Permitting Decisions - Bespoke Permit

We have decided to grant the permit for Saxon Brickworks operated by Johnsons Aggregates and Recycling Limited.

The permit number is EPR/DP3131NM.

The application is for the treatment of Incinerator Bottom Ash (IBA) to produce Incinerator Bottom Ash Aggregate (IBAA) that has the potential to be a direct substitute for virgin aggregate. The treatment process involves removal of ferrous and non-ferrous metals, and screening of the IBA to produce different sized fractions of IBAA. Unprocessed IBA that is received at the site is stored outside to undergo cooling and 'ageing' process for a maximum period of 12 weeks. The IBA is processed using a combination of a trommel, vibrating screens, and electrostatic and magnetic separators to remove ferrous and non-ferrous metals and to produce different sized fractions of IBAA. These processes are undertaken within two purpose-built and enclosed buildings. Other than the trommel which is located outside, all of the IBA treatment plants are situated within the enclosed buildings.

In addition to the IBA treatment operations, the site is also permitted to treat construction and demolition (C&D) wastes by screening. The C&D wastes are first screened into sizes and then mixed with IBAA in line with the product specification for use of aggregate in construction agreed between the operator and their customers.

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 considerations section to show how the main relevant factors have been taken into account.
- highlights key issues in the determination.
- shows how we have considered the consultation responses.

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

Read the permitting decisions in conjunction with the environmental permit.

Key issues of the decision

An overview of the application proposals/permit

The application is to allow Johnsons Aggregates and Recycling Limited to operate the following installation and directly associated activities (DAA) at the Saxon Brickworks site:

- S5.4 A(1) (b) (iii) - Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment of slags and ashes.
- Storage of waste prior to and after treatment.
- Raw material storage.
- Collection and storage of contaminated and uncontaminated surface water.

Johnsons Aggregates and Recycling Limited is also allowed to operate the following Waste Operation activity:

- Storage and treatment of C&D waste.

The installation activity is for the treatment of IBA to produce IBAA that has the potential to be a direct substitute for virgin aggregate. The treatment process involves removal of ferrous and non-ferrous metals, and screening of the IBA to produce different sized fractions of IBAA.

Unprocessed IBA that is received at the site is stored outside to undergo cooling and ‘ageing’ process for a maximum period of 12 weeks. The IBA is processed using a combination of a trommel, vibrating screens, and electrostatic and magnetic separators to remove ferrous and non-ferrous metals and to produce different sized fractions of IBAA. These processes are undertaken within two purpose-built and enclosed buildings. Other than the trommel which is located outside (but enclosed), all of the IBA treatment plants are situated within the enclosed buildings.

In addition to the IBA treatment operations, the site is also permitted to treat C&D wastes by screening. The C&D wastes are first screened into sizes and then mixed with IBAA in line with the product specification for use of aggregate in construction agreed between the operator and their customers. The C&D waste treatment operations represent small percentage of the overall site treatment capacity and is taking place outside of the buildings.

The facility is permitted to accept up to 250,000 tonnes of IBA and 50,000 of C&D wastes per year.

Dust Management Plan (DMP)

The operator submitted several revisions of the DMP. The approved version of the DMP (version 9) addresses the key issues identified in the original submissions. The key elements of the revised DMP include:

- Treatment of IBA treatment within enclosed buildings. The trommel is the only IBA treatment unit that is outside; however, it is fully enclosed.
- IBA and IBAA are stored outside of the building but at a moisture content of 20%. The moisture content is monitored on daily basis. The moisture content of the external stockpiles are maintained using mobile browsers with spraying units, permanent sprinklers.
- Misting units are installed in all external bays and on the hopper in Building 1 and Building 2.
- Screening of C&D is happening outside but far removed from potential receptors. The screening equipment is fully enclosed and there are sprinklers and water cannon unit is deployed when C&D waste is being processed.
- Mobile dust control measures are available within and outside of the buildings.
- Building 1 has fully enclosed units, conveyor belt and fogging unit that is used for dust control. There are no channelled emission points in Building 1.
- Building 2 has dust extraction units that are located outside but connected to the building. The extraction systems do not have any emission points; they are designed to capture the dust and drop it into a bag. As such there are no channelled emission points in Building 2.
- Buildings 1 and 2 are equipped with fast acting doors.
- Hopper in building 2 to be cladded including a roof with a front opening to allow JCB loading as well as a misting line to reduce the likelihood of dust emissions.
- A speed limit of 10 mph will be enforced where vehicles are operating around the site. Vehicles will be regularly cleaned and are maintained and serviced in accordance with legal requirements, best practice and manufacturer/supplier guidelines.
- A one way driving system is in operation for all vehicles exiting site. The exit area is fitted with a cattle grid and a wet sump to wash the wheels.
- Western and northern boundary have sprinkler systems that are installed by the bund to control potential dust release from the IBAA stockpiles.
- Dust emissions are monitored continuously at the two dust monitoring stations located in the north-eastern and south-western corners of the site. There are also mobile dust monitoring units that are held by staff in strategic locations around the site.

- The action level for dust monitoring is set at 25µg/m^3 while the trigger level is set at 75µg/m^3. Visible release of dust beyond the site boundary is not allowed.
- The entire site area is covered with impermeable surfaces (mainly concrete). There is a regular housekeeping schedule for the cleaning of roads and clearing of mud and spillages.

Noise Impact Assessment (NIA)

The operator submitted a NIA which was amended following the Schedule 5 Notice dated 06/05/2021. The latest revision of the NIA (version G), received on the 14/10/2021 and the addendum received on the 09/11/2021 considers the potential risk of noise emissions on human receptors around the site.

The NIA took into account the following external sound sources:

- HGVs delivering and removing waste
- A screener
- A trommel
- Front end loaders
- 360 loader
- Conveyors
- A hopper
- Telehandler
- Extractors

Two sound emitting buildings were also included:

- Building 1: including spreaders, conveyors, vibration sieves, eddy current, vibrating feeders, sensors separator and a forklift.
- Building 2: including rotor impact mill, dust extractor, and a Trennso air unit.

Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times.

The NIA modelling was derived from background sound levels over three time periods, 06:00 – 18:00, 18:00 – 22:00 and 22:00 – 06:00. Separate assessments were completed for weekends and weekdays. HGV movements were considered in the noise modelling.

Following the submission of the noise modelling data (submitted with version G of the NIA), we carried out sensitivity checks and uncovered that the dominant sound sources are associated with lorry loading, trommel, hopper and screener.

The outcome of our checks show that the proposed site operation is not likely to have significant or adverse impact on the receptors on weekdays and on Sundays. However, we found out that there is a risk of adverse impacts during the operations on Saturday at the following times and location:

- Saturday, during the day time operations (06:00 – 18:00) at Snoots Road.
- Saturday, early morning (06:00 – 09:00) at Peterborough Road.
- Saturday, late evenings (18:00 – 21:00) at Snoots Road and Peterborough Road.

Following our assessment of the NIA (version G), the operator submitted an addendum to the NIA on the 09/11/2021, making and incorporating the following changes to further reduce the risk of their Saturday operations:

- Saturday 06:00 to 08:00 – Building 2 operations only.
- Saturday 08:00 to 18:00 – All activities, with the exception of the screener. The screener will not be operational on Saturdays.
- Saturday 18:00 to 22:00 – Building 2 operations only.

Although the operator assessment in the addendum shows that adverse impact is not likely at three periods above, we noted that adverse impact is still likely for the period when the site fully operational on Saturday (even without the screener) at Snoots Road only. However, we consider that this is marginal especially with the proposed additional mitigation measures that will be implemented - reducing noise levels of the trommel by enclosing it, adding sound deadening linings to the main feed hoppers in Building 1 and 2.

Overall, we consider that the proposed mitigation measures (e.g. enclosed building, minimal drop heights, limited movement of waste during handling, no idling policy for vehicles, acoustic dampening) represent appropriate measures.

To ensure that noise emissions at the site are closely monitored, we have included improvement condition IC4 in the permit which requires the operator to undertake noise monitoring in line with BS4142:2014+A1:2019 to validate the data that was used in the NIA and to submit the report of such monitoring to the Environment Agency for approval. In the event that the noise monitoring identifies the need for further noise abatement measures, the operator shall submit a proposal for additional mitigation measures together with timescales for implementation.

Noise and vibration management

We have reviewed the noise and vibration management plan in accordance with our guidance on noise assessment and control.

We consider that the noise and vibration management plan is not satisfactory and we have not approved this plan.

We have not approved the noise and vibration management plan because we have considered that it is not detailed enough. We have advised the operator to update and resubmit the plan following the monitoring specified under Improvement Condition IC4.

Site Condition Report (SCR)

The SCR was submitted with the application but it was noted that it was limited in scope. There was no baseline data within the area marked in orange in the drawing reference number 502 (appendix IV of the site investigation report). As part of the Schedule 5 Notice dated 06/05/2021, we asked the operator to amend the Site Condition Report by providing baseline data for groundwater that covers the whole area of the site.

In response to the Schedule 5 Notice dated 24/09/2021 (received on the 08/10/2021), the operator advised us that they would want the requirement to provide baseline data for groundwater to be covered as a pre-operational condition. Their reason was that the vast majority of the area was still covered with soil bank that needs levelling before the area can be available for site investigation. They agreed to carry out sampling and testing of groundwater and provide the results to the Environment Agency before commencing any of the waste treatment activities. To implement this, we have included pre-operational condition PO2 in the permit.

Waste types

Following the Schedule 5 Notices dated 06/05/2021, 24/09/2021 and additional information received on the 14/12/2021, the list of wastes table submitted with the application was amended to remove waste codes that present high environmental risks and/or were considered inappropriate for the proposed treatment operations.

The waste codes were amended by the operator and the following waste codes were removed: 17 08 02, 19 01 02, 19 12 02, 19 12 03, 19 12 12 and 20 01 40.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority Planning - Fenland District Council
- Local Authority Environmental Health (EH) - Fenland District Council
- Food Standard Agency (FSA)
- Director of Public Health (DoPH)
- Public Health England, now called UK Health Security Agency (UKHSA).

The comments and our responses are summarised in the consultation responses section.

Operator

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 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 RGN2 ‘Defining the scope of the installation’, Appendix 1 of RGN 2 ‘Interpretation of Schedule 1’.

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

The operator has provided plans which we consider to be satisfactory.

These show 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 and baseline reporting under the Industrial Emissions Directive.

We have advised the operator what measures they need to take to improve the site condition report.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

We have not consulted Natural England.

The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator’s risk assessment is satisfactory.

General 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.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

The operating techniques are in line with the following guidance: Develop a management system, Control and monitor emissions for your environmental permit, Non-hazardous and Inert Waste Appropriate Measures for Permitted Facilities), Waste Treatment BAT Conclusions and Waste Incineration BAT Conclusions.

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 and we approve this plan.

We have approved the odour management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

The plan has been incorporated into the operating techniques S1.2.

Dust management

We have reviewed the dust and emission management plan in accordance with our guidance on emissions management plans for dust.

We consider that the dust and emission management plan is satisfactory and we approve this plan.

We have approved the dust and emission management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the

measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

The plan has been incorporated into the operating techniques S1.2.

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; and
- the environmental risk assessment is acceptable.

We made these decisions with respect to waste types in accordance with**:**

- Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste, and
- Non-hazardous and Inert Waste Appropriate Measures for Permitted Facilities.

Pre-operational conditions

Based on the information in the application, we consider that we need to include pre-operational conditions.

We have included the following pre-operational conditions in the permit:

- **PO1** which requires the operator to submit construction designs and a CQA report to demonstrate that the buildings and impermeable concrete surfacing and associated infrastructure for the site, including drainage systems (wedge-pits, above-ground storage tank, sump, connecting pipelines and secondary containment) are installed in line with the

standard and measures outlined in the Non-hazardous and Inert Waste Appropriate Measures for Permitted Facilities and CIRIA report C736.

- **PO2** which requires the operator to submit a report of the baseline conditions of the soil and groundwater at the site prior to the commencement of waste acceptance, storage and/or treatment operations.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

We have included the following improvement programmes in the permit:

- **IC1** which requires the operator to undertake continuous monitoring of particulate matter in ambient air following full commissioning of the permitted site operations for a period of 6 months.
- **IC2** which requires the operator to submit a report of the monitoring conducted under IC1 to the Environment Agency for written approval and to submit a proposal for mitigation of the impact of particulate matter arising from the site operations where the report shows that dust emissions are occurring beyond the site boundary and/or is having impact at the sensitive receptor locations.
- **IC3** which requires the operator to undertake noise monitoring in line with BS4142:2014+A1:2019 to validate the data that was used in the Noise Impact Assessment that was submitted with this application.
- **IC4** which requires the operator to review and submit updated Noise Management Plan to the Environment Agency for written approval following the completion of IC4.

Monitoring

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

Ambient monitoring at the fugitive emissions monitoring stations:

- Dust/particulate matter.

Process monitoring at the stockpiles

- Moisture content.

These monitoring requirements have been included in order to ensure that there are no significant emissions of dust and that the moisture content of the stockpiles is monitored and controlled.

We made these decisions in accordance with the Non-hazardous and Inert Waste Appropriate Measures for Permitted Facilities), Waste Treatment BAT Conclusions, Waste Incineration BAT Conclusions and M17 monitoring of particulate matter in ambient air around waste facilities.

Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

Reporting

We have specified reporting in the permit.

We made these decisions in accordance with the Non-hazardous and Inert Waste Appropriate Measures for Permitted Facilities), Waste Treatment BAT Conclusions, Waste Incineration BAT Conclusions and M17 monitoring of particulate matter in ambient air around waste facilities.

Management System

We are not aware of any 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 the CIWM/WAMITAB scheme**.**

We are satisfied that the operator is technically competent.

Previous performance

We have assessed operator competence. There is no known reason to consider the applicant will not comply with the permit conditions.

No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.

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

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 Responses

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 UKHSA.

Brief summary of issues raised:

UKHSA highlighted that there is overall insufficient information contained within the permit application to be able to fully assess the impact of the installation on

public health. A number of key documents do not appear to have been submitted for example, an Air Quality Assessment and the Environmental Risk Assessment.

It is considered that the documents that have been provided lack details, clarity and distinction regarding any existing brickworks site processes, whether this is subject to a permit, the proposed permit site processes (for example, whether this relates to IBA only) and any cumulative impacts resulting from different permitted activities within the same area/ footprint. The site and permit boundary plans and the location of infrastructure vary significantly across the documents submitted.

There is a general lack of consistency in the description of site processes, (including maximum storage times of stockpiles, quantities and maximum stockpile height) and emissions (for example, point source emissions).

UKHSA requested that the Environment Agency takes account of the following and aforementioned concerns; without this, we are unable to comment on the potential impact on public health at nearby receptors.

- More comprehensive and accurate characterisation of human health receptors is required across documentation, for example acknowledgement of residential properties (including distance and direction from the site boundary) and any public footpaths in the vicinity of the site.

Air

- It is unclear whether a screening assessment of air quality impacts of the site processes has been undertaken. It is recommended that an assessment include details regarding all potential pollutants, the use of generators or other plant equipment (including normal; start up; shut down and abnormal emissions) as well as any cumulative impacts.
- Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants and address inequalities (in exposure) and encourage their consideration during site design, operational management, and regulation.

Odour

- UKHSA also recommended that further details and clarity are provided regarding Odour Risk Assessment and Management including:
  - Potential odour risks from each phase of the process and mitigation measures including those for the screening process which is confirmed to take place externally (section 1.4.4.2 of the Odour Management Plan) and the odour masking system.
  - The location of the quarantine area, the storage areas of finished products and whether these present an odour risk.

- The presence or absence of vents/ emission points from within the building to outside or whether any extraction system is enclosed (please compare BAT report and Odour Management Plan).
- The location of odour monitoring points, relative to any residential areas; the assessment criteria used and action levels.

Summary of actions taken:

Following the comments received from UKHSA, the operator has amended the application and has provided revised copies of the initial documentation, including a revised site layout plan and location plan, dust management plan, odour management plan, noise impact assessment and management plan.

The key elements of the revised proposal include:

- A clear site layout plan that shows the locations of all waste treatment and storage activities, including emission monitoring and control facilities.
- Treatment of 250,000 tonnes of IBA and 50,000 tonnes of Construction and Demolition waste to produce IBAA – these represent a 50% reduction of the proposal.
- The IBA treatment operations are happening largely within enclosed buildings.
- IBA and IBAA are stored outside of the building but at a moisture content of 20% to ensure that fugitive dust emissions are controlled.
- Screening of C&D is happening outside but far removed from potential receptors. The screening is fully enclosed and there are sprinklers and water cannon units to control dust emissions.
- Dust control measures are available within and outside of the building.
- There are no channelled emissions to air. Although Building 2 has two dust extraction units; the dust extraction units are fully contained with no emission release points.
- All site areas are covered with impermeable surfaces (mainly concrete).
- Dust emissions will be monitored continuously at the site at an action level of 25µg/m^3 and trigger level of 75µg/m^3. Visible release of dust beyond the site boundary is not allowed.
- The north-east, east and south-eastern sides of the site is surrounded with 5.6m ‘lego’ block walls. The maximum stockpile height is restricted to 4.6m.
- There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression.
- The operator submitted a noise impact assessment which is considered satisfactory following assessment against our guidance.

- Even though potential release of hydrogen sulphide was alluded to in the application, the operator has retracted this. We do not associate IBA treatment with the ‘rotten egg’ smell at other sites that we regulate. IBA is mainly inorganic with cement or earthy kind of smell.
- The initial waste codes have been reduced significantly to ensure that the operator will not accept odorous waste.

Response received from EH.

Brief summary of issues raised:

Environmental Health indicated that they do not object with the principle of the proposed scheme and recognise the Environment Agency are the regulator. However, the environmental health determinants will need to be considered and effectively controlled as to protect the quality of life of our residents within proximity and the wider environmental receptors. This is to ensure a sustainable high-quality development.

Environmental Health have considered the supporting documentation with respect to matters concerning the impact of the development on air quality, noise and vibration and odour management.

They also recommended that a full air quality assessment should support the scheme and consideration be given to transport, building and operational emissions in accordance with best practice, air quality emission standards (although the site does not fall within the boundary of nearby Air Quality Management Areas (AQMAs), the processes impact on them should be considered).

They recommended that a scheme to monitor and mitigate the impact on local air quality should be included as part of this assessment and monitoring agreed with the Local Authority.

They agreed that the odour and dust mitigation as set out in the supporting documentation is considered reasonable, although extended real time odour and dust is expected to be carried out during site activities, using IPPC guidelines and appropriate mitigation implemented to prevent fugitive dust and odour impacting on the identified sensitive receptors.

They requested that monitoring of particulates from the process on the eastern boundary closest to sensitive receptors should be implemented in addition to monitoring of vehicle movement related particulates at the entrance of the site.

They criticised the NIA submitted with the application and suggested that the assessment could have been a lot more robust in terms of the recommended barriers and post completion noise monitoring in order to implement additional mitigation as may be required during the operation.

Summary of actions taken:

Following the comments received from EH, the operator has amended the application and has provided revised copies of the initial documentation, including revised site layout plan and location plan, dust management plan, odour management plan, noise impact assessment and management plan.

We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit

The operator submitted noise impact assessment which is considered satisfactory following an assessment against our guidance.

Dust emissions will be monitored continuously at the site at an action level of 25µg/m^3 and trigger level of 75µg/m^3. Visible release of dust beyond the site boundary is not allowed.

We have included improvement condition in the permit which requires the operator to undertake noise monitoring in line with BS4142:2014+A1:2019 to validate the data that is used in the Noise Impact Assessment that was submitted with this application.

We also included improvement conditions in the permit which requires the operator to undertake continuous monitoring of particulate matter in ambient air following full commissioning of the permitted site operations and to submit the report of the monitoring to the Environment Agency for written approval. It also requires that the operator to submit a proposal for mitigation of the impact of particulate matters arising from the site operations where the report shows that dust emissions are occurring beyond the site boundary and/or is having impact at the sensitive receptor locations.

Representations from individual members of the public

Response received from	Representations from the community and other organisations - brief summary of issues raised	Summary of actions taken
PR 1	I understand the need to dispose of waste and it has to go somewhere. We all generate it or use the products that are responsible for its generation. Until 2015 I regularly watched what was going on. I was impressed with the way the material was being spread and noticed that a membrane was being used. Lorries at that time belonged to a company named Singh. What has	We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit. The permit conditions are robust enough to ensure that there is no significant impact on public health

	happened since 2015 I don't know, but the pits are an ideal place for waste disposal and need filling in. STRICT environmental controls need to be put in place for all future waste disposal even if it means a full time inspector on site. The cost of which should be met by the waste company. I do not agree that the existing 120000 tonnes of material should be removed. That could be 6000 lorry loads and I think the plans to cover it are acceptable considering the low levels of contaminants.	and the environment as a result of the permitted site activities.
PR 2	I consider the application highly concerning because of the very close proximity of the site to residential estates and agricultural land. Movement of the Bottom Ash could release hazardous and/or unpleasant gases. Hazardous chemicals could leach into the ground and nearby river. Pumping out excess rainwater (there is much of this currently) - could carry hazardous chemicals off the site and into the river.	The site operations will not involve treatment of hazardous waste. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression.
PR3	The contaminated material needs to be removed, not sealed in for someone else to deal with at their expense. I have read nothing that indicates whether the proposal is carbon neutral when all the associated vehicle movements are taken into account. I want to see the numbers. The Environment Agency have a poor	We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.

	record in policing this site - how can we be sure that the environment will be a casualty.	We do not consider issues relating to carbon neutrality as part of the environmental permitting assessment. The conditions in the permit are robust enough to ensure that there is no significant impact on public health and the environment as a result of the permitted site activities.
PR4	If operational 24 hrs a day there will be a public nuisance through noise, dust, noxious smells, vibration and light pollution there will be an increase in co2 NOx and particulate matter. How will this be monitored and measured in a heavily residential area. Hydrogen sulphate is released when IBA is disturbed and moved from storage to the onsite filtering process this smells and can be dangerous to human health. Groundwater is historically a problem in the Saxon Pit. Can the water be safely managed and not illegally pumped out. There is no guarantee that the extensive controls promised by Johnson's will be provided. Based on past experiences of the EA on this site there is little or no confidence they will monitor, police and report. If this business becomes established it will be impossible to put right any contraventions. Currently the site has 122,858 tonnes of non-conforming waste buried between Oct 2017 and February 2018 50 boreholes sunk 43 of them producing hazardous samples the EA asked for this waste to be removed but then agreed to the waste remaining giving no reason but stating it was to be capped and gases monitored by them. Leaving hazardous waste in situ is simply not acceptable unknown chemicals could leach out into	Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activity inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit. Although the potential release of hydrogen sulphide was alluded to in the application submission, this was retracted as an error. Based on our experience from other sites we regulate we do not associate IBA treatment with a 'rotten egg' smell. IBA is mainly inorganic with earthy kind of smell. There is no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to

	groundwater and the air which could adversely affect human health. We have no faith in the EA monitoring this in view of the poor controls to date. Water ingress into the pit always has and continues to be a problem for Saxon Pit. Water has (until recently) been pumped into Kings Dyke Drain but this water passes through OUR land before entering Kings Dyke permission or never been given. East Midland Waste also dug out a shared ditch extending it northwards taking out trees and bushes on both sides. There is currently a dam at the end (to prevent the kings dyke drain collapsing into Saxon Pit). The water that collects in the dyke evaporates turning red and frothy this has never happened before. Finally our conclusion is that the EA have failed to face up to their responsibilities, therefore we have little confidence in the EA to monitor satisfactorily the proposed plant.	retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression. The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities.
PR5	I have a major concern that the vast increase in HGV's + movement of plant machinery is within a relatively short distance from residential areas. Housing on Peterborough Rd is within 220m of the site, housing at Priors Rd + Snoots Road 360m distance. With the increase comes more CO2, NOx & Particulate Matter (2.5 & 10). How is this going to be measured + monitored? Hydrogen Sulphate is released when bottom ash is disturbed + moved from storage to the onsite filtering process, this has a rotten egg small which is very unpleasant + can be dangerous to human health. Furthermore, we do not know the chemical make-up of the bottom ash, it is likely to come from several sources + with the excess water problem on the site, could cause	The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year to 300,000 tonnes per year in the course of the determination of this application. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit. Although the potential release of hydrogen sulphide was alluded to in the application submission, this was retracted by the operator as an error. Based on our experience from other sites we regulate, we do not associate IBA treatment with a 'rotten egg'

	pollution to be passed to the Kings Dyke, and again we do not know. Groundwater ingress is a real problem which can only get worse. Can the water be safely managed + not illegally pumped out? Based on past efforts of the Environment Agency, there's no guarantee that the extensive controls promised by Johnson Aggregates assure, will be provided. There is little or no public confidence in them to monitor, police + report given their track record on the current industry on the site. In my conclusion, the people of Whittlesey will be denied natural justice, their health + properties will be significantly affected if this proposal goes ahead. If this business becomes established, it will be impossible to put right any contraventions, therefore, the Environment Agency must step up to the plate + totally deny this proposal, by unequivocally supporting Planning in its refusal.	smell. IBA is mainly inorganic with earthy kind of smell. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression. The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities.
PR6	If approval is granted. Lorries will import this material at the rate of 1000 lorry movements per week. LORRIES on the A605 - noise, dust, noxious smells, vibration, and light pollution. Rotten EGG SMELL -this could wat towards Snoots housing with the excess water problem on the site could cause pollution to be passed to the Kings Dyke or any underground water cell. The E.A. must step up to the plate and deny this proposal and support Planning in its refusal.	We have considered issues relating to noise, dust, odour, vibration, light and volume of incoming waste in our assessment. We have restricted the proposed site operations to ensure that the impact of human health are prevented/minimised. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor

		emissions for your environmental permit. Although the potential release of hydrogen sulphide was alluded in the application submission, this was retracted by the operator as an error. Based on our experience from other sites we regulate, we do not associate IBA treatment with a 'rotten egg' smell. IBA is mainly inorganic with earthy kind of smell.
PR7	I, along with several other residents of Whittlesey are horrified at the prospect of an Industrial Incinerator plant to be situated so very close to residential and shopping areas. In my opinion a project like this should be situated well away from residential and town shopping areas. The increased level of air pollution and noise cannot be accurately envisaged and could cause extra concern and stress to people with underlying health problems.	The permit is for the treatment of IBA and C&D waste (and not for the installation of a new incineration plant). We have considered issues relating to noise, and air pollution in our assessment and are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR8	I would ask the Environment Agency to support the Planning committee in its refusal to grant permission for this project. I have concerns about the environmental and health impacts for the local population. I feel that these far outweigh any potential benefits from the operation of such a plant in this location. The original planning permission in 2003 gave consent for only 'INERT' material to be brought on site. All subsequent Planning Consents have included the same stipulation. This does not inspire confidence in the EA to carry out its duties with regards to this site, if it were to be granted permission. I would be concerned about a possible build-up of gases and	The site operations involve treatment of non-hazardous IBA and C&D wastes. The IBA treatment operations are happening largely within enclosed buildings. Dust control measures are available in the building and outside of the building. There are no point source emissions to air. We have considered issues relating to noise, and air pollution in our assessment and are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.

	possible contamination of the air or water in the area. E.A. say once capped the E.A. would monitor any build-up of gases etc. The site will operate 24 hours a day, 6 days a week, with 1,000s of lorries moving to and fro. The A605 is already overloaded by current traffic. The operation will produce noise, dust, smell, pollution, which will have a significant effect on those living nearby and some negative effect on most of the residents of the town. The prevailing wind direction means that any of the airborne problems will usually directly impact onto housing and a Primary school to the East of the plant, where both populations are more vulnerable to pollutants/irritants. Most residents being older people.	Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activity inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days. Lorry movements outside the boundary area of the site is not within the regulatory remits of the Environment Agency. The operator is aware that all relevant permissions need to be obtained before commencing the permitted site operations.
PR9	I fully understand that we need to put this Fly Ash somewhere and am not going to say 'not in my back yard', but, there needs to be regular inspections of the work that is going on before and definitely after it starts. Will it only be Fly Ash? Will there be a considerable amount of dust from this ash? What about noise levels and how does anyone know what this will be? I would also hope that part of the process is to check the suitability of the area that is to be used before deciding the issuing of a licence and if that is the case, what about the 122,000+ tonnes of hazardous waste that was illegally dumped on this site in the past and has still not been resolved as to it's safety and is still on the site?	The site operations involve treatment of non-hazardous IBA and C&D wastes. The IBA treatment operations are happening largely within enclosed buildings. Waste storage outside of the buildings will be maintained at a moisture content of 20% to ensure that dust emissions are controlled. We have considered issues relating to noise, dust, odour, vibration, light and volume of incoming waste in our assessment. We have restricted the proposed site operations to ensure that the impact of human health are prevented/minimised. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor

		emissions for your environmental permit.
PR10	In view of what has happened on this site in very recent years, it is essential that fully controlled and licensed operations are carried out on this site. Absolutely, no contamination of any sort should be permitted to occur. The same goes for leaching chemicals into the water table. Bore holes have shown that contamination is present in 43 out of 50 of the holes. Dust emissions must be kept to current Health and Safety regulations to protect nearby residents from nuisance. The prevailing westerly wind blows across the site to residential housing and Park Lane primary and nursery school. Airborne particulates would be a great hazard to everybody's health, young and old alike.	The site operations involve treatment of non-hazardous IBA and C&D wastes. The IBA treatment operations are happening largely within enclosed buildings. Waste storage outside of the buildings will be maintained at a moisture content of 20% to ensure that dust emission is controlled. We have considered issues relating to noise, dust, odour, vibration, light and volume of incoming waste in our assessment. We have restricted the proposed site operations to ensure that the impact of human health are prevented/minimised. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression.

PR11	The large increase in HGV's and movement of machinery within a short distance of dwellings will increase more CO2, NOX and particulate matter. How will it be measured and regularly monitored. There will be public nuisance from the operation by way of noise, dust, noxious smells, vibration and light pollution. Housing on Peterborough Road is within 220m of the site and housing at Priors/Snoots Road Hydrogen Sulphate (H.S.) is released when B.A. is disturbed and moved from storage to the onsite filtering process. H.S. has a bad egg smell which is very unpleasant and can be dangerous to human health.60m distance. Based on the past efforts of the Environment Agency (E.A.) there is no guarantee that the extensive controls promised by Johnson Aggregates will be provided in that they will be monitored by the E.A. based on their track record to date it is not likely.	We have considered issues relating to noise, and air pollution in our assessment and are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit. The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year to 300,000 tonnes per year in the course of the determination of this application. Although the potential release of hydrogen sulphide was alluded to in the application submission, this was retracted by the operator as an error. Based on our experience from other sites we regulate, we do not associate IBA treatment with a 'rotten egg' smell. IBA is mainly inorganic with earthy kind of smell.
PR12	Impact on wildlife. Pollution, dust, air etc. Whittlesey has a high rate of asma sufferers already Noise 24/7 Mud dirt on road (road cleaners are working 5 days a week now due to new bridge construction).	The operator carried out an ecological assessment survey in May, 2021 which concludes that '*…the proposed development will not result in the loss of any additional habitat outside of that which is already lost through permitted development. As no habitat loss will occur as a result of the proposed development, there are considered to be no further ecological constraints to consider'*. We agree with the conclusions of the ecological assessment survey having considered the evidence presented in the report. We have considered issues relating to noise, and air pollution in our assessment and are satisfied that the proposed

		monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit. We are also satisfied that the operator's house keeping measures are sufficient to control mud and litter.
PR13	Having read supporting documentation provided to me by the local authority detailing the purpose, intent and potential environmental impact, I strongly oppose to the application. Regarding the site location and its surroundings, as a local resident in direct view, I would be subjected to not only strong odours due to the prevailing South Westerly winds the majority of the time but also no doubt the constant noise from the associated operations (Vehicles to Processing Machinery). It is therefore not in our interests to accept this application in its entirety.	We have considered issues relating to noise, and air pollution in our assessment and are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit. We have restricted the proposed site operations to ensure that the impact of human health are prevented/minimised. Although the potential release of hydrogen sulphide was alluded to in the application submission, this was retracted by the operator as an error. Based on our experience from other sites we regulate, we do not associate IBA treatment with a 'rotten egg' smell. IBA is mainly inorganic with earthy kind of smell.
PR14	Although I accept that recycling this ash has to take place somewhere, I don't feel that this is a suitable site, for the following reasons: • operation is going to be working almost nonstop • The prevailing winds are from the south west which means that any pollution will be carried over the town. Apart from the homes, there is a primary and nursery school within close	We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and

	proximity as well as at least two small homes for people with learning difficulties. A recent study showed that Whittlesey already has poor health outcomes compared to other parts of the country, another reason why this operation should not be given permission. • the smell of the by-products will make this a very unpleasant environment to live in, even if the smell, in itself, can be proved to be harmless, which is debatable. • My confidence in the EA to monitor this operation is very low. The work that has been going on in the pit for the last few years has been illegal, yet it has been allowed to continue. We need to believe that the EA is fulfilling its obligations to ensure that the residents, wildlife, environment etc are all being protected, but I'm not confident that will be the case.	monitor emissions for your environmental permit. The site operations involve treatment of non-hazardous IBA and C&D wastes. The IBA treatment operations are happening largely within enclosed buildings. Waste storage outside of the buildings will be maintained at a moisture content of 20% to ensure that dust emissions are controlled. Although the potential release of hydrogen sulphide was alluded to in the application submission, this was retracted by the operator as an error. Based on our experience from other sites we regulate, we do not associate IBA treatment with a 'rotten egg' smell. IBA is mainly inorganic with earthy kind of smell. Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activities inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days.
PR 15	It would appear that they have not complied accurately with the original application. Apparently they have dumped hazardous substances, obviously not allowed and this must have had an effect on water, emission of gasses etc. Their non-compliance reminds me of the old saying "once a thief, always a	The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment

	thief" modified for Johnsons to "once a liar, always a liar". There are too many unknowns as to what they are dumping, they appear not to be sure themselves. The solution is to refuse the application and let residents of Whittlesey reside undisturbed by other peoples waste not dumped in the correct manner as been proven by the above company.	from the IBA and C&D waste treatment activities. We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR16 and PR17	We are worried about the proposals for Johnson's to bring 500,000 tonnes of bottom ash into Whittlesey. There is an ongoing issue at Saxon Pit and to date the EA has not managed to hold anyone to account over it. This does not create any faith in the Ea to monitor this project any better. This site proposes to be operational 24 hrs per day which only increases alarms over monitoring along with the other concerns of noise, light pollution and smells Hydrogen sulphate is released when the BA is disturbed and moved from storage this associated with smells can be dangerous to human health There is a heavily populated residential area directly next to the site and a primary school downwind should the BA not be kept sufficiently wet at all times. There is no specific guarantees that the controls promised by Johnson's will be strictly adhered to. To date controls in Saxon works have been lax and so has the monitoring of controls if this business is allowed to become established it will become impossible to put right contraventions. This site historically has significant water ingress issues and this	The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year (500,000 tonnes IBA and 100,000 tonnes C&D waste) to 300,000 tonnes per year (250,000 tonnes IBA and 50,000 tonnes C&D waste) in the course of the determination of this application. Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activities inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days. Although the potential release of hydrogen sulphide was alluded to in the application submission, this was retracted by the operator as an error. Based on our experience from other sites we regulate, we do not associate IBA treatment with a 'rotten egg' smell. IBA is mainly inorganic with earthy kind of smell.

	continues to be a serious issue. What guaranteed controls will be in place when water is pumped out or tankered. Away and who will ensure correct records are maintained particularly as pumped out water passes through third party property with no permission to do so. What scientific guarantees are there that the water that can be potentially pumped out through the third party property is safe? Would the unsuspecting third party be held responsible if not safe to humans or the environment? Finally this site currently has 122,858 tonnes of non-conforming waste some of it identified as hazardous by the EA correct monitoring of the vehicles obviously did not take place for their site of origin nor did the waste conform with the planning permission given to the site the current situation does not give us any faith in the EA managing this site any better with a new occupier particularly as the owner of the site was the previous operator.	We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit. The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities.
PR18	My understanding was that Saxon pit was being used as a plastic recycling operation. I had no idea that hazardous waste was being dumped there. I think this operation should stop asap. Apart from possible leaks to local water courses. If the information is correct that a considerable increase in lorry traffic will occur onto an already overflowing road network in the area. The increase chances of poor air quality and smells .People moaned enough about sulphar smells from brickyards and sugar beet smells during beet campaign when factory was open. I hope the EVA will look very seriously as the proposals ahead as I feel it will be very bad for Whittlesey and surrounding areas.	The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities. We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust

		and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR19	Proximity to residential property both the Snoots estate and Peterborough Road and the impact of hydrogen sulphate on residents. There is a question regarding the ability of the Environment Agency to police the promised controls. Given the geology of the site it is impossible to model how the proposals will impact on the flow of water within the site and the potential for polluting nearby water courses. Regardless of any action taken by the EA to address any problems with the site given the nature of the potential issues it will not be possible to restore the environment to its existing state.	We have assessed the potential environmental impact of the proposed site operations and have considered the proximity of the activities to potential sensitive receptors. We have considered issues relating to noise, and air pollution in our assessment and are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression.
PR20	Firstly, the proximity to housing: Housing on Peterborough Road about 200m of the site and housing at the Priors/Snoots Road estate about double the distance of that - i.e. lots of houses within a quarter of a mile. Leading on from this, the housing will likely be substantially affected by noise, smells, dust, and vibration from	The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year to 300,000 tonnes per year in the course of the determination of this application. We have assessed the potential environmental impact of the proposed site operations and

	the site. Also, it is clear that there will be a big increase in the number of HGV's and plant and machinery near the houses, causing a public nuisance. With this increase comes more CO2, NOx & Particulate Matter (2.5 & 10) How is this going to be controlled, measured, and monitored? The mitigation appears to rely on Johnson Aggregates having extensive controls, but once the application is approved and the Council and EA take their eyes off this site, what guarantees do residents have that any such controls will be maintained? I don't have any confidence in action by the Council or EA after a report of a breach is made - there will be no effective remedy. It follows therefore that Whittlesey residents will be denied natural justice and their health and properties will be significantly affected if this proposal goes ahead. It should be refused.	have considered the proximity of the activities to potential sensitive receptors. We have considered issues relating to noise, and air pollution in our assessment and are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR 21	The Environment Agency has yet to prove itself a friend and guardian of Whittlesey while the town faces uncertainty about its health and wellbeing through environmental vandalism half a mile from the town centre. With its long and close association with the Saxon site and its knowledge of the unlawful disposal of hazardous waste why has the EA proved itself to be so inept at effecting a resolution? If the EA is familiar with thinking outside the box alongside the use of common sense then this application should be thrown out, but based on what we know of their passed record don't hold out any hope. Whittlesey's slide into obscurity will continue if we allow old fashioned noisy, smelly and polluting metal bashers to inhabit a site that is prime	The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities. We have assessed the potential environmental impact of the proposed site operations and have considered the proximity of the activities to potential sensitive receptors. We have considered issues relating to noise, and air pollution in our assessment and are satisfied that the proposed monitoring and control measures

	for visionary development as an important element of the towns future urban renewal. We want our great grandchildren to be proud of their beautiful environment because of the decisions we made today.	for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR22	As a local resident, i am concerned with any pollution that may be created by these activities and this should be strictly controlled.	We have assessed the potential environmental impact of the proposed site operations and have considered the proximity of the activities to potential sensitive receptors. We have considered issues relating to noise, and air pollution in our assessment and are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR23	1/ The ongoing issues/problems regarding the illegal dumping of waste should have a bearing on any future development of this site, until the present serious concerns are fully resolved. 2/ Concerns over local residents' health and wellbeing, there are serious concerns over 'emissions, both noise (24 hour operations), dust, particulate matter, PM10 and 2.5 CO2 emissions. 3/ The public have concerns on how the site will be monitored, given the present issues at the site. 4/ The operations 24 hours 6 days a week, is within 200 metres of a residential area and 400 metres of a local primary school. 5/ It is accepted that 'if' Fly Ash is processed correctly there can be beifits to the environment, however , there are concerns that this will be undertaken, and also the giving off of Hyrogene Sulphide.	The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities. Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activity inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external

	6/ 1000 HGV movements on the site per week, again what mitigation in noise and polution. 7/ The public have not been told of the constituent make up of Bottom End Ash, the residues and waste produces after being processed. 8/ The ecological survey is well out of date and residents would asked for this to be done again. 9/ Serious flooding is historic on the site and processing of Bottom End Ash uses a lot of water, concerns on where/how the water will be managed, given that water has to be pumped out of the site (without a present licence to do so) on a fairly regular basis. The pumped water enters a local river course (Kings Dyke) 10/ Water ingress at present on site. 11/ Confidence in the Environment Agency ability to properly monitor this site remains very questionable. 12/ Bottom End Ash has to 'rest' for several weeks and be treated and dowsed with water, more concerns over this proceedures. 13/ Illegally dumped non-inert waste (file attached) which sat on the site for several months.	activities are allowed between 1800 – 2200 on week days. The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year (500,000 tonnes IBA and 100,000 tonnes C&D waste) to 300,000 tonnes per year (250,000 tonnes IBA and 50,000 tonnes C&D waste) in the course of the determination of this application. Although the potential release of hydrogen sulphide was alluded to in the application submission, this was retracted by the operator as an error. Based on our experience from other sites we regulate, we do not associate IBA treatment with 'rotten egg' smell. IBA is mainly inorganic with earthy kind of smell. The operator carried out ecological assessment survey in May, 2021 which concludes that '*…the proposed development will not result in the loss of any additional habitat outside of that which is already lost through permitted development. As no habitat loss will occur as a result of the proposed development, there are considered to be no further ecological constraints to consider'*. We agree with the conclusions of the ecological assessment survey having considered the evidence presented in the report. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest

		points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression. We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR24	1) The chemical makeup of the Bottom Ash which Johnsons Aggregates wish to process is not known and therefore may adversely affect the local environment which is unacceptable to a) the town of Whittlesey and the neighbouring properties and residents thereof. 2) Johnsons Aggregates do not state how they intend to deal with the polluted groundwater which will inevitably increase, it already being excessive. It would be wholly unacceptable for such water to be pumped out and enter the local water system. If it is to be tankered away that would increase the number of vehicles already predicted to enter and leave the site. 3) The site itself will be a public nuisance due to noise, noxious smells etc. The main wind direction for much of the year is from the west meaning that the detrimental effects of this site will affect the whole town, the site of Saxon Pit being to the west.	IBA is a non-hazardous waste that arises as a residue of waste incineration activity. The chemical nature can be variable but must be within the non-hazardous waste threshold to be accepted at the site. The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of

	4) The question of the non-conforming and hazardous waste buried/deposited in Saxon Pit has yet to be resolved and given that the Environment Agency has yet to correct the environmental damage caused by that this application by Johnsons Aggregate which is unacceptable in any event should be delayed until that problem is resolved to the satisfaction of the residents of Whittlesey.	effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression. We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR 25	We live backing onto the Saxon Pit and can already hear the noise of the existing plant and also have experienced the smell from the illegal waste being deposited. In view of the landowners allowing over 122,000 tons of illegal waste to be deposited in the pit, we are very concerned that this matter hasn't been resolved and they are looking at a new facility taking place when the landowners do not adhere to any rules or regulations. The boreholes that the EA have made show that there is hazardous material already in this site, and this new proposal would bring more unknown hazardous material to the area. There is also a high risk of the contaminated water getting into the water courses nearby causing unknown damage to wildlife.	IBA is a non-hazardous waste that arises as a residue of waste incineration activity. The chemical nature can be variable but must be within the non-hazardous waste threshold to be accepted at the site. The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities. Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be

	The proposed new facility will only increase the noise, pollution, smell and road traffic on an already busy road. The prevailing wind direction increases the likelihood of these being directed onto the housing estate and the nearby school which could cause health issues. The residents of Whittlesey deserve better than this. The health of people is at risk from airborne particles that could spread over a large residential area as well as the smell that would be produced and the continuous noise that will come from this new facility.	operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activity inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days. The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year (500,000 tonnes IBA and 100,000 tonnes C&D waste) to 300,000 tonnes per year (250,000 tonnes IBA and 50,000 tonnes C&D waste) in the course of the determination of this application. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression. We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and

		monitor emissions for your environmental permit.
PR26	I have studied these proposals at great length and come to the conclusion that it is not something we want in Whittlesey. The process is noisy dirty and dangerous, both processes should be carried out far away from a residential area. I can't see how contaminates from the incinerator bottom ash will not leech in to the water course and pollute it. The disposal of construction& demolition waste (C&D) will require crushing with a very noisy machine, C&D also seems wide open for the inclusion of asbestos materials unless they are monitored very closely. (See below penultimate paragraph, Environmental Agency)) The incinerator bottom ash is heavily doused with water prior to its departure from site, 1100 HGV vehicle movements a week will inevitably lead to contamination of the A605 which is bad enough at present even without the contamination of the current construction traffic. Both processes requires a lot of monitoring by the Environmental Agency ,I am not confident they have the resources to maintain the surveillance that these processes require, highlighted by the ineptitude of the EA during the dumping of 120,000 tons of toxic waste on this very site between October 2017 and February 2018. In conclusion I can see nothing in this process that will improve the residents of Whittlesey's way of life air quality or traffic problems, it will make the life of the residents local to the Saxon pit a misery. Again these processes should be carried out far from a residential area and the application should be	IBA is a non-hazardous waste that arises as a residue of waste incineration activity. The chemical nature can be variable but must be within the non-hazardous waste threshold to be accepted at the site. The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities. Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activity inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days. The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year (500,000 tonnes IBA and 100,000 tonnes C&D waste) to 300,000 tonnes per year (250,000 tonnes IBA and 50,000 tonnes C&D waste) in the course of the determination of this application. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around

	categorically refused with the backing of the Environment agency.	the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression. We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR27	The process is extremely noisy dirty and dangerous, both processes should be carried out far away from a residential area, as the air has to / must get highly polluted from floating debris. I can't see how contaminates from the incinerator bottom ash will not leech in to the watercourse, rivers and nearby streams and pollute it. There is already a problem with the last owners leaving some 200,000 tons of toxic waste, this combined with the intended with form a hazard that will not /cannot be understood for some years to come. Act now before there is an irreversible catastrophe. A new road / bridge is being built at a cost of £35 million pounds, it was supposed to relieve the congestion on this road (A605) but if this plan goes	Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activity inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days. The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year (500,000 tonnes IBA and 100,000 tonnes C&D waste) to 300,000 tonnes per year (250,000 tonnes IBA and 50,000 tonnes

	ahead, then the object of building the road and bridge will be destroyed as 110 vehicle movements will destroy the whole ethos of this build, as you will have replaced any gain into a loss. The noise 24/7 so close to housing is also a consideration that should be take into account when studying the legitimacy of such a project so close to housing, property and above all the residents. It is in my naive opinion a really silly and dangerous thing to have near to this small town. After due consideration BY YOU should be REFUSED.	C&D waste) in the course of the determination of this application. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression. We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit
PR28	Photo only	We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit

PR29	1. Our understanding is that Johnsons wish to set up a processing plant on the Saxon Pit to deal with 500,000 tonnes of BOTTOM ASH (B.A). We do not know the chemical makeup of the B.A. it is likely to come from several sources and with the excess water problem on the site could cause pollution to be passed to the Kings Dyke and the river, living on Kings Delph by the river this is a major concern for us. 2. Water ingress into the pit is a problem so bad this year that emergency permission was given by the Environmental Agency (E.A.) to pump excess water into the nearby river the Kings Dyke. This water passes through third party land without permission causing localised flooding and water staining which may be polluted threatening wildlife and us who use the river for leisure. 3. The Environmental Agency asked for all non-conforming (i.e., not 'inert' waste) to be removed. However, on 10th June 2020 they consented to waste remaining and be capped. Nobody gave a reason, or details of this capping has been made public. E.A. say once capped the E.A. would monitor any build-up of gases etc. We feel this has been too quickly and underhandedly. 4. We have already seen an increase in traffic especially HGV's and plant machinery to build the bridge here on the A605 with no extra revenue spent causing damage and vibrations to our property which will only increase if the plant goes ahead. As well as this there will be issue with the noise from the traffic as well as the plant itself, dust, noxious smells as well as light pollution. With the increase in traffic comes more CO2, NOx & Particulate Matter (2.5 & 10) How is this going to be measured and monitored?	IBA is a non-hazardous waste that arises as a residue of waste incineration activity. The chemical nature can be variable but must be within the non-hazardous waste threshold to be accepted at the site. The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities. Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activity inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days. The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year (500,000 tonnes IBA and 100,000 tonnes C&D waste) to 300,000 tonnes per year (250,000 tonnes IBA and 50,000 tonnes C&D waste) in the course of the determination of this application. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to

	5. We understand that 50 boreholes sunk by the E.A. have shown results that 43 of them produced hazardous samples, the E.A. has confirmed that 122,858 tonnes of non-conforming waste were buried/deposited on the site between October 2017 and February 2018 in the Saxon Pit. If there are already toxins there then why should we allow for you to add more endangering us and the environment?	retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression. We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.
PR30	1. We understand that Johnsons wish to set up a processing plant on the Saxon Pit. This is apparently dealing with 500,000 tonnes of BOTTOM ASH (B.A). Do we know what this is made up of? Are there any dangerous chemicals in this B.A.? We live along Kings Delph with the Kings Dyke River at the bottom of our garden. If excess water from this site is released into the river, how do we know this is safe and free of chemicals and won't pollute etc.? What about the wildlife that depend on the river, we are gravely concerned about this! 2. We understand that emergency permission was given by the EA to allow excess water to be pumped into the Kings Dyke River without any of us residents being informed of this. This is very worrying, especially as we don't know what the pollution level is!	IBA is a non-hazardous waste that arises as a residue of waste incineration activity. The chemical nature can be variable but must be within the non-hazardous waste threshold to be accepted at the site. The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities. Although the operator stated that the site will be operational 24 hours a day, 7 days a week,

	3. We understand that all non-conforming (i.e. not 'inert' waste) was to be removed on instructions from the Environmental Agency, but this did not happen, and in June last year, the EA then agreed for it to be kept and capped, with no explanation given or made public. Apparently the build-up of any gasses etc. are to be monitored, but again, will these findings ge made public? This all seems a bit 'hush hush'! 4. Apparently 50 bore holes tested by the E.A. On the site, have shown that 43 of them produced hazardous samples! They have also confirmed that nearly 123,000 tonnes of non-conforming waste were buried / deposited on the site between Oct 2017 and Feb 2018 in the Saxon Pit. We feel that our environment, wildlife and ourselves would be put at risk if we further allow you to add to the toxins that are already there. 5. There has been a considerable influx of traffic, especially heavy goods vehicles, with contractors etc. bringing materials and such for the bridge build on the A605. This in turn has caused increased vibrations to our residential properties as the road struggles to cope with the sheer volume and weight of the traffic, not to mention the added pollution, has anyone monitored this? If this plant goes ahead, this will only bring more HGVs to this road, it just won't cope! 6. On top of this, there is the plant itself - added noise pollution, light pollution, noxious smells, dust etc., how safe will this be for our health? Have the residents in the surrounding area just been forgotten, or just 'conveniently' not informed?! We feel that this is not a site that should be anywhere near residential dwellings and that it needs to be seriously	different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activity inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days. The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year (500,000 tonnes IBA and 100,000 tonnes C&D waste) to 300,000 tonnes per year (250,000 tonnes IBA and 50,000 tonnes C&D waste) in the course of the determination of this application. There will be no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent discharges of effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured at two wedge pits that are located at the north eastern and south western corners of the site. The captured surface water is treated and reused at the site for dust suppression. We have assessed the potential environmental impact of the proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and

	looked at from a health & safety point of view.	monitor emissions for your environmental permit.
PR31	On the limited grounds which the EA can consider, I believe that the EA should not grant a license for this site for the following reasons: 1. the proposed plant will clearly create noise. There are several dozen immediately neighbouring residential properties to the north and to the east of Saxon Pit which will suffer unreasonable noise disturbance at anti-social hours. This will be an unreasonable and unacceptable intrusion upon their residential amenity. 2. Some 40,000 vehicle truck movements a year will be required to deliver the proposed amount in excess of 500,000 tonnes of waste product to feed the recycling plant. That's significantly more than a hundred vehicle truck movements a day, seven days a week. Whilst the effects of this on our local roads is outside the scope of this EA consultation, the effects within the Saxon Pit site itself do fall within the limits of this consultation. Once the 50+ truck arrivals each day leave the public highway, and as the 50+ truck departures each day are approaching the public highway, whilst they are still on Saxon Pit land they will pass very close to a row of cottages on Peterborough Road. The end cottage is immediately adjacent to the private road on the site which these 100+ vehicles a day must use, as there is no alternative. The effect on the everyday lives of the residents of this row of cottages (especially the end one) will be horrific. No assessment has been made of the disruption caused by noise, vibration and dust to these properties'	IBA is a non-hazardous waste that arises as a residue of waste incineration activity. The chemical nature can be variable but must be within the non-hazardous waste threshold to be accepted at the site. The IBA and C&D waste treatment activity are under the control of a different operator. There is no connection between the proposed activities and the historical waste deposit at the nearby site. We are satisfied that the conditions of the permit are robust enough to ensure that there is no significant impact on public health and the environment from the IBA and C&D waste treatment activities. Although the operator stated that the site will be operational 24 hours a day, 7 days a week, different parts of the site will be operational at different times. The site operations are restricted based on the risks that they present. Other than treatment activity inside the buildings, the site operations are largely limited to 0600 – 1800. Very few external activities are allowed between 1800 – 2200 on week days. The proposed quantity of waste intake to the site has been reduced from 600,000 tonnes per year (500,000 tonnes IBA and 100,000 tonnes C&D waste) to 300,000 tonnes per year (250,000 tonnes IBA and 50,000 tonnes C&D waste) in the course of the determination of this application. We have assessed the potential environmental impact of the

	residents. The level of disruption is unacceptable. 3. Saxon Pit has been the location of the illegal dumping of substantially more than 120,000 Tonnes of non-conforming material, including hazardous chemical waste. Little has been published by the EA about this, including precisely what is dumped there and how dangerous it is, Given that bottom ash is non-inert, and given that the quantity of illegally dumped hazardous waste on the site is not known, it would be an unnecessary risk to approve this license at this time.	proposed site operations and have considered issues relating to noise, and air pollution in our assessment. We are satisfied that the proposed monitoring and control measures for noise, dust and odour are in line with the relevant BAT requirements and our guidance - Control and monitor emissions for your environmental permit.