

Sue Irons
Environment Agency
[Email only]

Our Ref: 316660L01/KB/180526/1.0

Re: EPR/TP3929LB/A001 – Ringway Infrastructure Services Ltd, Newport Pagnall – Response to Schedule 5 request for additional information

Site: Facility: Newport Pagnall, next to Newport Pagnall Services at Junction 14/15, M1, Newport Pagnall, MK16 8DS.

A Schedule 5 request for additional information was received from the Environment Agency on 22 April 2026. An original deadline of 5 May 2026 was set for the response, which was then extended to 18th May to allow for representative noise monitoring to be undertaken.

The questions posed in the Schedule 5 Notice are given in bold below and the response follows in-line below.

Form Part B2

Q3b) Technical Competent Manager (TCM)

- **Submit evidence of James’ registration or course certificate.**

Reason: The application says he is registered on ‘CIWM Level 4 diploma in non-hazardous waste treatment (MROC1)’; however, the registration document appears to be for “CIWM (WAMITAB) Level 4 Diploma in Systems and Operations Management (SOM4)”. As the application was submitted a while ago James may now have passed the MROC1; therefore, we would appreciate a copy of the certificate instead of the registration letter/ email it is exists.

The MROC1 course requires on the job experience to complete the assignments. James will use the Newport Pagnall site for gaining this experience once the site is permitted.

James will register for and complete an EPOC course once the application has been Duly Made as the EPOC lasts for 2 years only and cannot be sat again. This will allow 12 months for James to achieve his MROC1 WAMITAB qualification.

It is acknowledged that the name of course on the booking differs – this is what was received from the booking company and confirm receipt of payment. The course that James intends to complete following grant of the permit, is MROC1.

Q3d). Environmental Management System (EMS) summary

Amend your EMS so that its details are specific to this site's proposed operations. The summary only needs to be a few pages, but also to include proposed operation, management procedures, and times of site operations.

Reasons: We are currently unable to understand the site-specific operations and management on site from summary, because it reads too similar to a contents page. We do not require the applicant to send a copy of the whole management system only a summary, consisting of a brief paragraph explaining the site specific details.

We believe the site will operate outside the normal operating hours of other sites; however, the application doesn't indicate whether that would be between 7pm and 7am (night time hours).

As result of a site presenting a more detailed EMS at application stage it reduces the risk it won't have appropriate EMS information to run the site, if we agree to issue a permit.

Our latest application form part B2 states "You need to be able to explain what happens at each site and which parts of the overall management system apply..... For waste and installation permits only: your management system must also explain your resilience to climate change... Please send us a summary of the management system you are using....".

Please see enclosed updated EMS summary.

Q4a) Sewerage company

As the site proposes to discharge to foul sewer you must confirm the name of the sewerage company, so we can consult them.

Reason: The sewerage company/ water undertaker was not stated on the form, but elsewhere it mentions an assumption it is Anglian Water. You must be certain who you'd approach to obtain the Trade Discharge Consent (TDC).

All trade water consent applications are now submitted to a water retailer in the first instance.

A trade effluent application has been made to the water retailer Wave and is in progress. We understood at the time of application that the sewage undertaker was likely to be Anglian water but the retailer does not confirm this until it has been passed along the chain. We are now in contact with Anglian Water about this TDC application.

Q5c) NTS

- **Confirm annual throughput.**
- **Amend and resubmit documents that currently have the incorrect throughput.**

- **Confirm whether any of the waste would be from construction and demolition sites at the point of collection and/ or if the road sweeper is also used to clean the public highway used to access the construction site.**

Reasons: PAR page 2 states 11,500 Tpa throughput, but NTS (pg3) states 11,000 Tpa, and Part B4 form Table 1a states 12,500 Tpa.

When the source is from or near C&D sites a different waste code is required; therefore affecting the relevancy of the waste code proposed.

Annual throughput will be a maximum of 11,000 tpa. This has been amended in the documents.

The following documents have been updated and accompany this submission:

- Permit application report
- Forms – Part B4

The proposed wastes are not proposed to be from construction and demolition sites or close to access.

Site plans

The site boundary plan is currently not sufficiently suitable for us to be able to regulate the site against. This matter can be resolved in Determination stage if the application is Duly Made.

The final boundary map needs to be less magnified so we can see where it is in relation to other local landmarks. The current version suggests roads where none are shown on OS maps and gives no local landmarks such as a named road/ motorway or the neighbouring hotel.

[Document Management Service - Application Bespoke A001 Supporting Information - 23-12-2025 - 316660 - DW01 - Site Location.pdf - All Documents](#)

The Site Layout Plan 316660 DW02 has been updated to include reference to the National Highways depot as a form of orientation and the M1 motorway.

Form Part B4:

Table 1a:

- **Add the relevant R and D codes in the 3rd column.**
- **Ensure the annual throughput tonnage is correct.**

The following R and D codes have been added to Part B4 Table 1;

- R3 - Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) (Included for completeness as it appears on a permit allowing similar activities however we consider that the solid fraction of the waste recovery is better described by R5).

- R5 – Recycling/reclamation of other inorganic materials (separation of solid and liquid phases to allow recovery of each)
- R13 - Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) (storage of fines and liquid pending R5).
- D9 - Physico-chemical treatment resulting in final compounds or mixtures which are discarded by any of the operations numbered D1 to D12, e.g. evaporation, drying, calcination (It is considered that the liquid fraction discharged to sewer is recovered by the waste water company, however D9 code is included for completeness or in the event that this does not meet the specification of the discharge consent).
- D15 - Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) (temporary storage pending D9).

The tonnage being applied for is 11,000 tonnes per annum. This is based on a maximum throughput of 30 tonnes per day for 365 days per year. This is a very conservative maximum. This has been updated in Part B4.

Odour Management Plan (OMP)

The OMP content is satisfactory for Duly Making but Section 4.1 has Error (broken links); these will need to be addressed.

Please see enclosed updated OMP with rectified broken link.

Noise Impact Assessment and management plan (NIA and NMP)

Submit these and complete the table on the form.

The application does not include a Noise Impact Assessment or management plan. As you advised me by phone yesterday the proposal is to operate 24hours/ 7 days a week, and we are aware the site is close to local residents and a hotel we perceive NIA and NMP are required.

24hour/ 7day a week sites that handle externally 'hard' waste with local residents close by are likely to need to submit a Noise Impact Assessment and Noise Management Plan with an application. The proximity of busy local roads and the motorway, which present a different type of noise must also be taken into account.

Since December 2025 the Noise Assessment Tool (NAT spreadsheet) was made available to applicants at a newly created guidance page [Noise and vibration: environmental permit application guidance - GOV.UK](#). Sites that treat waste with local residents close by are likely to need to submit a Noise Impact Assessment and Noise Management Plan with an application. If the applicant chooses to use this external NAT please submit it with the application. The benefit is we can assess if the tool has been used appropriately and identify any common errors users make, thereby providing a source of potential improvements needed for any future external NATs and guidance released.

If you disagree with the 'outcome' from the NAT you must justify and evidence your reasoning.

Please see enclosed Noise Impact Assessment and Noise Management Plan. The inclusion of a NMP is updated in Part B4 and Part F1.

The associated assessment fee of £1,246 was processed via payment link on Friday 15th May 2026 under payment reference PSCAPPRINGW002.

Form Part F1:

Unfortunately the application payment you sent is incorrect. The correct application charge is £1,246 more than paid, as it was submitted before 1 April 2026.

1.16.12 Physical Treatment (passive dewatering) £7,930

Odour Management Plan (OMP) £1,246

Dust/ Emissions Management Plan (DEMP) £1,241

Noise Impact Assessment and Management Plan (NIA and NMP) £1,246

£1,246 for the additional Noise Management Plan has been processed using payment reference PSCAPPRINGW002.

We trust the above and enclosed address the queries raised. Should you need anything further, please get in touch.

Yours sincerely,

Kate Brady

Enclosures:

- Permit application report
- Part B4
- Part F1
- Noise Impact Assessment
- Noise Management Plan
- Odour Management Plan
- Site Location Plan 316660 DW01 Rev A