

Our ref: DDA/ST20399/001

Date: 7th June 2024

Your ref:

Simone Cumberbatch
Permitting Officer
Environment Agency
Aqua House
20 Lionel Street
Birmingham
B3 1AQ

By Email Only

Dear Simone

Response to Permit Variation Triage Questions on behalf of Valencia Waste Management Limited for Foxhall Landfill Site, EPR/BW2943IG/V009

As discussed on 6th June, the operations at Foxhall MRF will be limited to manual picking/sorting only, with the intention of picking out wood and metal for recycling off site, diverting these materials from the landfill which would otherwise be disposed of. There will be no mechanical treatment, e.g. shredding, undertaken at Foxhall MRF due to the smaller size of the building which gives restricted space on what equipment could be practically installed/used.

In addition to the requested documentation outlined below, the Non-Technical Summary and Operating Techniques have been amended to provide clarity of the intentions and activities to be carried out at the MRF. Additionally, amendments to the Fire Prevention Plan and Amenity and Accident Risk Assessment have been made, to remove references to the residual waste being sent off site for incineration or landfill. Instead, residual waste will be destined for the landfill only.

Thank you for your email dated 22nd May 2024 requesting further information. For completeness, your questions are set out below, our responses are in **bold** text.

1. You need to send us a Pest Management Plan. This should explain how you'll prevent or minimise pests in line with our guidance control and monitor emissions for your environmental permit (<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#pests>).





Your application is proposing to treat and/or store biodegradable waste that requires a Pest Management Plan. This should explain how you'll prevent or minimise pests in line with our guidance control and monitor emissions for your environmental permit. (<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#pests>)

Unfortunately, the application payment you sent is incorrect. The correct application charge is £13,678. This leaves a balance of £1241 to pay.

- You need to make an additional payment of £1,241 for a Pest Management Plan reference 1.19.4 [The Environment Agency \(Environmental Permitting and Abstraction Licensing\) \(England\) Charging Scheme 2022 \(publishing.service.gov.uk\)](#)
The charge for our assessment of your plan is not included in your baseline application charge. You will therefore need to make an additional payment of £1,241.

Please find Valencia's Pest Control Plan enclosed (reference VAL-ENV-PESTS, 07/02/2024 Version 1). The overall risk of pest generation is unlikely, given the restricted storage times for waste within the MRF and adherence to the waste acceptance procedures. Putrescible wastes would be sent to the landfill, diverting the MRF.

2. Form Part C2

- Complete Section 3
- Confirm in writing that your Environmental Management System will meet our requirements. *See section Question 3d – Management systems.*
- Provide a copy of a certificate or document of Technical Competency. *See section Section 3b for details.*
- Provide a Site Plan include a site plan(s) that clearly identify:
 - The recycling building placement on the landfill, include the permit boundary
 - Main access routes for vehicle
 - Location of the firewater storage tank

Please find Form Part C2 included in our response. Please find attached the Certificates for Patrick Hughes. With regards to the site plans please find attached the access route plan and location of the MRF in relation to the landfill. As the site has not yet been developed the location of the fire water storage tanks has not yet been confirmed, the layout drawing will include these as soon as we have received confirmation of the location.

3. Form Part F1

- Update Form Part F1 to reflect the updated charges.

Please find Form Part F1 enclosed, which now includes the additional fee for the Pest Management Plan. The unique reference number given to this payment is PSCAPPFOX06724.

4. Form Part C4



- Complete Part C4 form for the Waste Operation Activity. [Application for an environmental permit Part C4 – Varying a bespoke waste operation permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/application-for-an-environmental-permit-part-c4-varying-a-bespoke-waste-operation-permit)
- Provide a process diagram

Please find Form Part C4 included in our response.

The process undertaken at Foxhall MRF is relatively simplistic, in that incoming waste which is suitable to be accepted to the MRF, as per the pre-acceptance and acceptance procedures is manually sorted via a picking line to recover metals and wood. The metals and wood are picked out and placed into the appropriate storage bay, pending removal off site for recovery. The residual waste which is not suitable for recovery is then sent to the landfill. A process flow diagram has been included in Section 4 of the Operating Techniques (Version 2 May 2024).

5. Operating Techniques

- Submit to us your waste pre-acceptance procedures and your waste acceptance procedures for the new proposed activity. [Non-hazardous and inert waste: appropriate measures for permitted facilities - 3. Waste pre-acceptance, acceptance and tracking - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities-3-waste-pre-acceptance-acceptance-and-tracking)

Enclosed is the updated version of the Operating Techniques (Version 2 May 2024) which has the waste pre-acceptance and waste acceptance procedures detailed in Section 3.

Yours faithfully

for Wardell Armstrong LLP

DOMINIQUA DRAKEFORD-ALLEN

Associate Director

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