

**Our Ref:** PDE16/012a/SW25\_035

**Your Ref:** EPR/BP3923LR/A001

Environment Agency  
Trentside Offices  
Scarrington Road  
West Bridgford  
Nottingham, NG2 5BR



For the attention of Ms S Raymond

26 August 2025

The Alaska Building  
Sitka Drive  
Shrewsbury Business Park  
Shrewsbury  
Shropshire  
SY2 6LG.

Dear Sarah,

t: 01743 361918

w: pdeconsulting.co.uk

**Re: Newhaven Asphalt Plant – Request for Additional Information**

This letter has been written to address the questions in your letter dated 28 July 2025 in relation to the above referenced application. Below we have summarised your questions in black with our answers below each question in red. Alongside this letter we have submitted an updated copy of the permit application and a separate folder containing the response to Q16.

1. Provide an email address for the Company Secretary

**Mark.Goldsworthy@fmconway.co.uk**

2. Update and resubmit your application and application forms to reference the above relevant guidance and BAT conclusions removing any reference to S5.06.

**Application and application forms have been updated.**

3. Provide a legible and clear site drainage plan.

**Refer to Appendix 14 of the permit application.**

4. Update and resubmit your permitted area boundary plan to include all emission to sewer or point source emissions.

**Refer to Drawing Number KD.NHVN.5.D.002 which has been updated with this information.**

5. Update you site condition report to include a stage 1-3 assessment, identifying relevant hazardous substances (RHS) and where this identifies a risk to soil/and or groundwater link this to the baseline reference data that you have provided.

**Site Condition Report (Appendix 4 of the permit application) has been updated.**



Regulated by RICS  
Company number 04381474

6. Please update and re-submit form B3 to include the answers to a – c.

Application form B3 (Appendix 3 of the permit application) has been updated. Process flow diagrams are presented in the updated Working Plan in Appendix 6 of the permit application.

7. Please update and re-submit form B4 to include a response to – types of waste accepted.

Application form B4 (Appendix 3 of the permit application) has been updated.

8. Update and re-submit your working plan to clearly identify activities that you would not require to be regulated under this permit.

Refer to updated Working Plan in Appendix 6 of the permit application.

9. Update and re-submit your working plan to include your waste pre-acceptance process.

Refer to updated Working Plan in Appendix 6 of the permit application.

10. Update and resubmit your BAT assessment to reference the current standards, and for each relevant BAT conclusion explain how you will meet BAT or provide an alternative technique that will provide an equivalent level of environmental protection.

The BAT assessment (Appendix 7 of the permit application) has been updated.

11. For your waste activity provide an assessment that explains how you will meet relevant sections of the *Non-hazardous and inert waste: appropriate measures for permitted facilities*.

Now included as Table 5 in the permit application.

12. Update and re-submit your Accident Management Plan as a separate document ensuring that it includes all the requirements identified in the guidance *Develop a management system: environmental permits*.

Accident Management Plan included as a stand-alone report in Appendix 13 to the permit application.

13. Update your non-technical summary to include an explanation of what the temporary container storage area is.

The non-technical summary (Appendix 1 of the permit application) has been updated.

14. Update and resubmit your applications to clearly explain how your site surfacing meeting the requirements of guidance *Chemical waste: appropriate measures for permitted facilities*

Application updated.

The storage and treatment of non-hazardous asphalt road planings will be undertaken on hardstanding. These wastes do not pose any significant risk of contaminating surface water or groundwater, therefore it is considered that impermeable surfacing is not required. They are typically stored and treated on hardstanding at sites across the UK.

It is proposed that coal tar bound planings will be stored undercover in a three-sided bay with an impermeable surface. The impermeable surface will be constructed with a concrete pad and sealed construction joints.

The proposed site surfacing and the proposed covered storage bay for the coal tar bound planings will segregate the planings and form a barrier to prevent contaminant migration from the coal tar bound planings to the underlying soil. The cover on the storage bay will also prevent rainwater falling on the coal tar bound planings and leaching any mobile contaminants.

As built records will be maintained, to be submitted to the EA, to verify the construction of the concrete slab for the coal tar bound planings.

The coal tar bay will be inspected and records kept on a daily basis by the Site manager. Should there be any defect with the storage bays walls or the site surfacing, they will be reported immediately, and corrective action will be identified and implemented.

15. Noise impact assessment and NMP – awaiting any comments from the AQMAU team

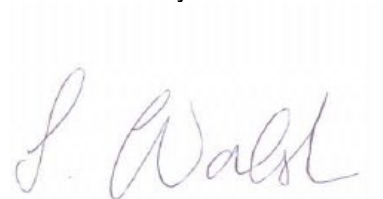
Not applicable at this stage.

16. Direct emissions to water – answers to a – c.

Provided as letter reference NWH.007 and supporting information.

We trust that you now have enough information to duly make the application. However, if you have any further queries please do not hesitate to get in touch.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'S. Walsh', is written over a light blue rectangular background.

**Suzanne Walsh** BSc (Hons) MCIWM  
PRINCIPAL