

## Summary Table

	Current Standard rules SR2008 No3	Proposed Bespoke Permit
Waste Types	Table 2.2	No changes other than removal of all waste codes other than 19 01 12
Waste activities	Sorting, separation, screening, baling, shredding, crushing and compaction, storage and bulking.	Storage and transfer/bulking.
Annex I (D codes) and Annex II (R codes) and descriptions	D15, R13, D14, D9, R3, R4, R5	R13 to cover storage and transfer/bulking
Annual Tonnage	75,000	No change
Fire Prevention Plan required by Permit	No	No, IBA has a very low fire risk as quenched.
Operating Techniques	Specified waste* shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system. (*specified wastes relate to wastes as listed within the Permit).	No change.

The variation to bespoke has been triggered by the removal of 19 01 12 ( Incinerator Botton Ash) from the revised set of Standard Permits, in particular SR2022 no.4 which replaces the current SR2008 no.3 for the site.

The site will continue to operate as it has done, without issue, since 2012.

### Pre-Application Advice

Pre application advice was sought on 4<sup>th</sup> April 2025 in relation to this application from SR to a bespoke Permit, and a response received 16<sup>th</sup> May, which is included with the submission for information although specifically confirmation of the forms required was requested, but the response doesn't tie with what was expected.

The variation submission made on 16<sup>th</sup> May 2025 was returned following technical screening of the application for the single issue that the fee was considered to be a normal variation not a minor variation as submitted. The correspondence didn't identify any other errors or missions.

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### **Environment Management System**

The EMS already required for the site has been reviewed but required little change. Guidance on the application form (Part C2 Q3d) does not require it to be submitted as no additional waste activity is being applied for, it is provided for information and completeness.

### **Technical Competence**

The requirement for technical competence for the site does not change because of this variation application and as noted above, the current guidance on form C2 Q3 therefore does not require information on the current technical competence to be provided. However, a COTC and continuing competency certificate has been included to avoid queries being raised at duly making.

### **Environmental Risk Assessment**

An ERA accompanies this application for variation.

### **Fire Prevention Plan**

A Fire Prevention Plan is not required, the material is quenched at source and therefore damp on receipt. FPPs have not been required for other bespoke IBA facilities which include treatment and considerably greater tonnages.

### **Odour**

A standalone odour management plan has not been provided with this variation application. The single material received is not odorous and stand alone odour management plans have not been required for other bespoke IBA facilities which include treatment and considerably greater tonnages.

The site has no history of odour issues or complaints, and this variation to a bespoke Permit does not change any of the activities that have been historically undertaken, therefore the variation does not give rise to any increased risk of odour.

For the reasons noted above, and based on an assessment of risk and likelihood, rather than simple waste types or proximity it is considered that no OMP is required in relation to the variation sought.

### **Habitats**

The pre-app sought did seek a Habitat screening but it has not been received. The ERA has, in keeping with the SR in place, not identified any designations within 500m that would give rise to additional considerations.

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### **Dust and Noise Emissions Plans**

Dust emissions and noise emission plans are included although dust and noise management measures are also included in the EMS for the site. These are the measures which have been utilised previously and the site has not given rise to any dust or noise complaints and therefore are deemed to be effective.

### **Forms**

The application for variation includes Forms A, C2, C4 and F1. This set of forms has previously been identified by the EA as the correct set for a SR to Bespoke application.

### **Site Plan**

The site layout plan has been updated to include a number of minor amendments that have occurred since 2011 when the SR Permit was applied for. The guidance for Form C2 5a notes that a site plan is only required where the variation sought includes additional land to be included in the Permit. This is not the case for this variation but it is included for completeness.

Form C4 3a notes site infrastructure plans, location plans and process flow diagrams should be provided to assist with describing the facility. These are not necessary for the variation sought which is simply the same operations as already Permitted under a Standard Rules.

### **Fee**

The normal variation fee has been paid.