



## **Permit with Introductory Note**

**Environmental Permitting (England and Wales)  
Regulations 2016 (as amended)**

### **Installation address**

**F M Conway Ltd  
Newhaven Asphalt Plant  
Plots 6 & 7  
North Quay  
Newhaven  
BN9 0AB**



Permit and introductory note LA-PPC

**Permit Reference: LDC/CONWAY/P2**

**Contact Details:**

Environmental Health  
Lewes District Council  
Southover House  
Southover Road, Lewes  
BN7 1AB

Tel: 01273 471600

[www.lewes-eastbourne.gov.uk](http://www.lewes-eastbourne.gov.uk)

Email: CustomerFirst@lewes-eastbourne.gov.uk

Permit and introductory note LA-PPC

## Introductory Note

*This introductory note does not form a part of the Permit*

The following Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) (SI 2016 No 1154) (“the EP Regulations”) to operate an installation carrying out one or more of the activities listed in Schedule 14 of those Regulations, to the extent authorised by the Permit.

The Permit includes conditions that have to be complied with. It should be noted that aspects of the operation of the installation which are not regulated by specific conditions are subject to the Best Available Techniques condition placed in the permit, that the Operator shall use the best available techniques for preventing or, where that is not practical, reducing emissions from the installation.

Please note techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

### Brief description of the installation regulated by this permit

Site for the coating of roadstone with bitumen or tar, the plant consists of a Marini Top Tower 3000S modular batch plant, rated at up to 240 tonnes per hour. With associated hot asphalt material storage bins with a capacity of 520 tonnes. A dedicated wharf for the importation of aggregates from vessels and a screen plant for recycling road planning’s and other pre-coated aggregate.

### Process Guidance Note pertaining to this installation: 3/15(12) Roadstone Coating

Superseded Licences/Consents/Permits relating to this installation		
Holder	Reference Number	Date of Issue
FM Conway Limited	LDC/Conway/P1	25 <sup>th</sup> Nov 2019

### Confidentiality

The Permit requires the Operator to provide information to Lewes District Council. The Council will place the information onto the public registers in accordance with the requirements of the EP Regulations. If the Operator considers that any information provided is commercially confidential, it may apply to Lewes District Council to have such information withheld from the Register as provided in the EP Regulations. To enable Lewes District Council to determine whether the information is commercially confidential, the Operator should clearly identify the information in question and should specify clear and precise reasons.

### Variations to the permit

Your attention is drawn to the Variation Notification Procedure condition in the Permit. This Permit may be varied in the future. If at any time the activity or any aspect of the activity regulated by the following conditions changes such that the conditions no longer reflect the activity and require alteration, the Regulator should be contacted.

### Surrender of the permit

Where an Operator intends to cease the operation of an installation (in whole or in part) the regulator should be informed in writing, such notification must include the information specified in regulation 24, or in accordance with Regulation 25 of the EP Regulations for Permits to which Regulation 24 does not apply.

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### **Transfer of the Permit or part of the Permit**

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 21 of the EP Regulations. A transfer will be allowed unless the Authority considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred Permit.

### **Responsibility under workplace health and safety legislation**

This Permit is given in relation to the requirements of the EP regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation.

### **Appeal against permit conditions**

Anyone who is aggrieved by the conditions attached to a permit can appeal to the Appropriate Authority, (Secretary of State for the Environment, Food and Rural Affairs, in England and the Welsh Ministers in Wales). Appeals must be made in accordance with the requirements of Regulation 31 and Schedule 6 of the EP Regulations.

Appeals should be received by the Secretary of State for Environment, Food and Rural Affairs or the Welsh Ministers at the following addresses:

The Planning Inspectorate  
Environment Team, Major and Specialist Casework  
Room 4/04 Kite Wing  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol BS1 6PN

Or for appeals in Wales:

The Planning Inspectorate  
Crown Buildings  
Cathays Park  
CARDIFF  
CF10 3NQ

### **Please Note**

An appeal brought under Regulation 31 (1) (b), (c) and Schedule 6, in relation to the conditions in a permit will not suspend the effect of the conditions appealed against; the conditions must still be complied with.

In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the local authority either to vary any of these other conditions or to add new conditions.

Our enforcement of this permit will be in accordance with the Regulators' Compliance Code. A copy is on the Business, Innovation and Skills Department website: <http://www.bis.gov.uk/files/file45019.pdf>.

**End of introductory note**

## Permit issued under the Environmental Permitting (England and Wales) Regulations 2016 (as amended)

**Permit Reference: LDC/CONWAY/P2**

Lewes District Council (the Regulator) in exercise of its powers under Regulation 13(1) of the Environmental Permitting Regulations (England and Wales) 2016 (as amended) (SI 2016 No 1154) hereby permits:

**F M Conway Ltd** (“the operator”)

**Whose Registered office is:**

**Conway House  
Vestry Road  
Sevenoaks  
Kent  
TN14 5EL**

**Company Number: 706445**

**To operate an installation at:**

**F M Conway Ltd  
Newhaven Asphalt Plant, Plots 6 & 7, North Quay, Newhaven, BN9 0AB**

to the extent authorised by and subject to the description, boundaries and conditions of this Permit.

### **Description of the installation regulated by this permit**

**Roadstone Coating Installation:** Aggregate materials or RAP are shovel fed into one of eight cold feed aggregate hoppers or three RAP feed hoppers, then moved by conveyor to the dryer drum. From the dryer drum the dried aggregate is transferred to the top of the plant in preparation for mixing. Aggregate and RAP (if required) will have bitumen, filler and any other required additive combined to the batch in the mixing unit. Directly associated activities

1. Ship unloading, the aggregate is either discharged by means of hydraulically operated dock crane or self-discharge ship, again using a hydraulically operated crane mounted on the vessel. The vessels will carry up to 4 parcels of aggregate of different gradings for the asphalt coating plant process and will be unloaded directly onto the quay.
2. Screening of road planings and returns to produce Recycle Aggregate Product (RAP) for re-introduction to the roadstone coating plant.

Signed



**Rachel Sadler  
Authorised to sign on behalf of  
Lewes District Council**

Dated

31<sup>st</sup> March 2021





**KEY**

- PLANNING APPLICATION BOUNDARY
- APPROXIMATE LOCATION OF NEW WALLS AND FLOOD ATTENUATION
- LIGHTING AND CCTV COLUMNS

**CONWAY**  
 CONWAY HOLDINGS LTD  
 100, WINDYBUSH ROAD  
 LITTLEHAMPTON, SUSSEX BN15 2JF  
 Tel: 01323 812121  
 Email: info@conway.co.uk

**CONWAY**  
 CONWAY HOLDINGS LTD  
 100, WINDYBUSH ROAD  
 LITTLEHAMPTON, SUSSEX BN15 2JF  
 Tel: 01323 812121  
 Email: info@conway.co.uk

**FOR PLANNING**

Site No: LDC/CONWAY/P2  
 Date: 15/01/2024  
 Drawing No: 100-016  
 Scale: 1:1000  
 Author: A

### **Emissions and monitoring**

- 4 No visible particulate matter shall be emitted beyond the installation boundary.
- 5 The emission requirements and methods and frequency of monitoring set out in Table 1 shall be complied with. Sampling shall be representative

Any monitoring display required for compliance with the permit shall be visible to operating staff at all times. Corrective action shall be taken immediately if any periodic monitoring result exceeds a limit in Table 1, or if there is a malfunction or breakdown of any equipment which might increase emissions. Monitoring shall be undertaken or repeated as soon as possible thereafter and a brief record shall be kept of the main actions taken.

Where continuous monitors are fitted to show compliance with a numerical limit in Table 1: All continuous monitors fitted to show compliance with the permit shall be fitted with a visible/audible alarm warning of arrestment failure or malfunction. They shall activate when emissions reach 75% of the relevant emission limit in Table 1 and record automatically each activation. Alarms shall be tested at least once a week.

- 6 All plant and equipment capable of causing, or preventing, emissions and all monitoring devices shall be calibrated and maintained in accordance with the manufacturers' instructions. Records shall be kept of such maintenance.
- 7 Recycled asphalt products containing coal tar shall be:
  - Identified, and stored separately from other recycled asphalt
  - Processed only using cold methods

### **Silos where used**

- 8 Fillers and bitumen shall only be stored within the filler and bitumen silos.
- 9 Dust emissions from loading or unloading road tankers shall be minimised by venting to suitable arrestment plant to meet the emission limits in Table 1. Emission limits shall also be minimised by connecting transfer lines first to the delivery inlet point and then to the tanker discharge point, and by ensuring delivery is at a rate which does not pressurise the silo.
- 10 Silos shall not be overfilled and there shall be an overfilling alarm.
- 11 (for silos new since Jun 2004) When loading filler silos, deliveries must stop automatically where over-pressurisation or over-filling is identified
- 12 Displaced air from pneumatic transfer shall pass through abatement plant prior to emission to air.

### **Aggregates delivery and storage**

- 13 Dusty materials (including dusty wastes) shall only be stored in covered/contained storage bays, hoppers, bags and temporary wharf side during unloading, as detailed on the plan attached to this permit and shall be subject to suppression and management techniques to minimise dust emissions.

### **Belt conveying**

- 14 All dusty materials, including wastes, shall be conveyed using adequate protection against wind whipping; where necessary conveyed material shall be dampened and conveyors fitted with effective means for keeping the return belt clean. All transfer points shall have necessary techniques employed at the point of discharge to minimise emissions.



### Loading, unloading and transport

- 15 No potentially dusty materials (including wastes) or finished products shall arrive on or leave the site other than by use of use of covered vessels, tankers, fully enclosed transport, sheeted transport or bagged so as to prevent visible dust emissions.
- 15.1 In order to prevent unacceptable dust emissions during ship unloading, no unloading shall be undertaken when wind speed is greater than 20 m/s.

### Roadways and transportation

16. All areas where there is regular movement of vehicles shall have a consolidated surface capable of being cleaned, and these surfaces shall be kept clean and in good repair. Quarry haul roads are excluded from this provision.
17. Vehicles shall not track material from the site onto the highway.

### Techniques to control fugitive emissions

18. The fabric of process buildings shall be maintained so as to minimise visible dust emissions

### Records and training

- 19 Written or computer records of all tests and monitoring shall be kept by the operator for at least 24 months. They and a copy of all manufacturers' instructions referred to in this permit shall be made available for examination by the Council. Records shall be kept of operator inspections, including those for visible and odorous emissions.
- 20 Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit. Records shall be kept of relevant training undertaken.

Table 1 - Emission Limits, monitoring and other provisions					
Row	Substance	Source	Emission limits / provisions	Type of Monitoring	Monitoring Frequency
<b>Whole site and all authorised emission points</b>					
1	Visible emissions	Site including the wharf, and asphalt/RAP screening area.	No visible emissions to cross site boundary	Operator observations	Once a day coating plant. Once on start-up and on 2 other times a day during RAP screening activities.
2	Visible emissions	All authorised emission points Including discharge from ship at the wharf.	No abnormal emission	Operator observations	2 x day during ship unloading.
3	Droplets, persistent mist, fume and smoke	All emissions to air (except steam and condensed water vapour)	No droplets, no persistent mist, no persistent fume.  No visible smoke except during start-up of coating plant and then no darker	Visual observations	On start-up and on at least two more occasions during the working day

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<b>Roadstone coating plant</b>					
4	Particulate matter	Roadstone coating plant existing at 1 July 2004, except where new or replacement arrestment equipment is fitted	Where currently achieved: 50 mg/m <sup>3</sup>	EITHER:  Periodic, quantitative, 6 monthly  OR: Period, quantitative, annual monitoring  Plus continuously recorder filter leak monitoring	
			Where 50 mg/m <sup>3</sup> currently achieved, but only inconsistently:  100 mg/m <sup>3</sup> PLUS efforts should be made to improve consistency.		
			Where 50 mg/m <sup>3</sup> currently not achieved:		
			100 mg/m <sup>3</sup>		
5	Particulate matter	Since 1 July 2004: new roadstone coating plant, and roadstone coating plant with new or replacement arrestment equipment	50 mg/m <sup>3</sup>		
6	Sulphur dioxide	All activities using heavy fuel oil or other residual type/comparable Quality Protocol Processed Fuel Oil	1% wt/wt sulphur in fuel	Sulphur content of fuel is regulated under the Sulphur Content of Liquid Fuels Regulations	
7	Sulphur dioxide	All activities using gas oil/ comparable Quality Protocol Processed Fuel Oil	0.1% wt/wt sulphur in fuel	Sulphur content of fuel is regulated under the Sulphur Content of Liquid Fuels Regulations	
Activities burning bio-fuels should have a limit set for sulphur in fuel Activities burning waste oil not covered by the quality protocol processed fuel oil must comply with the Waste Incineration Directive (WID).					
<b>Silos</b>					
8	Particulate matter	Silo inlets and outlets	Designed to emit less than 10mg/m <sup>3</sup>	Certification	Certification upon request
			No Visible emissions	Operator/driver Observations  Record start and finish times	Every delivery
<b>Arrestment plant not serving silos or roadstone coating plant</b>					
9	Particulate matter	Arrestment equipment with exhaust flow >300 m <sup>3</sup> /min: (see note a)	Designed to achieve 50 mg/m <sup>3</sup>	Recorded filter leak monitoring	Continuous

10	Particulate matter	Arrestment equipment with exhaust flow >100 m <sup>3</sup> /min: (see note a)	Designed to achieve 50 mg/m <sup>3</sup>	Filter leak monitoring to demonstrate that the arrestment equipment is functioning correctly	Continuous
11	Particulate matter	Arrestment equipment with exhaust flow =/<100 m <sup>3</sup> /min (see note a)	No visible emission	Operator observations	At least daily
				OR Filter leak monitoring to show that the equipment is functioning correctly	Continuous
<p>Notes</p> <p>*All periodic monitoring results shall be checked by the operator on receipt and sent to the Council within 8 weeks of the monitoring being undertaken.*</p> <p>(a) Where the plant is discharging to the external atmosphere.</p> <p>(b) The reference conditions for limits in Table 1 are: 273.1K, 101.3kPa, without correction for water vapour content.</p> <p>(c) All periodic monitoring shall be representative, and shall use standard methods.</p> <p>(d) The emission limits do not apply during start-up and shut down. All emissions shall be kept to a minimum during these periods</p>					

**End of Permit**