AN APPLICATION TO VARY ENVIRONMENTAL PERMIT NUMBER EPR/FB3139AU FOR THE INERT AND EXCAVATION WASTE TRANSFER STATION OPERATED BY TARMAC AGGREGATES LIMITED AT HARPER LANE QUARRY, RADLETT

Report reference: TAR/HA/EH/5793/01/AR
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1. Proposed changes

1.1 MJCA is commissioned by Tarmac Aggregates Limited (Tarmac) to prepare an application to vary Environmental Permit number EPR/FB3139AU (the permit) for the inert and excavation waste treatment facility operated by Tarmac at Harper Lane Quarry, Radlett, Hertfordshire, WD7 7HX (the site). The permit was first issued to Lafarge Aggregates Limited on 27 February 2012 as a Standard Rules Permit (SRP) SR2009No6 – inert and excavation waste transfer station with treatment permitted to accept up to 250,000 tonnes of waste per year. The permit was varied to add standard rules SR2008No3 on 9 March 2012. There have been three administrative variations comprising a change of company address on 18 November 2013, a variation to reflect the operator's change of name to Tarmac Aggregates Limited on 8 January 2016 and a change of company address on 9 January 2023. The site location is shown on Figure 1. The site is centred approximately at National Grid Reference (NGR) TL 15964 01655 and the boundary of the site the subject of the permit is shown outlined in green on the drawing at Schedule 1 of the permit. An updated version of the site plan is presented as Figure 2. There are no changes to the permit boundary.

1.2 SR2009No6 authorises the receipt, storage and processing of up to 250,000 tonnes per annum (tpa) of inert and excavation waste. The limits of the activities specified in SR2009No6 are treatment consisting only of manual sorting, separation, screening or crushing of waste into different components for disposal, (no more than 50 tonnes per day) or recovery. Following the completion of the Environment Agency (EA) Consultation Number 25 on SRPs, SR2009No6 was withdrawn by the EA on 18 December 2024 and consolidated into SRP SR2022No1 treatment of waste to produce soil, soil substitutes and aggregate. The EA provided letters to operators to explain the changes and published on 12 February 2025 a Regulatory Position Statement (RPS) 'Extension to comply with new standard rules permits: RPS 331' which states that if permit holders do not comply with the new Standard Rules, they must apply for a bespoke permit by 27 June 2025.

1.3 During checks conducted to determine whether the site complies with the new SR2022No1 it was determined that the site is located within a Groundwater Source Protection Zone (SPZ) 1 as confirmed by the nature and heritage screening report that was requested from the EA and is presented at Appendix A. For this reason,

Tarmac are applying to vary the current SRP to a bespoke environmental permit. There are no proposals to vary the activities which will remain consistent with those specified in SR2009No6. Although the permit was varied in March 2012 to add the standard rules set SR2008No3, Tarmac do not propose to undertake or include in the bespoke permit any activities consistent with SR2008No3. The activities under the bespoke permit will be consistent with those specified under SR2009No6 and the list of wastes permitted to be accepted at the site under the bespoke permit, which are presented in Table 1, are also consistent with the list of waste types in SR2009No6.

Content of the application

1.4 The application has been prepared with reference to relevant guidance provided by the EA on the gov.uk website. Parts A, C2, C3 and F1 of the Environment Agency Environmental Permit Application Forms have been completed and are presented at Appendix B. A Non-Technical Summary of the application is presented at Appendix C.

1.5 The application is supported by a qualitative Environmental Risk Assessment (ERA) for accidents, odour, noise and fugitive emissions presented at Appendix D. The ERA assesses the potential impacts to the surrounding environment from the activities. In the ERA it is concluded that the operation of the facility with the implemented controls has a low or very low risk of adverse impact on amenity or the surrounding environment including sites of heritage or nature conservation interest. Based on the assessment presented in the ERA it is unnecessary to provide an odour management plan with this application.

1.6 A dust and emissions management plan (DEMP) is presented at Appendix E. The DEMP identifies the operations at the site which may have the potential to have an impact on air quality as a result of emissions of particulate matter, presents the details of the operational controls which are implemented to minimise emissions and describes the monitoring which will be carried out to confirm the effectiveness of the management controls.

1.7 Environment Agency guidance *Risk assessments for your environmental permit*[1] states that:

> *"The Environment Agency may ask you to submit a noise and vibration impact assessment and a noise management plan if:*
>
> - *your activity uses noisy plant or machinery, for example cooling equipment or fans*
> - *you will be doing any noisy operations, such as loading or unloading, shredding, shearing, crushing, grinding, combustion, using trommels and conveyors or moving bulk materials*
> - *your activities are not contained within buildings*
> - *some of your activities take place at night*
> - *the area where you are planning to carry out your activity is sensitive to noise, for example rural areas may have quieter background noise levels than urban areas*
> - *there are sensitive receptors close to the site, for example houses or habitats"*

1.8 As there are no proposals to change the current activities, the process of varying the SRP to a bespoke permit with no change in the site activities will not change the risk in respect of noise. Based on the absence of noise complaints in respect of the current activities at the site since operations commenced in 2012 and as there are no receptors that are sensitive to noise within 150m of the site and there are no proposals to undertake activities at night, it is considered unlikely that the activities will have a significant adverse environmental impact in respect of noise and therefore a quantitative noise impact assessment and noise management plan is not required. Noise mitigation measures implemented at the site include ensuring that all plant and equipment are regularly serviced and maintained to identify and address any faults or wear and tear that may result in excessive noise, use of audible reversing warning systems on mobile plant and vehicles which, whilst ensuring that they give proper warning, has a minimum noise impact, instructions to vehicle users to

[1] https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit Environment Agency and Defra. Published 1 February 2016. Last updated 3 January 2025.

discourage unnecessary horn usage, revving of engines and aggressive accelerating/braking, minimising drop height of materials where possible, switching off or throttling down of plant and vehicles when not in use, maintaining vehicle routes and inspecting for potholes and repairing as necessary.

2. Additional information to support the Application Forms

Application form Part A - Section 7.2 Contact for receipt of official documents

2.1 A letter of authorisation is provided with the application to authorise Delia Boulis to receive the documentation on behalf of Tarmac Aggregates Limited.

Application form Part A – Appendix 1 – Date of birth information

2.2 As the Appendix states "*Only complete if you are applying for a new permit or to transfer an existing one*", Appendix 1 has not been completed.

Application form Part C2 – Section 3

2.3 The site will continue to be managed in accordance with an environmental management system (EMS) pursuant to Condition 1.1.1(a) of the permit using sufficient competent persons and resources pursuant to Condition 1.1.1(b) of the permit. A summary of the EMS and a copy of Tarmac's ISO14001 accreditation is presented at Appendix F and the Certificate of Technical Competence (COTC) and Certificate of Continuing Competence (CCC) for the technically competent site manager are presented at Appendix G.

Application form Part C2 – Q5a – Site Condition Report

2.4 As there are no proposals to amend the permit boundary it is unnecessary to provide a Site Condition Report (SCR) with the application. For reference, a copy of the SCR prepared in 2012 when the permit was first issued is presented at Appendix H.

Application form Part C4 – Table 3a – Technical standards

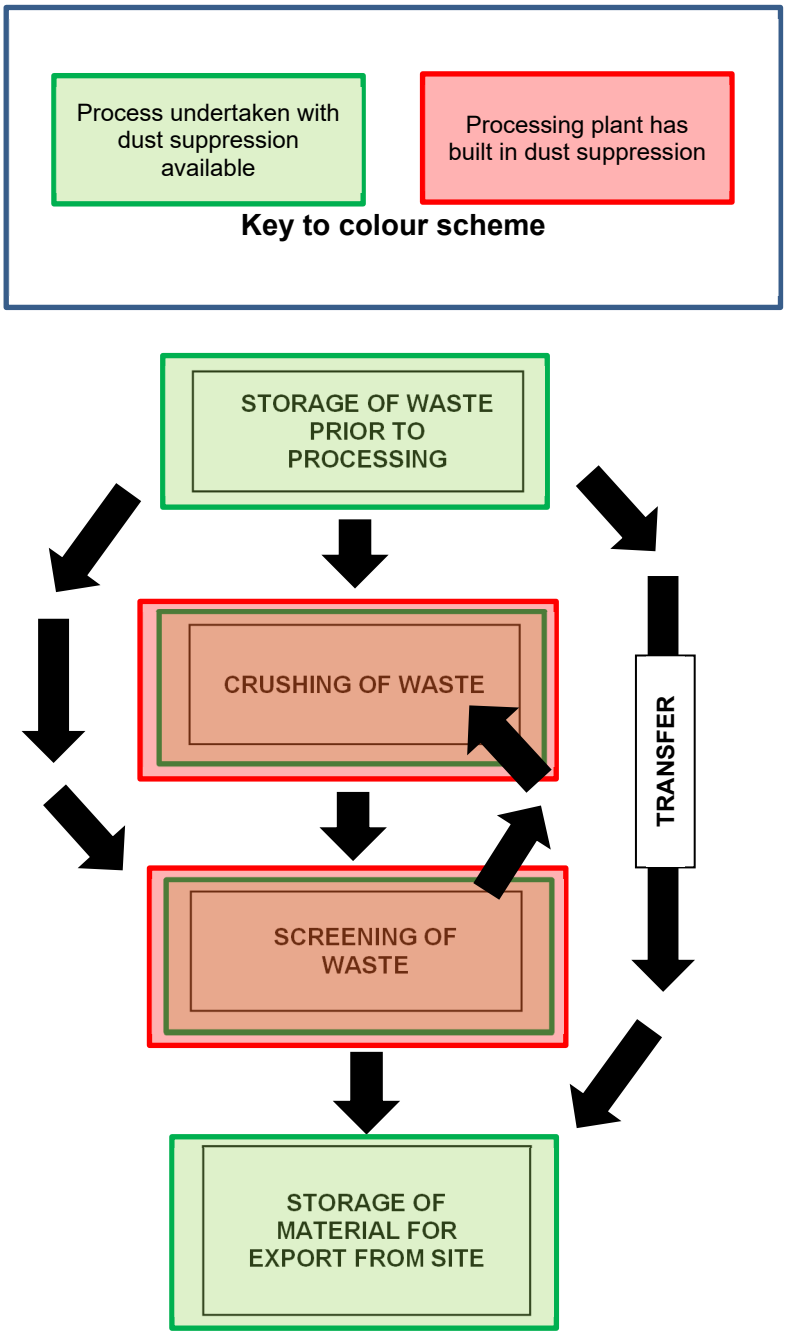
2.5 As the site will comprise an inert and excavation waste transfer station with treatment, the appropriate measures which are most relevant are "*Non-hazardous and inert waste: appropriate measures for permitted facilities*[2]" (the appropriate measures). Section 1 of the appropriate measures (*when appropriate measures apply*) states in paragraph 1.2 (*assessing appropriate measures for your site*)

2 https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities Published 12 July 2021. Last updated 1 August 2023.

"Some measures in this guidance may not be suitable or relevant for your operation. Appropriate measures will depend on the:

- *activities being carried out*
- *size and nature of the activities*
- *location of the facility"*

2.6 The schematic diagram below illustrates the limited and low risk nature of the activities undertaken at the site which comprise the crushing and screening of a small range of inert and excavation wastes on a campaign basis.



2.7 The site is located adjacent to Harper Lane Asphalt Plant and Tyttenhanger Concrete Plant north of the village of Radlett. Access to the site is via Harper Lane (B556) which is shown on Figure 1. Based on the Windrose for Luton shown on Figure 2, the prevailing wind direction is from the west southwest hence areas to the east northeast are considered to be of down prevailing wind direction from the site. As shown on Figure ERA1 in the ERA there are no residential properties downwind within 1km of the site. The closest residential receptor to the site is approximately 155m north west of the site.

2.8 The appropriate measures are subdivided into the following categories:

1. When appropriate measures apply
2. General management appropriate measures
3. Waste pre-acceptance, acceptance and tracking
4. Waste storage
5. Waste treatment
6. Emissions control
7. Emissions monitoring and limits
8. Process efficiency appropriate measures
9. Waste minimisation, recovery and disposal

2.9 Further details relevant to Section 6 - emissions control are presented in the ERA and in the DEMP provided with this application. Section 6.1 of the appropriate measures refers to enclosure within buildings and states the following:

1. *Enclosing activities within buildings <u>can be</u> an appropriate measure for preventing and minimising emissions of pollution*
2. *If your <u>waste treatment</u> activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you <u>must</u>*

carry out that waste treatment activity within an enclosed building.

3. *You must also carry out non-treatment activities, such as storing and transferring waste (including loading and unloading) in enclosed buildings if these activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures.* [Our emphasis]

2.10 Taking into consideration the guidance in relation to when appropriate measures apply which specifies that the appropriate measures will depend on the activities being carried out, the size and simple nature of the activities and the location of the facility, the absence of any noise or dust complaints for the currently permitted activities in the period of more than 10 years since the permit was issued, the fact that there are no proposals to change the currently permitted activities and the conclusions of the ERA it is considered that it is unnecessary to enclose the waste treatment activities within a building as there is a very low risk that the activities are likely to cause significant pollution at sensitive receptors. The control measures in respect of dust are described in the ERA and the control measures in respect of noise are described in paragraph 1.8 above.

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