

Katie Heath
Environmental Permit Manager
SUEZ Recycling and Recovery UK Ltd
katie.heath@suez.com

Our reference: EPR/EB3708UG/P001

Date: 08/08/2024

Dear Katie Heath,

Pre application advice – Enhanced service

Site: Mannings Heath Transfer Station, Poole
Reference Number: EPR/EB3708UG
Operator: SUEZ UK Environment LTD

Thank you for your pre application enquiry on 09/04/2024.

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 the following documents:

- Letter dated 09/04/2024
- Fire Prevention Plan received on 16/05/2024

Review of Fire Prevention Plan

We have carried out a review of the Fire Prevention Plan 'FPP' that you submitted to us on 16/05/2024. The findings of this review are provided within the attached document 'FPP Review Findings'.

As confirmed prior to providing this pre-application advice, this is not a pre-approval of the FPP. Although we can review FPP's as part of our enhanced pre-application advice service, we are not able to pre-approve or pre-determine FPPs. If a FPP is required as part of any variation application, it will still need to be formally assessed and approved as part of that application.

Pre-application advice regarding the FPP is limited to providing an indicative view on whether the plan is fit for purpose and lists any observed omissions in the plan, advises where further detail may be required, and advises where measures/infrastructure on site are clearly at odds with or demonstrably not going to be compliant with the measures in the published FPP guidance.

Proposed Permit Variation

The current permit for Mannings Heath Transfer Station is a Standard Rules Permit - SR2008 No7: 75kte household, commercial and industrial waste transfer stations with treatment and asbestos storage. It allows operation of a household, commercial and industrial 'HCI' waste transfer station and allows treatment consisting of manual sorting, separation, screening, baling, shredding, crushing or compaction of non-hazardous waste into different components for disposal, (no more

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

Page 1 of 8

than 50 tonnes per day) or recovery. The only permitted hazardous waste is asbestos which must be double-bagged and stored within secure, lockable containers. It also allows acceptance of (10 tonnes per day) asbestos storage. There is no treatment of asbestos wastes allowed. The current permit requires that, except for specified wastes (inert wastes, clean glass etc.), all bulking transfer or treatment of non-hazardous waste must be carried out inside a building.

The site currently has a S2 exemption registered at the site for storage of waste in areas of the site that are external to the main building to store batteries, WEEE, tyres, wood, UPVC, scrap metal, glass and cardboard.

You have proposed that you wish to vary the permit to be a bespoke permit. The main reason for this exemption being due to the coming exemption reforms, which will result in exemptions no longer being allowed be registered at or adjacent to (where there is a direct link) permitted waste operations.

You have proposed that the permit is varied to bespoke to allow certain wastes (that are already listed on the permit) to be stored outside the transfer station building, to allow manual sorting of bulky wastes outside which are unsuitable for further treatment by incineration.

Please Note - We do not expect the exemption reform changes to the Environmental Permitting Regulations (EPR) to happen before 2025. The exact date of the changes depends on parliament and its legislative programme. You will also have a transitional period of 12 months before the changes to the individual exemptions take effect, once the EPR is changed. Within this period, you will need to apply for an appropriate permit/vary your permit or make plans to stop any waste activities that are currently covered by the exemptions and aren't permitted under the permit.

For further details including the reform transition periods, please read [Waste Exemptions – Getting Ready for Change](#).

You have proposed to add a list of waste types to the permit including some hazardous wastes such as hazardous WEEE wastes, and hazardous batteries. You have proposed that the site would not accept, or store more than 10 tonnes of hazardous waste per day.

Additionally, you have proposed that you would like the permit to be varied to allow the acceptance of vapes, vape components and bottles of e-liquid for storage prior to being transferred onwards.

Advice on Application for Variation

If you want to change your operations so you'll no longer meet the conditions of the standard rules, you'll have to apply to make it a bespoke permit. The variation would be considered overall as a substantial variation, however the charge is based on the normal variation charges for the waste activities you are changing to.

The description of the different type of variations is available at:

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

To apply to vary the permit, you would need to complete the following application forms:

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

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

Page 2 of 8

Part C2 - Application for an environmental permit: part C2 varying a bespoke 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)

You must read all accompanying guidance (whether applying online or using forms) to ensure you do not miss anything out. If sections of the application forms are not applicable to your permit please indicate this rather than leaving a section blank.

Additional information required with application

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

- Non-Technical Summary
- Site Plan *(only required if there are proposed boundary changes)*
- Summary of your Environment Management System
- Site Specific Risk Assessment
- Site Condition Report
- Evidence of Technical Competency *(if any new waste activities are proposed added)*
- Fire Prevention Plan

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), what changes are being made, key technical standards you will adhere to and the main control measures arising from your risk assessment.

Site Plan

If you propose making any boundary changes as part of your application, you should provide a plan clearly showing the new proposed site boundary. 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 demonstrate the exact location of the site.

If there are any significant infrastructure changes, you should submit plans clearly marking site layout, infrastructure and drainage arrangements.

Summary of 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:

<https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

customer service line **03706 506 506**

incident hotline **0800 80 70 60**

floodline **03459 88 11 88**

Page 3 of 8

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:

<https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#risks-from-your-site>

Site Condition Report

We require a site condition report in line with the H5 Site Condition Report Guidance. This guidance includes a template you can use:

<https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report>

Evidence of Technical Competence

Appropriate copies of current technical competence must be provided which cover the new activity (*if any new activities are proposed to be added*). Please see the guidance on completing the application form C2 for more information:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c2-varying-a-bespoke-permit>

Management Plans and Assessments

Fire Prevention Plan

We would require you to submit a Fire Prevention Plan along with your variation application for assessment.

<https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>

The FPP must consider all aspects of the guidance. If there are areas of the guidance which do not apply, you must say why in the document. If you wish to deviate from the guidance, you must include alternative measures with full justification to demonstrate that such arrangements provide the same level of protection as required by the FPP objectives. We will assess your arrangements to determine whether they are adequate for the operations taking place on your site.

Other Management Plans

Based on the information provided as part of the pre-application request. We consider that, because of the nature of the proposed changes to activities, this application would not require the submission of a Dust and Emissions Management Plan 'DEMP', Odour Management Plan or Pest Management Plan. However, we cannot rule out that these plans could be requested as part of determination if the variation proposals change or if the determining officer feels that the risk of dust, odour, pest risk will increase when they are in possession of the full variation application.

Application Fees

customer service line **03706 506 506**

incident hotline **0800 80 70 60**

floodline **03459 88 11 88**

Page 4 of 8

The two charging components which make up the variation application charge for this proposal are:

- £7,172 - Hazardous Waste Transfer Station – Substantial Variation (change activity SR to bespoke, addition of hazardous and non-hazardous waste types, changes to storage restrictions to encompass exempt activities) - (charging scheme, row 1.16.5)
- £3,965 - Physical Treatment of Non-hazardous Waste - Normal Variation (change activity SR to bespoke and change to manual sorting of some bulky wastes outside) - (charging scheme, row 1.16.12)

The following plans and assessments should also be added to the baseline fee(s):

- £1,241 - Fire Prevention Plan Assessment (charging scheme table 1.19)

You will also need to add the fee of £779 for a habitats assessment because your site is within our screening distance(s) for the one or more conservation sites:

- European Site within the meaning of the Conservation of Habitats and Species Regulations 2017;
- Site referred to in the National Planning Policy Framework 2018 as requiring the same assessment as a European Site;
- Site of special scientific interest within the meaning of the Wildlife and Countryside Act 1981;
- Marine conservation zone within the meaning of the Marine and Coastal Access Act 2009.

The habitats assessment fee covers additional work we must undertake to review the potential mechanisms (source) for any impact. Where you consider there is no impact, this should be supported by a justification which we will consider upon receipt of the permit application.

Based on the information provided, the total application fee for this proposal will be **£13,157**.

The charging scheme can be found at:

<https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

Subsistence Charge

If your permit variation is issued, it will attract a subsistence fee of £4,842 per year as per table 2.16, row 2.16.3 of the charging scheme. This is based on the subsistence charge being the highest charge of the permitted activities on site that fall within table 2.16.

What happens next?

Your application can be submitted 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

customer service line **03706 506 506**

floodline **03459 88 11 88**

incident hotline **0800 80 70 60**

Page 5 of 8

After you apply

We will check your application to make sure it is complete. We refer to these checks as 'validation' and 'duly making'. This is to ensure we have enough information to start to determine your permit application. We will contact you if information is missing and can feasibly be provided within 10 working days. If we consider information missing is significant or cannot be provided within this timeframe, we will return your application with a list of what is missing.

If we cannot progress your application past this stage for any reason, we will return it and refund the application charge minus 20% to cover our costs to that point. The amount we will keep is capped at £1,500.

We will not charge this if we return an application after having done very little work – for example, because it contained obvious errors or omissions.

Once an application is validated and duly made, it is ready to be allocated for determination. This is when we do our technical checks. We may need to ask you for further information or additional documents at this stage.

The time it takes us to allocate an application depends on a number of factors, including the complexity of the specific application and the availability of a member of our team with the right skills to assess it.

The amount of time taken to determine your application will vary. It will be impacted by factors such as:

- The quality of the application
- The complexity of the application
- Whether an application is of high public interest
- Whether the application includes novel technologies or techniques
- Whether the determination requires input from others, both internal and external to the Environment Agency
- Whether modelling and/or monitoring and assessment is required, for example Air Quality modelling and assessment or water discharge or groundwater activity specific substances assessment.

The Permitting Officer determining your application will be able to keep you updated with the progress of your application.

Further guidance

I would 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:

<https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>

You should use the Technical Guidance WM3 to help you classify your wastes which is found at:

<https://www.gov.uk/government/publications/waste-classification-technical-guidance>

Persistent organic pollutants (POPs)

customer service line **03706 506 506**

incident hotline **0800 80 70 60**

floodline **03459 88 11 88**

Page 6 of 8

Any permit application involving the treatment or transfer of WEEE or of materials and components derived from WEEE needs to take into account the likelihood that some of the waste is POPs waste.

As an Operator you must show that if you treat or transfer POPs wastes you do so in a manner which is consistent with the requirement of article 7 of Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants. This requires that the POP content is destroyed or irreversibly transformed.

WEEE containing POPs can be dismantled as long as the plastic containing the POPs is sent elsewhere for destruction.

EEE manufactured after January 2009 is 'much less likely' to contain POPs. As a result, WEEE from categories that may be POPs waste can only be prepared for reuse, in the UK, if you have checked it was manufactured after 1 January 2009 and meets all other requirements for reuse. You can only export refurbished WEEE for re-use abroad if you can demonstrate it is not POPs waste.

Operators must ensure any WEEE, components or materials derived that may contain POPs (i.e. contain plastic) are described and consigned appropriately. The waste must be sent to regulated sites that either destroy the POPs or prepare them for destruction e.g. by separating POPs containing plastics from plastics that are POPs free.

Further guidance on the classification of WEEE, treatment options, re-use and export can be found at:

<https://www.gov.uk/how-to-classify-different-types-of-waste/electronic-and-electrical-equipment>

Advice on EWC Codes for waste e-liquids

As part of your pre-application request you have also sought confirmation that bottles of unused e-liquid would fall under EWC code 16 10 02. At the moment there is no formal EWC classification of how waste e-liquid should be coded. However, for now we agree that EWC 16 10 02 would seem to be an appropriate code or perhaps 20 01 99 (with an added description). Clarification will be sought on this and we will provide you with further advice separately on this matter.

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 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.

Enhanced pre application cost estimate

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

Page 7 of 8

At this stage the pre-application advice is expected to cost up to £1,300.00 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. If you require additional enhanced pre-application advice please complete our [online form](#).

Yours sincerely

Victoria Nicholls
Senior Permitting Officer

Victoria.Nicholls@environment-agency.gov.uk