Permitting decisions

Bespoke permit

We have decided to grant the permit for Johnsons Aggregates and Recycling Ltd - Recycling House operated by Johnsons Aggregates and Recycling Limited.

The permit number is EPR/RP3237YR.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken in to account.

This decision document provides a record of the decision making process. It:

- highlights key issues in the determination
- summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account
- shows how we have considered the consultation responses.

And

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

Description of the main features of the Installation

The installation will accept up to 250,000 tonnes of incinerator bottom ash (IBA) from the thermal treatment of municipal solid waste and 50,000 tonnes of metal wastes per annum. The IBA is processed to yield incinerator bottom ash aggregate (IBAA), which is generally accepted as a replacement for the majority of primary aggregates by both UK and European standards.

Key issues of the decision

1 List of Wastes, Waste Acceptance Procedures and Environmental Risk

Applicants are only required to provide a summary of their waste acceptance procedures where they are fully in line with the standards set out in SGN 5.06– Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste; . In our review of document JATEL12_Waste Acceptance and the summary of waste acceptance procedure we noted a number of conflicting statements on types of waste being handled; how they would be handled and how rejected waste would be dealt such that the procedures were not in line with SGN5.06. In addition the procedures failed to correlate with risks identified in the environmental risk assessment (ERA).

The Applicant was requested to confirm the waste being treated, to revise waste acceptance procedures and ERA as part of a Schedule 5 requests for further information dated 25/01/2018 and 19/04/2018. The Applicant responded to this request and submitted revised documents on 22/02/2018 and 11/05/2018. Having considered the waste acceptance procedures and other information submitted in the Application, we are satisfied that wastes are suitable for the proposed activities, proposed infrastructure is appropriate and the environmental risk assessment is acceptable. This is discussed in more detail in the sections below.

2 The site and its protection

The Installation is located in the at grid reference SJ 67584 10273. The site is located to the west of Waterloo Road, Ketley. It abuts the embankment of the M54 Motorway to the south of the site, with a band of wide of mature trees forming the site's western boundary which is formed by the line of a disused railway. Immediately to the north is a small industrial estate accessed off Sinclair Gardens, with another area of mature trees to the north east. Greenway Waste Recycling Limited operated at the site as "Pink Skips Transfer Station" under Permit Ref EAWML 47118 from 2000 to 2017. The company went into liquidation and permit was disclaimed on 17th September 2017. The site still has waste on site. The landlord is to clear this waste prior to the occupation of Johnsons Aggregate.

A site condition report (SCR) is required for any facility regulated under the EPR, where there may be a significant risk to land or groundwater. Article 22(2) of the IED requires the Applicant to provide a baseline report containing at least the information set out in paragraphs (a) and (b) of the Article before starting operation. The baseline report is an important reference document in the assessment of contamination that might arise during the operational lifetime of the Installation and at cessation of activities at the Installation.

At the definitive cessation of activities, the Operator has to satisfy us that the necessary measures have been taken so that the site ceases to pose a risk to soil or groundwater, taking into account both the baseline conditions and the site's current or approved future use. To do this, the Operator has to apply to us for surrender, which we will not grant unless and until we are satisfied that these requirements have been met.

The Operator provided a SCR as part of the bespoke application using our H5 template and provided the site plan under a separate cover JATEL- A4 site layout, potential wedge pit, along with copies of the drainage plan and surface finishes from the previous operator (documents JATEL_Pink Skips – Drainage, and JATEL_Pink Skips - Surface Finishes). Due to access problems and volume of waste remaining on the site, no site reconnaissance to assess the adequacy of existing pollution prevention measures or baseline data was submitted

We have reviewed the report and consider that it does not adequately describe the condition of the soil and groundwater prior to the start of operations. Our review of pollution incidents that have occurred at the site using https://data.gov.uk/dataset/environmental-pollution-incidents indicates evidence of historic contamination. Nine incidents are recorded as having had a minor impact to land and/or minor impact to land and water. Baseline reference data is therefore essential and we have imposed a pre-operational condition, PO1 for the collection of baseline data prior to waste being brought onto site,

All applicants are required to demonstrate that the plant will be designed in such a way as to prevent the unauthorised and accidental release of polluting substances into soil, surface water and groundwater. In our review of the application documents we noted that the external storage area was larger than that used by the previous occupier and as such it was not clear the extent of the storage area infrastructure that sufficient measures would be taken to protect soil and groundwater. We asked the operator via a schedule 5 notice to provide further details of the site surfacing, the drainage system and pollution control measures to be employed. The operator responded on the 22/02/18 with a revised drainage plan, a JATEL_Flood Action Plan, the design details of the IBA storage areas and wedge pits and associated inspection and maintenance regime.

The Operator reports that **ALL** operational areas of the site will benefit from an impermeable surface which will prevent the release of potentially polluting liquids to surface water and groundwater. Secondary containment will be provided for the oil storage tanks. The proposed secondary containment is designed to hold a minimum of 110% of the capacity of the largest tank or 25% of total tank volume, whichever is the greater. They also will undertake regular visual inspections of level of waste waters held in the wedge pits and during the annual outage a full clean out and inspection will be undertaken. Based upon the information in the application we are satisfied that the appropriate measures will be in place to protect soil and groundwater.

We have set pre-operational condition (POC 2) which require the submission of a report confirming the construction and integrity of the secondary containment of the oil storage tanks (including pipework); wedge pits along and site surfacing are fit for purpose and in accordance with industry standards **PRIOR** to waste being accepted on site. This will ensure that the proposed site infrastructure is properly designed to minimise risks to the environment and reduce the risks of accidents and their consequences.

3 Noise and vibration

The applicant submitted a noise risk assessment undertaken by Clement Acoustics that was prepared in support of a planning application to Telford & Wrekin Council. Its focus was to show that the noise emission criteria set by the planning authority for the site would be achieved. We do not accept this approach. There is no set number that we consider to be acceptable or unacceptable (a numeric noise limit) as each environment and industry needs to be considered on its own merits (as outlined in the Noise Policy Statement for England). Applicants must ensure that "*all the appropriate preventative measures are taken against pollution, in particular through the application of BAT***"**. We asked the applicant to provide a revised noise impact assessment in accordance with BS4142:2014 and Noise Management Plan (NMP).

In the Applicants response to our Schedule 5 Notice dated 25/01/2018 received on the 22/02/2018 the noise assessment concluded that complaints would be unlikely during both the daytime and evening period provided the following control measures are in place:

- External site activities will be limited to the operating hours of 7am to 7pm Mondays to Fridays inclusive;
- The trommel will have an acoustic screen
- All IBA treatment processes are to be carried out within an enclosed building;
- All machinery
- All machinery will be operated in accordance with manufacturers' instructions and within normal working parameters;
- Heavy plant, lorries and other vehicles operating at the site will be fitted with white noise reversing alarms;
- An on-site speed limit of 10 miles per hour will be enforced;
- External areas of hardstanding and site roads will be regularly maintained and kept clean to reduce vehicle suspension noise;
- Annual monitoring of noise impact at sensitive human receptors; and
- Implementation of a site noise management plan (NMP).

As noted earlier, the initial NMP, JATEL_13. Noise Management Plan of the Application provided was considered to be unsatisfactory as it failed to identify all noise sources on site; it failed to specify the

preventative measures that would be taken to minimise noise generated by the facility, and to failed to identify who would be responsible for evaluating and monitoring the effectiveness of the mitigation measures being put in place. We asked the Applicant to submit a revised NMP via a Schedule 5 Notice. The revised NMP, submitted on 22/02/2018 was deemed to be in-line with our guidance the indicative BAT requirements for noise and vibration of the TGN5.06 and Annex 2 of H3 – Part 2 Noise Assessment and Control. We have incorporated the NMP into the permit in table S1.2.

We have also set improvement conditions (IC1) for a further noise assessment following the commencement of site operations to verify the assumptions made in the application and proposals for carrying out mitigation measures from the results of the assessment if required (IC2).

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise noise and vibration and to prevent pollution from noise and vibration.

4 Application of Best Available Techniques (BAT)

The principal aim of IBA treatment is to improve ash quality in order to generate a material that has the potential for safe recovery (e.g. for use as a secondary aggregate material in road construction) and to mechanically separate and collect the ferrous and non-ferrous metal fractions for further recycling. The use of treated IBA as a secondary aggregate both reduces the use of virgin aggregates and reduces the amount of waste sent to landfill.

The Applicant proposes to use a dry treatment process. Currently this is the most common type of treatment and generally involves the following mechanical processes: screening, size-reduction of oversize material, separation of ferrous and non-ferrous metals and any residual un-burnt material.

- IBA storage and handling: The site has the capacity to store 30,000 tonnes of incoming unprocessed IBA. All waste storage areas are on impermeable surface. Drainage removes surplus water to two wedge pit lagoons which collect all arisings for recycling to the process. Unprocessed IBA is stored externally to enable weathering (maturing/ageing) reactions to take place. The treatment is carried out within a building and the processed IBA is stored for a further weathering period of 3 months, externally.
- IBA Treatment: this consists of the separation of metals (ferrous and non-ferrous), unburned material and oversize material via the following methods:
    - handpicking
    - overband magnets
    - screens
    - eddy current separators.

The processed IBA is screened into size-segregated fractions suitable for its final destination.

As a result of our assessment, we are satisfied that the Applicant's proposals are BAT for ash treatment (Environment Agency guidance document Quick guide 384_12 – Storing and treating incinerator bottom ash) and the recycling of metal wastes (British Metals Recycling Association Bref Report).

5 Dust Management Plan (DMP)

The Applicant submitted a DMP with the application which outlined possible risks from the operation of the facility and control measures. We considered the plan lacked sufficient detail and the Applicant was requested to re-submit a revised plan as part of a Schedule 5 request for further information dated 19/04/2018. A revised DMP was submitted on 11/05/2018.

We consider the management techniques proposed to be appropriate for the facility. Dust management aspects addressed include:

- Regular dampening of IBA stockpiles using the site bowser which is able to access and dampen all IBA stockpiles to minimise fugitive dust emissions.
- Management of IBA loading procedures. Loading will be closely monitored to ensure piles are adequately dampened prior to loading. If dust is experienced during the loading process the operation will be suspended and the IBA pile dampened further before loading is attempted.
- Management of the IBA hopper level. The hopper level will be maintained at a level that will reduce the impact of potential dust emissions arising from hopper loading.
- Processing of IBA will only take place within an enclosed building
- Housekeeping procedures including regular sweeping of site roadways to minimise fugitive dust emissions arising from site roadways.

Based upon the information in the Application we are satisfied that appropriate measures will be in place to prevent and/ or minimise fugitive emissions, which will be regulated through permit conditions 3.2.1 to 3.2.3.

6 Odour Management Plan (OMP)

The Applicant submitted an OMP with the application. We considered the plan lacked sufficient detail and the Applicant was requested to resubmit a revised plan as part of a Schedule 5 request for further information dated 25/01/2018. We have reviewed and approved the revised OMP provided by the operator on 22/02/2018, including the additional information requested during the determination. We assessed the OMP against the requirements of the Environment Agency Technical Guidance H4 – Odour Management and consider the management techniques proposed to be appropriate for the facility. The OMP submitted by the Operator was updated during the determination to address the information we requested. Odour management aspects addressed include:

- Use of stockpile management to ensure oldest IBA stockpiles are processed first.
- Contingency measures in the event that the site receives odorous waste.
- Contingency measures in the event that the site is unable to accept waste (e.g. insufficient storage capacity).
- Plant maintenance/inspection programme for critical spare parts/processing equipment to ensure maximum availability of the IBA treatment process.
- Daily olfactory monitoring around the site perimeter.
- Odour complaints response and investigation procedures

Based upon the information provided we are satisfied that appropriate measures will be in place to prevent and/or minimise potential odour emissions from the site.

7 Accident Management Plan (AMP)

The Applicant submitted an AMP with the application which outlined possible risks from the operation of the facility and control measures. We considered the plan lacked sufficient detail and the Applicant was requested to resubmit a revised plan as part of a Schedule 5 request for further information dated 25/01/2018. The Applicant responded to this request and submitted a revised AMP on 22/02/2018. Having considered the Plan and other information submitted in the Application, we are satisfied that appropriate measures will be in place to ensure that accidents that may cause pollution are prevented but that, if they should occur, their consequences are minimised. The accident management plan will form part of the Environmental Management System required by Permit condition 1.1.1(a).

8 Fire Prevention Plan (FPP)

The Applicant submitted a Fire Risk Assessment with the application which outlined possible risks from the operation of the facility and control measures. This concluded that there was a low risk of fire occurring on site and as such a fire prevention was not necessary.

Waste fires are potentially harmful to human health. The Environment Agency has a statutory duty to regulate certain activities, including waste management facilities in order to protect the local community. Our FPP guidance aims to improve the standards at all permitted sites storing combustible waste so that fires are less likely and, when they do occur, their duration and impact on the public is minimised. Our guidance requires operators that store combustible wastes to have in place an FPP approved by the Environment Agency. FPPs must meet the minimum standards in our guidance, or where there is deviation from these standards, this must be fully justified by the operator and agreed by the Environment Agency.

We asked Applicant to provide a FPP as part of a Schedule 5 request for further information dated 25/01/2018. The applicant declined to provide FPP as standalone document but updated there Accident Prevention Plan. They justified this approach as an ESA Renewable Energy Working Group, 18 January 2018, Agenda Item: 4b IBA Flammability Report found that the exposure of un-ground samples of IBA to water has shown evidence of gas production. However, the maximum rate of gas production observed was 0.017 l kg-1 hr-1; 59 times lower than the hazardous threshold limit of 1 l kg-1 h-1.

As discussed in the preceding section we are satisfied that appropriate measures will be in place to ensure that accidents that may cause pollution are prevented but that, if they should occur, their consequences are minimised.

The AMP includes appropriate measures for managing common causes of fire, preventing self-combustion, preventing fire spread, fire water containment and contingency planning during and after an incident. We consider these to be in line with the guidance.

Based upon the information provided we are satisfied appropriate measures will be in place to prevent and/or minimise fires on site via the AMP and a standalone FPP is not necessary.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
Consultation	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement. The application was publicised on the GOV.UK website. We consulted the following organisations: • Health & Safety Executive • Public Health England • Director of Public Health, • Telford Borough Council (Environmental Health Department) • Telford Borough Council (Planning Department) The comments and our responses are summarised in the consultation section.
Operator	
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.
The facility	
The regulated facility	We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits. The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.
The site	
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is not satisfactory. The decision was taken in accordance with our guidance on site condition reports. We have advised the operator what measures they need to take to improve the site condition report. See key issues section 2.

Aspect considered	Decision
Biodiversity, heritage, landscape and nature conservation	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat: • New Hadley Brickpit (SSSI) New Hadley Brickpit (SSSI) As well as the following Local Wildlife Sites (LWS): • Limekiln Wood • Shortwood • Smalley Hill • Whitchurch Drive • Marlborough Way Pond • Paddock Mound And Ancient Woodlands (AW): • Limekiln Wood • Short Wood. We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process. We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified. We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.
Environmental risk assessment	
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory. See key issues section.
Operating techniques	
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility. • IPPC S5.06 – Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste; • BRMA Bref Report; and • Quick guide 384_12 – Storing and treating incinerator bottom ash. The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit. The proposed techniques/emission levels for priorities for control are in line with the benchmark levels contained in the above technical guidance notes and we consider them to represent appropriate techniques for the facility. We are satisfied with the BAT assessment provided by the operator which adequately addresses the following points:

Aspect considered	Decision
	• pre-acceptance & acceptance of waste (See Key issues Section1) • storage and handling of waste • process (treatment) description • fugitive emissions to air (dust) • fugitive emissions to surface and groundwater (secondary containment, site drainage plan) See key issues section 2 • accidents (See Key issues Section 7).
Odour management	We have reviewed the odour management plan in accordance with our guidance on odour management. We consider that the odour management plan is satisfactory. See Key issues section 6.
Noise management	We have reviewed the noise management plan in accordance with our guidance on noise assessment and control. We consider that the noise management plan is satisfactory. See key issues section 3
Fire prevention plan	We have assessed the fire prevention plan and are satisfied that it meets the measures and objectives set out in the Fire Prevention Plan guidance. See key issues 8.
Permit conditions	
Use of conditions other than those from the template	Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.
Raw materials	We have specified limits and controls on the use of raw materials and fuels.
Waste types	We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility. We are satisfied that the operator can accept these wastes for the following reasons: • they are suitable for the proposed activities • the proposed infrastructure is appropriate • the operating systems and technical capability to manage these wastes using appropriate measures • the environmental risk assessment is acceptable. We made these decisions with respect to waste types in accordance with our Technical Guidance Note Quick guide 384_12 – Storing and treating incinerator bottom ash.
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions. Please refer to Key Issues of the Decision section of this document.
Improvement programme	Based on the information on the application, we consider that we need to impose an improvement programme. We have imposed an improvement programme to ensure that if noise emissions are not as expected then additional mitigation will be undertaken See Section 3 of key issues

Aspect considered	Decision
Emission limits	We have decided that emission limits are not required in the permit.
Operator competence	
Management system	There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions. The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.
Technical competence	Technical competence is required for activities permitted. The operator is a member of an agreed scheme. Mr Stuart Thompson has registered on MROC1 WAMITAB VQ course on 24/11/2017, Application No. 30606. To be completed by end of November 2018. We are satisfied that the operator is technically competent.
Relevant convictions	The Case Management System been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The operator satisfies the criteria in our
Financial competence	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit. Paragraph 1.3 of the guidance says: "The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation." We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections. We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Planning - Telford & Wrekin Council (dated 29/12/2017).
Brief summary of issues raised
They provided a summary of the sites planning permission for waste handling. This included the current permission - "The Extension of existing recycling centre; extensions to existing building/workshop, construction of additional car parking, creation of storage of skips, and associated landscaping" (our ref: W2005/0906) which was allowed on appeal in 2008 and was subject to 33 planning conditions (appeal decision notice and conditions attached). Reference was also made a current planning application (our ref: TWC/2017/0882 in determination to vary conditions 1, 9, 11, 16 and 17 and to remove conditions 31 and 32 of the appeal consent. This application has been 'called-in' by Ketley Parish Council and so it is yet to be determined. They drew our attention to the complaint history that included planning enforcement action against one of previous operators over various matters and that the most recent complaints had been related to the number of large HGV vehicles using the site. They accepted that some of the proposed changes Johnsons Aggregates wish to make, such as installing a second weigh bridge and demolition of the small shed, have the potential to make the site operate in a more effective manner and overcome some of the issues created by previous operators over the years, including reducing the need for lorries to wait outside the site. They advised that over 150 objections from local residents had been received regarding the current planning application and variation of conditions. Note that the Planning Officers had yet to review the documents but they anticipated that they would be wanting further clarification on the following: 1. Traffic- use of larger vehicles and increased numbers. 2. Noise from earlier start - there is the potential for the earlier 6am start to adversely impact on the amenity of local residents. The 6am start, which is considered to be a night time hour, may have the potential to create unacceptable traffic noise levels within the site as HGVs start up, engines idle and vehicles manoeuvre out of the site. The waste storage area, where it is anticipated HGVs will be parked, is on a higher elevated ground than the entrance and buildings, so noise levels may be exacerbated. There are sensitive receptors (residents) adjacent to the north side of the site in Sinclair Gardens and the early morning HGV vehicle movements within the site may cause harm to the amenity of nearby residents. 3. Site layout - clarification on the layout plan to show how the demolition of the smaller shed and how the largest northern and western part of the site is to be organised as an area for incoming waste, storage, a quarantine area and whether there is a need for specific designated areas that are only used for particular uses, e.g. storage of waste, areas kept free for HGVs to manoeuvre/turn/unload/load/ park overnight. If these areas do not function well, then there is the potential for the site as a whole to become congested and cause similar problems experienced by the previous operator. The Council may wish to seek a more detailed layout that specifically and more accurately demarcates specific areas and areas to be kept free of obstructions. 4. Drainage – Our drainage engineers have recently expressed concerns that the planning application appears to remove or not provide an attenuation pond, which appears to be shown on old site layout plans. Any changes to the site layout or surface treatments that may increase impermeable areas may in turn impact on surface water flows, attenuation and increase flooding in the local

area, which is already prone to flooding. Our engineers will be wanting a Flood Risk Assessment and details of attenuation methods.
Summary of actions taken or show how this has been covered
1. & 2 We have assessed the noise risk assessment including noise from onsite traffic and pollution control measures described in the Application and we are satisfied that that the control measures are BAT for this installation and the operations are unlikely to cause significant pollution. A noise management will be implemented on site. Condition 3.3.1 of the permit will ensure compliance with this plan as agreed. Please see section 3 for details 3. Congestion is not an environmental permit consideration, however, please section 2 on how we have assessed the site and its protection. 4. The attenuation pond is not part of the permitted boundary. As discussed in section 2 we have assessed the site surfacing and drainage system and other pollution control measures described in the Application and we are satisfied that that the control measures are BAT for this installation and the operations are unlikely to cause significant pollution. The site has sufficient capacity to handle surface and waste waters. All waters are to be used on site and any excess waters will be tankered offsite as necessary. Please see section 2 for details.

No responses were received from the Health & Safety Executive, Public Health England, Director of Public Health, Telford Borough Council (Planning Department), the Food Standards Agency or individual members of the public.