

Response	Summarised Comments	Environment Agency Response
1.	<ul style="list-style-type: none"> <li>• Objects.</li> <li>• Threat to humans and wildlife.</li> </ul>	<ul style="list-style-type: none"> <li>• No specific issues.</li> </ul>
2.	<ul style="list-style-type: none"> <li>• Objects.</li> <li>• Threat to humans and wildlife.</li> </ul>	<ul style="list-style-type: none"> <li>• No specific issues.</li> </ul>
3.	<ul style="list-style-type: none"> <li>• Objects.</li> <li>• Proximity to Daneshill Lakes recreation area and nature reserve.</li> <li>• Access is by minor roads through villages.</li> <li>• Hazardous to the health of local residents and wildlife.</li> <li>• Applicants originally failed to consult with all parties affected.</li> <li>• Asbestos picking operation in the open air.</li> </ul>	<ul style="list-style-type: none"> <li>• Sensitive receptors must be confirmed and included in any revised risk assessments/modelling.</li> <li>• Open air operation prevented by enclosure and abatement under varied permit.</li> </ul>
4.	<ul style="list-style-type: none"> <li>• Objects.</li> <li>• CL:AIRE guidance is not intended/not appropriate for permanent or quasi permanent operation.</li> <li>• Asbestos dust will be released and is likely to cause contamination.</li> <li>• Further controls are not only reasonably practicable but also necessary (building, under negative pressure and with HEPA filter).</li> <li>• Bonded asbestos is also likely to contain not just chrysotile, but also other more harmful forms of asbestos. Soil will also include contamination.</li> <li>• In event of decision to allow the Appeal that there are strict conditions placed on the applicant including <ul style="list-style-type: none"> <li>- formation of a community working party</li> <li>- continuous sampling, the use of a building with filtration</li> <li>- training and supervision</li> </ul> </li> <li>• attention to the transportation and storage of unprocessed soils, particularly in the summer months and/or windy conditions</li> </ul>	<ul style="list-style-type: none"> <li>• Comments support our enclosed/abated requirements for long-term operations.</li> <li>• Open air operation prevented by enclosure and abatement under varied permit.</li> </ul>
5.	<ul style="list-style-type: none"> <li>• Objects.</li> <li>• Site is next to a site of special scientific interest, nature reserve, above an 'A' aquifer, adjacent to a caravan park and residential property</li> </ul>	<ul style="list-style-type: none"> <li>• Sensitive receptors must be confirmed and included in</li> </ul>

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	<ul style="list-style-type: none"> <li>• Ongoing environmental issues dis-amenity to the local areas over several decades from developments (landfill, roads, traffic, air pollution, compulsory purchases affecting area, waste movements causing litter, mud on roads, wheel-wash, traffic accidents, Site opening hours)</li> <li>• Complaint the operator had not run parallel (permit and planning) applications.</li> <li>• States there is no safe level for asbestos.</li> <li>• Concerns asbestos will be friable and that the processes proposed will release fibres.</li> <li>• the operators risk assessment is based on their assumption that a safe level asbestos exists</li> <li>• States there is clean soil for restoration available.</li> <li>• FCC Waste Services Ltd was fined £200,000 by the health and safety executive (details available on H and S website). The two companies share an identical address, plus share 20 directors. There are also two enforcement notices from HSE against FCC in 2016 in the realm of failure to carry out risk assessments.</li> <li>• Concerns regarding content of permit application documentation. The application also does not specify the thickness of the polythene bags or nature of the tape required to seal for bagged asbestos,</li> <li>• Risk assessment do not appear to include remediation of spillages of hazardous materials on the public highway.</li> <li>• Concerns regarding former Royal Ordnance site, waste munitions and contamination. This site is within the buffer zone of the Royal Ordnance site. If, during the development, land contamination not previously considered is identified, then the Local Planning Authority shall be notified.</li> <li>• SW ditches on site - filter to the adjacent marshland SSSI, to and through the Sherwood A Aquifer, and the site itself is in a zone 3 protection designation for agricultural irrigation and groundwater abstraction for human consumption.</li> <li>• There is a prevailing wind map within the application, however we regularly have northerly winds too, plus there is a large area of turbulence as wind currents pass over the abrupt hill and down into the proposed hazardous waste area, affecting air currents creating rotors and wake, further increasing airborne pollutants concentration risk</li> </ul>	<p>any revised risk assessments/modelling.</p> <ul style="list-style-type: none"> <li>• Groundwater status considered during check of the original STF Site Condition Report.</li> <li>• Relevant convictions were considered during determination of the STF.</li> <li>• Bags and tape for asbestos controlled by the relevant H&amp;S requirements for asbestos.</li> <li>• Off-site spillages of waste in transit is not controlled by the permit.</li> <li>• All waste treatment and storage controlled by the permit is required to take place on an impermeable surface with a sealed drainage system.</li> <li>• From an environmental perspective, the site is suitable for this type of permit but the suitability for the site for Planning Permission is a matter for the Local Planning Authority.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Relevant weather data and any significant local conditions that may impact relevant sensitive receptors for modelling must be confirmed.</li> </ul>
6.	<ul style="list-style-type: none"> <li>• Objects</li> <li>• Harm to human health and the environment</li> </ul>	<ul style="list-style-type: none"> <li>• No specific issues.</li> </ul>
7.	<ul style="list-style-type: none"> <li>• Objects</li> <li>• Harm to human health</li> </ul>	<ul style="list-style-type: none"> <li>• No specific issues.</li> </ul>
8.	<ul style="list-style-type: none"> <li>• Objects.</li> <li>• Concerns regarding effective containment of asbestos.</li> <li>• Site setting - natural, wildlife setting, with fishing lakes, caravan site, school, and residential properties close by and not a purpose built industrial area.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments support our enclosed/abated requirements.</li> <li>• Open air operation prevented by enclosure and abatement under varied permit.</li> <li>• Sensitive receptors must be confirmed and included in any revised risk assessments/modelling.</li> </ul>
9.	<ul style="list-style-type: none"> <li>• Objects.</li> <li>• Concerned regarding proximity to the village residents.</li> <li>• Concern that though asbestos dust will be produced by the sorting of asbestos contaminated soils over a period of 30 years, the operator has based its proposed controls on short-term remediations sites.</li> <li>• If the Appeal was to be allowed, we also feel that much more stringent controls would be appropriate:</li> </ul>	<ul style="list-style-type: none"> <li>• Sensitive receptors must be confirmed and included in any revised risk assessments/modelling.</li> <li>• Comments support our enclosed/abated requirements for long-term operations.</li> </ul>

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	<ul style="list-style-type: none"> <li>○ background environmental monitoring at receptor sites (including schools, site boundary, within the village of Lound) to be carried out before the work commenced to determine the true levels of asbestos dust in the air</li> <li>○ The testing of asbestos contamination in soils before they are delivered to site to ensure that amphiboles are not present in any contamination (including in asbestos cement)</li> <li>○ The use of a building to store and process soils That building should have high efficiency filtration that would capture any asbestos dust released from the work</li> <li>○ The use of controls inside that building to include the use of damping of soils during work, training, supervision</li> <li>○ Frequent airborne sampling carried out within the building, outside the filtration unit, at the site boundary and at key receptor sites</li> <li>○ A condition that if the asbestos dust concentrations outside the building and/or at any of the receptor sites is increased significantly that work is stopped immediately and a full investigation carried out, where necessary in consultation with the community, and the work does not commence until remedial measures have been taken</li> <li>○ A condition placed on the applicant for appropriate insurance provision to cover the potential risk of individuals developing an asbestos-related condition in later life;</li> <li>○ A condition that the owner of the land also owns and holds relevant insurance to cover the processing of hazardous material on its site and has been indemnified by the Applicant;</li> <li>○ A condition for records of atmospheric sampling to be retained by or on behalf of the Applicant through a local working group;</li> <li>○ The establishment of a local community working group to ensure that any concerns of the community are addressed by the Applicant and that relevant records are shared</li> </ul>	<ul style="list-style-type: none"> <li>● Open air operation prevented by enclosure and abatement under varied permit. Permit includes asbestos monitoring requirements from emission points and for ambient air monitoring externally.</li> <li>● Damping down of soils must be identified as a control measure.</li> <li>● Loss of containment and emergency procedures covered by pre-operational condition PO7.</li> <li>● Such insurance is outside the scope of an environmental permit.</li> <li>● Monitoring records are required to be kept under the condition of the permit.</li> <li>● Operation of a local working group would be outside the scope of the permit conditions.</li> </ul>
10.	<ul style="list-style-type: none"> <li>● Objects</li> <li>● Harm to humans and wildlife</li> </ul>	<ul style="list-style-type: none"> <li>● No specific comments.</li> </ul>
11.	<ul style="list-style-type: none"> <li>● Objects</li> <li>● Raised concerns previously (not repeated)</li> </ul>	<ul style="list-style-type: none"> <li>● No specific comments</li> </ul>

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12.	<ul style="list-style-type: none"> <li>• Objects</li> <li>• Location</li> <li>• Harm to environment and health</li> <li>• Louden is in prevailing wind direction</li> </ul>	<ul style="list-style-type: none"> <li>• Relevant weather data and any significant local conditions that may impact relevant sensitive receptors for modelling must be confirmed.</li> </ul>
13.	<ul style="list-style-type: none"> <li>• Objects.</li> <li>• Concerns Loundfield Farm location as sensitive receptor is wrong.</li> <li>• Disputes farm is not in prevailing wind direction.</li> <li>• Concerns wind data from Robin Hood Airport is incorrect for this location.</li> <li>• Clearance level of 0.01 f/ml does not represent an acceptable or safe level of exposure. Duty holders are required to reduce exposure to all types of asbestos dust to the lowest level that is reasonably practicable.</li> <li>• Effect on children playing in gardens and nearby.</li> <li>• Effect on children of exposure to asbestos - is Committee on Carcinogenicity in its "Statement on the relative vulnerability of children to asbestos compared to adults" which concluded that: "the lifetime risk of developing mesothelioma is predicted to be about 3.5 times greater for a child first exposed to asbestos at age 5 compared to an adult first exposed at age 25 and about 5 times greater when compared to an 7 adult first exposed at age 30."</li> <li>• The information provided regarding potential risks to health of those at the proposed receptor sites is lacking in meaningful detail.</li> <li>• Hazardous work should be done inside.</li> </ul>	<ul style="list-style-type: none"> <li>• Sensitive receptors must be confirmed and included in any revised risk assessments/modelling.</li> <li>• Relevant weather data and any significant local conditions that may impact relevant sensitive receptors for modelling must be confirmed.</li> <li>• Any human health risk assessment provided should be suitably precautionary and take into account the effects of asbestos exposure on children.</li> <li>• Comments support our enclosed/abated requirements for long-term operations.</li> </ul>
14.	<ul style="list-style-type: none"> <li>• Objects</li> <li>• Open air, not in a building.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments support our enclosed/abated</li> </ul>

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	<ul style="list-style-type: none"> <li>• Soil testing (to standards that are not currently valid, as explained in Response 649434312 of the consultation and its attached letter from the Health &amp; Safety Executive, dated 9 November 2020).</li> <li>• Concern the conveyors are not properly contained (just weather covered).</li> <li>• Concern standards are for temporary site, not suitable for a permanent site.</li> <li>• Concerns regarding handpick accuracy/consistency.</li> <li>• In the Amenity and Accident Risk Assessment document loss of containment of asbestos is not mentioned</li> <li>• Concerns all sensitive receptors have not been identified</li> <li>• Requests the provision of total containment for all asbestos related operations</li> </ul>	<p>requirements for long-term operations.</p> <ul style="list-style-type: none"> <li>• Conditions in the permit cover testing and restoration soils.</li> <li>• Sensitive receptors must be confirmed and included in any revised risk assessments/modelling.</li> <li>• Open air operation prevented by enclosure and abatement under varied permit.</li> <li>• Loss of containment and procedures covered by pre-operational condition PO7.</li> </ul>
15.	<ul style="list-style-type: none"> <li>• Objects</li> <li>• Copied original Planning objection provided.</li> <li>• Compares open activity to the Rowley Regis site.</li> <li>• Lack of info lack of information about the ongoing monitoring and mitigation of the “operational Impacts” listed as part of the Air Impact Assessment and Dust Management Plan.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments support our enclosed/abated requirements.</li> </ul>
16.	<ul style="list-style-type: none"> <li>• Objects.</li> <li>• Grounds of asbestos pollution, poor planning scope</li> <li>• Proximity to nature reserves</li> <li>• Poor local road infrastructure.</li> <li>• Harm to human health nature sites, environment</li> </ul>	<ul style="list-style-type: none"> <li>• Comments support our enclosed/abated requirements.</li> <li>• Sensitive receptors must be confirmed and included in any revised risk assessments/modelling.</li> </ul>

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17.	<ul style="list-style-type: none"> <li>• Objects</li> <li>• Harm to health</li> <li>• Leisure area (Lake) affected</li> </ul>	<ul style="list-style-type: none"> <li>• Sensitive receptors must be confirmed and included in any revised risk assessments/modelling.</li> </ul>
18.	<ul style="list-style-type: none"> <li>• Objects</li> <li>• Comments regarding planning process.</li> <li>• Comment regarding who the operator is (FCC/Provectus link).</li> <li>• There have been convictions by HSE.</li> <li>• Concerns re the assertion that the results of asbestos fibre monitoring will be similar to the Operator's other site at Rowley Regis, as that is in a building.</li> <li>• Concerns regarding open air operations.</li> <li>• A building on that site would be contraindicated as the site was a munitions factory during the war and the ground is seriously contaminated with toxic chemicals some "sensitive to percussion" and has never been remediated.</li> <li>• Comments regarding use of contaminated soils on the landfill (mentions Nicole report).</li> <li>• Questions why asbestos not managed better a source rather than imported.</li> </ul>	<ul style="list-style-type: none"> <li>• Operator of the activity covered in the determination of the original STF operation.</li> <li>• Relevant convictions were considered during determination of the original STF application.</li> <li>• Comments support our enclosed/abated requirements.</li> <li>• Open air operation prevented by enclosure and abatement under varied permit.</li> <li>• From an environmental perspective, the site is suitable for this type of permit but the suitability for the site for Planning Permission is a matter for the Local Planning Authority</li> <li>• Suitability of the soils for restoration is controlled under the site permit.</li> </ul>

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19.	<ul style="list-style-type: none"> <li>• Objects</li> <li>• Issues with landfill - traffic, dust, noise pollution, litter and debris being spread from the site.</li> <li>• No attempt to fully explain the asbestos processing or their procedures for mitigating the many risks associated.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments support our enclosed/abated requirements.</li> <li>• Open air operation prevented by enclosure and abatement under varied permit.</li> </ul>
20.	<ul style="list-style-type: none"> <li>• Objects</li> <li>• Harm to health and environment.</li> <li>• No information about how they will prevent the release of asbestos fibres into the air during the course of their operations</li> </ul>	<ul style="list-style-type: none"> <li>• Comments support our enclosed/abated requirements.</li> </ul>