Construction Environmental Management Plan

Construction and use of a waste transfer station and provision of site office, container storage, vehicle parking and ancillary infrastructure for a temporary period

at

Old Coal Depot, Tavistock Road, West Drayton, London Borough of Hillingdon

On behalf of

PUNJAB SKIPS

May 2024

by

Heatons

CONTENTS

1 INTRODUCTION & BACKGROUND

1.1.1 This Construction Environmental Management Plan (CEMP) has been prepared by Heatons on behalf of Punjab Skips Limited (the Applicant) as part of a planning application which seeks planning permission for a waste transfer station, site office, container storage, vehicle parking and ancillary infrastructure for a temporary period. It is proposed that the development would be for a period of five years.

1.1.2 The application site lies within a wider industrial depot known as the Old Coal Depot, off Tavistock Road, West Drayton in the London Borough of Hillingdon. The detailed site description, together with a description of the proposed development are provided within the Planning Statement which accompanies this planning application.

1.1.3 This CEMP aims to address the potential environmental impacts associated with the construction of the proposed waste transfer station and ancillary infrastructure. It also addresses the potential for environmental effects associated with dust, noise, traffic, light, water and ground pollution.

1.1.4 The CEMP shall be retained in the site office and will be made available to interested parties on request.

1.1.5 The information contained within this document will be communicated to site staff in order to ensure that the requirements of the CEMP are undertaken effectively and in accordance with the Plan.

1.1.6 The CEMP will be reviewed quarterly, to ensure that the information contained within it remains up to date. The CEMP will be updated as necessary and the requirements of the revised document communicated to all staff, as appropriate. The contents and requirements of the CEMP will also be explained during the induction of any new staff employed on site.

2 SITE AND SURROUNDINGS

2.1 Site Location

2.1.1 The site is located within the Old Coal Depot, off Tavistock Road, West Drayton which is within the London Borough of Hillingdon. The site is centred on National Grid Reference TQ 0552 8025.

2.1.2 The proposed site for the waste transfer station amounts to approximately 2,000m^2. However, it is necessary to extend the planning application boundary to the nearest public highway (Tavistock Road) and the total planning application area therefore amounts to 6,012m^2 (0.6 hectares).

2.2 Site Description

2.2.1 The Old Coal Depot site is owned by Network Rail and is currently in use by several businesses which are primarily industrial in nature, including a number of waste management operations (cardboard, window and wood recycling businesses), a scaffolding company and haulage business. Parts of the Old Coal Depot site are also used for vehicle parking.

2.2.2 The planning application site lies in the north of the depot and is currently vacant. The site is concrete surfaced.

2.2.3 The site has previously been used by Powerday plc for waste management purposes although all equipment and infrastructure have been removed and the site is currently vacant. Powerday currently operates a temporary Civic Amenity Site on land in the north east of the wider depot, which operates on Saturdays and Sundays only.

2.2.4 The site is accessed from Tavistock Road approximately 425m to the east-south east of the site. An internal access road routes through the Old Coal Depot and provides access to separate businesses located within the site.

2.3 Site Setting

Surrounding Area

2.3.1 The site is located within a wider site known as the Old Coal Depot which is currently in industrial use by multiple businesses. The area immediately surrounding the application site is therefore industrial in nature.

2.3.2 The plots to the immediate east and west of the site are both currently vacant. The plot to the south of the site is occupied by a scaffolding business. The new Elizabeth London Underground line lies approximately 95m to the south of the site with a rail sidings and West Drayton aggregate depot, which is operated by Hanson, located inbetween. A railway line lies close to the northern boundary of the application area and the wider Old Coal Depot site.

2.3.3 Tavistock Road lies approximately 225m to the east at its closest point.

2.3.4 The closest residential properties are located approximately 140m to the south of the site, beyond the Elizabth Line, and 140m to the east of the site in Merrivale Mews. New housing is being built to the north east of Tavistock Road approximately 350m east-south east of the site, although the development plot (proposed for future development) is approximately 270m at its closest point.

2.3.5 The closest public rights of way (PROW) to the site are Colne Valley Walk which runs to the west and north of the Old Coal Depot site approximately 230m to the west of the application site at its closest point, Bridleway Y1 which lies approximately 200m to the north and footpath Y26 which runs adjacent to the Grand Union Canal approximately 620m to the north. A walk known as the London Loop runs alongside the Grand Union Canal approximately 500m to the east of the site.

2.3.6 Fray's River lies approximately 110m to the east of the site and the Grand Union Canal lies to the north and east of the site, approximately 450m from the site at its closest point. The River Colne lies approximately 430m to the west at its closest point. Bigley Ditch lies to the north west and south west of the site. A number of waterbodies associated with Thorney Weir Fishing Club Lake lie to the north and north west of the site with The Mets Lake beyond.

2.3.7 According to the Flood Map for Planning website, the site lies within Flood Zone 1, which is land at the lowest risk of flooding.

3 PROPOSED CONSTRUCTION AND OPERATIONAL WORKS

3.1 Working Hours

3.1.1 It is proposed that the operating hours for both construction works and the operation of the site will be restricted to the following hours:

7am to 6pm Monday to Friday

8am to 1pm on Saturdays

No operations will be undertaken on Sundays or Bank/Public Holidays.

3.1.2 It is proposed that whilst the site would operate on Saturdays to accept waste and to bulk up sorted materials and load it into waste vehicles, there would be no screening of waste on Saturdays (i.e. using the trommel).

3.2 Timescale

3.2.1 The construction phase (i.e. construction of waste transfer station building, positioning of site office and connections to services etc) is anticipated to be completed within one month.

3.2.2 The proposed operation of the waste transfer station would be temporary in nature. It is proposed that the development would be for a period of five years, after which time all buildings and equipment would be removed from the site. As the site comprises a concrete hardstanding surface, no restoration work or landscaping is proposed. However, the land would be cleared and 'made good' to enable the site to be subsequently used and the operator's Environmental Permit to be surrendered.

3.3 Site Infrastructure

Site Entrance

3.3.1 The site is accessed from Tavistock Road, via a shared entrance used by multiple businesses. The application site is accessed from a shared access road which runs in a generally east to west direction through the middle of the Old Coal Depot site. The access road is concrete surfaced, but will be routinely monitored for mud and debris. If required, a road sweeper will be used periodically to ensure that the access road is maintained in a clean, debris free condition for the life of the waste transfer station.

3.3.2 The site entrance will comprise a secure metal gate. Details of the operator and the site's Environmental Permit will be provided at the site entrance by signage.

3.3.3 The site entrance will be kept clear of vehicles, in order to allow safe and clear access and egress for waste vehicles and staff/visitor cars.

Reception Area

3.3.4 The reception area will comprise a small portacabin style site office which will be situated on a 12m long shipping container that would be used for storage. The shipping container and site office would have approximate dimensions of 3m width, 12m length and an overall height of 5.3m.

3.3.5 The storage container and site office would be re-located from another site and would be positioned using mobile plant. The site office would be connected to the existing mains electrical and water supplies. Toilets would be connected to a new foul water treatment tank.

3.3.6 Adjacent to the site office there would be parking provision for 5 staff and visitor cars and a cycle stand for 6 cycles.

3.3.7 All delivery vehicles will stop at the site office so that the waste load can be checked in accordance with the site's waste acceptance procedures and the conditions of the site's Environmental Permit. Vehicles will not be permitted to leave the reception area until the site staff are satisfied that the load meets the waste description within the waste transfer note and that the material is permitted at the site under the Environmental Permit.

Waste Transfer Station

3.3.8 A waste transfer station building will be erected on site. The proposed building would be located in the north of the application site, as shown on the Block Plan. The waste transfer station building would have a total height of approximately 11.5m to the roof ridge (10m to the eaves) and an approximate footprint of 30m length by 30m width (i.e. 900m^2). It is proposed that the building walls and roof would be constructed of 0.4mm profiled steel cladding. The colour of the building would be discussed and agreed with the Planning Authority.

3.3.9 The waste transfer station building would be open fronted on its southern elevation with enclosed sides on the western, eastern and northern elevations. The open front would provide high levels of natural light.

3.3.10 The construction period for the waste transfer station building is anticipated to be approximately 4 weeks.

3.3.11 Once operational, the proposed development would be of a temporary nature for a period of 5 years.

Vehicles

Construction Phase

3.3.12 The construction of the proposed waste transfer station would result in a very small number of vehicles over a period of approximately 4 weeks. The steel frame will be delivered on a low loader at the start of the project and the cladding (roof and walls) will be delivered on a separate articulated HGV.

3.3.13 Mobile plant will be delivered to the site (cherry picker and excavator) at the start of the construction period.

3.3.14 It is anticipated that 4 staff members will be required to construct the waste transfer station building. They will travel together in a single vehicle.

Operational Phase

3.3.15 A Transport Statement (TS) was prepared to support the planning application for the proposed waste transfer station. The TS calculated the proposed vehicles numbers travelling to and from the site based on a worst case scenario of the facility accepting 75,000 tonnes per annum (tpa), which is the maximum throughput that would be permitted under the Environmental Permit. The TS calculated that using a throughput of 75,000tpa there would be an average of 99 HGVs travelling to and from the site per day, although the site would work reduced hours on a Saturday.

3.3.16 However, based on existing levels of business but including a 'growth factor', Punjab Skips Limited anticipates that a throughput of 55,000tpa is more likely over the proposed 5 year period. This would result in an average of 73 HGVs per day.

3.3.17 There would be 8 site based staff on site each day. The company encourages car sharing and as most staff live locally, cycle stands will be provided for staff who wish to cycle to work.

3.3.18 Vehicle drivers will comply with the on-site speed limit, which is 10mph. Drivers will be made aware of the speed limit by the presence of signage along the haul road. The site speed limit will be enforced and drivers who exceed the speed limit will be given a verbal warning. Further breaches of the speed limit will result in the driver being requested to leave the site.

3.3.19 The condition of the signage will be regularly inspected and repairs made where necessary.

3.3.20 Skip lorries would enter the site and signage would instruct drivers to report to the site office situated in the south eastern corner of the site, adjacent to the site entrance. A banksman would then direct the waste vehicles into the waste transfer station building.

Security

3.3.21 The site is secured by a concrete block wall along the northern, southern, eastern and western boundaries. This would be enhanced and repaired as necessary. A security gate will be installed on the southern site boundary and locked when the site is closed.

3.3.22 All waste vehicles delivering material to the site must report to the site office. All other visitors to the site must sign in within the Site Diary before proceeding on to the site and must sign out prior to leaving.

3.3.23 All reasonable precautions will be taken to prevent the unauthorised entry of the general public and the unauthorised depositing of waste within the site. The site will include CCTV cameras.

Lighting

3.3.24 The waste transfer station building will be open fronted which will provide high levels of natural light. However it will be necessary to provide additional lighting within the building for health and safety reasons. It is proposed that the building will use low voltage LED floodlights.

3.3.25 The site office includes ceiling LED strip lights.

3.3.26 It will be necessary to erect directional external lighting in the external yard and at the site entrance. All lighting will be directed downwards to minimise light spillage beyond the site boundary.

3.4 Housekeeping

3.4.1 During both the construction phase and during the life of the site, the operator and any appointed contractors will follow a 'good housekeeping' policy at all times. The operator and all contractors will:

- Ensure considerate site behaviour of all operational staff;
- Ensure that no reversing alarms are employed at the site on mobile plant other than white noise alarms;
- Prohibit open fires on site;
- Ensure that appropriate measures for dust control and road cleanliness are implemented to ensure that the areas adjacent to the site are in no worse condition than they are at commencement;
- Remove any rubbish at frequent intervals, leaving the site clean and tidy;
- Maintain all welfare facilities for staff;
- Undertake all unloading of vehicles within the proposed working area;
- Ensure all skip vehicles arriving at the site are adequately sheeted;
- Ensure that Personal Protective Equipment (PPE) and high visibility clothing is worn at all times on site; and
- Ensure boots are free of dirt and debris when leaving site.

3.5 Emergency Planning and Response

3.5.1 It is essential that all necessary measures are taken to prevent accidents, which may have environmental consequences, and to have procedures in place to limit those consequences should they occur.

3.5.2 The implementation of the waste acceptance criteria and the procedures described within this CEMP will control all waste deposited at the site, thereby minimising the risk.

3.5.3 Firefighting equipment of a suitable type shall be kept within the site office and on mobile plant. All firefighting equipment shall be kept in good condition, unobstructed and serviced at least once a year by a competent person. The site will be designated as a 'no smoking area' and signed accordingly.

3.5.4 All waste operations will be undertaken in accordance with the site's Fire Prevention Plan, a copy of which will be retained in the site office. Any fire on the site will be treated as an emergency and will be extinguished at the earliest opportunity. Any smouldering material on the site will be immediately isolated. Soils, or other appropriate materials, will be used for smothering. If necessary, the Fire Service will be summoned. Any incidents of fire will be recorded in the Site Diary.

3.5.5 Waste material accepted at the site will be solid in nature as liquid and sludge wastes are excluded under the conditions of the Permit. The main likely source for spillages will therefore be associated with plant and machinery (e.g. fuel, oils etc).

3.5.6 In the event of a spillage of fuel from site machinery or vehicles, the following procedure will be implemented:

- Clear the area straight away;
- Lay absorbent granules over the spill to soak up the spillage;
- Use PPE provided on site if required;
- Once the liquid has all been absorbed use a shovel to clear the spillage, put it in a plastic sack and then place it in the container for non-compliant waste for disposal at an appropriately permitted facility; and
- A record of the spill incident and remedial action will be recorded in the Site Diary.

4 CONSTRUCTION METHODOLOGY AND PROGRAMME

4.1 Mobile Plant and Equipment

4.1.1 The plant and machinery likely to be used on site will vary depending on the activities being undertaken. During the construction phase, one 14 tonne 360^{o} excavator will be used along with a cherry picker. These items of plant would be required for a period of approximately 4 weeks. A Hiab loader crane would be required for a day to position the storage container and site office in the south east of the site.

4.1.2 During the operational phase, the following would be used:

- 2 x 14 tonne 360^{o} excavators with selector grab attachments;
- 1 x trommel screen;
- Conveyor and hopper (picking line).

4.1.3 These items of plant and equipment would be used within the building to sort the material and transfer it into containers and outgoing vehicles.

4.1.4 All mobile plant and equipment will be subject to a programme of planned preventative maintenance, in accordance with the requirements of the site's Environmental Permit. The maintenance programme seeks to minimise the risk to safety, health and the environment by ensuring that all relevant plant and equipment used within the site are serviced and inspected on a regular basis. The manufacturer's inspection and maintenance schedules are followed where available.

4.1.5 All inspections and maintenance of operational plant is recorded in the Site Diary and will be undertaken by an appropriately trained or qualified person. The servicing records of all plant and machinery will be kept on file at the site office and be available for inspection upon request.

4.2 Programme of Works

4.2.1 The anticipated construction programme for the development of the waste transfer station facility is as follows:

1. Site infrastructure set up, construction of waste transfer station building, positioning of site office, connections to services (water, electricity and septic tank) – up to 1 month;
2. Operation of waste transfer station facility – up to 5 years;
3. Decommissioning building, removing infrastructure, clearing site to original status – up to 1 month.

5 TRAFFIC MANAGEMENT

5.1 Operating Hours

5.1.1 The site working hours will be 7am to 6pm Monday to Friday and 8am to 1pm on Saturdays. The waste transfer station would operate on Saturdays to accept waste and bulk up sorted material and load it into waste vehicles. However there would be no screening of waste on Saturdays.

5.1.2 There would be no working on Sundays or Bank/Public Holidays.

5.1.3 In exceptional circumstances, for safety and operational reasons including plant/equipment maintenance, it may be necessary to work outside of these hours. Where this occurs, the hours and duration of work will be subject to prior consultation with the Local Planning Authority.

5.2 Access Arrangements

5.2.1 Access to the site for waste vehicles will be made from Tavistock Road, via the existing operational entrance to the Old Coal Depot, which is used by multiple businesses.

5.2.2 Within the Old Coal Depot, access to the application site would be provided by a concrete access road which runs in a generally east to west direction. Vehicles will enter the site via a new dedicated gated entrance.

5.2.3 The construction of the waste transfer station building would require a very small number of vehicles (approximately 2 to 4) to deliver the construction materials. The vehicles will arrive by prior arrangement with site management and there is sufficient space within the site for maneuvering.

5.2.4 During the operational phase, waste vehicles will arrive at the site and drivers will report to the site office which would be located within the south eastern corner of the site, close to the site entrance.

5.2.5 A banksman will direct the driver to the waste transfer station building and ensure the safe maneuvering of the vehicle whilst it is on site.

5.3 Traffic Management Principles

5.3.1 It is anticipated that the number of construction vehicles will be very small and staff working on the site will travel together in a single vehicle. There is sufficient space within

the site for the number of vehicles proposed. However, drivers of vehicles reversing within the site will always use a banksman.

5.3.2 The application site is not open to the general public. However, it is important that construction and operational phase traffic within the Old Coal Depot site and traffic on the existing highway network are managed to maximise efficiency and safety whilst minimising risk, inconvenience and nuisance to the public. This will be achieved through careful management, programming and co-ordination of all works and traffic accessing the site.

5.3.3 To minimise the impact of the company's waste movements on the existing highway network the following traffic management principles will be observed:

- Traffic will enter the site via Tavistock Road. With the exception of local collections or deliveries, all site traffic will turn right out of the Old Coal Depot site, onto Tavistock Road; and
- To minimise the impact that the site traffic will have on local residents and the surrounding environment, the Site Manager will be given a number of duties relating to the management of traffic. The Site Manager will be responsible for the following:

    - Ensuring all delivery vehicles to and from the site are managed efficiently, reducing nuisance or unnecessary disruption to the operation of the existing highway network. The role will also include advising drivers of the most appropriate route to follow when approaching/leaving the site in particular providing advice on local width and weight restrictions;
    - Ensuring waste vehicles only travel to and from the site within the permitted operating hours. No vehicles will be allowed into the site outside of these hours. Vehicles will be discouraged from parking outside the site before it opens;
    - Ensuring traffic management principles and the mitigation measures are implemented and that the public highway is kept clear of mud and debris

through ensuring that loads are suitably sheeted and secured and undertaking regular street cleaning, as necessary;

- In the event that a complaint is received relating to the company vehicles, the Site Manager will investigate the issue and liaise with the complainant to ensure that the issue is adequately resolved. The details of the complaint, and any action taken, will be recorded in the Site Diary.
- Any breach of the principles contained within the document by drivers will be subject to a warning with any subsequent breach resulting in a ban from the site.

5.4 Additional Mitigation Measures

5.4.1 In order to minimise the potential for any impact from the operation of the site on the surrounding area, the following measures will be introduced and retained through the course of the construction works:

- Watering of the site or access roads during dry weather in order to minimise the potential for dust; and
- No vehicles idling – where possible, on-site vehicles will be encouraged to turn off their engines when parked, waiting to unload or when not in use. This will reduce the noise impact on the surrounding area and will result in lower vehicle emissions.

6 ENVIRONMENTAL MANAGEMENT

6.1.1 The site would operate under the conditions of an Environmental Permit which would be regulated by the Environment Agency. The conditions of the Permit require that environmental and amenity issues are managed and monitored, thereby minimising the potential for the site activities to give rise to unacceptable effects.

6.2 Dust

6.2.1 As the site and the access road are concrete surfaced and the waste transfer operations will be undertaken within a building, it is considered that the potential for the site to generate dust emissions is relatively low. However, it is recognised that the proposed construction works, and the operation of the waste transfer station, have the potential to generate levels of airborne dust during dry or windy weather.

6.2.2 Vehicles accessing a site are often a primary source of airborne dust. Vehicles would be subject to an on-site speed limit of 10mph and all vehicles delivering waste to the site would be sheeted. Vehicles which are not sheeted will not be permitted to enter the site.

6.2.3 Whilst the internal access road is used by other businesses, the access road and the internal yard will be suitably maintained and kept clear of debris. This will ensure that levels of dust associated with vehicles driving through the site are kept to a minimum. Working areas will be dampened down during dry weather. Any stockpiles of particularly dusty material, such as soils, will also be dampened to minimise the potential for any windblown dust from surfaces.

6.2.4 All waste transfer operations, including sorting and screening, will be undertaken within the building, which will minimise the potential for dust emissions beyond the site boundary. Wastes which consist solely of dusts, powders or loose fibres are specifically excluded under the conditions of the Environmental Permit.

6.2.5 Routine dust monitoring will be undertaken daily in the form of a visual inspection of the site and site boundary by the Site Manager. A diary will be kept of weather conditions and any obvious dust as well as an estimation of wind direction.

6.2.6 Any complaints relating to dust emissions will be recorded within the Site Diary. The Site Manager will be responsible for addressing any dust-related problems, including liaison

with the complainant. The actions taken to address the issue will also be recorded to avoid a recurrence and so that lessons can be learnt for the future.

6.2.7 In summary, it is proposed that dust is managed through a number of mitigation measures which would include, but not be limited to, the following:

- Ensuring that all waste vehicles entering and leaving the site are sheeted to prevent dust;
- Enforcement of a 10mph speed limit on site to minimise dust arising from vehicle movements;
- Good housekeeping measures to promote a clean and tidy site particularly within the surfaced site reception area;
- Use of mobile water sprays to dampen material stockpiles during dry or windy conditions, if required;
- Use of water sprays or water bowsers to dampen the yard and/or access road or other site areas during dry or windy conditions, if required;
- Temporary closure of site and employment of mitigation measures when dust is seen by the Site Manager (or other member of staff) to be emitted beyond the boundaries of the site; and
- Temporary closure of site during exceptionally windy conditions, if considered necessary by the Site Manager.

6.3 Mud & Debris

6.3.1 Measures will be in place to ensure that mud and debris is not tracked onto the public highway by waste vehicles and other vehicles entering and leaving the site. The vehicle parking and site reception area would be located close to the main site entrance and this will be kept clean through good housekeeping measures.

6.3.2 The Site Manager would monitor the condition of the vehicle parking and site reception area as well as the public highway on a daily basis.

6.3.3 The site and access road have a concrete surface, which will minimise the potential for mud to be tracked onto the public highway. However, in the event that mud from the

site is observed on the highway the Site Manager would arrange for a road sweeper to rectify the problem. The source of the mud and/or debris would also be investigated and the incident reported in the Site Diary, including any remedial measures taken, so that the likelihood of a repeat incident is significantly reduced.

6.3.4 If any further complaints are received regarding mud or debris on the public highway, and the source of the incident is confirmed as being the waste transfer station, the Site Manager will investigate the source of the problem and arrange for any remedial action required as a matter of urgency.

6.4 Odour

6.4.1 The proposed construction works would not give rise to odours.

6.4.2 The potential for odour associated with the operational waste transfer station is considered to be low as the waste will comprise mixed skip waste from household and commercial/industrial sources which is unlikely to contain high proportions of putrescible waste. However, whilst it is anticipated that approximately 50% of incoming waste would be inert in nature, there is the potential for waste to include biodegradable waste which could give rise to odours.

6.4.3 The Environmental Permit relates to the control of odours and requires emissions from the site activities to be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved Odour Management Plan, to prevent or where that is not practicable, to minimise, the odour.

6.4.4 The operator is required to:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an Odour Management Plan;

(b) implement the approved Odour Management Plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

6.4.5 The Site Manager, or nominated representative, will ensure that odour is routinely monitored at the site to confirm that odours are not detectable beyond the site boundary.

Where odours are detected beyond the site boundary, measures will be taken to investigate the source of the odour and implement remedial measures, as required. Details of the incident, and any remedial measures taken, will be recorded in the Site Diary.

6.4.6 In the event of any odour complaints being received by the site, the Site Manager or nominated representative, will liaise with the complainant and ensure that the matter is appropriately investigated and addressed. Details of the complaint and any remedial measures taken will be recorded in the Site Diary.

6.5 Noise

6.5.1 The proposed construction works will inevitably have the potential to give rise to noise. However, this would be carried out over a short period of time of approximately 4 weeks. The main source of noise would be from the penetration of concrete with the anchor bolts required to secure the building and the assembly of the pre-fabricated construction materials (steel frame and cladding).

6.5.2 The operation of the waste transfer station will be within an open fronted building, with the southern elevation open and the other three sides enclosed.

6.5.3 The site lies within an existing industrial estate with other similar businesses already operating on the wider site. A noise assessment produced to support the planning application for the waste transfer station concluded that, within the context of the site and the existing sound environment, sounds from the proposed activities would not be readily distinctive at the identified receptor locations.

6.5.4 The site would operate under the conditions of an Environmental Permit, which seeks to control noise and vibration. The Permit requires that emissions from the site activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved Noise and Vibration Management Plan, to prevent or where that is not practicable, to minimise, the noise and vibration.

6.5.5 The operator is required to:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a Noise and Vibration Management Plan;

(b) implement the approved Noise and Vibration Management Plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

6.5.6 However, best practical means will be adopted at all times to reduce the likelihood of nuisance issues. The following measured will be employed as a minimum requirement:

- All noise generating activity, unloading of skips, sorting material, screening waste and loading outgoing collection vehicles, will be confined to the operating hours permitted in the planning permission, except for emergency repairs of mobile plant and equipment, which may need to be undertaken outside of these hours. In the unlikely event of the need to undertake work outside the permitted hours, this would be agreed in advance with the Planning Authority;
- No screening of waste will be undertaken outside the hours of 7am to 6pm Monday to Friday;
- All plant and machinery will have effective silencers and be maintained in accordance with the manufacturer's requirements;
- All equipment, when not in regular use, shall be switched off; and
- White noise warning and reversing signals will be used on mobile plant and equipment.

6.5.7 Operatives will be trained to employ appropriate techniques to keep site noise to a minimum, and will be effectively supervised to ensure that best working practice in respect of noise reduction is followed. All employees will be advised of the following, as part of their training or site induction:

- the proper use and maintenance of tools and equipment;
- the positioning of machinery on site to reduce the emission of noise to the neighbourhood and to site personnel; and

- the avoidance of unnecessary noise when carrying out manual operations and when operating plant and equipment.

6.5.8 Any complaints relating to noise will be recorded within the Site Diary. The Site Manager will be responsible for addressing any noise related problems, including liaison with the complainant. The actions taken to address the issue will also be recorded to avoid a recurrence and so that lessons can be learnt for the future.

6.5.9 Upon reasonable request by the Local Planning Authority (such as if a noise complaint is received), sample noise monitoring will be undertaken at an agreed location to determine the level of noise associated with the works. The noise monitoring should enable a comparison with the noise threshold to be established. If this threshold is exceeded, on-site activities will be investigated and it will be identified whether activities could be easily changed or other reasonable actions taken to reduce noise levels.

6.6 Surface Water

6.6.1 The site has a concrete surface. Surface water falling on the site currently falls to an underground tank which is emptied when full.

6.6.2 London Borough of Hillingdon, as the Lead Local Flood Authority (LLFA) requires that excess surface water run off is managed effectively and does not cause an increase in flood risk elsewhere.

6.6.3 Surface water drainage will be managed to ensure that run-off rates are controlled to minimise the risk of flooding, either on site or off-site. Surface water will be directed to the existing surface water drainage system which currently flows through the Old Coal Depot. Water will flow via an underground storage/ attenuation tank and control mechanism to control flow rates. The surface water drainage system incorporates an existing interceptor.

6.7 Pests

6.7.1 The proposed waste types will not be particularly attractive to pests as they will be stored largely inert or non-putrescible and stored in containers/skips. However, measures will be taken to control pests and vermin within the site. If required, a pest control contractor will be employed.

6.8 Litter

6.8.1 Waste vehicles entering and leaving the site will be sheeted to prevent litter escaping. The waste will be tipped out, sorted, stored and bulked up within a building which will minimise the potential for litter to escape.

6.8.2 The Site Manager will routinely carry out litter inspections to ensure that the site remains tidy and that no litter escapes beyond the site boundary. In the unlikely event that litter is noted beyond the site boundary, litter pickers will be used to tidy the area.