (AD) plant and associated infrastructure and for a static screening plant.

On 10^{th} April 2014 SCC granted extant planning permission for the Site (Ref: S.13/22/467 W). The AD plant has not been built and there are no plans to do so.

There is a current planning application in progress with SCC (Ref: 18/12/467 W) for:

- Consolidation of the existing permitted open windrow composting operations including all development permitted by planning permission Ref: S.13/22/467 W but excluding all elements related to AD;
- Removal of steelwork for the partly built AD building;
- Erection of a new building for the operation of a shredder within;
- Construction of a concrete storage area around the shredder building;
- Retrospective planning permission for the importation of wood waste for shredding, composting and milling in the permitted milling building;
- Retention of the existing permitted milling building; and,
- Retrospective planning permission for the addition of a dust extraction unit on the northern side of the milling building.

The application has a target date of determination of 18 August 2025.

3 Permitting

3.1 Wider non-waste site operations

In 2017 3 No. biomass boilers were installed on Site for the burning of clean biomass (non-waste wood) to produce heat for the direct heating of farm buildings and drying floors only; there is no associated power generation. Each boiler is 1mW but operated to a capacity of 500kW. MCPD controls do not apply to MCP using the gaseous products of combustion for direct heating, drying or other treatment of materials. These boilers do not form part of the permitted activities. Part of the farm building is used to house livestock periodically during the year.

3.2 History

In 2005 the Environment Agency (EA) issued Mr. Robert Ainsworth and Mrs. Anne Ainsworth (a partnership) with the original environmental permit for the Site, a bespoke waste operation permit for open windrow composting (reference: EAWML/40264). This permit was superseded in 2008 by EAWML/100313 and the permit number EPR/XP138EF/A001 assigned.

On 25 June 2013 a varied permit was issued (reference: EPR/XP3198EF/V002) which included an additional 12 permitted waste codes for treatment within the composting process. On 11 September 2017 a varied and consolidated bespoke installation environmental permit was issued (EPR/XP3198EF/V003) to reflect the biological waste treatment capacity of over 75 tonnes per day, but which reduced the annual throughput from 75,000 to 45,000 tonnes. This authorises the Operator to operate an open windrow composting facility. The Environment Agency (EA) initiated a review of the permit occasioned by the Waste Treatment BAT Conclusions published on 17 August 2018. A varied and consolidated permit was issued 16/12/2022 (Ref: EPR/XP138EF/V004).

Changes to the Environmental Permitting (England and Wales) Regulations 2016 (as amended) mean that previously exempt activities at a regulated facility must become permitted activities. On 27 January 2024 a permit variation application (reference: EPR/XP3198EF/V005) was submitted to the EA by the Operator to incorporate the non-hazardous (Grade A) wood waste treatment activities on site which were previously carried out under a T6 waste exemption. This application was not Duly Made.

On 1 July 20205 a permit transfer was issued which changed the legal entity holding the permit from Mr. Robert Ainsworth and Mrs. Anne Ainsworth (a partnership) to Mill Farm Recycling Limited reference EPR/XP3198EF/T006.

¹https://www.gov.uk/guidance/waste-exemption-t6-treating-waste-wood-and-waste-plant-matter-by-chipping-shredding-cutting-or-pulverising Accessed 30 April 2025

3.3 Current variation

3.3.1 Overview

This document summarises the current permit variation application. This submission (reference: EPR/XP3198EF/V006) addresses the information outstanding from the 'Not Duly Made' previous application and increases the area of the site which will fall within the permit boundary due to inclusion of further waste activities. A summary of the environmental management system (EMS) and a fire prevention plan (FPP) were submitted to support the application to transfer the permit; these documents have been updated and submitted as part of this permit variation application.

3.3.2 Permitted Activities

This permit variation is to add a waste operation to the permitted activities; there are no proposed changes to the listed activity, composting (S5.4 A (1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment). However, for the purposed of clarification we request the addition of a directly associated activity (DAA) to the main listed activity, namely blending of PAS100 compost with products e.g. BS3882 topsoil to enrich the compost for use in landscaping projects.

The variation application assesses the environmental risk and associated control measures pertaining to the new proposed waste operation. The variation requires an extension of the permit boundary and a Site Condition Report² has been included in the permit variation application documents.

The additional waste activities are the transfer and treatment of non-hazardous waste wood namely:

- Acceptance of non-hazardous waste wood (Grade A wood only)³
- Storage of waste wood pending treatment
- Shredding, milling, chipping, screening of wood
- Storage of wood products after treatment
- Drying of wood products utilising heat from on-site biomass boilers
- Dispatch of wood products

In accordance with Part C4, Table 1a of the permit variation application, the proposed additional permitted activities and limits of activities are shown in Table 1 below.

Table 1: Proposed additional permitted activities

Description of activities	Limits of activities
R13: Storage of wastes pending any of the operations numbered R3	Storage and pre-shredding of Grade A non-hazardous wood on a concrete surface with sealed drainage.
R3: Recycling/reclamation of organic substances which are not used as solvents	Shredding, milling, chipping and screening of Grade A wood within 2 No. dedicated buildings with dust abatement units. Drying of wood products within 6 No. dedicated drying bays.

² Site Condition Report, V2.0, Earthcare Technical Limited, July 2025

³ Waste Wood Assessment Guidance for the UK Waste Wood Industry, Wood Recyclers' Association, Version 4, November 2024

Description of activities	Limits of activities		
	Storage of wood products on an impermeable surface within a building or within covered bays on an impermeable surface with sealed drainage.		
D10: incineration on land.	Use of diesel in 2 No. generators to produce electricity for the process.		

3.3.3 Waste Types

The proposed waste types for addition to the permit for the wood waste operation are shown in Table 2 below:

Table 2: Proposed Waste Types for Wood Operation

Code	Description	Entry type		
02	Wastes From Agriculture, Horticulture, Aquaculture, Forestry, Hunting And Fishing, Food Preparation And Processing			
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing			
02 01 03	plant-tissue waste Absolute no hazardous			
03	Wastes From Wood Processing And The Production Of Panels And Furn Cardboard	niture, Pulp, Paper And		
03 01	wastes from wood processing and the production of panels and furnitu	re		
03 01 01	waste bark and cork	Absolute non- hazardous		
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04	Mirror non- hazardous		
03 03	wastes from pulp, paper and cardboard production and processing			
03 03 01	3 01 waste bark and wood Absolute hazardo			
15	Waste Packaging, Absorbents, Wiping Cloths, Filter Materials And Protective Clothing Not Otherwise Specified			
15 01	packaging (including separately collected municipal packaging waste)			
15 01 03	5 01 03 wooden packaging Absolute in hazardous			
17	Construction And Demolition Wastes (Including Excavated Soil From C	ontaminated Sites)		
17 02	wood, glass and plastic			
17 02 01	Mirror nor hazardou:			
19	Wastes from Waste Management Facilities, Off-Site Waste Water Treatment Plants and The Preparation Of Water Intended For Human Consumption and Water For Industrial Use			
19 12	wastes from the mechanical treatment of waste (for example sorting, c pelletising) not otherwise specified	rushing, compacting,		

Code	Description Entry type		
19 12 07	wood other than that mentioned in 19 12 06 Mirror non-hazardous		
20	Municipal Wastes (Household Waste And Similar Commercial, Industrial And Institutional Wastes) Including Separately Collected Fractions		
20 02	garden and park wastes (including cemetery waste)		
		Absolute non- hazardous	

3.3.4 Waste Tonnages

The site currently receives approximately 20,000 tonnes per annum of Grade A Wood, which forms part of the total maximum permitted tonnage to be received on Site of 45,000 tonnes per annum. This is consistent with both the Site planning permission and the current environmental permit.

There is no change to the annual waste tonnages proposed.

4 Site Details

4.1 Location

Site Address: Mill Farm, Stone Lane, Chebsey, Stafford, ST21 6NX

National Grid Reference (approx. centre of Site): SJ 85306 29458

Local Authorities: Stafford Borough Council and Staffordshire County Council

The Site is situated on Mill Farm, off the B5026 (Stone Road). The Site Location is shown in Figure 1 - Site Location Plan.

The current Site footprint is 4.1 hectares (10.1 acres) in extent. The additional proposed permitted area is 0.8 hectares (1.8 acres) in extent. Subject to the permit variation application, the permitted area will increase to 4.9 hectares (11.9 acres).

4.2 Environmental Sensitivities

4.2.1 Geology

The underlying geology is of Stafford Halite Member – Halite stone and mudstone.

The soil type is classified as slightly acid loamy and clayey soils with impeded drainage in the northern section of the Site and slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils in the southern section of the Site.⁴ Areas of the site subject to previous development are Made ground and most of the Site is surfaced with impermeable concrete.

4.2.2 Hydrogeology

There are no recorded superficial or bedrock aquifers on site. The groundwater vulnerability is classified as high due to the soluble rock risk. ⁵

The site is not within a designated Groundwater Source Protection zone (SPZ) or within a Drinking Water Safeguard Zone (groundwater). There are no boreholes depicted within 250 m of the Site.

4.2.3 Surface Water

The Site is not within 10 m of a watercourse. The closest watercourse is located 285m east of a tributary of the River Sow and 390m north of the main River Sow which runs from the north of Eccleshall to the west to Little Bridgeford to the south east where it joins the Meece Brook. The site is within the 'Sow-Brockton Brook to Doxey Brook' Water Body catchment area which was designated under the Water Framework Directive as having moderate ecological status in 2019 and 2022.⁶

The site is not within a Drinking Water Protected Area (surface water) or Drinking Water Safeguard Zone (surface water).

⁴ https://www.landis.org.uk/soilscapes/ Accessed 24 April 2025

⁵ https://magic.defra.gov.uk/MagicMap.html Accessed 24 April 2025

⁶ https://environment.data.gov.uk/catchment-planning/WaterBody/GB104028047220 Accessed 24 April 2025

The site is within a Nitrate Vulnerable Zone (NVZ) for surface water; River Trent (source to confluence with Derwent).

4.2.4 Flood Risk

The site is within Flood Zone 1 which means that there is a low probability of flooding from rivers and the sea⁷. There are some areas at risk of surface water flooding within the proposed new permitted area with the highest risk of onsite being flooded during a 1 in 30-year event.

4.2.5 Human Receptors

Human receptors within 1 km of the site are captured in Table 3 below and are shown in Figure 5 – Human Receptor Plan.

Table 3: Human Receptors within approximately 1 km

ID	Receptor name	Type of receptor	Easting	Northing	Distance from site boundary (m)	Direction from site
H1	Mill Farm (owned by Operator)	Residential	385382	329571	20	East
H2	The Vicarage / Vicarage Fields	Residential	385762	329087	325	East south east
Н3	Stokes	Residential	384875	329694	370	West
H4	The Lodge	Residential	384815	329724	435	West
H5	The Old Vicarage	Residential	385866	328989	460	East south east
Н6	The Grange	Residential	384793	329746	460	North west
H7	Oxleasows Farm	Residential and workplace	385594	330087	475	North east
Н8	Hilcote Hall (previously a care home, now flats)	Residential	384749	329697	490	North west
Н9	Keepers Cottage	Residential	384714	329446	520	West
H10	Chebsey Village	Residential	385948	328836	610	South east
H11	Mill Court Farm	Residential	385897	328697	650	South east
H12	Fieldhouse Farm	Residential and workplace	384633	328959	720	South west
H13	Manor Farm	Residential and workplace	386230	329304	745	East
H14	The Leas	Residential	384468	329692	760	North west

⁷ https://flood-map-for-planning.service.gov.uk/ Accessed 24 April 2025

ID	Receptor name	Type of receptor	Easting	Northing	Distance from site boundary (m)	Direction from site
H15	Walton Hall Academy	School	385218	328354	835	South west
H16	Rodgeley Lodge Farm	Residential and workplace	386413	329304	930	East
H17	Scamnel Farm	Residential and workplace	386261	329938	930	North east

4.2.6 Ecological Receptors

Ecological receptors within relevant screening distances from the Site as identified in the pre-application Nature and Heritage Conservation Screening Report (Appendix B) provided by the Environment Agency (EA), are detailed in Table 4 below.

The site is not within:

- 500 m of a European site (within the meaning of Regulation 8 of the Conservation of Habitats and Species Regulations 2017) or a Site of Special Scientific Interest, including candidate or proposed sites or Marine Conservation Zone
- 250 metres of the presence of great crested newts, where it is linked to the breeding ponds of the newts by good habitat
- 50 m of a Local Nature Reserve, Local Wildlife Site, Ancient Woodland or Scheduled Monument
- 50 m of a site that has species or habitats of principle importance (as listed in Section 41 of the Natural Environment and Rural Communities Act 2006) that the Environment Agency considers at risk to this activity

Table 4: Ecological Receptors within Relevant Screening Distances

	Table 4. Leological Neceptors within Netevant Gereening Distances					
ID	Location	Designation	NGR X	NGR Y	Distance and direction from green line boundary	
					Distance (m)	Direction
E1	Midland Meres and Mosses Phase 2 Ramsar site/Cope Mere	Ramsar/SSSI	380496	329556	4,750	west
E2	Fieldhouse Dingle/The Dingle	LWS/AW	384754	328712	760	southwest
E3	Drumble Wood	LWS, AW	386350	328888	960	southeast
E4	Chebsey Hollow	LWS	386102	328380	1,000	southeast
E5	Meece Brook	LWS	385573	330416	755	northeast
E6	Yelds Rough	LWS	386962	329053	1,665	east

A Nature and Heritage Conservation Risk Assessment which considers the impact on these sites from the proposed changes forms Appendix C.

4.2.6.1 Statutory Designated Sites within 10km

There are no SACs or SPAs within 10km of the Site and no SSSIs, NNRs or LNRs within 2km. The pre-application Nature and Heritage Conservation Screening Report (Appendix B) provided by the Environment Agency (EA). Midland Meres and Mosses Phase 3 Ramsar site lies 4.75km to the west of the Site; it is coincident with Cop Mere SSSI.

4.2.6.2 Non-statutory Designated Sites

The pre-application Nature and Heritage Conservation Screening Report (Appendix B) identifies:

- 5 No. Local Wildlife Sites within 2km of the Site, the closest being Fieldhouse Dingle 745m to the south west and Meece Brook 755m to the north east.
- 2 No. Ancient Woodland Sites within 2km of the Site; The Dingle 760m south west and Drumble Wood 960m south east.

4.2.6.3 Priority Habitats & Species

There are numerous areas of PHI deciduous woodland within 2km of the site and an area of PHI Coastal and floodplain grazing marsh 400m to the south associated with the River Sow, which is identified on the maps in Appendix B.

The pre-application Nature and Heritage Conservation Screening Report (Appendix B) identifies that the River Sow 390m to the south of the site at the closest point is a migratory route for the European Eel.

4.2.7 Air Quality Management Areas

There are no Air Quality Management Areas within proximity of the site. 8

⁸ https://uk-air.defra.gov.uk/aqma Accessed 24 April 2025

4.3 Process Summary

The Process Flow Diagram is provided as Appendix A.

The permit variation application is to add the waste wood treatment processes which are described within this NTS. The existing permitted composting process i is described fully within Section 5.2 of the EMS Manual (MIL-OD-01).

Pallets are received as waste and sorted. Suitable Clean pallets are sorted and recycled in accordance with MIL-SOP-01 Wood Waste Acceptance Rejection Procedure V1.0 (MIL_SOP-01). Pallets which are not suitable for resale are processed via shredding, chipping, screening and drying, depending on the desired output into:

- animal bedding which is used under Agricultural Exemptions (U8, T23 and U10); and
- Fuel Grade wood chip for biomass boilers.

A Site Layout Plan is also provided (Figure 3).

4.4 Infrastructure

The site infrastructure for the wood waste operation is listed in Table 5 below.

Table 5: Site infrastructure list

Infrastructure	Sub Item
Pre-shred (Komptech Crambo 5200)	
3 No. covered wood chip storage bays	
Main wood processing building	Plant hopper
Main wood processing building	• •
	Conveyor to mill with magnet
	Haas HZM1600 wood recycling plant
	Magnets and Eddy Current separator (Wagner ECS2000)
	Chip screen
	Product storage bays (3 No. Bays within building)
	3. No metal skips
	KOHLER SDMO Diesel generator 1
	HAAS Dust abatement plant
Bedding plant building – wood chip handling system	Hopper
- Gyotom	Conveyors
	Hammermill
	Screen
	KOHLER SDMO Diesel generator 2
	HAAS Dust abatement plant
6 no. Product storage bays	
6 no. bays with drying floors	
Impermeable surfacing and sealed drainage	Upper yard - impermeable surfacing, sump, pump and above
system	ground storage tank (1,500m³)
	Lower yard storage area – impermeable surfacing and
	underground tank (750m³)

5 Management

5.1 Staff Structure

The site is operated by Mill Farm Recycling Limited.

Mill Farm Recycling Limited is a limited company and comprises three directors who form the management team and have specific management roles:

- Robert Ainsworth- Site Manager and Technically Competent Manager
- Anne Ainsworth Office Manager
- William Ainsworth Wood Processing Manager and Technically Competent Manager

The Management Team manage a small team of Site Operatives.

5.2 Environmental Management System

The site is operated in accordance with an Environmental Management System. The EMS comprises of a series of 'live' documents to assist and inform daily site operations. The EMS Manual (MIL-OD-01), the current version of which has been submitted with this permit variation application, is an overarching document which links together all the EMS documents including the Emergency Procedure, Odour Management Plan (OMP), Standard Operating Procedures (SOPs), maintenance schedules and forms used for record keeping. The EMS is based on the Environmental Risk Assessment (provided as Appendix A of the EMS Manual)

All the EMS documents are listed within the Master Document Control File (MIL-OD-02) which is used as a complete reference to all management system documents and includes version numbers and issue dates to ensure document control.

5.3 Roles and responsibilities

The directors have overall responsibility for the site operation and any associated impacts. Roles and responsibilities are detailed in Section 10 of the EMS Manual (MIL-OD-01) and in associated SOPs.

6 Control of Emissions to Land and Water

6.1 Overview

Please review this section of the NTS in conjunction with Figure 7 Surfacing & Drainage Plan. All areas within the regulated facility where waste is stored or treated benefit from an impermeable surface with a sealed drainage system. There are no point source emission points to water or ground from any areas that are utilised for the storage and treatment of waste.

6.2 Drainage

The access road to the site facility has been constructed using reinforced C40 concrete and laid to a fall to encourage water run-off and prevent ponding. As shown on the Surfacing and Drainage Plan any water falling on the road is captured within the site drainage systems.

Roof water from buildings is captured via a separate drainage system and routed to the clean water storage lagoon.

6.3 Wood waste areas

Wood waste is received, shredded and stored on a concrete pad to the west of the current composting area. This concrete drains to a 750 m³ underground collection tank. This water may be used for dust suppression within the permitted area or as a water source for the adjacent composting process, which itself has a sealed drainage system.

With the exception of pre-shredding which is carried out on the concrete pad in the lower yard, wood treatment activities are carried out within the 2 No. dedicated buildings and/or drying bays. Any surface water from the yard areas around the buildings drain to a collection sump from which water is pumped to an above ground water storage tank (1,500m³).

6.4 Fuels and Chemicals

There is no chemical storage associated with the permitted activities.

Diesel for on-site machinery and generators associated with the permitted activities is stored in 2 No. bunded locked stores as shown on Figure 4 FPP Layout Plan Drainage

6.5 Control of Emissions to Land & Water under Abnormal Operations

The site is checked at least daily for any spillages (Daily Checks **MIL-MP-01**) and any spillages are cleared up as soon as possible and in accordance with the Spillage Procedure (**MIL-SOP-03**). Spill kits are in the upper yard as shown on the FPP Layout Plan (Figure 4). All on-site mobile plant carries oil spill kits.

7 Control of Emissions to Air

7.1 Overview

There are 4 No. point source emissions to air associated with the wood waste operation, these are detailed in Table 6 below and their locations are shown on the Permit Boundary and Emission Point Plan (Figure 2):

Table 6: Emission Points to Air

Emission point ID	Description	X(m)	Y(m)
A1	Dust abatement plant for main wood processing building	385277	329627
A2	Dust abatement plant for bedding plant	385321	329643
A3	Diesel generator 1 for main wood processing building	385251	329588
A4	Diesel generator 2 for bedding plant	385322	329641

7.2 Control of Emissions from the Dust Abatement Plant

The wood treatment equipment housed within the 2 No. wood processing buildings were manufactured by HAAS and supplied by a UK based company CRJ Services Ltd (CRJ).

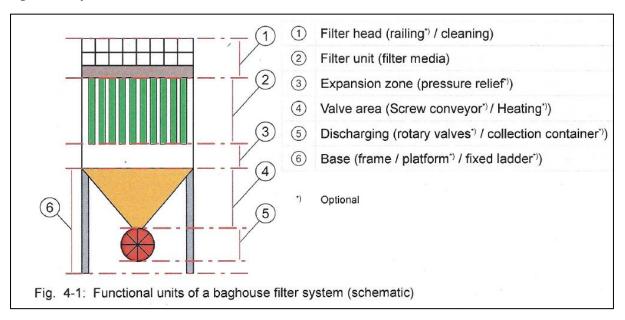
The wood processing equipment is enclosed and within buildings. The doors to the buildings are only opened to allow ingress and egress of vehicles. When the doors are open the building is under negative pressure to reduce dust emissions from the door openings.

There is a dedicated dust extraction unit on the Milling Hall Building, which can treat up to 27,000m³/h of air from the building. There is a single point source emission from this extraction unit at 12m high. The maximum dust concentration as specified by HAAS who manufactured and installed the extraction unit as 3mg/m³.

The building containing the bedding plant equipment also benefits from a dust extraction system which can treat up to 15,000m³/h of air. There is a single point source emission from this extraction unit at 6.7m high; the outlet is directed downwards via a curved section. The maximum dust concentration as specified by HAAS who manufactured and installed the extraction unit as 5mg/m³.

The basic layout of both baghouse filter systems is shown in Figure 1 below:

Figure 1: Layout of Dust Extraction Units



Note the filters systems installed both have the following features:

- Valve area hopper with a screw conveyor
- Discharging area rotary valves.

The detailed specifications of the 2 No. filter systems are detailed in Table 7 below:

Table 7: Filter system specifications

Filter system	Maximum air volume for treatment (m³/h)	Filter surface area (m²)	Air-to- cloth ratio (m³ /m²/h)	No. of filter bags	Length of bag filters (mm)	Filter media specification	Cleaning system	Height of discharge point (m)	Maximum dust conc. (mg/m³)
Milling Hall	27,000	243	111	121	4,000	Polyester Needle Felt (PE/NF) 550g/m ²	RECO JET system	12	3
Bedding Plant	15,000	150.8	150	100	3,000	PE/NF 500g/m ²	RECO JET system	6.7	5

There is a fan which exhausts filtered air to atmosphere from the duct which rises vertically to roof ridge level. The duct incorporates an attenuator.

The fabric filters undergo cleaning using JET cleaning technology which allows for continuous operation of the abatement systems. A pressure difference monitor is integrated into every JET system. It monitors the pressure difference between the raw and pure gas side of the filter thus determining whether cleaning of the filters is required.

During JET cleaning, cleaning impulses are triggered by pressure differences by a controller in the compressed air container sector. The compressed air blasts through the filter bag from the inside to the outside and, for a short time, puts it under pressure. This means for a short time it is inflated; the direction of flow is inverted and the caked dust clinging to the bag is freed and falls into a dust collection container.

In addition, there is a system timed to shake the filters every 5 minutes thus optimising the release of dust from the filters into the collection system.

The filter bags have snap rings at the upper end that are clicked into the perforated filter plates. The filter bags are stabilised by support cages that are fitted as standard.

The dust extraction units are closed units that benefit from a vibration and air injecting system such that they are self-cleaning. They are inspected daily in accordance with:

- Biomass Screening Plant Daily Checks (MIL-RC-02); and
- Bedding Plant Daily Checks (MIL-RC-03).

The Operator has a contract with CRJ who carry out annual inspection and maintenance of the HAAS wood treatment equipment including the dust abatement plants. They also provide a call out service should there be any mechanical failures that the Operator is unable to rectify. Critical spares are kept on site, such that the downtime of machinery is limited.

7.3 Control of Combustion Emissions

The 2 No. diesel generators are inspected and maintained as part of the site wide planned preventative maintenance system. On a daily basis the following are checked and corrective actions taken as required:

- Oil level
- Coolant level
- Pre-heater
- Air filter
- Visual cleanliness
- Fuel facilities in order
- Fuel/ oil spillages

See Biomass Screening Plant Daily Checks (MIL-RC-02) & Bedding Plant Daily Checks (MIL-RC-03).

In addition, the Operator has a service and maintenance agreement in place for the generators.

7.4 Control of Fugitive Emissions

Fugitive emissions to air are controlled in accordance with the measures described in Section 8.4 Control of Dust and the Dust and Emission Plan (MIL-OD-10).

7.5 Control of Emissions to Air under Abnormal Operations

Control of emissions to air under abnormal operating conditions are further detailed in the Fire Prevention Plan (MIL-OD-07).

8 Fire Prevention

The permit application is supported by an updated Fire Prevention Plan (MIL-OD-07) written using the template and guidance provided by the Environment Agency. The non-permitted activities on site involving the acceptance and processing of virgin wood have been incorporated into the FPP.

The primary control measures in place to reduce the risk of a fire starting or spreading on site are:

- Site security including a single gated access with key card entry and CCTV.
- Storage of combustible waste in piles with a 6m separation distance or in bays with fire walls and a 1m freeboard.
- Inspection and maintenance of plant and equipment including regular cleaning.
- Daily checks and fire watches.
- First in first our policy for any waste that is at risk of self-combustion.
- Monitoring of temperature for any waste stored longer than 3 months.
- Fire detection and suppression systems.
- Ample storage of clean fire water on site.

In order to limit the impacts from any fires on site the primary control measures are:

- Impermeable surfacing for all waste storage and treatment areas.
- Containment systems for fire water in all waste storage and treatment areas.

9 Control of Amenity Impacts

9.1 Overview

Odour has not been considered within the permit variation application as there is no change to odour potential as a result of the proposed changes and a written odour management plan is in place.

9.2 Noise

The potential impact of noise from the wood treatment activities on site have been assessed for planning by Sharpes Redmore, who concluded that the relevant sound thresholds for nearby sensitive receptors are satisfactorily met. The potential sources of noise from the wood waste operation and control measures are shown in Table 8 below:

Table 8: Potential sources of noise and control measures

Source of noise	Control measures
Vehicles delivering waste to the Site and collecting wood, compost or topsoil products	 The number of HGVs entering the Site are regulated in accordance with condition 31 of the extant planning permission. There is an enforced site speed limit of 10 miles per hour.
Mobile plant moving around the Site e.g. compost turner, 360 excavator for turning, loader with bucket, loading or unloading the drying floors	 There is an enforced site speed limit of 10 miles per hour. All vehicles used at the Site are maintained in good efficient working order. Mobile plant on site has an Eco setting with automatic switch off. The mobile plant is fitted with reversing bleepers, which automatically adjust relative to ambient noise levels to minimise this intermittent noise emission. All equipment used at the site is silenced to manufacturer's recommendations.
The wood milling equipment	 Enclosure of noisy equipment within 2 No. buildings which are kept with their doors shut unless vehicles are entering or leaving Planned preventative maintenance for all equipment including the shredder etc. which are potential sources of noise emissions. All equipment used at the site is silenced to manufacturer's recommendations.
Fixed plant for composting operation	 Planned preventative maintenance for all fixed equipment used at the site (e.g. screener) The screen is housed in an open sided building All equipment used at the site is silenced to manufacturer's recommendations.

The drying floors themselves are not a source of noise.

Noise is monitored daily; Daily Checks (MIL-MP-01). If noise emissions are detected off-site then corrective actions will be taken as soon as possible and, if required, a Noise Management Plan will be developed, submitted to the EA and implemented.

9.3 **Dust**

9.3.1 Sources & Control Measures

The potential sources of dust from the site operations and control measures are shown in Table 9 below:

Table 9: Potential sources of dust and control measures

Source of dust	Control measures
Operational surfaces	Concrete access road, turning and processing areas
through vehicle movements	Checking and removal of debris / spillages of waste
movements	In dry spells, the access roads and processing area may be sprayed using a vacuum tanker
	Site speed limit (10 miles per hour)
The deposit,	Screening by earth bunds and woodland
mechanical sorting, transfer, loading, turning of non - hazardous organic wastes	In dry spells, the access roads and processing area may be sprayed using a vacuum tanker
Turning /shredding	Screening by earth bunds and woodland
/screening operations	Control of moisture content of compost 40-60% moisture
Wood waste milling	This is carried out within buildings which benefit from dust abatement
	The doors are kept shut when not in use
Drying floors	Wood being dried is static within the drying bays and loaded carefully to abate dust.
Animal bedding	Stored within enclosed buildings and transferred via elevators internally to the building from the milling/screening equipment.
Loading of compost	Concrete loading areas
and A grade wood	Screening by buildings
products	Minimise drop height into lorry trailer.
	Transported by covered/sheeted trailer
Stockpiles	Screening by earth bunds and woodland
	Storage of dried wood products in roofed bays and buildings.

9.3.2 Monitoring

Dust is monitored daily; Daily Checks (MIL-RC-01). This frequency will be increased in dry conditions.

If dust is detected, then the yard and / or access road will be dampened down using a hose. Dust will then be monitored for again and further dampening down will be carried out as necessary. If dampening down is not found to be effective the operation creating dust will be temporarily halted until effective corrective action has been taken.

All of these control measures can be found in the Dust and Emissions Management Plan (DEMP) (**MIL-OD-10**). Staff training will be provided on the DEMP. The DEMP and proposed control measures will be revised and improved if required.

9.4 Bioaerosols

9.4.1 Sources & Control Measures

Shredding, windrow turning and screening are regular operational activities which have the greatest potential to generate airborne particles or bioaerosols.

Windrow composting operations have been designed to minimise dust and bioaerosol emissions. Control measures may include maintaining appropriate moisture levels in the compost and adequate aeration with regular turning frequency.

Wood accepted is not mouldy or decaying.

A site-specific Bioaerosol Risk Assessment⁹ has been carried out which concluded:

The results of the assessment indicated residual risk from all sources was determined as very low or low. As such, it is concluded that no further control measures, other than those detailed in the assessment, are required in order reduce the potential for impacts at sensitive locations in the vicinity of the site.

9.4.2 Monitoring

The EA regulatory position statement on bioaerosol monitoring at regulated facilities, states that if the facility is over 250m from a residential or workplace receptor, there is no requirement to carry out a site-specific risk assessment or to monitor bioaerosols.

Shredding, windrow turning and screening are regular operational activities which have the greatest potential to generate airborne particles or bioaerosols. Recent monitoring data shows that the migration of any airborne particles generated from the site is unlikely to pose any significant risk.

The operational facility was undertaking monitoring of bioaerosols. This was undertaken by a nominated contractor and more frequently if higher or unexpected concentrations of bioaerosols are recorded.

Bioaerosol monitoring study is undertaken in accordance with the EA Technical guidance note M17 and the AFOR sampling protocol by a competent company.

9.5 Litter

Any litter arising will be detected during Daily Checks (MIL-RC-01) and cleared up on the same day. All waste will be stored securely and disposed of appropriately. Perimeter litter fencing is in place.

9.6 Mud

The working surfaces and access roads are constructed from concrete to minimise the accumulation of mud and debris on the wheels and other parts of the waste collection vehicles.

All waste delivered to site will be via public highways and most unlikely to carry either mud or debris to the site.

Should any mud or debris be carried onto or accumulate on the site access road; remedial action may include scraping up with a loading shovel or a road sweeper to clean site roads and working areas.

9.7 Pests

Site operations are not typically expected to attract vermin, flies and scavenging birds due to the absence of food waste in the composting process. The operations will be checked on a daily basis as part of the Daily Checks (MIL-RC-01) and, if required, a specialist contractor will carry out independent inspections.

⁹ Site Specific Bioaerosol Risk Assessment, Redmore Environmental Limited, Reference: 9659r1, 31st July 2025

Should an infestation ever be found, then appropriate pest control measures will be immediately implemented.

The site has a Pest Management Plan (MIL-OD-09) which is adhered to.

10 Control of Climate Change Impacts

Climate change impacts and mitigation controls are considered in a separate site-specific Climate Change Adaptation Risk Assessment (MIL-OD-13).

11 Assessment Against Appropriate Measures

11.1 Overview

An assessment has been made against Appropriate Measures for permitted sites handling non-hazardous and inert waste ¹⁰ (Appropriate Measures) and the findings are summarised below.

11.2 Management

There is an up to date written management system in place which is adhered to. The management system incorporates the features stipulated in Appropriate Measures except for the provision of a decommissioning plan which is being developed as a result of this review.

11.3 Waste pre-acceptance, acceptance and tracking

The Operator only accepts pre-arranged loads of timber for processing. All loads are inspected for contamination and rejected if appropriate in accordance with the Wood Waste Acceptance & Rejection SOP (MIL-SOP-02). Wood waste coming in and going out of site is tracked utilising the on-site computerised records.

11.4 Waste Storage

There are waste storage and handling procedures in place which include Daily Checks (MIL-RC-01) on waste containment. Waste storage quantities will be kept within that stipulated within the Fire Prevention Plan (MIL-OD-07), which also includes site security measure to reduce the risk of arson or vandalism. All staff are trained in the management system controls.

Spillages are dealt with promptly in accordance with Spillage Procedure (MIL-SOP-06).

Waste is handled using a first in – first out policy as detailed in the Fire Prevention Plan (MIL-OD-07).

11.5 Waste Treatment

Wood waste is treated to make animal bedding and biomass fuel to meet customer requirements. The waste treatment processes are closely monitored and optimised in order to produce the final products. The waste treatment processes are described in accordance with the requirements in Appropriate Measures within the EMS Manual and summarised within this document.

11.6 Emissions Control

Wood waste treatment activities, with the exception of initial shredding, are carried out within buildings with dust abatement where required. The doors are shut except to allow ingress and egress to the buildings.

Drying is carried out on dedicated drying bays within buildings.

¹⁰https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities Accessed 28 April 2025

The control of point source and fugitive emissions including dust, mud and litter, odour and noise and vibration are detailed within the relevant sections of this document.

Weather conditions are monitored to assist with day to day operations and for collating historical background information, particularly rainfall.

The following weather conditions are monitored and recorded daily in the site office:

- temperature;
- description of weather conditions, including any precipitation (drizzle, rain, sleet, hail, snow);
 and
- · wind direction

See Section 6 for details of controls of emissions to land and water.

11.7 Emissions Monitoring & Limits

Emission limits relevant to the waste wood transfer and treatment activities on site will be set by the Environment Agency as part of the permit variation determination process.

11.8 Process Efficiency Appropriate Measures

These requirements are not relevant to the waste operation.

11.9 Waste Minimisation, Recovery & Disposal

Any residual waste arising from the treatment of wood waste is minimal and is managed in accordance with the waste hierarchy.

Residual waste from the green waste composting area comprises of predominantly plastics from the screening process. The site has 6 euro bins from council which are removed once per week. The residual waste tonnages are declared quarterly on the waste returns. The residual waste is sent to a waste to energy plant which is currently the optimum recovery route in terms of the waste hierarchy.

Stones are also removed from the green waste and reused as aggregates. Any trowels or garden implements are washed and donated for local causes.

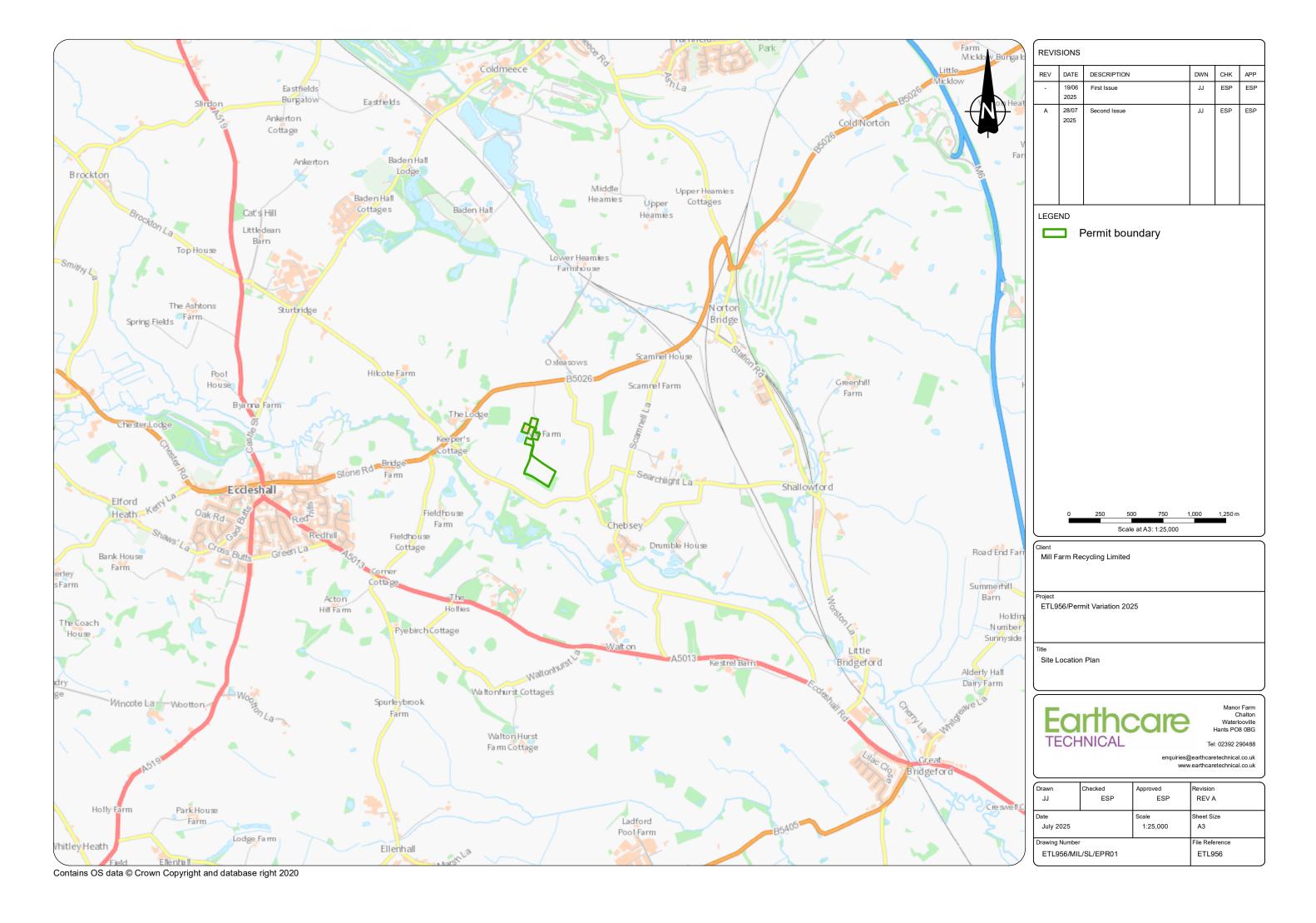
The wood waste operation is focussed on reuse where possible. Any pallets which are accepted are inspected for suitability for reuse; around 1,000 pallets per week are sent off site for reuse. Fire doors are also accepted and reused as fire resistant cladding.

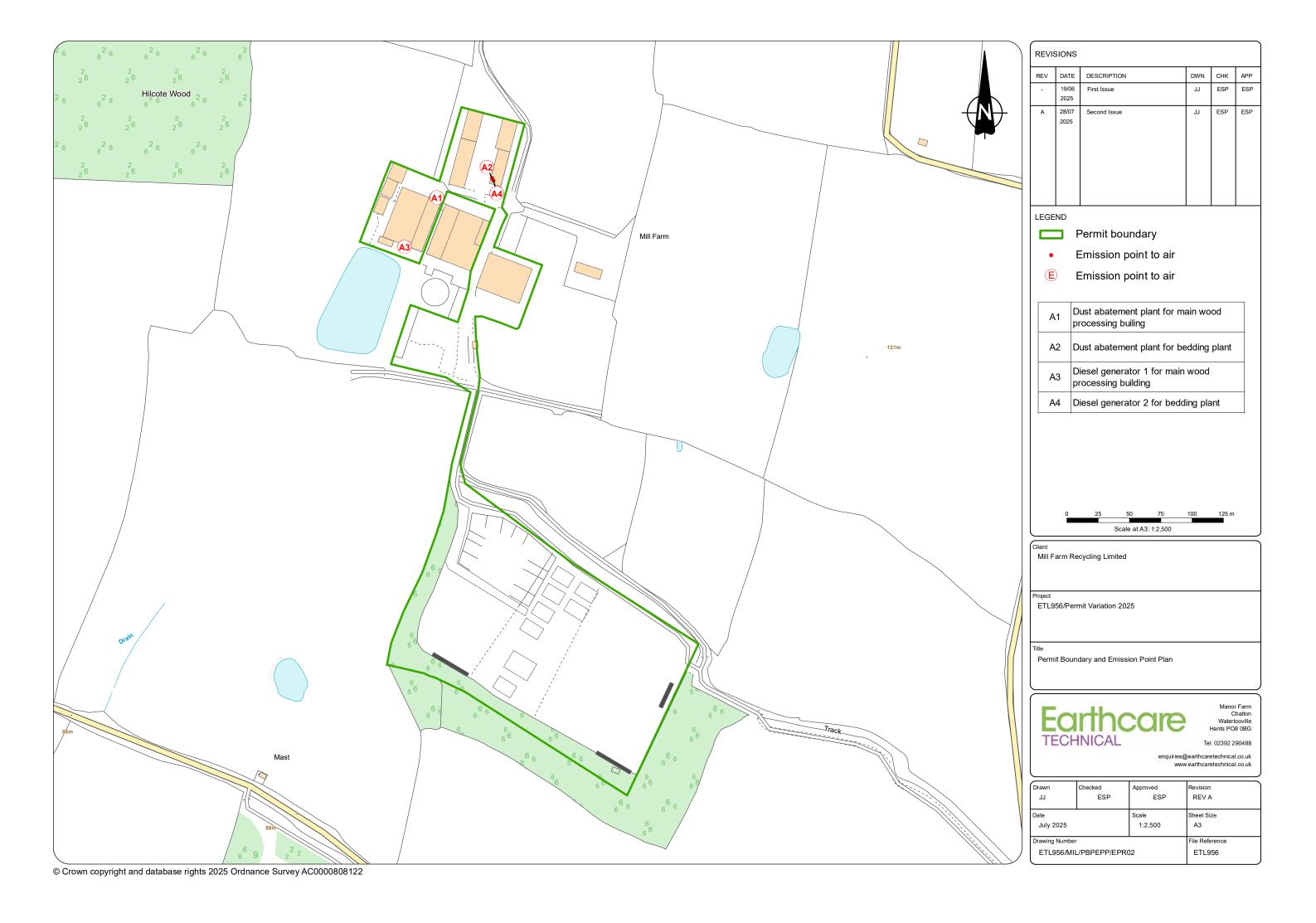
Residual waste from the wood waste operation is predominantly metal fastenings from the pallets; 10 to 12 tonnes per month of nails or staples.

A Waste Minimisation Plan (MIL-OD-19) has been developed in accordance with Best Available Techniques and forms part of the management system.

Figures

- Figure 1: Site Location Plan, Earthcare Technical Limited (ETL956 MIL SL EPR01 V1.0)
- Figure 2: Permit Boundary and Emission Point Plan, Earthcare Technical Limited (ETL956MIL PBEPP EPR02 V1.0)
- Figure 3: Site Layout Plan, Earthcare Technical Limited (ETL956 MIL SLP EPR04 V1.0)
- Figure 4: FPP Layout Plan, Earthcare Technical Limited (ETL956 MIL FPPSL EPR05 V1.0)
- Figure 5: Human Receptor Plan, Earthcare Technical Limited (ETL956 HRP EPR06 V1.0)
- Figure 6: Ecological Receptor Plan, Earthcare Technical Limited (ETL956 ERP EPR07 V1.0)
- Figure 7: Surfacing & Drainage Plan, Earthcare Technical Limited (ETL956 SDP EPR08 V1.0







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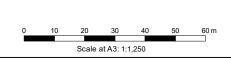
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Permit boundary



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Site Layout - Lower Yard



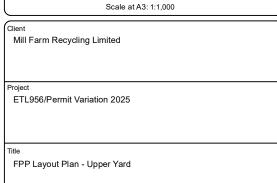
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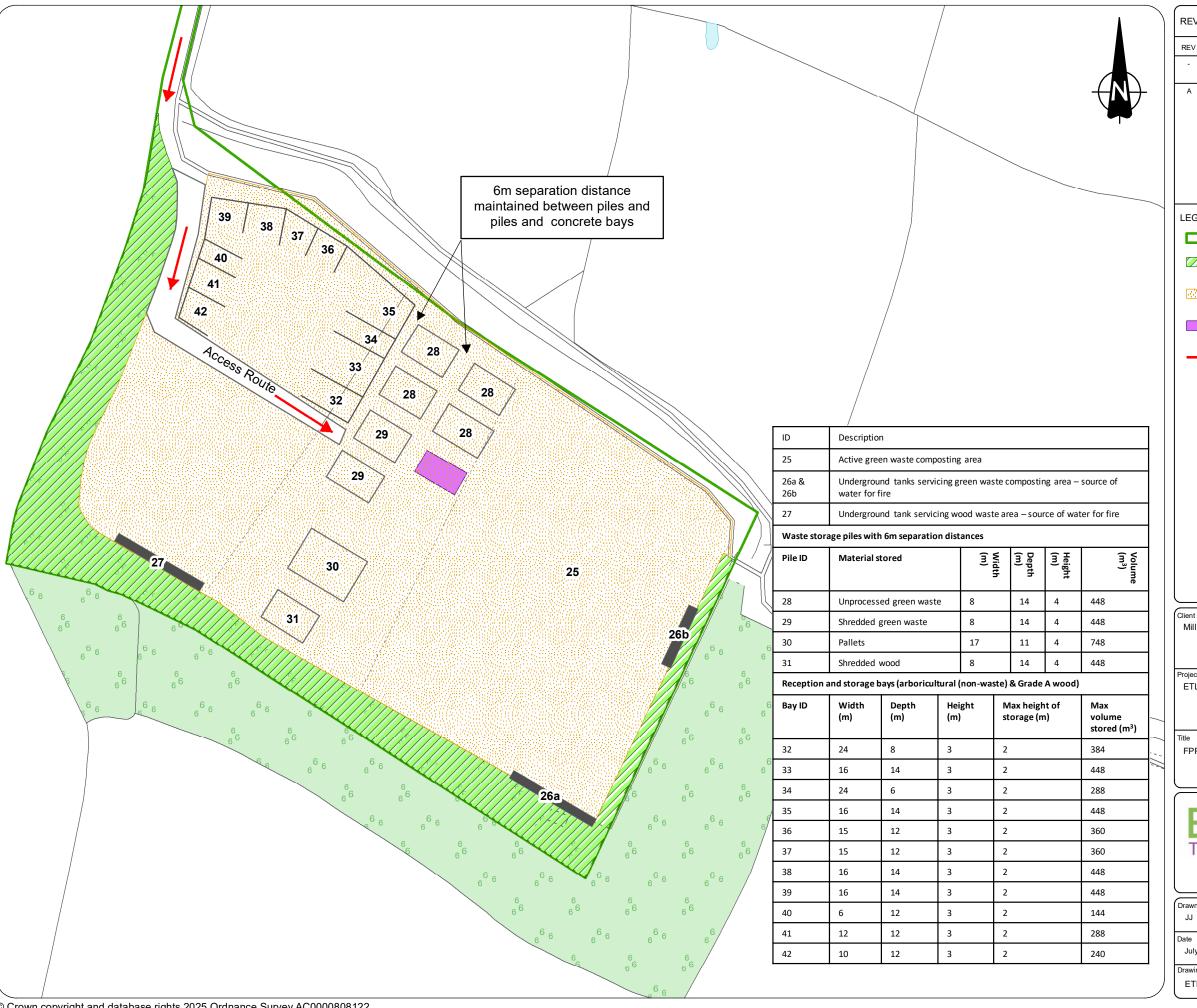


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7		inded fuel storage (waste erations)										
	F	Fixed fire extinguisher										
		Spill kit										
• CCTV Location												
Overnight parking of mobile plant												
_		Access route for emer	gency	/								





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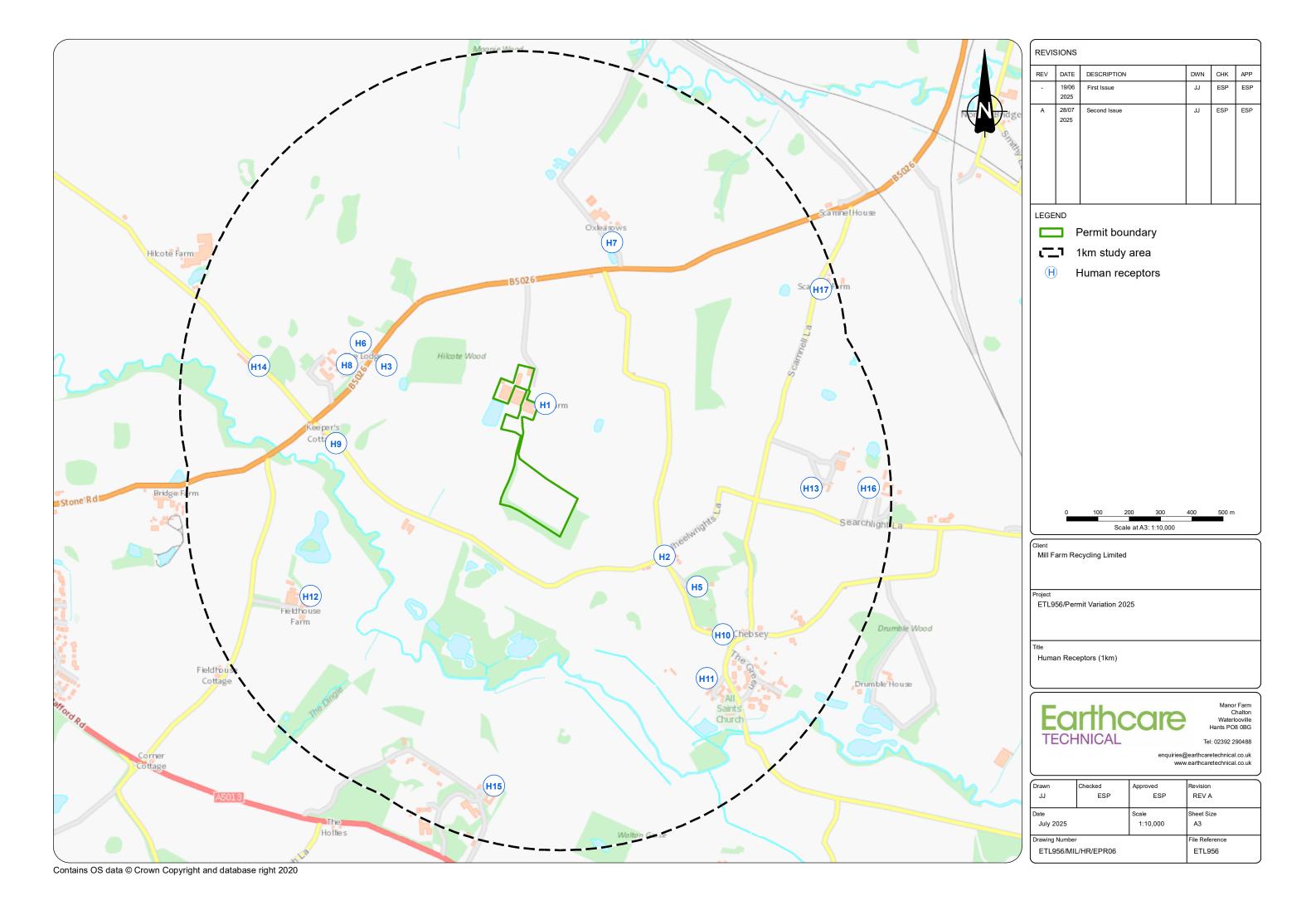
FPP Layout Plan - Lower Yard



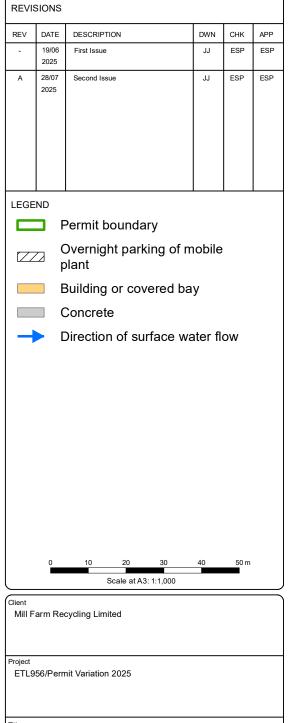
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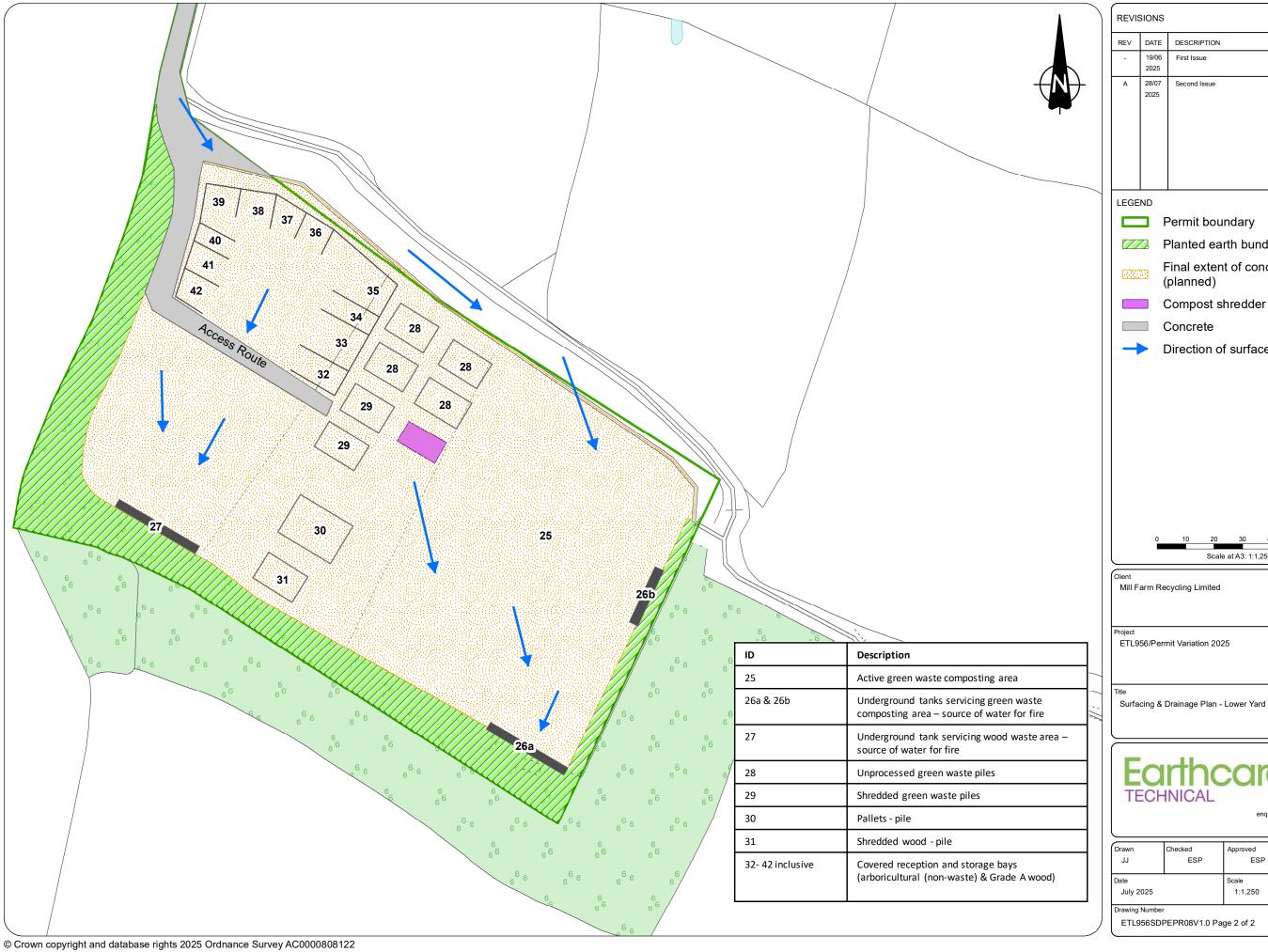






Surfacing & Drainage Plan - Upper Yard

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<u>-330</u>	5.4	Final extent of cond planned)	crete		
Compost shredder (mobile)					
Concrete					
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Client
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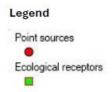
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Figure 6: Ecological Receptor Plan, Earthcare Technical Ltd (ETL956 EPR07 V1.30)

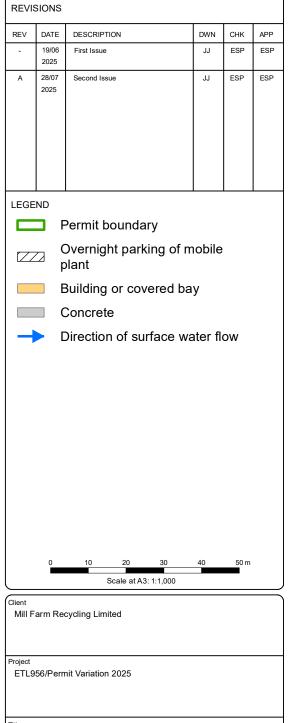


Background image @OpenStreetMap contributors www.openstreetmap.org/copyright



ID	Location	Designation	NGR X	NGR Y	Distance and direction from green line boundary		
					Distance (m)	Direction	
E1	Midland Meres and Mosses Phase 2 Ramsar site/Cope Mere	Ramsar/SSSI	380496	329556	4,750	west	
E2	Fieldhouse Dingle/The Dingle	LWS/AW	384754	328712	760	southwest	
E3	Drumble Wood	LWS, AW	386350	328888	960	southeast	
E4	Chebsey Hollow	LWS	386102	328380	1,000	southeast	
E5	Meece Brook	LWS	385573	330416	755	northeast	
E6	Yelds Rough	LWS	386962	329053	1,665	east	

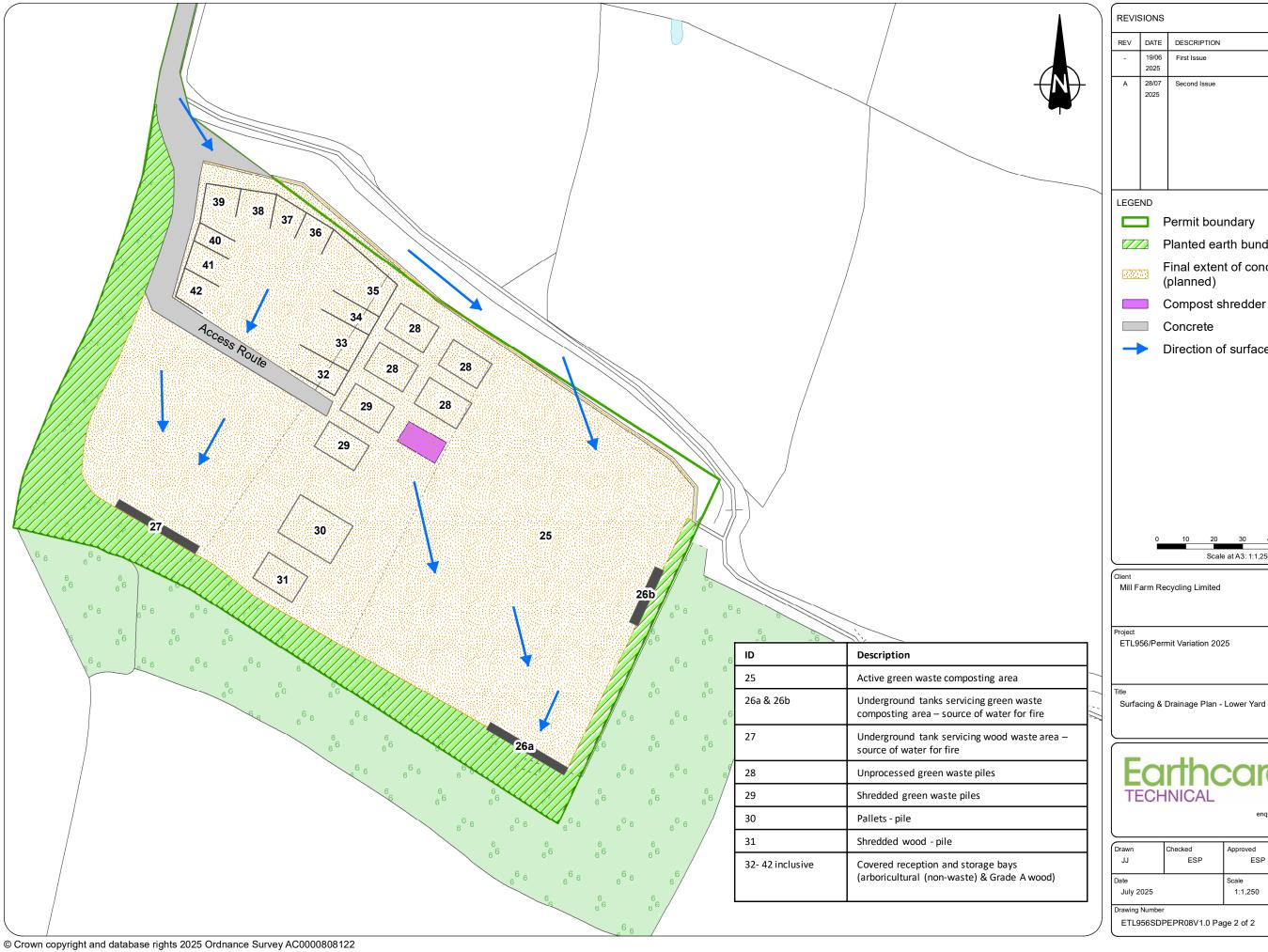






Surfacing & Drainage Plan - Upper Yard

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	 F	Permit boundary			
	<u> </u>	Planted earth bund	(4m)		
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Compost shredder (mobile)					
Concrete					
-	_ [Direction of surface	water fl	ow	

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Appendix A – Process Flow Diagram

Mill Farm Recycling, Process Flow Diagram July 2025

