Supporting Statement & Non-Technical Summary

Sutton Courtenay Materials Recycling Facility

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[1] Introduction

[1.1] Non-Technical Summary

[1.1.1] Background

This report has been prepared by Ayesa (ByrneLooby Partners (UK) Limited) on behalf of FCC Environment (UK) Limited in support of a normal permit variation application for the Sutton Courtenay Materials Recycling Facility (MRF) Environmental Permit (EP) ref. EPR/NP3890VV.

Sutton Courtenay MRF ("the Site") is centred on National Grid Reference (NGR) SU 514 932 and is located at Appleford Sidings, Abingdon, Oxfordshire, OX14 4PW. The Site is operated by FCC Environment (UK) Limited (FCC), which is hereafter referred to as the Operator.

[1.1.2] Site Location and Environmental Setting

Sutton Courtenay MRF is located approximately 1km to the southwest of the village of Appleford and approximately 1.25km to the southeast of the village of Sutton Courtenay. The Site has been developed at the centre of a complex of former and active sand and gravel quarries and waste management sites (Figure 1). The MRF has however been constructed on a previously undeveloped area of grassland. Heidelberg Materials operate a quarrying and aggregates business within 10m of the MRF boundary to the east and north of the site (Figure 2). A composting facility is located immediately to the west.

The Site is relatively remote from residential receptors with the closest residential receptors being positioned some 800m north-west of the site on Warbler View (Figure 1).

Figure 1 - Site Location and Surrounding Landfills

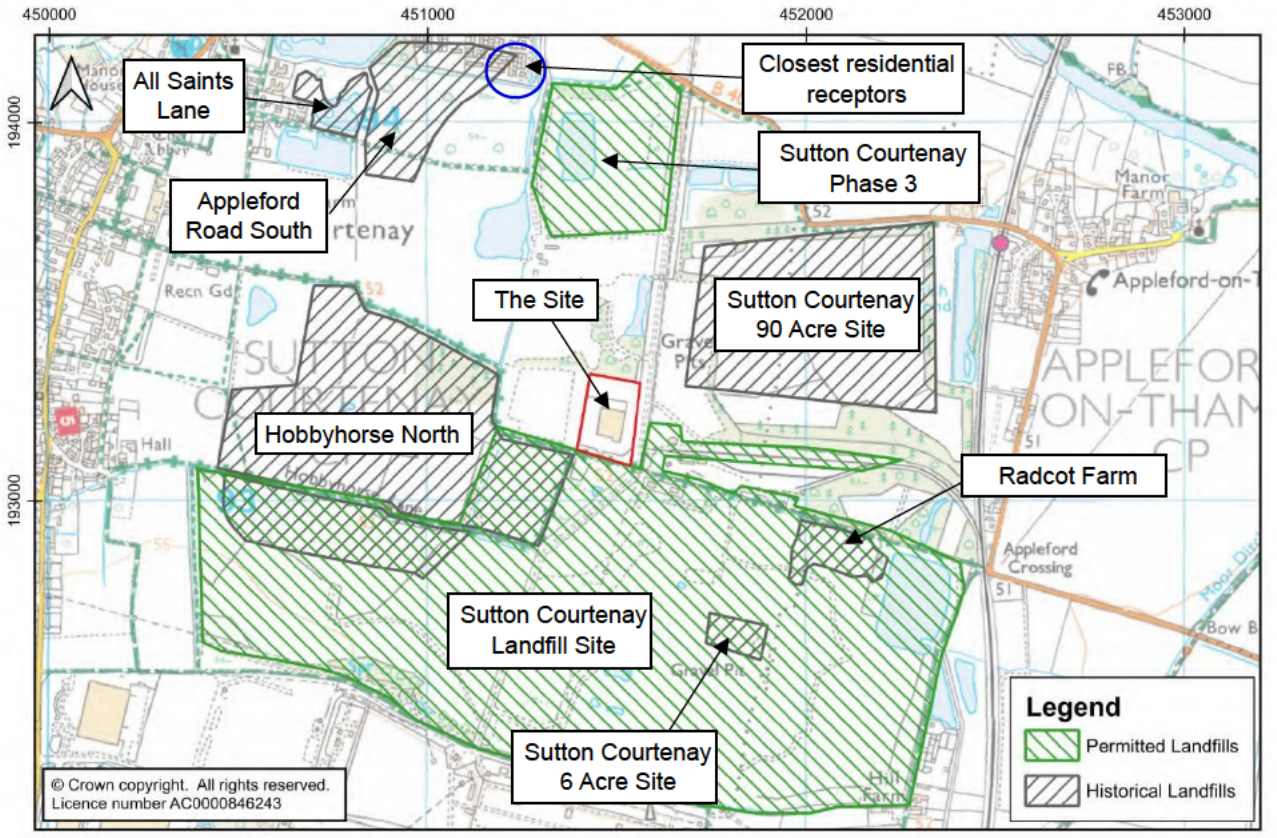
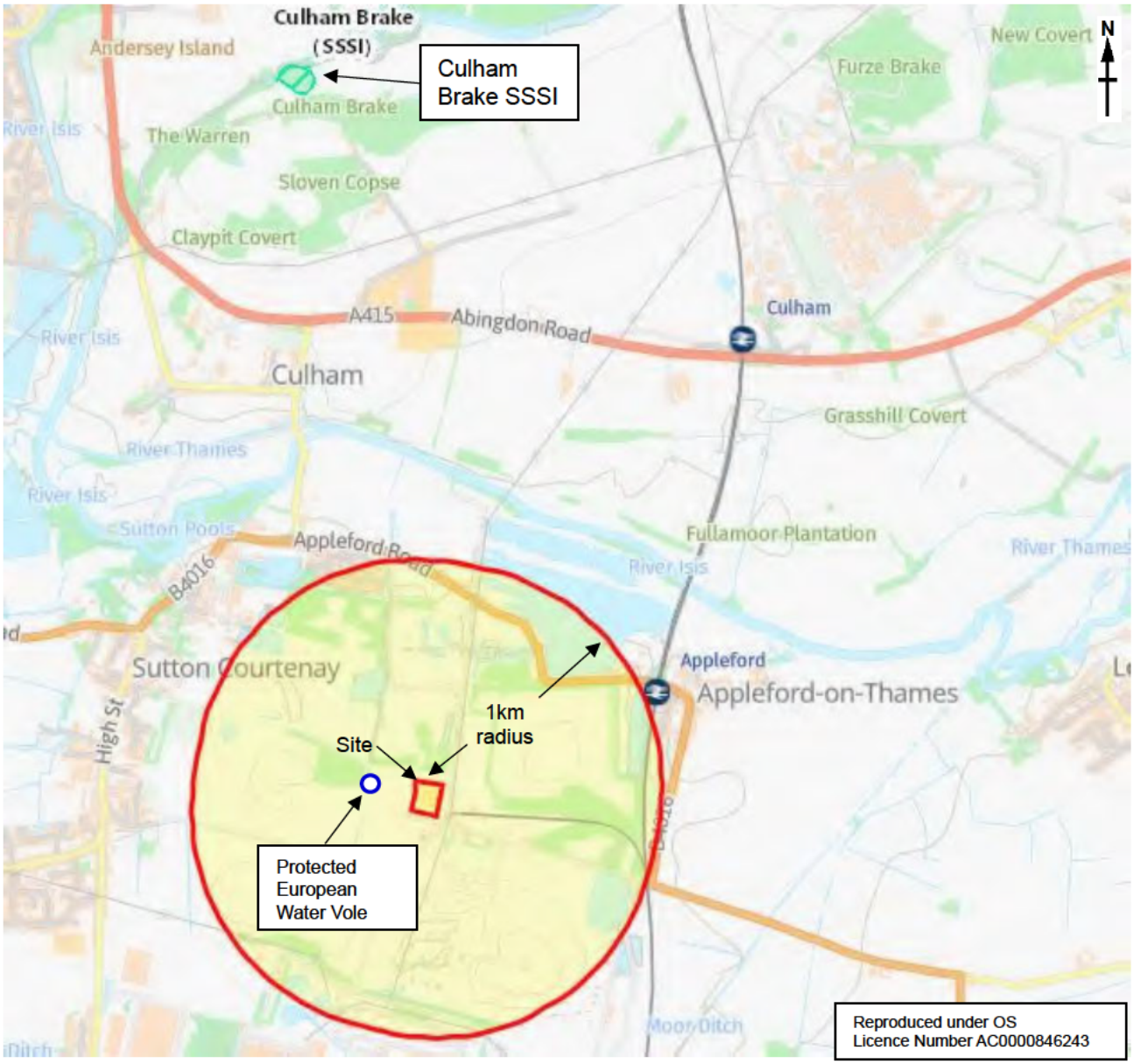


Figure 2 - Site Location and Surrounding Features

Sutton Courtenay MRF is not located within 1km of any designated sites. The closest designated site is the Culham Brake Site of Special Scientific Interest (SSSI) located ~3.1km to the north of the site (Figure 3).

As part of a pre-application basic conservation screening (reference EPR/NP3890VV/P001), the Environment Agency did identify a protected European water vole within a stream located approximately 255m to the east of the site (Figure 3) and to the west of the compositing facility.

Figure 3 – Statutory Protected Sites (Extract from DEFRA's Magic Maps)



[1.1.3] Permitting History

Sutton Courtenay MRF became operational in February 2013, with the EP issued to FCC Environment (UK) Ltd on 11th February 2013. The EP was varied for the first time in March 2014 (V002) for the inclusion of a new waste code. A second variation (V003) was issued two months later in May 2014 for the addition of a waste transfer station, clinical waste, a disposal activity and increasing site throughput. A third variation (V004) was determined in July 2017 to allow outside storage of baled Refuse Derived Fuel (RDF) and process segregated metals, alongside the addition of a recovery activity to permit the pre-treatment of more than 75 tonnes per day of non-hazardous wastes for incineration. The EP was most recently varied on 9th June 2022 (V005) to modernise the conditions as part of an Environment Agency 'Non-hazardous Waste Sector Review'.

The EP authorises the operation of a MRF and Waste Transfer Station (WTS) for the acceptance of non-hazardous household, commercial and industrial wastes for the production of RDF. It permits the recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day, involving the pre-treatment of waste destined for incineration or co-incineration.

The following directly associated activities (DAA) are also permitted:

- Storage of waste prior to pre-treatment (AR2);
- Raw material storage (AR3);
- Storage of baled RDF and separated metals and recyclables, prior to onward transfer to a suitable licensed facility off-site (AR4);
- Storage, transfer and treatment of non-hazardous waste only as a MRF and WTS (AR5); and
- Non-hazardous clinical waste storage and repackaging as a healthcare waste facility (AR6).

Persistent organic pollutant (POPs) waste and waste upholstered domestic seating (WUDS) is shredded and prepared for onward transfer to an Energy from Waste (EfW) facility.

The Site's Fire Prevention Plan (FPP)[1] and waste handling procedure[2] detail the waste sorting, storage, transfer, processing and treatment procedures for all waste types accepted at the site.

Although the EP allows for the storage of some processed wastes outside, this is not currently being carried out. All wastes are stored undercover within the MRF building. A sealed drainage system is in place at the site which drains to surface water. The drainage system can be isolated in the event of a spill or fire by a lockable penstock shut-off valve.

The proposed additional wastes type are not expected to pose an increased spill risk where handling and storage procedures are followed.

[1.1.4] Proposed Changes to the Permit

This application is seeking to amend Permit table S2.2 (for waste activity AR5 – recycling and transfer of non-hazardous waste) to accept the waste types listed in Table 1 below.

The treatment of waste electrical and electronic equipment (WEEE), hazardous wastes and batteries shall consist of manual sorting only.

WEEE, discarded hazardous wastes and batteries will not be compacted or compressed.

All wastes shall be clearly identified and segregated, stored on an impermeable surface with sealed drainage system and, stored under weatherproof covering to prevent the ingress and contamination of water.

A full list of the proposed waste types is provided as Appendix D.

No changes are proposed to the site's annual throughput which is currently limited to 160,000 tonnes per annum.

All waste activities will continue to be carried out upon an impermeable concrete surface with a drainage system that can be sealed by a penstock valve to collect and contain any run-off when necessary.

All waste shall be kept secure. Wastes will be stored in containers which will not exceed 40m^3. Larger household items including fridges and freezers containing CFCs, HCFCs and HFCs will be stored upright within a segregated storage area within the MRF building.

[1] FCC (2024) *Sutton Courtenay MRF/WTS Fire Prevention Plan*. Ref. IMS-FRM-046

[2] FCC (2024) *Waste Handling procedure version 8*. Ref. EMS-3.02.04-SCTS

Hazardous wastes will be kept within clearly identified, segregated containers or demarcated areas. It shall not be mixed with a different category of hazardous waste or with other waste, substances or materials.

Table 1 – List of proposed additional waste types

16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 01	**end-of-life vehicles from different means of transport [including off-road machinery] and waste from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)**
16 01 08*	components containing mercury
16 01 09*	components containing PCBs
16 02	**wastes from electrical and electronic equipment**
16 02 09*	transformers and capacitors containing PCBs
16 02 10*	discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09
16 02 11*	discarded equipment containing chlorofluorocarbons, hydrochlorofluorocarbons and hydrofluorocarbons
16 02 12*	discarded equipment containing free asbestos
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 13
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	hazardous components removed from discarded equipment
16 02 16*	components removed from discarded equipment other than those mentioned in 16 02 15
16 06	**Batteries and accumulators**
16 06 01*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
16 06 06	separately collected electrolyte from batteries and accumulators
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 01	**separately collected fractions (except 15 01)**
20 01 21*	Fluorescent tubes and other mercury-containing waste
20 01 23*	Discarded equipment containing chlorofluorocarbons
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

The acceptance and treatment of the above listed additional waste types will be limited to the following:

a) All combustible wastes will be segregated appropriately and removed from site within 3 months and managed in accordance with the site's Fire Prevention Plan.

b) Details of the proposed waste storage and handling arrangements are provided within the accompanying Environmental Management System (Appendix E).

[1.2] Application Structure

In accordance with the Environment Agency's guidance on Environmental permits: when and how you are charged[3], a normal variation has been prepared and is supported by the following documents:

- Application Forms (Appendix A);
- Environment Agency basic pre-application conservation screening and application advice (Appendix B);
- Environmental Risk Assessment (Appendix C);
- Proposed revised list of waste codes (Appendix D);
- Environmental Management System (Appendix E);
- Fire Prevention Plan (Appendix F);
- Evidence of Technical Competence (Appendix G);
- Management System Certificate (Appendix H); and,
- Drawings.

This supporting statement has been prepared in response to the following questions raised in Application Form A, Form C2 and Form C4, which have been completed in support of the permit variation application. These questions ask the Operator to provide the following:

- Form A Appendix 1: Details of Directors
- Form C2 Q1a: Discussions before your application
- Form C2 Q2b: Changes or additions to existing activities
- Form C2 Q3b: Technical Ability
- Form C2 Q3d: Summary of Site Management System
- Form C2 Q4: Environmental Risk Assessment
- Form C2 Q6a: Provide a Non-Technical Summary
- Form C2 Q6b: Updated Site Plans
- Form C2 Q6c.2: Do you want to start storing combustible waste or will the fire risk increase in other ways?
- Form C4 Q1: What waste operations are you applying to vary?
- Form C4 Q2: Point Source Emissions to Air, Water and Land
- Form C4 Q3a: Technical Standards
- Form C4 Q3b: General requirements
- Form C4 Q3c: Information for Specific Sectors
- Form C4 Q4: Monitoring

[3] https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance

[2] Application Form A Questions

[2.1] Appendix 1 – Details of Directors

The required details of the Directors of FCC Environment (UK) Limited are as follows:

Name: Steven John Longdon
Role: Chief Executive Officer
Date of birth: [redacted]

Name: Fraser Wilson McKenzie
Role: Chief Financial Officer
Date of birth: [redacted]

Name: Miguel Angel Martinez Parra
Role: Chief Financial Officer
Date of birth: [redacted]

Name: Inigo Sanz Perez
Role: Director
Date of birth: [redacted]

Their correspondence address is:

FCC Recycling (UK) Limited, 3 Sidings Court, White Rose Way, Doncaster, England, DN4 5NU.

[3] Application Form C2 Questions

[3.1] Question1a – Discussions before your application

A pre-application requested was submitted prior to preparing this variation application. The correspondence is provided in Appendix B.

The Environment Agency provided a Nature and Heritage Conservation Screening assessment and this is also provided in Appendix B. The screening did not identify any sites or features within 1km of the site. The screening did identify protected European water vole within a stream located approximately 255m to the east of the site. However, due to the nature of the proposed changes, the supporting Environmental Risk Assessment (Appendix C) concluded that the protected species will not be affected.

As part of the pre-application response (Appendix B) received on 30th June 2025 (reference EPR/NP3890VV/P002), the Environment Agency advised that the AR5 activity should be separated into two activities as follows:

- AR5a: This will include the Materials Recycling Facility (currently in permit);
- AR5b: For the Waste Transfer Station activity and to include proposed additional EWC codes.

The Agency recommended that FCC Environment (UK) Ltd submitted a normal variation for a 'hazardous waste transfer station', on the basis that any hazardous waste will not be treated at the site. The application fee for this variation is £3,894 as required by charging code 1.16.5 for a hazardous waste transfer station. It was advised that submission of a habitats fee (£779) was not required.

It was advised that a revised FPP is not required in support of the application as all waste processing activities will be taking place within the proposed transfer station building and therefore no increased environmental risk will occur.

[3.2] Question 2b – Changes or additions to existing activities

The proposed changes to the waste activities are outlined in Section [1.1] of this supporting statement.

[3.3] Question 3b – Technical Ability

The proposed amendments will not influence the technical competency requirements for operation of the site after issue of the proposed variation.

A copy of the current Competence Management System Certificate (CMS) is attached as Appendix G.

[3.4] Question 3d – Summary of Site Management System

The Site is operated by FCC in accordance with their Integrated Management System (IMS) certified to ISO 14001. A copy of the ISO14001 certificate is attached in Appendix H.

The EMS has been updated to include the proposed changes to the facility and has been prepared in accordance with the Environment Agency's electronic guidance on *Develop a management system: environmental permits*[4]. A copy of the site's Environmental Management System (EMS) is provided within Appendix E and includes the following procedures and management plans:

- Clinical Waste Acceptance procedure (reference EMS-3-13.01-SCTS)
- Waste Acceptance (EMS-3-13.02-SCTS)
- Waste Rejection (EMS-3-13.03-SCTS)
- Waste Handling (EMS-3-13.04-SCTS)
- Site Inspections (EMS-3-13.07-SCTS)
- Dust Management and Monitoring Plan (EMS-3-13.09-SCTS)
- Odour Monitoring and Control Plan (EMS-3-13.10-SCTS)
- Litter Management and Monitoring Plan (EMS-3-13.12-SCTS)
- Pest Control Plan (EMS-3-13.13-SCTS) and
- Noise and Vibration Management Plan (EMS-3-13.14-SCTS).

[4] https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

[3.5] Question 4 – Environmental Risk Assessment

Whilst additional waste codes are being proposed above, the majority of the proposed waste types are similar in nature. Following the proposed changes, the nature of the site is unlikely to significantly change and will continue to present a very low risk to nearby receptors whilst the site is operated in accordance with appropriate operating techniques as set out within the site's EMS.

Nevertheless, a bespoke Environmental Risk Assessment has been carried out and is attached to this Supporting Statement as Appendix C.

[3.6] Question 6a – Provide a Non-Technical Summary

A non-technical summary has been provided in Section [1.1] of this supporting statement.

[3.7] Question 6b – Updated site plans

The following drawings are provided for the site in support of the proposed changes:

- 427A414B- Fire Prevention and Site Layout Plan

[3.8] Question 6c.2 – Do you want to start storing combustible waste or will the fire risk increase in other ways?

The proposals will not increase the risk of fire at the site. Nevertheless, a copy of the site's existing Fire Prevention Plan is provided as Appendix F.

[4] Application Form C4 Questions

[4.1] Question 1 – What waste operations are you applying to vary?

The proposed changes to the waste activities are outlined in Section 1 of this supporting statement. The proposed changes are to the waste code list for activity AR5 and no new waste activities are being applied for.

[4.2] Question 2 – Point source emissions to air, water and land

The variation application is not seeking to make changes to point source emissions and therefore no associated monitoring is required.

An Environmental Risk Assessment for potential fugitive emissions has been completed and is presented in Appendix C.

[4.3] Question 3a – Technical Standards

The site will continue to operate in accordance with the measures set out within the site's EP and EMS. The EMS (Appendix E) has been updated to include the additional waste codes and provides details for the storage and handling of wastes at the site.

[4.4] Question 3b – General Requirements

The potential impact of fugitive emissions (odour, dust, noise, mud and litter) is assessed within the Environmental Risk Assessment (Appendix C). All fugitive emissions will continue to be controlled in accordance with the site's EMS.

[4.5] Question 3c – Information for Specific Sectors

The information for specific sectors is not applicable to this site and its associated activities.

[4.6] Question 4 – Monitoring

No monitoring changes are anticipated as part of this permit variation application.

Monitoring will continue in accordance with the existing permit. There are no additional point sources proposed as part of this application.

The site will continue to be managed in accordance with the site's EMS.