

Mr Isaac Allen

Ian J Barnes - Foulds Metals

The Foundry,

Sidings Road,

Fleetwood,

FY7 6NS

Our reference: EPR/YP3091CA/P002

Date: 21/05/2024

Dear Isaac Allen

### **Pre application advice – Enhanced service**

Site: Ian J Barnes - Foulds Metals, The Foundry, Sidings Road, Fleetwood, FY7 6NS

Thank you for your pre application enquiry on 22/02/2024

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 conversations/emails recorded on the following dates:

- Emails on 07/03/2024, 08/04/2024 and 29/04/2024
- Telephone conversation on 01/05/2024

The Environment Agency have determined that the cable stripping activity is not a physico-chemical treatment of waste. Therefore, even if your operation processes more than 10 tonnes of hazardous cable per day, it does not constitute a Scheule 1 installation activity. Consequently, the storage of hazardous cable pending that activity does not qualify as an installation activity either, even if it exceeds 50 tonnes per day, given that the cable is stored for manual dismantling.

Based on this understanding, it appears likely that your site can continue to be permitted as a waste operation. However, it's important to ensure that other hazardous waste stored pending physico-chemical treatment, such as batteries, do not exceed 50 tonnes at any one time. We will need to include a condition in your permit to cover this requirement.

There were additional hazardous waste codes included in the application that we understand will be removed. In the event that they are not removed, you will need to provide details on how these wastes will be treated on site what quantity will be stored/treated. This waste treatment and storage could still have an impact on whether your operation is an installation or a waste operation.

The operation will be both a metal recycling site (MRS) (for the mixed metal and WEEE) under 1.16.16 and an ELV treatment facility (vehicle dismantler) under 1.16.15. As this is a variation to a bespoke waste operation there is no discount to the application fee which will be a substantial variation fee for both these two activities.

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**floodline 03459 88 11 88**

**incident hotline 0800 80 70 60**

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LIT 55346

8/4/2024

The total application fee £7, 956 (1.16.15) + £8, 517 (1.16.16) = **£16,473**

Regarding the yearly subsistence fee if the overall tonnage is staying at 75,000 or less for each individual activity then this would potentially fall under a single fee under 2.16.20, **£2,567 per year.**

You can accept up to 75,000 tonnes per annum under either the metal recycling (which includes the WEEE/Batteries) or ELV activities.

If the annual tonnage for either of the activities is above this then the subsistence would be under 2.16.19, **£4,006 per year.**

If the changes to the site activities result in an increased environmental risk or scale of operations, then the FPP will need to be reassessed. A revised Noise Impact Assessment (and associated Noise Management Plan) may be required if there is a change to the noise profile on site. An updated/new Dust Management Plan will be required if there is an increase in risk of dust dependant on the site location and receptors. There may also be habitats charge if within the screening distance.

Useful links:

- [Read the fire prevention plan guidance](#)
- [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](#)
- [Noise and vibration management: environmental permits - GOV.UK \(www.gov.uk\)](#)
- [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](#)
- [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](#)

Application Forms for a waste variation application:

Complete [part A: about you](#), [part C2: varying a bespoke permit](#), and [part C4](#) to change a bespoke waste operation permit, along with [part F1: charges and declarations](#).

### 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:

<b>Application reference number</b>	EPR/YP3091CA/P002
<b>Application charge required</b>	£16,473
<b>Forms required to be submitted</b>	Part A, part C2, part C4, part F1

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

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A complete application must contain the following information below:

<b>Declaration</b>	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.
<b>Site Plan</b>	<p>Site plan must be clearly marked with the full site boundary.</p> <p>For water discharge activity permits your site plan must also show:</p> <ul style="list-style-type: none"> <li>• the sewage treatment plant</li> <li>• the sample point</li> <li>• the point where the sewage is discharged to the receiving surface water</li> </ul>
<b>Payment</b>	Please note your application will not be processed until we receive the full payment.

## Exemptions

Waste exemptions allow low-risk waste management operations to be carried out without an environmental permit. Waste exemptions are intended to be operated as discrete activities and the rules around exemptions will be changing in future.

Although there have been no changes to the law yet, future waste exemptions reforms will mean exemptions cannot be registered at or adjacent to (where there is a direct link) permitted waste operations. Waste exemptions cannot currently be used on a permitted installation. For further details please read [Waste Exemptions – Getting Ready for Change](#).

You may wish to consider the waste exemption reforms before submitting permit applications or variations and incorporate those waste exemptions into your application.

You can also deregister some or all of your exemptions using our [waste exemptions digital service](#).

Once your application has been allocated to a permitting officer, please ask if you have questions about how exemptions you already have registered or are proposing to register may affect your permitted site.

## What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: **EPR/YP3091CA/P002**

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](mailto:psc@environment-agency.gov.uk)

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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

### **Application Timescales**

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.

Once an application is duly made, 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

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

### **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**

At this stage the pre-application advice is expected to cost up to £800 plus VAT. An invoice will be sent separately at a later date.

**This pre-application request is now closed.**

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We consider this pre application request is now closed however if you have any questions regarding this letter please contact Thomas Proudfoot, [thomas.proudfoot@environment-agency.gov.uk](mailto:thomas.proudfoot@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.

### **User research request - opportunity to participate in the development of the Environment Agency online customer portal**

The Environment Agency is developing a new Online Customer Service which will support individuals, businesses, and representatives in the application process. The Service will also create and provide an account to help you manage the requirements of their environmental permissions\*.

We looking to recruit people who have **experience with environmental permission application/s** and would be interested in taking part in **user research** to give feedback on new designs and features to assist with future service development. This experience could be anything from applying for a new bespoke or new standard rules permission yourself or managing aspects of them.

If you are interested in taking part in either of these activities email [applypermissions@environment-agency.gov.uk](mailto:applypermissions@environment-agency.gov.uk)

*\*The term permission is being used to cover licences, permits, permissions and registrations.*

*As per our privacy notice [Environmental permits privacy notice - GOV.UK \(www.gov.uk\)](#), you do not need to take part in this user research.*

Yours sincerely

**Thomas Proudfoot**

[thomas.proudfoot@environment-agency.gov.uk](mailto:thomas.proudfoot@environment-agency.gov.uk)