



Non-Technical Summary

Chertsey Waste Transfer Station: Environmental Permit Application

Envar Composting Limited

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Basis of Report

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1.0 Introduction

Envar Composting Limited (Envar) has retained SLR Consulting Limited (SLR) to prepare a bespoke Environmental Permit (EP) application under the Environmental Permitting (England and Wales) Regulations (as amended) 2016, for the Chertsey Green Waste Transfer Station (WTS) located in Chertsey, Surrey, KT16 0EF.

This document provides a Non-Technical Summary (NTS) of the proposed EP application, including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed application.

To support this EP application, the following documentation is submitted in addition to this NTS:

- Environment Agency (EA) Application Forms, Parts A, B2, B4, and F1 and associated appendices;
- Environmental Risk Assessment (ERA);
- Operating Techniques (OT) Document;
- Site Condition Report (SCR);
- Fire Prevention Plan (FPP);
- Emissions (Dust) Management Plan (DEMP);
- Associated Drawings.

1.1 The Site

The site is situated approximately 1.7km south of Virginia Water and approximately 4.3km west of Chertsey. The site is accessed via Kitsmead Lane which runs to the west of the site, and the M3 lies approximately 90m north. The National Grid Reference (NGR) for the site is SU 99323 66260.

The immediate surrounding land consists of open/agricultural land, commercial/industrial premises, and residential properties. The closest residential properties to the site are situated approximately 210m north along Trumps Green Road.

The site location is illustrated on Drawing 001, and the EP boundary and site layout is shown on Drawing 002.

The surrounding land uses and local receptors within 500m are identified on Drawing 003, in addition to the cultural and natural heritage within 1km,

A summary of the site's immediate surrounding land uses is identified in Table 1-1 below.

Table 1-1 Surrounding Land Uses

Boundary	Description
North	An area of open ground/woodland, followed by the M3, and the residential area of Trumps Green including Virginia Water Football Club.
East	Open/agricultural land, beyond which lies Trumps Farm, Splitz Facilities and further areas of open/agricultural land and woodland.



Boundary	Description
South	Immediately to the south lies an area of open/agricultural land and woodland, and a surface water pond. Beyond this lies a commercial/industrial area including Facilities by ADF, Morris Leslie Plant Hire & Sales, and Severn Trent Green Power West. This is followed by a woodland area, and Chertsey Common.
West	Kitsmead Lane and open/agricultural land followed by a commercial/industrial area including James Mansfield Timber, Pilgrim 2 Workshops, Longcross Studios, and 5 Star Roofcare. Beyond this lies Longcross Estate.

1.2 Pre-Application Discussions

Basic pre-application advice was requested from the EA in April 2024. Initial discussions concluded that due to the nature of the operations (historically these activities were fully covered under an exemption) and the likely short life-span of the site it would not be practicable to install excessive or additional infrastructure and as such this application progresses as such.

The waste basic pre-application advice document was provided by the EA.



2.0 Overview of Proposed Activities

2.1 Overview of Waste Operations

Envar currently operate a green waste bulking and transfer operation at Chertsey Green WTS under a T6 Waste Exemption (*Treating Waste Wood and Waste Plant Matter by Chipping, Shredding, Cutting or Pulverising*). The conditions of the T6 waste exemption are due to change which will reduce the waste storage limits below what is commercially viable for this site. It will also significantly restrict the local authority's ability to use the site, which is key to serving the green waste transfer requirements for the county. The local authority relies on the ability to transfer green waste in bulk to prevent excessive travel and carbon emissions in smaller vehicles. Therefore, Envar wish to apply for a bespoke EP to facilitate the continued green waste bulking and transfer activities on site prior to transfer to suitably permitted composting sites for further treatment. There will be no change to the existing waste types, activities, or storage arrangements at the site as a result of the EP application, and therefore it is not considered that the proposed EP application will increase the risk of the site.

The site accepts, and stores both waste and non-waste materials.

Non-waste materials stored on site consist of the following:

- PAS100 compost (brought in from partner sites to sell to local businesses only);
- Untreated virgin logs from arboriculture i.e. tree surgeons; and
- Untreated virgin wood chip from arboriculture i.e. tree surgeons.

Non-waste materials are stored in bays within a designated area to the east of the site as illustrated on Drawing 002. Non-waste materials are segregated, and not mixed with waste materials or other non-waste materials. They are not covered by the EA's Guidance or jurisdiction but are described within this EP application for completion to provide wider context of the site.

Waste material accepted on site consists of un-shredded green waste only from households, and local gardeners.

Green waste is collected from Surrey residents in standard RCVs and delivered to the site in typical loads of 6 to 8 tonnes. The back of the site benefits from push walls which extend partially down the two sides. Waste is tipped within the designated area to the west of the site as illustrated on Drawing 002, where it is inspected before being pushed towards the wall. Green waste is stored within two stockpiles and the site operates on a rolling basis where waste is tipped out at the left and then to the right. Due to the nature of the accepted waste (contract un-shredded green waste), it is anticipated that during the working day, the reception waste stockpile will exceed the EA's FPP guidance as multiple vehicles may arrive in a short space of time. The waste will be processed during operational hours and operatives will ensure that the stockpiles are reduced in size, in accordance with the EA's FPP guidance and that they are separated by a minimum distance of 6m before each shift finishes. The green waste is bulked up into 26 tonne artics prior to transfer to suitably permitted composting sites for further treatment.

A maximum of 500 tonnes of un-shredded green waste will be stored on site at any one time, within two stockpiles of 250 tonnes each. The site will have a maximum annual throughput of 35,000 tonnes per annum (tpa). Green waste will be stored for a maximum of 5 days. During Spring, Summer, and Autumn (March to November) green waste will usually be moved off site within a maximum of 48 hours, and always within a maximum of 5 days. The only waste activities to be undertaken on site will continue to be the bulking up, storage, and transfer of household green waste.



The site is currently leased from Surrey County Council who are in the process of applying for planning permission for a new large Materials Recycling Facility (MRF) on the site, and therefore Envar will only likely be able to operate from the site for 2-3 years. Due to low-risk nature of the site, previous activities covered by exemption, the short term availability of the site, minimal waste storage volumes, short waste storage times, limited waste activities, and negligible risk to the environment, it is not considered viable for the site to have a fully impermeable surface. This was confirmed with the EA during pre-application discussions as detailed in Section 1.2 above. In addition, the site is considered to constitute a lower risk to the environment when compared to the Standard Rules SR2021 No 5 permit (*Composting in open and closed systems – waste recovery operation*) as the standard rules permit allows for biological and physical treatment of waste, whilst the proposed site will carry out waste storage operations only. SR2021 No 5 only requires activities to be undertaken on an impermeable surface when the site is located within a source protection zone 1 or 2, and as the proposed site is not situated within a source protection zone impermeable surfacing is not considered to be appropriate.

2.1.1 Specified Waste Management Activities

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **R13:** Storage of wastes.

2.1.2 Waste Tonnages and Types

The site will accept up to 35,000 tpa of the waste types detailed in Table 2-1 below:

Table 2-1 Proposed Waste List

Waste Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 07	Wastes from forestry
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste

2.1.3 Site Infrastructure Requirements

Excessive, or additional site infrastructure including a fully impermeable surface is not considered to be practicable for the following reasons:

- Green waste bulking, storage, and transfer operations on site are currently carried out under a T6 Waste Exemption. There is no change proposed to the existing waste activities at the site as a result of the EP application, and the only activities carried out on site will continue to be bulking up, storage, and transfer of green waste. It is not considered that the proposed EP application will increase the risk of the site, and as the activities are currently carried out under an exemption which does not require



a fully impermeable surface, additional infrastructure is not considered to be practicable;

- The site is currently leased from Surrey County Council who are in the process of applying for planning permission for a new large Materials Recycling Facility (MRF) on the site, and therefore Envar will only likely be able to operate from the site for 2-3 years. Due to the short term availability of the site, it is not considered viable for the site to install additional infrastructure;
- Waste storage volumes will be minimal, with a maximum of 500 tonnes of un-shredded green waste stored on site at any one time with a maximum annual throughput of 35,000 tpa;
- Waste storage times will be short and limited to a maximum of 5 days. During spring, summer and autumn, waste will typically be removed within 48 hours; and
- The site will only accept household green waste with a limited proposed waste list of two EWC codes as listed in Table 2-1 above.



3.0 Application Contents

3.1 Application Forms

Parts A, B2, B4, and F1 of the EA's EP application forms have been completed, in support of this EP application and are enclosed as Section 2.

3.2 Application Fee

In accordance with the EA's Environmental Permitting and Abstraction Licensing (England) Charging Scheme 2022¹, the following charges will apply to this EP application:

- 1.16.6: Household, commercial and industrial WTS (includes assessment of FPP): **£9,176.**

In addition, the following assessments submitted with this application, will require an additional fee:

- 1.19.5: Emissions (Dust) Management Plan: **£1,241.**

Therefore, the total fee for the EP application is **£10,417.**

Due to the low-risk, simple nature of the application, the charge above as listed in the EA's Environmental Permitting and Abstraction Licensing (England) Charging Scheme¹, is considered to be disproportionate when compared to the costs that the EA will incur during the determination of the application. An 'abatement decision' is therefore requested for the EA to reduce the listed charge.

3.3 Environmental Risk Assessment

The ERA has been prepared in accordance with the EA's guidance Risk Assessments for your Environmental Permit, last updated November 2023² to assess any potential risks associated with the proposed Chertsey Green WTS.

The site currently operates under a T6 waste exemption and carries out green waste storage and bulking up operations prior to transfer to suitably permitted composting sites for further treatment. There is no change proposed to waste types, activities, or storage arrangements as a result of the EP application and therefore it is not considered that the proposed EP application will increase the risk of the site to the local environment.

Strict operational procedures will continue to be implemented at the site to monitor and manage amenity risks from the activities and include provisions for the monitoring of scavenging birds, vermin, insects and litter, mud on road, odour and noise. The impact of the site on surrounding human and environmental receptors is set out in the assessment and the potential receptors are illustrated on Drawing 003.

Subject to the implementation of the stated management measures, the conclusion has been reached that the proposed EP application is unlikely to result in a significant accident risk or risk to the amenity of the local environment.

The ERA (Ref: 402.065376.0001/ERA) is enclosed as Section 3 of the EP application.

¹ [The Environment Agency \(Environmental Permitting and Abstraction Licensing\) \(England\) Charging Scheme 2022 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115444/2022-06-23-epal-charging-scheme-2022.pdf)

² Risk Assessments for your Environmental Permit, last updated November 2023, available at: [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115444/2022-06-23-epal-charging-scheme-2022.pdf). Accessed June 2024



3.4 Operating Techniques Document

The site will be operated in accordance with the OT document. This document sets out best practice for operating the site, based on legislation and best available techniques in the industry.

The management system and OT will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system and the OT document;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The OT (Ref: 402.065376.0001/OT) is enclosed as Section 4 of the EP application.

3.5 Site Condition Report

A SCR has been prepared in support of this EP application to establish the baseline environmental conditions within the proposed EP boundary. The SCR has been prepared in accordance with EA guidance H5 (version 3), April 2013³.

The site will operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the site does not pose a significant risk to the surrounding human and natural environment.

The SCR (Ref: 402.065376.0001/SCR) is enclosure as Section 5 of the EP application.

3.6 Fire Prevention Plan

The FPP has been prepared in accordance with the EA's Guidance for FPP's, last updated January 2021⁴. The FPP details the required mitigation and management methods to prevent a fire of combustible materials stored on site.

The FPP identifies measures to be employed to reduce the likelihood of fires at the site. In addition, the plan identifies measures to be employed in the event of a fire to limit the damage caused to the environment or human health.

The information contained within the FPP for the facility aims to continue to ensure that the following 3 main objectives are met:

- Minimise the likelihood of a fire happening;
- Aim for a fire to be extinguished within 4 hours; and
- Minimise the spread of fire within the site and to neighbouring sites.

The FPP (Ref: 402.065376.0001/FPP) is enclosed as Section 6 of the EP application.

³ H5 Site Condition Report (Version 3), April 2013 Available At: [Environmental permitting: H5 Site condition report - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-permitting/h5-site-condition-report), accessed June 2024.

⁴ Fire Prevention Plans, last updated January 2021 Available At: <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits>, accessed June 2024



3.7 Emissions (Dust) Management Plan

A DEMP has been prepared in accordance with the EA's Guidance, Control and Monitor Emissions for your EP, last updated November 2022⁵. The DEMP aims to ensure that the EP is complied with through the identification of all potential dust sources, pathways and receptors. The DEMP also details information regarding monitoring, investigations, and reporting of dust emissions from site and management for the control of emissions.

The DEMP will be incorporated into the site procedures and will be revised as necessary to ensure that it remains appropriate to the activities occurring on site, and that any changes in conditions relating to dust management are dealt with as part of those revisions.

The DEMP (Ref: 402.065376.0001/DEMP) is enclosed as Section 7 of the EP application.

3.8 Associated Drawings

The following drawings have been prepared to support the EP application:

- Drawing 001 Site Location Plan;
- Drawing 002 Site Layout and Environmental Permit Boundary Plan; and
- Drawing 003 Environmental Site Setting.

The drawings are enclosed as Section 8 of the EP application.

⁵ Control and Monitor Emissions for Your Environmental Permit, last updated November 2022 Available At: [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit), accessed June 2024



4.0 Technical Standards and Control Measures

The key technical standards laid out in this NTS will govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- EA Guidance, Risk assessments for your EP, updated November 2023;
- EA Guidance, Control and Monitor Emissions from your EP, updated November 2022;
- EA Guidance, Developing a Management System: Environmental Permits, updated April 2023;
- Sector Guidance Note S5.06; Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste (October 2018);
- EA Guidance, Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities, August 2023;
- Relevant EA Guidance e.g. Environmental Risk Assessments, Fire Prevention Plans, Odour Management Plans etc...

The site will be managed and operated in accordance with Envar's Environmental Management System (EMS) and the OT document. The control measures relevant to the proposed facility are described in the OT document submitted with this EP application.

As the site is currently operating under a T6 waste exemption, there will be no change to the existing waste operations as a result of the EP application, and therefore no increased risk to the local environment. The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed Chertsey Green WTS.

Envar is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the Company's Environmental Policy, EMS, and associated procedures.



