

Michaela Fry

On behalf of Suez Recycling and Recovery UK Ltd
Suez House
Grenfell Road
Maidenhead
SL6 1ES

Our reference: EPR/BB3609KA/P001

Date: 2nd August 2023

Dear Michaela

Pre application advice – Enhanced service

Site: Darwen Resource Recovery Park

Thank you for your pre application enquiry on 31/05/2023.

I am pleased to provide you with your enhanced level of pre-application advice. This advice is based on the information provided on your pre application advice form and conversations/emails recorded on the following dates:

- Email on 09/06/2023

What enhanced pre application covers

Further information on the enhanced pre-application service is detailed on section 2 of the [Environmental permitting charges guidance on GOV.UK](#).

As part of this service, we have provided you with the following information:

Application reference number	EPR/BB3609KA/P001
Additional information	As detailed in Appendix 1

A complete application must contain the following information below:

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary
Payment	Please note your application will not be processed until we receive the full payment.

What happens next?

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If you submit an environmental permit application, then please quote this pre-application reference number: **EPR/BB3609KA/P001**

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to:

psc@environment-agency.gov.uk

Please email applications where possible. If email is not possible you can submit by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF.

Current application timescales

Our current queues are large and we are taking longer than usual to allocate work for initial assessment, known as duly making. The table below shows our estimated queue times by application type. Please note, this is based on our average times and some applications may be picked up before or after the timescales listed below.

Application type	Estimated time to allocation
New bespoke	30-32 weeks
New standard rules	30-32 weeks
Admin variation	2-6 weeks
Minor variation	12-16 weeks
Normal variation	30-32 weeks
Substantial variation	30-32 weeks
Transfer	10-14 weeks
Surrender	9-13 weeks
Medium Combustion Plant	10-14 weeks
Intensive Farming new bespoke	15-19 weeks
Intensive Farming admin variation	2-6 weeks
Intensive Farming normal variation	8-12 weeks
Intensive Farming substantial variation	12-16 weeks
Intensive Farming transfer	12-16 weeks
Intensive Farming surrender	10-14 weeks

Disclaimer

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

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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 installations only.

Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

Enhanced pre application cost estimate

At this stage the pre-application advice is expected to cost up to £400 plus VAT. An invoice will be sent separately at a later date.

This pre-application request is now closed.

We consider this pre application request is now closed however if you have any questions regarding this letter, please contact Emma Baillie (Emma.Baillie@environment-agency.gov.uk).

If you require additional enhanced pre-application advice please complete our [online form](#).

We look forward to working with you on this project.

If you have any questions, please call 03708 506 506.

Yours sincerely

Emma Baillie

Senior Permitting Officer

Emma.Baillie@environment-agency.gov.uk

Appendix 1

The following advice is based on the request for information in the additional information letter sent by email to the Environment Agency on 09/06/2023, reference SUEZ/DRRP/01 and dated 31st May 2023. This advice should be considered alongside the basic advice and screening report sent to you on 2nd June 2023.

You requested advice on the following questions:

1. *We seek confirmation that the proposed scope of the environmental permit application (Table 1) is correct and that a Cumulative Odour/Ammonia/H₂S Modelling Assessment will not be required.*

You do not need to provide a cumulative odour/ammonia/H₂S modelling assessment. You should focus on providing a robust odour management plan for the entire site which includes the anaerobic digestion facility and any new activities.

With regards to the other management plans referenced in table 1 of your pre-application letter you are not required to do a bioaerosol site-specific risk assessment if your biowaste facility is over 250 metres from a sensitive receptor.

I have carried out a basic noise screening assessment and you do not need to submit a noise impact assessment and/or management plan at this stage. Nor do you need to provide a pest management plan.

An emissions management plan for dust will be required as part of an application based on your proposals which will need to address the aspects listed under 'Emissions that do not have set limits' in our guidance, [Control and monitor emissions for your environmental permit](#).

An assessment of how you will comply with the BAT conclusions and the appropriate measures will be required. The links to the [BREF](#) and [BAT conclusions](#) are available [here](#).

The application forms required:

Part A- [Application for an environmental permit: part A about you - GOV.UK \(www.gov.uk\)](#)

Part B2- [Application for an environmental permit: part B2 new bespoke permit - GOV.UK \(www.gov.uk\)](#)

Part B3- [Application for an environmental permit: part B3 new bespoke installation - GOV.UK \(www.gov.uk\)](#)

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Part C2.5- [Application for an environmental permit: part C2.5 vary to add MCP or SG or change an existing MCP or SG permit - GOV.UK \(www.gov.uk\)](#)

Part C4- [Application for an environmental permit Part C4 – Varying a bespoke waste operation permit - GOV.UK \(www.gov.uk\)](#)

Part F1- [Application for an environmental permit \(charges and declarations\): part F1 - GOV.UK \(www.gov.uk\)](#)

As you are making a substantial change to the site you may wish to submit a site condition report with your application. The site condition report should be maintained throughout the life of your permit and should be in line with our [guidance](#).

2. *We seek confirmation that the proposed AD facility does not need to be included in the revised FPP.*

As the proposed process is a 'wet' process, not involving combustible waste streams, an FPP will not be required at the time of application for this activity. However, the FPP condition is included in the permit. This means that, if notified, you shall be required to submit an FPP to the Environment Agency for approval within a specified period.

3. *We seek confirmation on whether the air quality assessment would need to consider any emission points associated with a POPs abatement system. In addition, we seek confirmation on the most appropriate methodology to use within the air quality assessment.*

The shredding system will need to contain fugitive emissions of particulates. You must use a bag filter on the abatement plant designed to release particulates below 5mg/m³. The air quality assessment should consider the emission point associated with the abatement system as well as the cumulative emissions for all emission points on site.

The risk assessment needs to follow the guidance; [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](#). This outlines the steps you need to follow to complete an air emissions risk assessment and what you need to include in your application. You should explain how the modelled scenarios represent your operations in your report.

If you would like the finished modelling report checked for completeness you can open a new request for enhanced application advice. This will be charged at standard 3.5 hours work.

4. *We seek confirmation of the application charge to remove the Plastics Physical Treatment and Glass Bulking Facility from the environmental permit.*

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Where the application is to remove authorisation to carry on an activity which has not been put into operation the charge is the lower of £770 or the applicable charge for a minor variation.

5. *We seek confirmation that it is acceptable to remove the Glass Bulking Facility as a separate activity as this is currently covered under the HCI Waste Transfer Station.*

Yes, the glass bulking facility can be removed as a separate activity.

6. *We seek confirmation if it is possible to retain the MRF activity within the permit although its location is not currently on the site plan. The future operation of the MRF would be subject to an improvement condition.*

We would not remove an activity from permit unless requested to do so. As the MRF activity is currently in the permit we would not remove it. Should the plant be operational, the inclusion of an improvement condition and/or Pre-Operational Conditions would be considered when we determine the application.

7. *We seek confirmation that the scope of the Odour Management Plan is restricted to the AD facility as the other operations are currently controlled through an existing, approved Odour Management Plan.*

The scope of the odour management plan should include the existing activities, detailing where there is any change in approach with a new site lay out. It should also include details for the management of odour arising from any of the new activities as the odour profile at the site will change with these proposals.

Further information on requirements for Odour Management, assessment and abatement can be found here: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit>.