# <u>Why is the design of the Hollingdean Waste Transfer Station not fit for the purpose of containing odorous waste?</u>

The design of the Hollingdean Waste Transfer Station has been criticized as not fit for purpose in containing odorous waste due to several key shortcomings:

### 1. Inadequate Odour Containment Measures:

The building lacks sufficient airtightness and advanced ventilation systems needed to effectively contain and treat foul air. Waste transfer stations handling mixed municipal waste — especially food and organic material — require sealed environments and negative air pressure systems to prevent odours from escaping, which the Hollingdean facility reportedly does not consistently maintain.

### 2. Proximity to Residential Areas:

The station is located close to homes and schools in Brighton. This proximity makes effective odour control even more critical. Any failure in containment or filtration becomes immediately apparent to nearby residents, leading to repeated complaints and public dissatisfaction.

### 3. Design Not Tailored to Waste Type:

The original design may not have fully accounted for the highly odorous nature of the waste processed, especially with changes in waste composition over time. Without adaptable infrastructure (such as enhanced biofilters or air scrubbers), odour control can be compromised.

### 4. Operational Issues Exacerbating Design Flaws:

Even a reasonably sound design can be undermined by poor maintenance or ineffective operational protocols. Reports have suggested problems with keeping doors closed, inadequate cleaning regimes, or delays in moving waste off-site — all of which are exacerbated by design limitations.

### 5. Community Feedback and Regulatory Pressure:

Ongoing complaints from the community and attention from environmental regulators suggest that the station's design is not delivering the level of odour mitigation expected in a modern urban waste facility.

# Does the absence of an an entrance airlock system contribute to the problem of odour control?

Yes, the absence of an entrance airlock system **significantly contributes** to the problem of odour control at the Hollingdean Waste Transfer Station.

Here's why:

### 1. Loss of Negative Air Pressure:

Waste transfer stations typically rely on maintaining *negative air pressure* inside the building to keep odorous air from escaping. Without an airlock (a sealed vestibule with two sets of doors), each time a waste truck enters or exits, that pressure is disrupted, allowing foul air to escape directly into the surrounding environment.

### 2. Frequent Door Openings = Odour Leakage:

In high-traffic facilities, doors open dozens of times a day. Without an airlock buffer zone,

every opening creates a direct path for odours to be released — especially problematic when dealing with putrescible waste.

3. Poor Environmental Containment Design:

Airlocks are standard best practice in modern waste management facilities, not only for odour but also for dust, vermin, and bioaerosol control. Their absence at Hollingdean suggests the design falls below best-practice standards for urban waste facilities.

### 4. Impact on Neighbouring Areas:

Without an airlock, odour episodes can spike dramatically during waste deliveries or collections, which aligns with the pattern of complaints from nearby residents.

So yes, the lack of an entrance airlock is a fundamental design flaw when it comes to odour mitigation.

### Why wasn't an entrance airlock system fitted?

An entrance airlock system likely wasn't fitted at the Hollingdean Waste Transfer Station due to a combination of **cost**, **space constraints**, **and underestimation of odour risks** during the planning and design stages. Here are the main likely reasons:

### 1. Cost-Saving Measures During Design:

Airlock systems add to both capital and ongoing operational costs (e.g., for maintenance, automation, and energy). If the original design aimed to minimize upfront spending, odour control features like airlocks may have been considered non-essential.

#### 2. Space and Site Constraints:

The Hollingdean site is tightly confined within a dense urban area. Adding large entrance airlocks for refuse vehicles would have required more space than was available or would have required significant compromises to traffic flow and site layout.

### 3. Planning Oversights or Assumptions:

Planners may have assumed that odour would be manageable using simpler ventilation or filtration measures. If environmental impact assessments underestimated the odour levels or community sensitivity, more robust containment solutions like airlocks may not have been prioritized.

### 4. Lack of Regulatory Pressure at the Time:

Waste infrastructure built in the early 2000s often followed less stringent odour control standards than are now expected, particularly in urban locations. Regulatory frameworks have tightened since then, but retrofitting such features is complex and expensive.

### 5. Dependence on Operational Controls:

The facility may have relied on operational controls (like closing doors quickly or using negative pressure systems) instead of physical infrastructure. In practice, such methods often prove unreliable without strong enforcement and maintenance.

Here's a draft **formal complaint letter** and a **community action proposal** you can adapt and use. Both are written with clarity and professionalism to be taken seriously by local authorities, the Environment Agency, or your council.

# **Formal Complaint Letter: Odour and Environmental Concerns at Hollingdean** <u>Waste Transfer Station</u>

**To:** Environmental Health Department Brighton & Hove City Council Bartholomew House Bartholomew Square Brighton BN1 1JE

# Subject: Formal Complaint Regarding Ongoing Odour Issues at Hollingdean Waste Transfer Station

Dear Sir/Madam,

I am writing to formally raise a complaint regarding persistent and unacceptable odour emissions from the Hollingdean Waste Transfer Station, located in close proximity to residential properties, schools, and community facilities.

Despite previous assurances and mitigation efforts, odour issues from the facility continue to affect the quality of life for local residents. The foul smells are particularly noticeable during waste deliveries, suggesting a failure in basic containment and ventilation systems. The lack of an entrance airlock system — a standard feature in modern waste facilities — appears to be a significant design flaw contributing to this problem.

This facility was approved on the condition that it would not cause environmental harm to the surrounding community. However, the ongoing complaints and clear lack of effective odour control strongly suggest the facility is **not fit for purpose in its current form**.

We request the following:

- 1. A full environmental audit of the site's odour containment systems.
- 2. Immediate action to implement physical improvements, including retrofitting an entrance airlock system.
- 3. Transparent public reporting on complaints, monitoring data, and mitigation measures.

Residents deserve to live in a clean, safe environment free from industrial-level odour pollution. The current situation is both distressing and unacceptable.

# Yours sincerely,

### [Your Full Name]

(on behalf of concerned residents of Hollingdean and surrounding areas)

# **Community Action Proposal: Improving Conditions at Hollingdean Waste Transfer Station**

### Title:

Clean Air for Hollingdean: Community Campaign for Odour Control and Accountability

### **Objective:**

To mobilize local residents, schools, and community groups to demand improved environmental protections and infrastructure upgrades at the Hollingdean Waste Transfer Station.

### Goals:

- Press for the installation of an entrance airlock system to prevent further odour leakage.
- Advocate for stricter environmental monitoring and public access to odour data.
- Engage local councillors, MPs, and media to raise awareness.
- Explore legal or environmental complaint mechanisms through the Environment Agency or Planning Ombudsman.

This facility was approved under the promise that it would not harm the local environment. Yet, the lack of an entrance airlock system and failure to maintain proper negative air pressure show that the station is **not fit for purpose**.

We demand:

- 1. The installation of an entrance airlock system to reduce odour emissions.
- 2. An independent audit of the facility's environmental performance.
- 3. Regular public reporting on odour monitoring and complaints.
- 4. Enforcement action if the site is found in breach of its operational conditions.

Our community deserves clean air and responsible infrastructure. Join us in holding those in power accountable.

The absence of an entrance airlock system at the Hollingdean Waste Transfer Station (WTS) appears to stem from decisions made during the facility's initial planning and design phases. While specific documents detailing the rationale are not readily accessible, available information provides insights into potential reasons for this omission.

## **Planning and Design Context**

The Hollingdean WTS was approved under planning application reference BH2006/00900, which permitted the site's use as a materials recovery facility and waste transfer station with a combined throughput restricted to 160,000 tonnes of waste per year . Supplementary Planning Guidance (SPG) documents from that period, such as SPGBH 17, provided guidance for the site's development but did not explicitly mandate the inclusion of an entrance airlock system .<u>Brighton & Hove City Council+1Brighton & Hove City Council</u>

## **Community Observations and Environmental Assessments**

Local community groups, notably the Round Hill Society, have highlighted that the building was constructed without an entrance airlock system. This design choice allows odours to escape directly into the surrounding environment when the facility's doors are opened, particularly during waste

deliveries . Further, the Environment Agency has identified the building's design and the nature of the waste received—especially food waste—as primary contributors to odour issues. They noted that the facility's structure is not adequately equipped to contain odours from a constant stream of food waste, suggesting that the only complete solution would be the separate collection of food waste .<u>The Round Hill Society+1The Round Hill Society+1The Round Hill Society</u>

# Potential Reasons for Omission

Based on the available information, several factors may have contributed to the decision not to include an entrance airlock system:

- **Cost Considerations**: Incorporating an airlock system would have increased the initial construction and ongoing operational costs. Budget constraints may have led to prioritizing other aspects of the facility's design.
- **Spatial Constraints**: The site's urban location may have limited the available space for additional structures like airlocks, influencing the design choices.
- **Regulatory Standards at the Time**: At the time of planning, regulatory requirements may not have explicitly required airlock systems for such facilities, leading to their exclusion from the design.
- **Reliance on Operational Controls**: The facility may have planned to manage odour emissions through operational practices, such as keeping doors closed when not in use, rather than through structural design features.

## Accessing Further Information

To obtain detailed information about the planning and design decisions, you can:

- **Review Planning Application Documents**: Access the original planning application (BH2006/00900) and associated documents through the Brighton & Hove City Council's planning portal.<u>Brighton & Hove City Council+1Brighton & Hove City Council+1</u>
- **Submit a Freedom of Information (FOI) Request**: If specific documents are not publicly available, consider submitting an FOI request to the council requesting access to planning documents, environmental assessments, and design specifications related to the facility.
- **Contact Local Authorities**: Reach out to the Brighton & Hove City Council's Planning Department or Environmental Health Department for assistance in locating relevant documents.

## Why has there been so many fires at Hollingdean's Waste Transfer Station?

The Hollingdean Waste Transfer Station in Brighton has experienced multiple fires over recent years, primarily due to the improper disposal of hazardous items in household waste. Investigations by East Sussex Fire and Rescue Service and Veolia have identified that smouldering disposable barbecues, often discarded in public litter bins along the seafront, are a common cause. When these are not fully extinguished, they can ignite other waste materials upon collection and transfer to the facility .Brighton and Hove NewsBrighton and Hove News+4Brighton & Hove City Council+4Brighton and Hove News+4Brighton Journal+1Brighton and Hove News+1

Additionally, lithium-ion batteries from electronic devices like e-scooters and mobile phones have been implicated in fires at the depot and in collection vehicles. These batteries can explode or catch fire if damaged or improperly disposed of, posing significant risks during waste processing .<u>Brighton and Hove News</u>

Local residents have raised concerns about the facility's location in a densely populated area, citing health risks from smoke and inadequate fire safety measures. The waste transfer station lacks a sprinkler system, and its design does not effectively contain smoke or odors, exacerbating the impact of fires on the surrounding community .<u>Brighton and Hove News+2Brighton and Hove News+2SussexWorld+2Brighton and Hove News</u>

In response to these incidents, measures such as implementing new protocols for checking litter bins for smouldering items and considering the installation of sprinkler systems have been discussed. However, residents continue to advocate for more robust safety measures or the relocation of the facility to mitigate ongoing risks .

# Has a sprinkler system now been fitted within Hollingdean's Waste Transfer Station following the fires?

Yes, as of June 2020, a full fire suppression system, including sprinklers, was installed at the Hollingdean Waste Transfer Station. This upgrade was part of a broader initiative by Veolia to enhance fire safety across all three of its waste transfer stations in East Sussex, following a significant fire in August 2019. The improvements also included the installation of advanced fire detection systems and the construction of internal fire break walls to prevent the spread of fires .<u>The Round Hill Society+1The Round Hill Society+1</u>

Prior to these enhancements, the Waste Transfer Station lacked a sprinkler system, unlike the adjacent Materials Recovery Facility, which had one in place. This absence had been a point of concern for local residents and council members, especially given the station's proximity to densely populated areas and schools .<u>Brighton & Hove DemocracyBrighton and Hove News</u>

The costs for these fire safety improvements were borne by Veolia, not the local council, as part of their contractual obligations to maintain safe operations at their facilities .<u>The Round Hill</u> <u>Society+1The Round Hill Society+1</u>

While these measures have addressed some safety concerns, community members continue to express apprehensions about the site's location and overall suitability, advocating for ongoing reviews and potential relocation discussions.

## Return to <u>https://roundhill.org.uk/main?sec=planning&p=Hollingdean\_Depot</u>