

**Application Reference: EPR/HB3004KS/A001**

**Operator: Towns Of Weston Ltd**

**Facility: Towns Of Weston Ltd, Westonzoyland**

I write further to your email dated 23/01/19. Thank you for the additional payment and for sending Andy Read's WAMITAB certificate. I have assessed your application and in order to duly make it we require further information.

### **TCM**

I can confirm that Andy has a suitable qualification for being the Technically Competent Manager (TCM) for the site. However until Nick Towns is able to provide his original certificate he is unable to share the role of being the TCM for the site.

- Please can you confirm that Andy will be the sole TCM or provide Nick's certificate.
- Amend the response to Part B2, question 3b.

I can confirm that Nick and Andy will be the TCM for Westonzoyland. Nick has requested copy certificates from WAMITAB. As soon as they arrive, I will forward them on.

### **Dust Management Plan**

Please can you amend the plan.

- The plan refers to SCR.WZ.2017 Site Layout Plan but this is not included in the Dust Management Plan. The plan 'SCR.WZ.2017 is not an integral part of the Dust Management Plan but is referenced within the Dust Management Plan. The plan 'SCR.WZ.2017 was sent with the original application.

Provide a site layout plan showing infrastructure, location of buildings, loading and unloading areas, storage bays, fixed plant (such as crushers), locations of any mobile plant, locations of suppression systems and nozzle heads (including their arc coverage area), different types of site surface, etc. (More than one site plan is acceptable if one plan would be too complex or busy.)

The plan 'SCR.WZ.2017' contains all of the above information, with the exception of the arc coverage area of the suppression system. I am currently getting the plan amended to include said arc and will forward as soon as I receive it back. With reference to the location of fixed plant, the individual pieces of plant aren't referenced on the plan; the plan shows a processing area and this is where all processing will take place, including crushing and shredding.

- Provide details of other sources of dust within 1 km of your site e.g. from the industrial estate.

This is currently being worked on but please could you advise why this is needed? There is no reference in any Environment Agency guidance of the need to do this and with other dust being out of our control it seems a slightly futile task. Are you asking for a simple list of locations that may produce dust?

- Detail how you intend to break the source-pathway-receptor model for each of the receptors for your dust sources

This is contained within the Dust Management Plan in section 3.13 where various methods of dust suppression are referenced all of which are designed to break the pathway.

- Detail how you will interact with neighboring businesses/local residents.

All local businesses and residents will receive a leaflet, delivered by hand, before the commencement of operations on the site. The leaflet design can be seen below.

- The risk assessment states that the reference number of the Dust Management Plan is 41121\_70496. This number does not appear in the Dust Management Plan. If this is the correct number then please add it to the Dust Management Plan. If not amend the risk assessment with the correct reference for the Dust Management Plan.

This reference has been amended to 'SCR.WZ.2017'

### **Noise Impact Assessment (NIA)**

Please can you amend the NIA.

- Provide the computer modelling or spreadsheet calculations that were used in the BS4142:2014 assessment.

Noise Impact Assessments need to include description of the noise mitigation measures proposed and supporting evidence, such as the manufacturer's engineering specification for items that mitigate noise emissions, or calculations of the screening effect of barriers. It states that there will be a 2.5m wooden closed board fence or concrete block wall.

- Provide the engineering specifications and calculations for the wooden closed board fence and concrete block wall.

Provide the following details for fixed and mobile plant on this site, for example, the crusher.

- Grid references (use 1 metre resolution National Grid references for all location data),
- referenced or derived sound power levels (preferably octave band, for derived provide the measurements and calculations)
- heights
- directivities

- operating times (The Noise Impact Assessment states 2 or 3 times a week for 1 to 2 hours but if you have any specific details please provide these or confirm you have no further details.)

Provide the following information about site traffic:

- Grid references for site roads
- Vehicles sound power levels
- Traffic numbers
- Traffic speed

For all site buildings, provide:

- corner grid references
- heights

The consultant who commissioned the original report has been contacted to amend the report to include the additional information as requested above.

### **Noise Management Plan**

After assessing your permit application we consider that a Noise Management Plan is also necessary.

- Please submit a Noise Management Plan with full details of any mitigation and appropriate measures to be put in place to achieve acceptable noise emissions from the site either at source or on the pathway to sensitive receptors and which justifies any barriers to be used, with barrier calculations using a recognised method of barrier attenuation.

Can the request for this information be put on hold, subject to you receiving and reviewing the updated noise assessment report, as mentioned above? This is because the noise assessment report will itself contain details of mitigation.

### **Waste types and activity codes**

You are proposing 4 different activities on your site. Please provide the following breakdown of the treatment operations you carry out.

- Provide a list of which waste codes are treated under each treatment operation, further broken down by which are treated under R3 and which under R5.
- Provide the tonnages per day that are treated under each treatment and each R code.

I have amended table 'Part B4 Table a' to include this information, with the exception of tonnages per day. Until the site is operational it is a stab in the dark to know what materials, in daily quantities, will be available for processing. Maximum storage capacity and annual tonnage is included.

## Site condition report (SCR)

Please can you amend the SCR.

- It says in 1.0 Site Details in the Site Condition Report template that has been provided that the document reference and dates for the Site Condition Report at permit application is SCR.WZ.18 and in 2.0 Condition of the land at permit issue it says "See report SCR.WZ.18". This reference is not shown anywhere within the Site Condition Report. However it says SCR.WZ.2017 in the supporting information. Please clarify which is the reference and/or provide an amended version of the Site Condition Report that has this document reference clearly within the Site Condition Report.

I apologise for the confusion. I don't find the H5 template particularly user friendly so some of the H5 template has been filled in, but in the most the information has been presented in a separate site condition report, the reference of this is SCR.WZ.18. I have amended the document reference of the Site Condition H5 template to SCRH5.WZ.2019.V1

- Site Condition Reports need a date and a version number. In the supporting information the date is 12/09/18. Please update document control and put an amended date and add a version number.

V1 has been added to the document reference.

- Provide an additional site plan showing the site and the receptors within 1 km.

All sensitive receptors are shown on the Envirocheck maps, which are contained in Appendix G of the Non-Technical Summary. In turn, these receptors have all been considered as part of the risk assessment.

- It says in 1.2.5.3 that there is a drainage plan within the permit application but I can't find it. Please send this drawing of the site drainage and reference it in the Site Condition Report.

A full flood risk assessment and drainage plan was conducted by Harcombe Environmental Services. This report was included with the original application as reference 'HES Drainage and FRA'. I have updated the site condition report 'SCR.WX.2018' to include this reference'

- Site Condition Reports need to include evidence of historical contamination (i.e. historical site investigation, assessment, remediation and verification reports (where available). Is 1.3 and 1.4 meant to be the evidence of historical contamination? If not either provide the evidence of historical contamination or confirm that it is not available.

There is no information relating to or pertaining to historical contamination of the site. However, local knowledge about previous use suggested it may be contaminated. This is why Towns did their own sampling of the site, which is what is referenced in section 1.3 and 1.4

## Risk assessment


- The risk assessment refers to 41121\_70482\_180608\_Towens of Weston\_Site Plan. I cannot find a plan with this reference number within the application. Please provide this plan or correct the reference number within the risk assessment.

This reference has been removed from the Risk Assessment and has been amended to SCR.WZ.2017, which is the site plan that was included with the original application.

Please send the information, quoting the above application reference, to:

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

## Leaflet design



Dear Local Residents,

Towens Group's New Physical Treatment Facility Is Opening in Westonzoyland at:

The Former Airfield  
Land Off A372  
Westonzoyland

Great News! Our new facility at Westonzoyland will encourage recycling and sustainability in the local area. Activities at the new site will include:

- Crushing Aggregate to produce road Sub Base Layers
- Chipping wood for use as biofuel (Towens HQ site in Weston is heated using this method)
- Shedding green waste for onward composting
- Recovering soils for use in landscaping

Have any further questions or concerns? Please do not hesitate to contact us at [sales@towens.co.uk](mailto:sales@towens.co.uk)

For any complaints please head to our website [www.towens.co.uk](http://www.towens.co.uk) where a copy of our complaints procedure is held in the 'company permits & docs' section.

TOWENS PRIME OBJECTIVE IS TO MAXIMISE  
RECYCLING AND MINIMISE LANDFILL

