



Non-Technical Summary

**YPH Waste Management Limited, Lufton Trading Estate,
Yeovil**

Environmental Permit Variation Application

Prepared by:

SLR Consulting Limited

3rd Floor, Brew House, Jacob Street, Tower Hill,
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SLR Project No.: 416.066353.00001

18 September 2025

Revision: 1

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	18 September 2025	RE	GA	GA
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Basis of Report

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Appendix A Pre-Application Advice



1.0 INTRODUCTION

SLR Consulting Ltd (SLR) has been instructed by EMS Waste Services Limited (EMS) to prepare an environmental permit (EP) variation application for YPH Waste Management Limited (YPH Waste) located at Artillery Road Transfer Station, Artillery Road, Lufton Trading Estate, Yeovil, Somerset, BA22 8RP hereafter referred to as 'the Site'.

This Non-Technical Summary (NTS) provides a summary of what is being applied for, the regulated facility and outlines the key technical standards and control measures that will be implemented at the Site as a result of the risk assessments.

In addition to this NTS, the EP variation application comprises the following documents:

- Section 2- Application Forms (A, C2, C4, F1)
- Section 3 – Environmental Risk Assessment

1.1 Site History

YPH Waste hold a standard rules permit, SR2022 No4 for non-hazardous waste recycling with asbestos, hazardous batteries, cable and WEEE storage (ref. EPR/NP3093FN, issued January 2025).

YPH Waste were issued a standard rules permit, SR2008 No7_75tke- household, commercial, industrial waste transfer station with treatments and asbestos storage, on the 10th of July 2014. SR2008 No7 was withdrawn on 18th December 2024 and consolidated into standard rules permit SR2022 No4: non-hazardous waste recycling with asbestos, hazardous batteries, cable and WEEE storage.

SLR supported EMS Waste Services to transfer the permit from YPH Waste into their company's name. The transfer application was submitted on 9th September 2025.

1.2 Site Location

The site is located approximately 3.3km west of Yeovil at National Grid Reference ST5234116808. The site is located within Lufton Trading Estate from which access to the site is gained via Artillery Rd and Lufton Way.

The surrounding land generally consists of commercial premises to the north, east and west, with Artillery Road adjacent to the site's northern boundary. Lufton Trading Estate extends northwards and westwards. There are several residential properties within 500m of the site, with the nearest being located adjacent to southern site boundary.

1.3 Operations Undertaken on Site

The operations that take place on site are the transfer and recycling of inert and non-hazardous waste, including sorting, bulking and storage activities.

Waste is received at the Waste Transfer Building (Plan No. 21259-500-01), where it is unloaded and manually segregated. Mobile plant is then used to transfer the waste to the processing facility. Oversized items unsuitable for mechanical processing, along with clean timber, are removed in the Primary Picking Shed.

The remaining waste is conveyed to a stepped twin screen, which separates materials into distinct streams:

- **Fines (<10mm):** These pass under a magnet to extract metals and are then conveyed to the external fines bay.



- **Medium-sized materials (10–40mm):** These are processed through an Air Density Separator, which separates lighter materials into one bay and oversize aggregates into another.
- **Oversized materials (>40mm):** These pass through a blower to remove lighter materials and are then conveyed to the Picking Shed for final sorting into three bays: wood, general waste, and other recyclables. The wood bay is emptied daily for shredding or transferred to a roll on roll off (RORO) container located away from the main building.
- **Residual materials:** These pass under a magnet for metal removal and are sorted into two final bays. While some combustible materials may remain in the lights bay, the majority consists of aggregates.

Waste is temporarily stored in stockpiles located within the Waste Reception Area of the main Waste Transfer Building, as well as in yard-facing holding bays situated at the south-eastern end of the building. Processed waste is subsequently transferred to skips or external stockpiles for further storage. No waste is stored in the Ancillary Building located on the eastern side of the site. This facility is used exclusively for the sorting of waste, not for storage.

Figures 1-4 are photographs taken of the site from a site visit undertaken in July 2025.



Figure 1- Outdoor storage bays



Figure 2- Wood storage bay



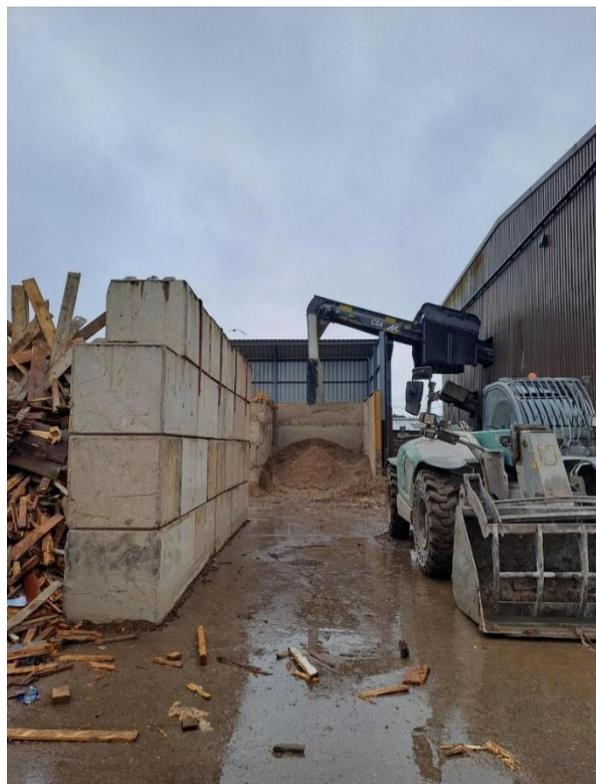


Figure 3– External fines storage bay



Figure 4 – Waste being sorted by the mobile shredder

1.4 Pre-application Discussions with the EA

Pre-application advice received on 01/05/2025 is included in Appendix A. The pre-application advice stated that a variation from standard rules to a bespoke permit is likely to require significant assessment due to the increased risk from the operations and therefore likely to fall under a substantial rather than a normal variation. SLR disagrees with the classification of the variation as substantial as the site is not proposing any changes to its current activities. All operations will continue as per current arrangements. It is therefore considered that the variation is a normal variation, as there is no increase in operational risk.

SLR engaged with an Environment Agency permitting officer to discuss the classification, but the pre-application process was closed on 05/08/2025 without a resolution being reached.

2.0 APPLICATION OVERVIEW

2.1 Bespoke Environmental Permit Application

YPH Waste hold a standard rules permit, SR2022 No4 for non-hazardous waste recycling with asbestos, hazardous batteries, cable and WEEE storage (ref. EPR/NP3093FN, issued January 2025).

YPH Waste previously held a standard rules permit, SR2008 No7_75tke- household, commercial, industrial waste transfer station with treatments and asbestos storage. SR2008 No7 was withdrawn on 18th December 2024 and consolidated into standard rules permit SR2022 No4: non-hazardous waste recycling with asbestos, hazardous batteries, cable and WEEE storage.



EMS Waste Services Ltd (EMS Waste Services) wish to apply for a bespoke environmental permit as they do not meet the waste storage conditions included in SR2022 No4 requiring waste to be stored within an enclosed building prior to 19 June 2026.

No infrastructure changes are required to enable this, and it is not proposed to increase storage capacity or the throughput capacity.

The EA Charging Scheme guidance¹ states that varying standard rules permit to a bespoke permit should be classed as either a normal or substantial variation. A substantial variation applies when the change is likely to involve significant assessment—for example, where there is a significant increase in operational risk. As the operations are existing, the site has a history of good compliance and no complaints, there are no infrastructure or operational changes proposed as part of this variation application, SLR consider that it should be classified as a normal variation.

3.0 APPLICATION CONTENTS

3.1 Application Forms

3.1.1 Bespoke Environmental Permit Application

Application forms (A, C2, C4 and F1) have been completed and are enclosed in Section 2 of the application.

3.2 Environmental Risk Assessment

The Environmental Risk Assessment considers odour, fugitive emissions, dust, releases to water, litter, mud, birds, vermin and insects, potential for accidents and incidents. There are no point source discharges to air, surface water or groundwater from the site. The assessment concludes that with the implementation of the risk management measures described, potential hazards from the activities undertaken on site are not likely to be significant.

The Environmental Risk Assessment is enclosed in Section 3 of this application.

4.0 TECHNICAL STANDARDS AND KEY CONTROL MEASURES

The key technical standards laid out in this Non-Technical Summary and OT govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- Develop a management system: environmental permits, April 2023;
- Control and monitor emissions for your environmental permit, June 2025;
- Non-hazardous and inert waste: appropriate measures for permitted facilities, August 2023;
- Risk assessment for your environmental permit, January 2025; and
- Environmental permitting: H5 Site condition report, May 2013.

¹ <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance>



The control measures relevant to the proposed operations are described in the OT document submitted with this application.

5.0 CONCLUSIONS

The overall conclusion from the studies undertaken as part of the application is that there is unlikely to be a significant environmental impact as a result of the bespoke permit application.

EMS Waste Services is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the company's environmental policy and management system.

It is therefore considered that the permit variation should be issued as detailed above.





Appendix A Pre-Application Advice

Non-Technical Summary

YPH Waste Management Limited, Lufton Trading Estate, Yeovil

Environmental Permit Variation Application

SLR Project No.: 416.066353.00001

18 September 2025



Outlook

RE: Basic pre-application advice request- follow up question EPR/BP3722LZ/P002 CRM:0110214

From Joanne Carney <joanne.carney@environment-agency.gov.uk>**Date** Wed 2025-08-06 08:37**To** Roisin Ellis <rellis@slrconsulting.com>

Good Morning Roisin

As mentioned in my previous email, any enquiries resulting from my previous response must be logged as a new request using the online form:

[Get advice before you apply for an environmental permit - GOV.UK](#)

Kind regards

Joanne Carney

Permitting Officer, National Permitting Service

Environment Agency | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

joanne.carney@environment-agency.gov.uk

External: 0203 025 3947

Usual working schedule: Mon, Tues, Thurs, Fri 08:00-16:00 & Wed 08:00 -12:00

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From: Roisin Ellis <rellis@slrconsulting.com>**Sent:** 05 August 2025 17:09**To:** Joanne Carney <joanne.carney@environment-agency.gov.uk>**Cc:** Greg Altria <galtria@slrconsulting.com>**Subject:** Re: Basic pre-application advice request- follow up question EPR/BP3722LZ/P002 CRM:0110214

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Good afternoon Joanne,

Thank you for your response.

We would like to clarify that no changes are proposed to the existing operations at the YPH Waste site. The activities will continue as they were under the previous standard rules permit, and as such, we do not anticipate any increase in risk from the operations. In light of this, we find the classification of the variation as substantial to be somewhat contradictory. Based on your guidance, and given that the operational risk remains unchanged, we believe the variation should be considered a normal variation.

We would be grateful if the Environment Agency could confirm that the variation will be classified as a normal variation.

Kind regards

Roisin Ellis

Roisin Ellis (*she/her/hers*)

PIEMA REnvP

Senior Consultant - EMPC - Environment Management, Permitting & Compliance

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SLR Consulting Limited. A company incorporated in England and Wales with registered number 03880506 and with its registered office at Third Floor, Summit House, 12 Red Lion Square, Holborn, London, WC1R 4QH.

From: Joanne Carney <joanne.carney@environment-agency.gov.uk>

Sent: Tuesday, August 5, 2025 14:00

To: Roisin Ellis <rellis@slrconsulting.com>

Subject: RE: Basic pre-application advice request- follow up question EPR/BP3722LZ/P002 CRM:0110214

Good Afternoon Roisin

A variation from standard rules to a bespoke permit is likely to require significant assessment due to the increased risk from the operations and therefore likely to fall under a significant rather than a normal variation.

The risk increases if storing/treating odorous, combustible or dusty waste outside, therefore relevant management plans must be submitted and assessed. Please see Section 3.3.3 on the following webpage:

<https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance#varying-a-permit-charges>

Your risk assessment will help you to identify the emissions from your site and subsequently which management plans you will need to submit for assessment:

[Control and monitor emissions for your environmental permit - GOV.UK](#)

If your risk assessment indicates that there has been no increase in the risk from odour, dust, combustible wastes etc, you may wish to re-apply for pre-application advice and state why you believe that the variation falls under a normal variation, please include any evidence to support this.

Please note, further enquiries resulting from this and my initial response must be logged as a new request using the online form:

[Get advice before you apply for an environmental permit - GOV.UK](#)

Our basic pre-application service is free and is limited to the information detailed on section 2 of the [Environmental permitting charges guidance](#) on gov.uk.

If you need more extensive or technical pre-application advice, you can ask for our enhanced pre-application service. The enhanced pre-application advice is charged at £100 per hour plus VAT. You will need to complete and submit a new online pre-application request to request enhanced pre-application advice.

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The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers waste only. Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

This pre-application request is now closed.

Kind regards

Joanne Carney
Permitting Officer, National Permitting Service
Environment Agency | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

joanne.carney@environment-agency.gov.uk

External: 0203 025 3947

Usual working schedule: Mon, Tues, Thurs, Fri 08:00-16:00 & Wed 08:00 -12:00

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From: Roisin Ellis <rellis@slrconsulting.com>

Sent: 31 July 2025 13:55

To: Joanne Carney <joanne.carney@environment-agency.gov.uk>

Cc: Rebecca Holland <rebeccaholland@slrconsulting.com>; Greg Altria <galtria@slrconsulting.com>

Subject: Re: Basic pre-application advice request- follow up question EPR/BP3722LZ/P002 CRM:0110214

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Dear Joanne,

I hope this message finds you well.

I am writing to seek clarification regarding the recent classification of the permit variation for YPH Waste as a substantial variation. From our understanding, the site is not proposing any changes to its current activities, and all operations will continue as per the existing permit conditions.

Given this, we would appreciate further insight into the rationale behind the decision to classify the variation as substantial. Specifically, could you please advise on which aspects of the variation triggered this classification, and whether there are any opportunities to review or reconsider this assessment? As the site is not proposing to make any changes to the way it currently operates, we assumed that it would be classified as a normal variation as there are no requirements for substantial technical assessment.

We are keen to ensure full compliance and transparency throughout this process and would welcome any guidance you can provide.

Thank you in advance for your time and support. I look forward to your response.

Kind regards

Roisin

From: SM-Defra-RESP-noreply (DEFRA) <RESP-noreply@defra.gov.uk>

Sent: Monday, July 21, 2025 8:57 AM

To: Rebecca Holland <rebeccaholland@slrconsulting.com>

Subject: Basic pre-application advice request- follow up question EPR/BP3722LZ/P002 CRM:0110214

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Pre-application reference: **EPR/BP3722LZ/P002**
Operator: EMS WASTE SERVICES LIMITED
Facility: YPH Waste, ARTILLERY ROAD, YEOVIL, BA22 8RP

Pre-application reference:

Dear Rebecca Holland

Thank you for your pre-application follow-up enquiry submitted on 14/07/2025 and the additional information received on 17/07/2025.

Based on the information provided, you need to vary permit EPR/NP3093FN from SR2022 No.4 to a bespoke permit. Following the Standard Rules Consolidation, the standard rules condition regarding storage cannot be met, and you need to know:

- whether the variation will be a normal variation
- what the fee will be
- What management plans are required

Our response is detailed below:

- **Variation type:**

A variation from a standard rules permit to a bespoke permit, requires significant technical assessment and is therefore classed as a substantial variation.

The forms to complete are:

Form Part A, Form Part C2, Form Part C4 and Form Part F1

The application forms can be downloaded from the following link:

[Change, transfer or cancel your environmental permit - GOV.UK](#)

- **Fees**

Based on the activity descriptions of SR2008 No.7 and SR2022 No.4, it is likely that the charge activity code for a bespoke permit will fall under either:

1.16.8 Household waste amenity site taking non-hazardous waste only; includes assessment of fire prevention plan and odour management plan

or

1.16.12 Physical treatment of non-hazardous waste.

The baseline fee for a substantial variation for 1.16.8 is £7,137

The baseline fee for a substantial variation for 1.16.12 is £7,137

Please see table 1.16 of the charging scheme, rows 1.16.8 and 1.16.12:

[Environmental permits and abstraction licences: tables of charges - GOV.UK](#)

Attached to this email is a Bespoke Activity Descriptors guidance document, which describes the activities that can be carried out under a particular activity code. You can use the content to help you assign the appropriate charge to activities that will typically be seen for new bespoke permits and variations to include additional activities or alter existing ones.

If the baseline fee does not include the assessment of any management plans, you will need to add the relevant assessment charges to the baseline fee.

The charges for plans and assessments are found in table 1.19 of the charging scheme and in Form Part F1 Working out charges.

- **Management plans and assessments:**

You will need to assess the need for any other management plans. Your risk assessment will help you to identify the emissions from your site and which management plans you will need to submit for assessment.

Further information is available on the GOV.UK website:

[Control and monitor emissions for your environmental permit - GOV.UK](#)

Additional information required

The following additional documents and supporting information will be required as part of your application:

Provide a plan clearly showing the site boundary, and plans clearly marking site layout, infrastructure and drainage arrangements. The site plan must not be an aerial photograph. The site plan should include a date and a reference, and must be drawn accurately to a defined scale. It is helpful if local features are shown on the plan to help us clearly identify the exact location of the site.

Evidence of appropriate technical competence

Appropriate evidence of technical competence must be provided

Site-specific risk assessment

You should describe the environmental risk posed by your proposals. This must take the form of an environmental risk assessment which should follow the methodology set out in 'Risk assessments for your environmental permit' at:

[Risk assessments for your environmental permit - GOV.UK](#)

Non-Technical Summary

You need to send us a non-technical summary which should explain your proposal using non-technical language. This should summarise your operations (including how waste is handled, treated and stored), key technical standards you will adhere to and the main control measures arising from your risk assessment.

Environment Management System

You must submit a summary of your Environment Management System. Your summary should cover all the points in 'Develop a management system: environmental permits' at:

[Develop a management system: environmental permits - GOV.UK](#)

Further guidance

We recommend that you read our Core Guidance document which will tell you about the permitting process and provide information about your responsibility as a waste operator. Here is the link:

[Environmental permitting guidance: Core guidance - GOV.UK](#)

Disclaimer

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This advice covers waste only. Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

This pre-application request is now closed.

Further enquiries resulting from this response must be logged as a new request using the online form:

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new online pre-application request to request enhanced pre-application advice.

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Kind regards

Joanne Carney

Permitting Officer, National Permitting Service
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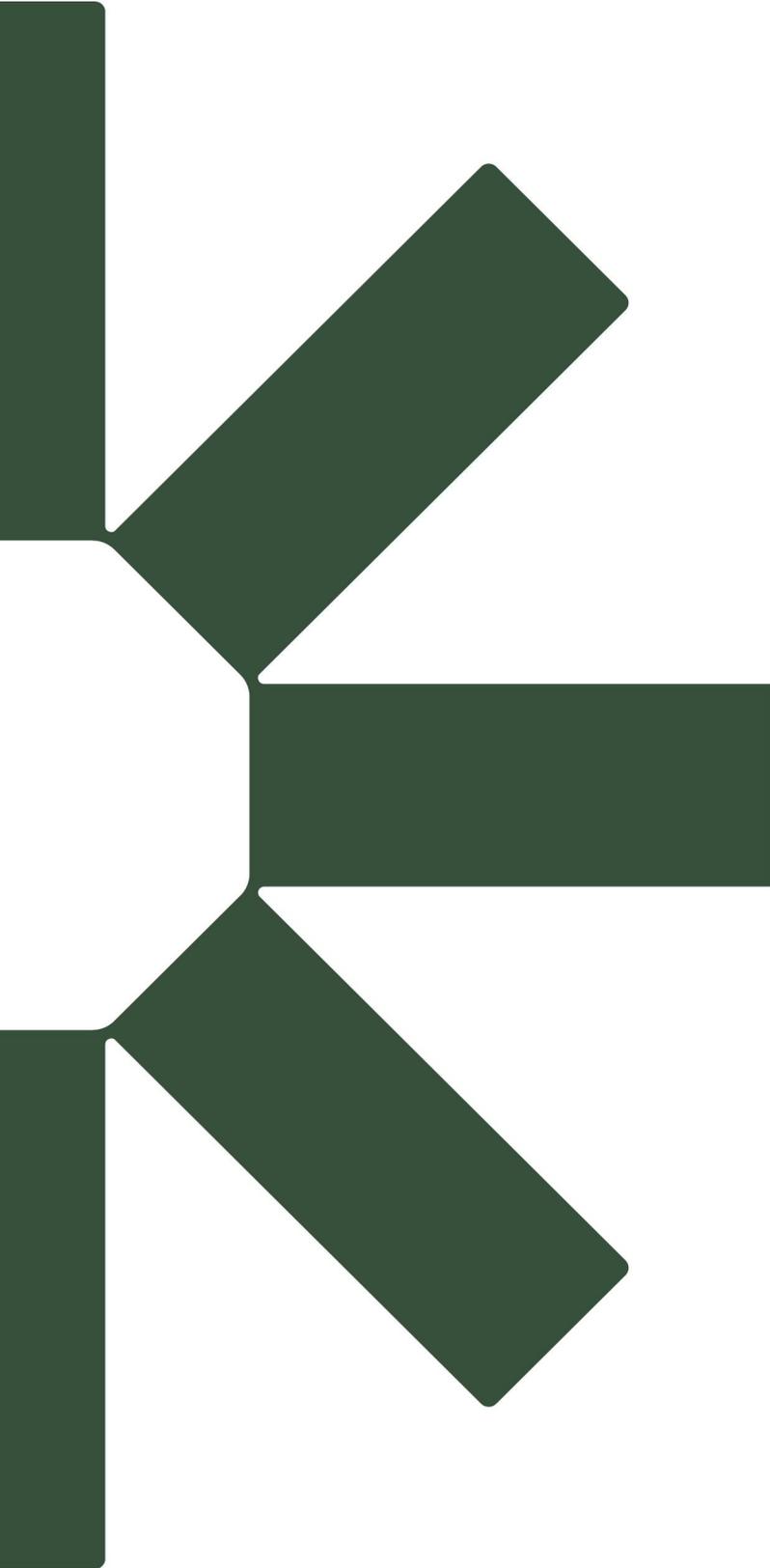
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Making Sustainability Happen