

**From:** [Shaw, Alice](#)  
**To:** [SM-Defra-RESP-notifications \(DEFRA\)](#)  
**Cc:** [Irons, Sue](#); [PSC Land](#)  
**Subject:** RE: EPR/PP3594ZP/V003 (Allendale) We Need More Information About Your Application CRM:0392011  
**Date:** 27 November 2024 18:24:19  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[EPR\\_PP3594ZP\\_V003 - NDM Response Cover Letter.pdf](#)  
[Part C2 \(Version 2\).pdf](#)  
[Part C4 \(Version 2\).pdf](#)  
[Part F1 \(Version 2\).pdf](#)  
[PSCAPPSUEZ0237 - Evidence of Payment.png](#)  
[EP6 - Operator Information \(Version 2\).pdf](#)  
[EP4 - Non-Technical Summary \(Version 2\).pdf](#)  
[EP8 - 1.0 - Management System Summary \(Version 2\).pdf](#)  
[EP8 - 1.2 - Operations & Emissions Management Plan \(Version 2\).pdf](#)  
[EP8 - 1.1 - Figure 2 - Proposed Site Layout.pdf](#)  
[EP8 - 1.1 - Figure 4 - Proposed Site Drainage Plan.pdf](#)  
[EP8 - 1.1 - Figure 3 - Receptor Plan.pdf](#)  
[EP8 - 1.4 - Environmental Risk Assessment \(Version 2\).pdf](#)  
[EP8 - 1.7 - Fire Prevention Plan \(Version 2\).pdf](#)

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Hi Sue,

Please find attached the following documents which have been prepared in response to the 'Not Duly Made' notification that was issued for the above application on 13/11/2024.

- Cover Letter with our response to the queries listed in the 'Not Duly Made' notification
- Part C2 (Version 2)
- Part C4 (Version 2)
- Part F1 (Version 2)
- Screenshot of additional payment
- Operator Information Document (EP6 – Version 2)
- Non-Technical Summary ( EP4 - Version 2)
- Management System Summary (EP8, Section 1.0 - Version 2)
- Operations and Emissions Management Plan (EP8, Section 1.2 - Version 2)
- Environmental Risk Assessment (EP8, Section 1.4 - Version 2)
- Fire Prevention Plan (EP8, Section 1.7 - Version 2)
- Proposed Site Layout (EP8, Section 1.1, Figure 2)
- Proposed Site Drainage Plan (EP8, Section 1.1, Figure 5)
- Revised Receptor Plan (EP8, Section 1.1, Figure 3)

I hope that this is acceptable. If you have any queries, then please do not hesitate to contact me.

Kind regards,

**Alice Shaw**  
Environment Permit Manager  
**SUEZ recycling and recovery UK**

Mobile: [REDACTED]



SUEZ Recycling and Recovery UK Ltd  
Higher Swan Lane - Bolton – Greater Manchester – BL3 3AJ - United Kingdom  
[www.suez.co.uk](http://www.suez.co.uk)



General

**From:** SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>  
**Sent:** Wednesday, November 13, 2024 12:23 PM  
**To:** Shaw, Alice [REDACTED]  
**Cc:** Irons, Sue [REDACTED]  
**Subject:** EPR/PP3594ZP/V003 (Allendale) We Need More Information About Your Application CRM:0392011



Dear Alice Shaw

**Environmental Permitting (England and Wales) Regulations 2016**

**Application reference: EPR/PP3594ZP/V003**

**Operator: SUEZ RECYCLING AND RECOVERY NORTH EAST LTD**

**Facility: Allendale C A Site, Shilburn Road, Hexham, NE47 9LQ**

Thank you for your application received on 27/10/2023. The following is to confirm our last conversation of 12/11/2024.

We need to ask you for some missing information and fee before we can do any more work on your application.

Unfortunately the application payment you sent is incorrect. The correct application charge is £7916. This leaves a balance of £779 to pay for the Habitats Assessment.

Please also provide us with more information to the following questions. We need to know:

**Form Part C2:**

### Q2b Changes

- Confirm if R2 is to be removed from permit.
- Confirm if D14 is to be added to permit.

*Reason: These are indicated in other parts of the application but were not included here.*

### Q3b) Technical ability

- Update the information provided in Operator Information sheet (EP6) and submit evidence demonstrating the proposed Technical Competent Manager(s) is/ are appropriately qualified.

*Reason for request: The validity dates of all certificates submitted have been exceeded/ expired.*

- Submit date of birth information for any new TCM being proposed.
- Confirm which site(s) each Technical Competent Manager (TCM) covers.

### Q5a) Site Layout plans

Submit a proposed site layout, featuring current and wastes proposed to be accepted .

*Reason for request: The applicant only submitted a layout which indicated it was the existing/ current site, not the proposed.*

### Q5c) Non-Technical Summary (EP4)

Clarify whether hazardous chemicals are to be accepted. If they are not to be taken please remove them from the list.

*Reason: There are waste codes (EWC) listed e.g. photochemical/ acids/ pesticides, but the Fire Prevention Plan states “2.6.5 Householders are requested to keep hold of their hazardous chemicals and advised to use the Northumberland Council collection service”.*

Please note the applicant misinterpreted that HWRCs/ Civic Amenity sites don't need Dust Management Plan (DEMP). The Gov.uk guidance indicates bespoke applications where a DEMP is required for certain waste types, so although HWRC/CA isn't listed it does list metals and aggregates which they might receive.

### Q5e) Fire Prevention Plan (FPP)

- Clarify whether hazardous chemical are to be accepted, and amend 2.6.5 if they are to be accepted.

*Reason: There are waste codes (EWC) listed, but the Fire Prevention Plan states “2.6.5 Householders are requested to keep hold of their hazardous chemicals and advised to use the Northumberland Council collection service”.*

- Ensure the site layout and drainage plans reflect the scope proposed in the variation application.

*Reason: The title of 'existing' on a plan would assume what it is like before the new wastes codes are accepted on site. For clarity plans should be labelled 'proposed' as the permit does not formally allow the proposed wastes to be accepted onsite.*

#### Q6) Environmental Risk Assessment - ERA (EP8 - Doc 1.3)

Please:

- amend the statement in section 4.1.3 ..."no European sites of ecological significance (i.e. Special Protection Areas, Special Areas of Conservation or Ramsar sites) within 1km of the site", as there is a SSSI and SPA within the 1km screening distance.

*Reason: The SSSI and SPA was not picked up in the pre-application habitats screening and advice due to the distance of central National Grid Reference (NGR) and buffer distance not being accurately described.*

- explain in the risk assessment why the extra waste codes (hazardous and non-hazardous) requested would not increase risk to the habitats and other receptors.
- Explain what risks could potentially affect the habitats and mention the measures /mitigation to be employed. Be clear whether any acons are specifically to prevent/ reduce harm to the designated habitats and the wildlife in them.

*Reasons:*

*The applicant must show awareness of the habitats and explain why harm (including but not limited from dust risk) is/is not expected to increase. We will need to do Habitats Assessments (Appendix 4 and HRA); therefore we request the assessment fee is paid.*

*The ERA must reflect the full range of hazardous wastes the applicant proposes to accept on site rather than only batteries, oil, fuel, and hydraulic fluid which the ERA currently mentions.*

#### **Form Part C4**

Table 1a:

- Confirm whether R2 for recycling/ reclamation of organic substances is still required, or is to be removed from the permit.
- State the maximum amount in tonnes per day of hazardous wastes that will be treated for (1) recovery, (2) disposal, (3) temporarily stored onsite.

*Reason: There are IED limits; exceeding activity capacities would result in a Waste operation becoming an Installation.*

- State the amount in tonnes per day of non-hazardous wastes that will be treated for (1) recovery, (2) disposal.

#### Q3a Supporting documents

Describe how the new wastes including but not limited to all received hazardous waste will be handled, including waste acceptance, quarantine, storage and segregation.

*Reason: As the variation to add waste codes will be changing the risk of the site, the*

*plans, diagrams, and descriptions must include details of the infrastructure necessary for this change in risk. Infrastructure includes but not limited to containment information and buildings. If hazardous chemicals are to be accepted information on these should be included too.*

### Q3b Management Plans

Clarify/ amend the following statement in the Operations & Emissions Management Plan:

- 4.5.1 refers to wood being tipped in a building; however there is no other reference in the application there is a building.

It would be helpful if you resolve now the seeming inconsistency in 4.6.2 which refers to retaining putrescible wastes; however, elsewhere it is claimed no such wastes are accepted.

### **Form Part F1**

Your application requires an assessment under the Habitats Regulations. The charge for this assessment is not included in your baseline application charge. You will therefore need to make an additional payment of £779.

- Amend Table 3 so it includes Habitats assessment fee (£779)
- Pay the £779 by BACS, or tick the box to request our Permitting Support Team to contact you to take debit/ credit card details from you.
- If you pay by BACS please send a copy of the remittance to help us locate the payment.
- Before submitting the new Form Part F1 please update the 'Date payment sent'.

Please reply directly to this email with your information and copy in [REDACTED]

Please send the information, quoting the above application reference, to: Email address: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk).

Postal address:  
Integrated Permitting Services  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

You must send us the **information and or payment by 10 working days: close of 27/11/2024.**

Details of how to pay are given in Part F of the application form.

If we do not receive this by this deadline we will return your application. Please let us know if it will take longer than 10 working days to make the payment.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination.

Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,500.

Further information on charging can be found

at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

We have also identified the following missing information, which although it will not prevent us from duly making the application, will be required during determination. You should provide this information as early as possible to avoid delays during determination.

- **Q5e) FPP (EP8 - Doc 1.7) -** the SSSI and SPA habitats which are within the 1km screening distance of the south-east boundary have been omitted and should be included.

Please reply directly to this email with your information and copy in [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk).

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions please phone me on [REDACTED] or email [REDACTED].

Yours sincerely,

Sue Irons

Waste Permitting Officer

Permitting Team

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