



PEMBROKESHIRE COUNTY COUNCIL ECO-PARK

# ENVIRONMENTAL PERMIT APPLICATION

Non-Technical Summary V1

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**WRAP is a climate action NGO working around the globe to tackle the causes of the climate crisis and give the planet a sustainable future.**

**Our core purpose is to help you tackle climate change and protect our planet by changing the way things are produced, consumed, and disposed of.**

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**Written by:** SLR Consulting Ltd



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## **Acknowledgements**

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# 1.0 Introduction

The Waste and Resource Action Programme (WRAP), on behalf of Pembrokeshire County Council (PCC) has retained SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) application for the proposed new Pembrokeshire County Council Eco Park in Milford Haven under the Environmental Permitting (England and Wales) Regulations 2016 (as amended). The Eco Park will consist of a Waste Transfer Station (WTS) and a Waste and Recycling Centre (WRC).

This document provides a Non-Technical Summary (NTS) of the application including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed changes.

## 1.1 Site Location

The site is situated approximately 3km north west of Milford Haven and approximately 8km south west of Haverfordwest. The National Grid Reference (NGR) for the site is SM 88985 09338.

The area to the north of the site consists predominantly of open/agricultural land and commercial/industrial premises associated with Puma Energy are located immediately to the south and west. Pembrokeshire Coast National Park lies approximately 30m from parts of the site's northern boundary and extends to the north and west. An individual residential property (holiday let property - human receptor) lies approximately 25m to the north and further residential and farm/agricultural buildings are located approximately 75m north.

The surrounding land uses and local receptors within 1km are identified on Drawing 002A, Environmental Site Setting. Drawing 002B shows the cultural and natural heritage receptors within 2km.

A summary of the site's immediate surrounding land uses is identified in Table 1 below.

*Table 1: Surrounding Land Uses*

Boundary	Description
North	Pembrokeshire Coast National Park and an unnamed road, followed by a residential property (holiday let property – human receptor), and farm/agricultural buildings. Beyond this lies open/agricultural ground.
East	Farm/agricultural buildings (including a poultry farm) and open/agricultural land. Beyond this lies a solar farm
South	Immediately to the south lies commercial/industrial premises associated with Puma Energy (separately permitted COMAH industrial fuel storage facility). A railway line and open/agricultural ground are also located in this direction.
West	Commercial/industrial land is located to the west of the site. Beyond this lies open/agricultural land, individual residential properties, and Pembrokeshire Coast National Park.

## 1.2 Pre-Application Discussions

WRAP requested a pre-application advice meeting with Natural Resources Wales (NRW) on the 7<sup>th</sup> April 2022 to discuss the approach to the transition of operations from PCC's existing site to the new site at Eco Park, and the bespoke EP application. However, NRW declined this request based on the discretionary nature of the service. WRAP were signposted to NRW's online guidance instead.

## 2.0 Proposed Activities

PCC propose to open a new multi-faceted Eco-Park to support its county-wide collection service implementing the Welsh Government Blueprint. Additionally, the new site location will allow the vehicle fleet to be relocated reducing current waste mileage, and increasing productivity.

The site will be developed in four phases as follows:

- **Phase 1:** Recycling transfer facility, and associated access roads. This phase will contain an office and a visitor centre, offering the opportunity for groups to come and learn about waste and recycling;
- **Phase 2:** Vehicle and staff parking area. A vehicle maintenance workshop and staff welfare facilities are also included as part of this phase;
- **Phase 3:** Residual waste building and recycling facility; and
- **Phase 4:** Publicly accessible Waste and Recycling Centre (WRC).

Phases 1 and 3 make up the WTS, whilst Phase 4 consists of the WRC. Phases 1, 2, and 3 will be constructed first, followed by Phase 4.

The new site will replace PCC's current interim WTS at Units 29/29B and 41 (Pembroke Dock, SA72 6TD) and the WRC at Winsel Waste and Recycling Centre (Old Hakin Rd, Haverfordwest SA61 1XG) to provide a future proofed facility in line with Welsh Government objectives.

### 2.1 Process Description

Proposed operations at the site will be to accept and process up to 74,999 tonnes per annum (tpa) of non-hazardous, hazardous, and commercial wastes arising from household and commercial premises. Waste will be delivered to the site in local authority and commercial vehicles or delivered directly to the WRC by members of the public and commercial businesses.

The site will host a number of supporting ancillary services, namely HGV parking, a garage for routine and minor repairs, vehicle washing facilities, an education centre, and office accommodation. A satellite garage and workshop facility will be located on site (Phase 2) to deal with routine checks, inspections, and minor maintenance to support the fleet of waste vehicles and plant which will be based and operate from the site. All major maintenance activities will be delivered from the separately permitted Thornton Depot (Unit 23, Thornton Business Park, Milford Haven, SA73 2RR). Vehicles operating from the site will be able to re-fuel on site from a dedicated fuelling area.

PCC's fleet of waste collection vehicles will operate from the site, with parking provided to allow drivers and operatives to park whilst out on waste vehicles. On returning to site at the end of each shift, vehicles may need to be re-fuelled and washed.

The EP boundary is illustrated on Drawing 001 and the overarching site layout on Drawing 003.

### 2.1.1 WTS

The WTS will comprise the following:

- A Recycling building, housing pre and post processed (sorted and baled) recyclates along with sorting and baling equipment;
- A Residual waste building housing bagged and loose residual waste, bagged Absorbent Hygiene Products (AHP), and bagged Dry Mixed Recyclate (DMR); and
- External covered bays for the bulking of a range of materials as illustrated on Drawing 005.

The following material types will be bulked for onward transfer at the WTS:

- Paper;
- Cardboard;
- Food Waste;
- Plastic Film;
- Hard/Rigid Plastic;
- Aluminium;
- Plastic;
- Steel;
- Cartons;
- Mixed plastic, cartons, and metal packaging;
- Plastic and metal packaging (including cans and aerosols);
- Glass;
- Tyres;
- Scrap Metal;
- UPVC;
- Absorbent Hygiene Products (AHP);
- Dry Mixed Recycling (DMR);
- Residual Waste;
- Carpets;
- Wood; and
- Mattresses.

Recycling collection vehicles and commercial collection vehicles will enter the WTS area of the facility from the southern entrance road to the weighbridge. The waste will be weighed at the weighbridge and directed to the appropriate waste unloading area. An operative will inspect the vehicle load for any contaminants or hot loads before allowing the vehicle to discharge their load prior to exiting the site.

The following treatment activities will be carried out within the recycling building at the WTS:

- Bulking up of materials for transfer;
- Automated and manual sorting;



- Separation; and
- Baling.

Within the recycling building, mixed metals, plastics, food and beverage cartons will be stored in designated bays before being sorted and baled using a conveyor and sort-line system which incorporates both manual and automated sorting and baling. Manual picking will be used to remove food and drink cartons for storage and baling and any contrary material will be removed for disposal.

Cardboard will be stored in a designated bay prior to being baled (primarily using a second baler and conveyor system however both balers may be used where required). Food waste will arrive on site in Resource Recovery Vehicles (RRVs) pods/stillages or trade waste vehicles and where possible this material will be tipped directly into a sealed skip or artic trailer. In some instances, food waste will be tipped into the designated food waste bay prior to transfer to the sealed skip/trailer prior to onward transfer for processing. Each skip/trailer will remain on site for no more than 72 hours (3 days), to account for residual waste held over the weekend period. Household batteries will be stored in a small, designated bin in the recycling building.

Residual waste, AHPs, and DMR arrives on site bagged and will be deposited in dedicated bays within the residual building at the WTS for bulking up, prior to onward transfer.

The external covered bays within the WTS will be used for bulking a range of materials. Glass waste will be collected loose and stored in a designated bay within this area of the site. Glass and wood waste will be reduced in size by pushing/crushing the material against the bay walls. All materials will then be transferred off site for further processing, recovery, or disposal via third party hauliers or PCC haulage vehicles as appropriate.

The WTS site layout is illustrated on Drawing 005.

### 2.1.2 WRC

The following material types will be accepted at the WRC:

- Residual Waste;
- Paper;
- Cardboard;
- Tyres;
- Carpet;
- Hard/Rigid Plastics;
- Wood;
- MDF;
- Green Waste;
- Scrap Metal;
- UPVC;

- Books;
- Textiles;
- Shoes;
- Cartons;
- Cans and plastic;
- Inert Waste;
- Mixed Glass;
- Plasterboard;
- Mattresses;
- Frame Non-Reusable Furniture;
- Frame Reusable Furniture;
- Reusable Furniture;
- Paints;
- WEEE;
- FLO Tubes;
- TV Cages;
- Gas Bottle Cages;
- Large Domestic Appliances;
- Oil bank and cooking oils; and
- Household and vehicle batteries.

The following treatment activities are carried out at the WRC:

- Bulking up of materials for transfer;
- Manual sorting; and
- Separation.

Private vehicles will enter the WRC from the southern site entrance road. They will be stopped by a site attendant who will identify the waste items they are carrying and direct them to the appropriate waste unloading area. Any commercial vehicles will be dealt with in accordance with the commercial waste policy and procedure and their loads will be visually inspected for contaminants or hot loads before allowing the vehicles to discharge their load and exit the site. Permitted waste streams will be stored in appropriate containers/dedicated areas.

The WRC may also undertake sorting where recyclates are removed from residual bags brought in by members of the public. The WRC site layout is illustrated on Drawing 004.

## 2.2 Specific Waste Management Activities

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **R3:** Recycling/reclamation of organic substances which are not used as solvents;

- R4: Recycling/reclamation of metals and metal compounds;
- R5: Recycling/reclamation of other inorganic materials;
- D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D1 to D12;
- R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced);
- D14: Repackaging prior to submission to any of the operations numbered D1 to D13; and
- D15: Storage pending any of the operations numbered D1 to D14.

## 2.3 Waste Types and Storage

The site will accept up to 74,999 tpa and a maximum of 1495 tonnes will be stored on site at any one time.

No more than 50 tonnes of hazardous waste will be stored on site at any one time.

Waste will be stored on site for a maximum of 6 months.

The proposed waste list is shown in Table 2 below.

Table 2: Proposed EWC Codes

Waste Code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 01	Wastes from mineral excavation
01 01 01	Wastes from mineral metalliferous excavation
01 04	Wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays
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 04	Waste plastics (except packaging)
02 01 10	Waste metal
13	OIL WASTES AND WASTES OF LIQUID FUELS (EXCEPT EDIBLE OILS, AND THOSE IN CHAPTERS 05, 12 AND 19)
13 02	Waste engine, gear and lubricating oils
13 02 05*	Mineral-based non-chlorinated engine, gear and lubricating oils
13 02 06*	Synthetic engine, gear and lubricating oils
13 02 07*	Readily biodegradable engine, gear, and lubricating oils

15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	Packaging (including separately collected municipal packaging wastes)
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	metallic packaging
15 01 05	Composite Packaging
15 01 06	Mixed Packaging
15 01 07	Glass packaging
15 01 09	Textile packaging
15 02	Absorbents, filter materials, wiping cloths and protective clothing
15 02 02*	Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances
15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	End-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	End-of-life tyres
16 01 07*	Oil filters
16 01 13*	Brake fluids
16 01 14*	Antifreeze fluids containing hazardous substances
16 01 15	Antifreeze fluids other than those mentioned in 16 01 14
16 02	Wastes from electrical and electronic equipment
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 05	Gases in pressure containers and discarded chemicals
16 05 05	Gases in pressure containers other than those mentioned in 16 05 04
16 06	Batteries and accumulators
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, bricks, tiles and ceramics
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

17 02	Wood, glass and plastic
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 04	Metals
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals
17 04 11	Cables other than those mentioned in 17 04 10
17 05	Soil (including excavated soil from contaminated sites), stones, and dredging spoil
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
17 06	Insulation materials and asbestos-containing construction materials
17 06 01*	Insulation materials containing asbestos
17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 06 05*	Construction materials containing asbestos
17 08	Gypsum-based construction material
17 08 02	Gypsum-based construction materials other than those mentioned in 17 08 01
17 09	Other construction and demolition wastes
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
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, crushing, compacting, pelletizing) not otherwise specified
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	Glass
19 12 06*	Wood containing hazardous substances

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19 12 07	Wood other than that mentioned in 19 12 06
19 12 08	Textiles
19 12 12	other wastes (including mixtures of materials from mechanical treatment of wastes other than those mentioned in 19 12 11
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 08	Biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 13*	Solvents
20 01 14*	Acids
20 01 15*	Alkalines
20 01 17*	Photochemicals
20 01 19*	Pesticides
20 01 21*	Fluorescent tubes and other mercury-containing waste
20 01 23*	Discarded equipment containing chlorofluorocarbons
20 01 25	Edible oil and fat
20 01 26	Oil and fat other than those mentioned in 20 01 25
20 01 27*	Paint, inks, adhesives and resins containing hazardous substances
20 01 28	Paint, inks, Adhesives and resins other than those mentioned in 20 01 27
20 01 29*	Detergents containing hazardous substances
20 01 30	Detergents other than those mentioned in 20 01 29
20 01 33*	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	Batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, and 20 01 23 containing hazardous components
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23, and 20 01 35
20 01 37*	Wood containing hazardous substances
20 01 38	Wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	Wastes from chimney sweeping
20 01 99	Other fractions not otherwise specified (consisting of nappies and absorbent hygiene products (AHPs) only)

20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 02 03	Other non-biodegradable waste
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 03	Street-cleaning residues (excluding mechanical sweepings or sweepings requiring
20 03 07	Bulky waste

## 3.0 Application Contents

To support this application for an EP, the following documentation is submitted in addition to this NTS:

- NRW Application Forms (Parts A, B2, B4 and F1);
- Evidence of technical competence;
- OPRA Spreadsheet (Waste Facilities);
- Site Condition Report (SCR);
- Environmental Risk Assessment (ERA);
- Operating Techniques (OT) document;
- Fire Prevention & Mitigation Plan (FP&MP);
- Noise Impact Assessment and Management Plan (NIAMP);
- Odour Impact Assessment (OIA);
- Odour Management Plan (OMP);
- Pest Management Plan (PMP);
- Dust and Emissions Management Plan (DEMP); and
- Drawings:
  - Drawing 001                      Environmental Permit Boundary
  - Drawing 002A                  Environmental Site Setting Local Receptors
  - Drawing 002B                  Environmental Site Setting Natural and Cultural Heritage
  - Drawing 003                   Site Layout and Environmental Permit Boundary – Overview
  - Drawing 004                   Site Layout and Environmental Permit Boundary – WRC
  - Drawing 005                   Site Layout and Environmental Permit Boundary – WTS
  - Drawing 006                   Drainage Layout

### 3.1 Site Condition Report

A SCR has been prepared as part of this application to establish the baseline environmental conditions within the proposed EP boundary.

The facility will operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the site does not pose a significant risk to the surrounding human and natural environment.

### 3.2 Environmental Risk Assessment

An ERA has been produced to assess the environmental risk posed by the proposed activities on site.



Table 3 highlights the main potential risks on site and the associated risk assessment and/or management plan.

*Table 3: Summary of Environmental Risk Assessment*

Potential Emission Risk	Risk Assessment/Management Plan
To Water	All waste activities will be carried out impermeable concrete surfacing with sealed construction joints and an engineered drainage system either within the buildings or outside of the buildings. All runoff from areas where waste activities are undertaken will drain to a controlled drainage system. Surface water drains through a number of sustainable drainage systems (SuDS) features and a rainwater harvesting system is utilised to capture rainwater runoff from the building roofs, used for vehicle wash down, and grey water for the offices.
Fire	A FP&MP is included that follows NRW guidance for FP&MPs <sup>1</sup> and details the required mitigation and management methods to prevent a fire of combustible materials stored on site.
Noise	<p>A NIAMP has been produced to assess the risk of adverse impact from noise 'pollution', generated by the proposed activities, on noise-sensitive receptors in the surrounding area. A Baseline Noise Survey was conducted at five nearby noise-sensitive receptors to determine threshold noise levels to assess against. Mitigation for inclusion within the site layout and site operations was identified and included within the sound predictions and assessment as embedded mitigation. The mitigation measures will comprise:</p> <ul style="list-style-type: none"> <li>• The re-routing of HGV traffic so that all night-time (05:00 – 07:00) departures will use the southern access, removing the need for HGV movements on the northern internal route (i.e. the distance between HGV movements and receptors will be increased) during more sensitive operational hours;</li> <li>• Installation of a 3m high acoustic barrier at the northern site boundary;</li> <li>• Installation of a 3m high acoustic barrier at the western side of the Phase 3 covered glass bay.</li> </ul> <p>The results have concluded that with the identified mitigation strategy, all reasonable steps have been taken to reduce sound levels and the potential for adverse noise impact at nearby noise-sensitive receptors. There will not be a significant adverse impact during the daytime or night-time periods.</p>
Odour	<p>The proposed facility will introduce a new source of odours within the local area with a potential to impact upon the amenity of existing sensitive receptors. Therefore, the OIA is provided in order to:</p> <ul style="list-style-type: none"> <li>• Ascertain whether odour issues may be expected as the result of the proposed facility;</li> <li>• Provide a quantification of potential odour impact; and</li> <li>• To identify appropriate odour mitigation measures, where required, in order to prevent adverse odour impact at a range of potential sensitive receptors in proximity to the site.</li> </ul> <p>In adoption of a precautionary assessment approach, the results of the dispersion modelling predict that the odour concentrations resulting from the proposed site operations are well below the relevant benchmark criterion at all nearby receptors identified. Therefore, there is no risk of unacceptable odour pollution as a result of the site operations.</p> <p>Notwithstanding the results of the OIA, an OMP is included to ensure best practice measures for the control of odour emissions within the site are implemented.</p>
Pests	A PMP has been produced which outlines the methods by which PCC will systematically assess, reduce and prevent a potential infestation of pests at the proposed facility during normal operation and during potential abnormal events.
Dust	A DEMP has been produced which includes a review of the site's location, potentially sensitive receptors and local wind speed and direction data. The sources of dust associated with the proposed activities on

<sup>1</sup> Fire Prevention & Mitigation Plan Guidance, August 2017

	site have been considered and appropriate techniques for monitoring, management and mitigation will be in place. Subject to the implementation of the stated management measures, the conclusion has been reached that the proposed activities are unlikely to result in a significant risk of dust emissions that would affect the amenity of the local environment.
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### 3.3 Operating Techniques

PCC will operate their own EMS which is supplemented by the OT document submitted with this application.

The OT document details the management measures that will be implemented on site to minimise the risk of accidents or emissions that could impact workers and local receptors.

The document includes the detailed process description and relevant roles and responsibilities to ensure the safe and effective management of the site to keep it in compliance with the EP.

The document includes the following information;

- Management;
- Site Operations;
- Emissions and Monitoring; and
- Information and Reporting.

Operational management procedures will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the EMS and the OT;
- Performance against the EMS is audited at regular intervals; and
- The EP is complied with.

## 4.0 Technical Standards and Control Measures

The key technical standards laid out in the following documents govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- Developing a Management System: Environmental Permits and Controlling and Monitoring your Emissions for an Environmental Permit;
- Sector Guidance Note S5.06 – Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste;
- Technical Guidance Document: How to Comply with your Environmental Permit, Version 8, October 2014;
- Fire Prevention & Mitigation Plan Guidance;
- Site Condition Report Template, Version 3;
- H4 Odour Management;
- H3 Horizontal Guidance for Noise; and
- Fly Management: How to Comply with your Environmental Permit, Version 1, April 2013.

The control measures relevant to the proposed activities are described in the OT submitted with this application.

The proposals have been assessed against these standards and are all considered to meet the relevant technical standards.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the application.

PCC is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with their EMS.



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