Non-Technical Summary for a New Bespoke Waste Operation

Site name:	Ottery Park
Site address:	Ottery Park Industrial Estate, Tavistock, Devon, PL19 8NS
Operator name:	Marine and Boat Recycling Limited
Permit reference:	EPR/NP3627SV
Document ref:	SPC0126/MBR HUB/NTS/V2.0 December 25

Written by Emily Shann Pitts, Shann Pitts Consulting Limited, September 2025

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1 Introduction

This Non-Technical Summary has been prepared by Shann Pitts Consulting Limited (SPC) on behalf of Marine and Boat Recycling Limited, the Operator, to support a permit application for a bespoke waste operation environmental permit for the depollution and dismantling of end of life boats at Ottery Park Industrial Estate, Tavistock, Devon, PL19 8NS herein termed 'the Site'.

The application has been prepared by SPC in conjunction with and on behalf of the Operator.

A nature and heritage conservation screening report was requested from the Environment Agency with respect to this new permit application (Reference EPR/ NP3627SV/P001).

A full Environmental Risk Assessment has been carried out and is provided as a supporting document to the permit application.[1] This Non-Technical Summary highlights the key control measures that will be employed to minimise any impacts from the operational site and signposts the reader to the key supporting documents.

2 Site & Process Overview

2.1 Site Location

Address: Ottery Park Industrial Estate, Tavistock, Devon, PL19 8NS

National Grid Reference: SX 44433 75592

Local Authority: West Devon District Council, Devon County Council

2.2 Process Description

Refer to:

- Hub site Process Flow Diagram (Appendix B)
- Site Layout Plan (Appendix A) which shows site infrastructure.

The waste management and associated operations include depolluting and dismantling of vessels, sorting and processing of waste, and temporary storage of hazardous and non-hazardous waste.

Emissions to land and water are primarily controlled via:

- Depollution and washing of vessels on an impermeable surface with a sealed drainage system.
- Storage of depolluted vessels on a concrete pad which drains to an interceptor.
- Storage of whole vessels (depolluted) or Vessels for refurb / resale on hardstanding.

There are no point source emissions to air.

2.3 Permit Type

The activity is classed as a waste operation as there are no proposed listed activities in accordance with Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2016.

The permit will be 'bespoke' by virtue of the fact that the proposed activities are not included in any Standard Rules permits.

[1] Appendix A of EMS Manual (MBR-OD-01), V3.0, Dec 25

2.4 Waste Activities

The Operator will not undertake any waste management activity unless it is specifically listed in Table 1 below:

Table 1: Proposed Waste Activities & Limits

Description of activities	Limits of activities
R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **R4:** Recycling/ reclamation of metals and metal compounds **R5:** Recycling/ reclamation of other inorganic compounds **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	Treatment consisting only of depollution of end of life boats and sorting, separation, grading, baling, shearing, compacting, crushing, shredding or cutting of waste into different components for recovery. There shall be no treatment of lead acid batteries, other than sorting and separating from other wastes. The maximum quantity of hazardous waste treated for disposal or recovery shall not exceed 10 tonnes per day. This does not include the manual depollution and dismantling of end of life boats. Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery. The maximum quantity of hazardous waste stored at the site will not exceed 50 tonnes at any one time of which no more than 10 tonnes shall be stored for disposal. This does not include waste vessels awaiting manual depollution. No more than 25 tonnes of waste batteries (waste code 16 01 01* or 16 06 05) shall be stored at the site at any one time.

2.5 Waste Types

The waste types that may be accepted for treatment at the Site have the following European Waste Catalogue codes and descriptions as shown in Table 2 below:

Table 2: Waste Types

Waste	Description	Waste classification in accordance with the List of Waste (England) Regulations 2005.[2]
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**	
16 01	**end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)**	
16 01 04*	end-of-life vehicles (Boats or ships only)	Absolute hazardous
16 01 06	end-of life vehicles, containing neither liquids nor other hazardous components (Boats or ships only)	Absolute non-hazardous

[2] http://www.legislation.gov.uk/uksi/2005/895/contents/made Accessed 19th March 2024

2.6 Waste Quantity

The maximum treatment capacity of the plant is in the region of 200 tonnes per day which reflects days when the mobile GRP shredder is operating. The maximum annual tonnage of waste accepted on to site will be 25,000 tonnes.

The maximum volumes of waste are detailed in Sections 7 and 8 of the Fire Prevention Plan **(HUB-OD-02).**

3 Key Sensitivities

3.6.1 Geology

The bedrock geology is 'Brendon Formation - Slate, siltstone and sandstone.' There are no records pertaining to the superficial geology.[3]

The site is on freely draining slightly acid loamy soils.

3.6.2 Hydrogeology

The bedrock geology is a Secondary A aquifer of high vulnerability.

The site is outside any Groundwater Source Protection Zone [4] and is not within 50m of any well spring or borehole used for the supply of water for human consumption including private water supplies. The site is not within a Groundwater Source Protection Zone or a Drinking Water Safeguard Zone for Groundwater.

3.6.3 Surface Waters

The site sits over 300m away from three tributaries of the Lumburn Brook as shown on the Sensitive Receptor Plan (Ecology) (see Site Plans). The Lumburn Brook waterbody was classified under the Water Framework Directive as having a good ecological status in 2022 and 'does not require assessment' for chemical status.[5] The site is not within a Drinking Water Protected Areas or a Drinking Water Safeguard Zones for Surface Water.

3.6.4 Ecology

There are no European Sites and or Sites of Special Scientific Interest within 200m of the site. There are Priority Habitat Inventory and Ancient Woodland sites within 1km of the site boundary as shown in Sensitive Receptor Plan (Ecology) (see Site Plans) but none closer than the area of Purple Moor Grass and Rush Pasture over 550m to the north east of the site.

In response to a request for pre-application heritage and nature conservation screening (Ref: EPR/NP3627SV/P001 / Date: 03/07/24), the Environment Agency did not identify any protected and priority sites, habitats and species for particular consideration within this permit application.

3.6.5 Flood Risk

The site is within flood zone 1 has a low probability of flooding from rivers and the sea.[6]

[3] https://geologyviewer.bgs.ac.uk/ Accessed 10 June 2024
[4] https://magic.defra.gov.uk/MagicMap.aspx Accessed 10 June 2024
[5] https://environment.data.gov.uk/catchment-planning/WaterBody/GB108047007850 Accessed 10 June 2024
[6] https://flood-map-for-planning.service.gov.uk/ Accessed 10 June 2024

3.6.6 Human Receptors

Human receptors within 1km of the hub site are shown on the Sensitive Receptor (Human) Plan (see Site Plans) and Table 3 below. The closest residential receptors to the site are approximately 170m to the south of the site. There are other businesses operating from Ottery Park Industrial Park who may be sensitive receptors.

Table 3: Human Receptors (1km)

Receptor ID	Receptor name	Receptor type	Distance to site boundary (m)	Direction from site
R1	Other tenants of Ottery Park	Workplace	Adjacent	South and west
R2	Properties to south	Residential	170	South
R3	Ottery Park Farm including Tavy Turf	Residential & Commercial	310	South west
R4	The Old Coach House Hotel	Residential & Commercial	235	South west
R5	Ash Tree Barns	Residential	525	South
R6	White House	Residential	840	South west
R7	Venn House Residential Home	Residential and Commercial	780	North east
R8	Beeches Farm	Residential & Workplace	740	South west
R9	The Copper Penny Inn	Workplace & Commercial	825	South west
R10	Mill Hill Slate Quarries	Workplace	795	South east
R11	Residential properties in Rushford	Residential	830	North east
R12	Widslade Farm	Residential & Workplace	965	North

3.6.1 Air Quality Management Area

The site is not within an Air Quality Management Area.[7]

[7] https://uk-air.defra.gov.uk/aqma/maps/ Accessed 20 June 2024

4 Management

4.1 Management system

The site will be operated by Marine and Boat Recycling Limited in accordance with the Environmental Management System which includes the documents detailed in Table 4 below which are relevant to operational control:

Table 4: Management System Documents

Document reference	Document title
Marine & Boat Recycling Overarching documents	
MBR-OD-01	Environmental Management System Manual
MBR-OD-02	Permitting Decision Flow
MBR-OD-03	Personal Protective Equipment and Respiratory Protective Equipment Policy
MBR-OD-04	Training Matrix
MBR-OD-05	Non-conformance & Corrective Action Log
Marine & Boat Recycling Form templates	
MBR-FT-01	Incident Report Form
Hub Site Overarching documents	
HUB-OD-01	Process Flow Diagram Hub Site
HUB-OD-02	Fire Prevention Plan
Hub Site Standard Operating Procedures	
HUB-SOP-01	Vessel Depollution Procedure
HUB-SOP-02	Spillage Procedure
HUB-SOP-03	Fire Procedure
Hub Site Monitoring and / or Maintenance Schedule	
HUB-MP-01	Daily Checks
HUB-MP-02	Weekly Checks

The relevant documents have been submitted to support this permit application:

- EMS Manual **(MBR-OD-01)**
- Process Flow Diagram Hub Site **(HUB-OD-01)**
- Fire Prevention Plan **(HUB-OD-02)**

4.2 Technical competence

William Higgs is the Technically Competent Manager (TCM) for the hub site.

The Operator may train or employ further TCMs; the Environment Agency will be notified should this happen.

The Site will be supervised by the TCM for at least 10% of operational hours or otherwise as agreed with the Environment Agency. This minimum attendance requirement has been calculated in accordance with the online Environment Agency guidance 'Legal Operator and Competence Requirements: Environmental Permits'[8] using the Site Operational Risk Appraisal (OPRA) score and banding.

The minimum attendance requirement calculation is shown in Table 5 below:

Table 5: TCM Minimum Attendance Requirement Calculation

Aspect	OPRA category	Associated points
Complexity (waste operation)	B	2
Location	A	1
Emissions	A	1
		TOTAL = 4 points which equates to 10% minimum attendance

The TCM will note attendance hours in the Daily Sheet **(HUB-MP-01).**

4.3 Roles & Responsibilities

The TCM is responsible for:

- Ensuring that operational and TCM attendance hours are recorded;
- Carrying out site checks with respect to environmental and health and safety controls;
- Duty of care checks for waste loads entering and leaving the site;
- Relevant training for staff;
- Ensuring that incidents, accidents and complaints are recorded and reported as appropriate and that mitigations are actioned;
- Management of any contractors to ensure that they adhere to environmental and health and safety standards; and
- Maintenance of fire extinguishers and spill kits.

The Site Manager or nominated competent person will carry out the following daily checks and record them **(HUB-MP-01)**:

- Condition of any containment measures including boat wash, concrete surfacing and concrete bay walls.

[8] https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits Accessed 16 June 2024

- Waste storage is secure and within limits as stipulated in the Fire Prevention Plan **(HUB-OD-02).**
- Check for any leaks and spills.
- Fire Watch every four hours and at the end of the working day.
- Mobile plant maintenance is carried out as per maintenance schedules and recorded as necessary.
- There are no amenity impacts arising; noise, dust or litter; and
- Check on Site Security measures; CCTV cameras

The Site Manager is responsible for ensuring that:

- Daily Checks are carried out and recorded; Daily Checks **(HUB-MP-01)**;
- Operations are carried out in accordance with Vessel Depollution Procedure **(HUB-SOP-01)**; and
- Any contractors are correctly managed to ensure all tasks are carried out in accordance with safe working procedures and risk assessments.

5 Control of Emissions to Land and Water

5.1 Drainage

There are no emissions to water from the site.

A full survey of each vessel is carried out to include hazardous materials.

All undepolluted waste vessels are stored in the boat wash which is constructed of sheet metal with a sealed drainage sump. Vessels are washed and depolluted in the boat wash. The wash water from the boat wash sump is recirculated and disposed as a waste off site once it is not feasible to recirculate it further.

All waste liquids removed from the vessels are stored securely in bunded containers or tanks. Depolluted vessels are stored in concrete bays within a concrete pad area. All run off from the concrete area drains to an interceptor and soakaway. The concrete is inspected as part of the site Daily Checks **(HUB-MP-01)** and the interceptor is checked weekly as part of Weekly Checks **(HUB-MP-02)** and any oil pumped out into an IBC for disposal.

The rest of the site is made up of hardstanding and will be used for the storage of non-waste and depolluted whole vessels only.

The site layout and drainage are shown on the Site Layout Plan (Appendix A).

5.2Spillages

The site is checked at least daily for any spillages (Daily Checks **HUB-MP-01**) and any spillages are cleared up as soon as possible and in accordance with the Spillage Procedure **(HUB-SOP-02),** utilising on-site spill kits. All staff are trained in the Spillage Procedure.

5.3 Site Security

The site security measures to reduce the risk of arson and vandalism include:

- Heras fencing and an entrance gate; and
- Motion sensitive and thermal detection CCTV cameras (at least 3) which will send an alarm to a mobile phone(s).

There will always be a person 'on call' to respond to any alarms – this will either be the Technically Competent Manager (lives 5 minutes from site) and / or the Nominated Competent Person (lives 10 minutes form site).

6 Control of Emissions to Air

There are no point source emissions to air.

7 Fire Prevention

The permit application is supported by a Fire Prevention Plan **(HUB-OD-02)** written using the template and guidance provided by the Environment Agency.[9]

Combustible wastes will be stored in bays with concrete walls (2hr fire resistance rating) and a 1m freeboard above the height of the waste will be maintained.

Mobile plant is stored overnight with a 6m separation distance around it. Mobile plant is subject to a planned preventative maintenance plan.

Daily Checks **(HUB-MP-01**) include:

- Checking that combustible waste is stored within specified limits;
- Checking for leaks and spills of oils and fuels;
- A Fire Watch twice a day; and
- Cleaning of fixed and mobile plant to remove accumulated dust, fluff and waste.

An automated fire detection system is being installed which works via heat detection and will notify the Operator via telemetry if any heating in the waste storage area is detected.

There is a Fire Procedure **(HUB-SOP-03)** which will be trained out to staff to minimise the impacts of any fires on site.

8 Control of Amenity Impacts

8.1 Dust

The GRP shredder has the potential to generate dust emissions but is used infrequently when hired in (one day every few months). When the shredder is in operation water suppression will be used as required using rainwater collected on site.

Dust is monitored daily at the site boundary downwind; Daily Checks **(HUB-MP-01).** This frequency will be increased in dry conditions or if the shredder is in use.

8.2 Control of Noise & Vibration

The hub site operations will generally be carried out between the hours of 08:00 and 17:00 hrs Monday to Friday with some extension to these hours in exceptional circumstances. The site planning permissions does not restrict operational hours.

The potential sources of noise and vibration from the hub site and associated controls are:

[9] https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits Accessed 22 May 2024

1. Vehicles entering or leaving the site with vessels or waste.
2. Vehicles moving around the site:
    - All vehicles used at the Site are maintained in good efficient working order.
    - Machines in intermittent use are shut down or throttled down in the intervening periods when not in use or throttled down to a minimum.
3. The mobile shredding operation is a short term activity i.e., one day every few months and any noise generated will be during normal working hours.

Given the control measures in place and the fact that the closest residential receptors to the site are approximately 170m to the south of the site, it is not anticipated that noise from the permitted activities will be an issue. Noise is monitored daily; Daily Checks **(HUB-MP-01).** If noise and or vibration is found to have an impact on the local amenity then a Noise and Vibration Management Plan will be written and actioned.

8.3 Control of Litter

The waste treatment activities pose a low risk of litter generation. There will be a daily walk around and litter pick as part of the Daily Checks **(HUB-MP-01)**. All waste will be stored securely and disposed of appropriately.

8.4 Other Amenity Impacts

In accordance with the Environmental Risk Assessment (Appendix A of the EMS Manual **(MBR-OD-01)**), there is a low risk of other amenity impacts i.e., pests, mud on road or odour.

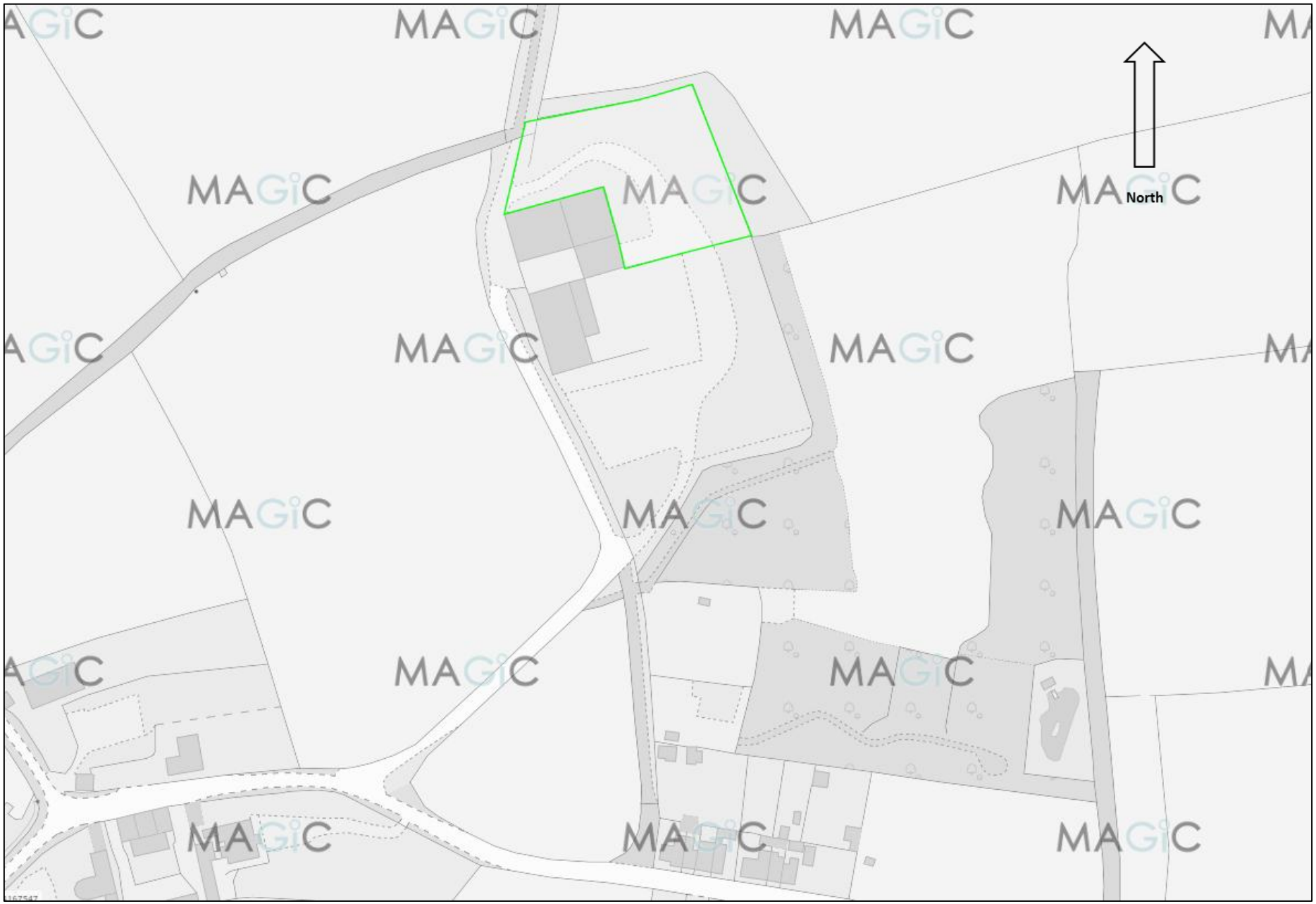
Appendix A – Site Plans

Permit Boundary Plan, Shann Pitts Consulting, SPC0126/MBR/Permit Boundary Plan V3.0 June 25

Site Layout Plan, Shann Pitts Consulting, SPC0126/MBR/Site Layout Plan V2.0 September 2025

Sensitive Receptors (Ecology) Plan, Shann Pitts Consulting, SPC0126/MBR/Sensitive Receptors Ecology V3.0 June 2025

Sensitive Receptors (Human) Plan, Shann Pitts Consulting, SPC0126/MBR/Sensitive Receptors Human V3.0 June 2025



Permit Boundary Line

Project: New bespoke waste operation permit application, Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS

Client: Marine & Boat Recycling Limited

Title: Permit Boundary Plan

Reference number: SPC0126/MBR/Permit Boundary Plan V3.0

Date: June 2025

Produced by: Emily Shann Pitts, Shann Pitts Consulting Limited

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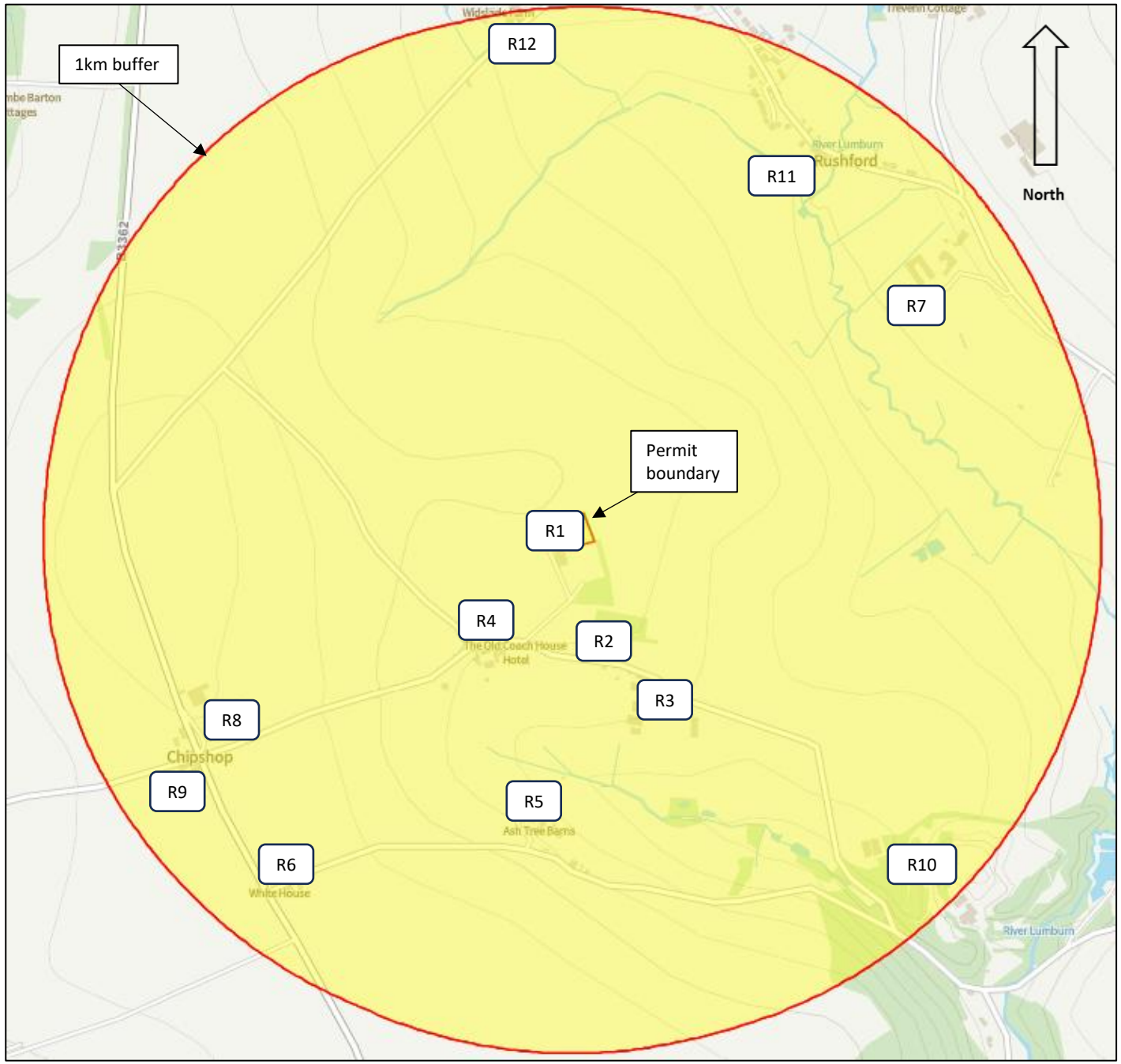

Receptor ID	Receptor name / type
R1	Other tenants of Ottery Park (Commercial)
R2	Residential Properties to south
R3	Ottery Park Farm including Tavy Turf (Residential & Commercial)
R4	The Old Coach House Hotel
R5	Ash Tree Barns
R6	White House
R7	Venn House Residential Home
R8	Beeches Farm
R9	The Copper Penny Inn
R10	Mill Hill Slate Quarries (Commercial)
R11	Residential properties in Rushford
R12	Widslade Farm

Project: New bespoke waste operation permit application, Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS

Client: Marine & Boat Recycling Limited

Title: Sensitive Receptors (Human) within 1km

Reference number: SPC0126/MBR/Sensitive Receptor Plan (Human)/V3.0

Date: June 25

Produced by: Emily Shann Pitts, Shann Pitts Consulting Limited

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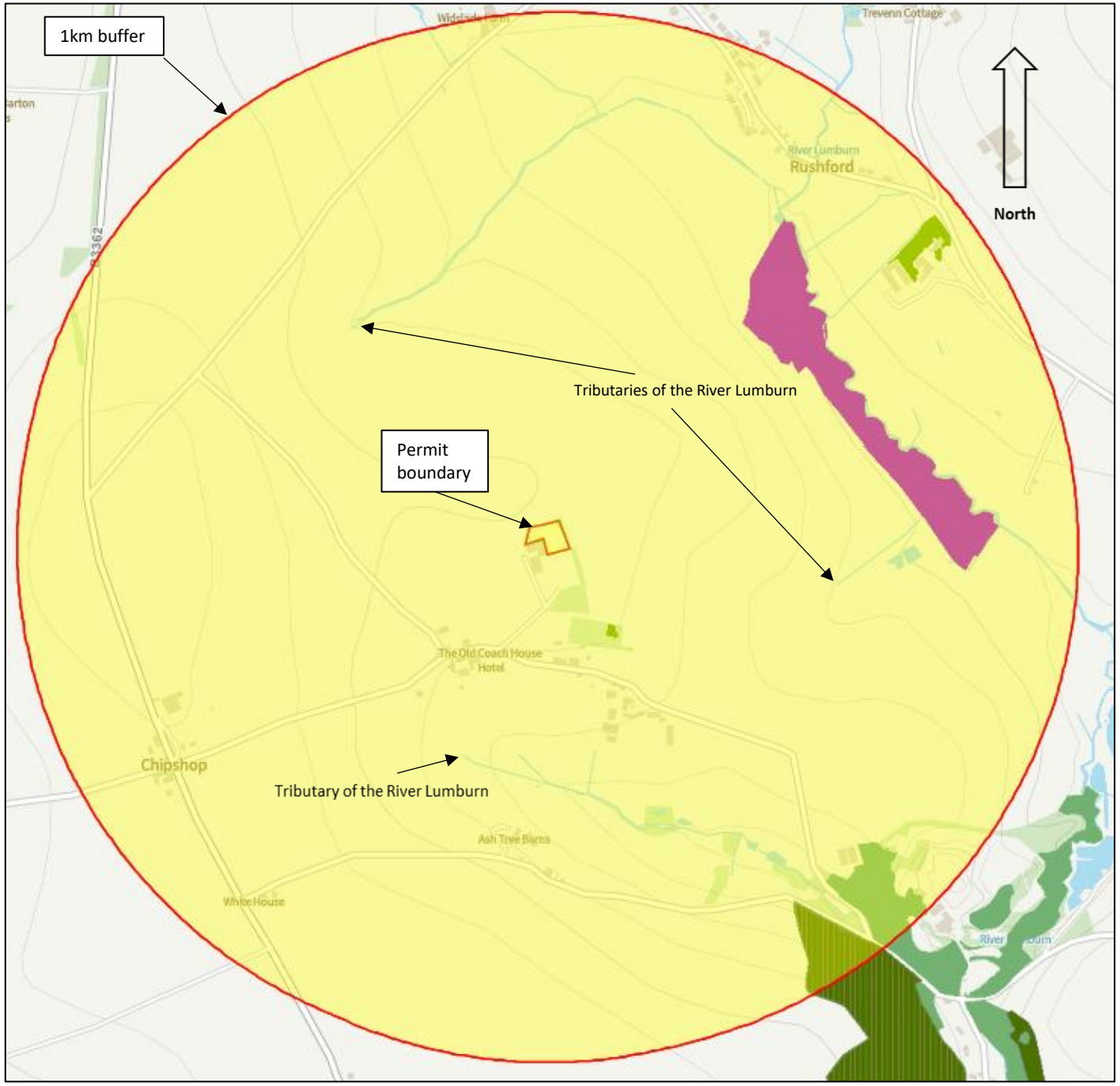

Legend:

- Priority Habitat Inventory - Traditional Orchards (England)
- Ancient Woodland (England)
  - Ancient and Semi-Natural Woodland
  - Ancient Replanted Woodland
- Priority Habitat Inventory - Deciduous Woodland (England)
- Priority Habitat Inventory - Purple Moor Grass and Rush Pasture (England)

Project: New bespoke waste operation permit application, Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS

Client: Marine & Boat Recycling Limited

Title: Sensitive Receptors (Ecology) within 1km

Reference number: SPC0126/MBR/Sensitive Receptor Plan (Ecology)/V3.0

Date: June 25

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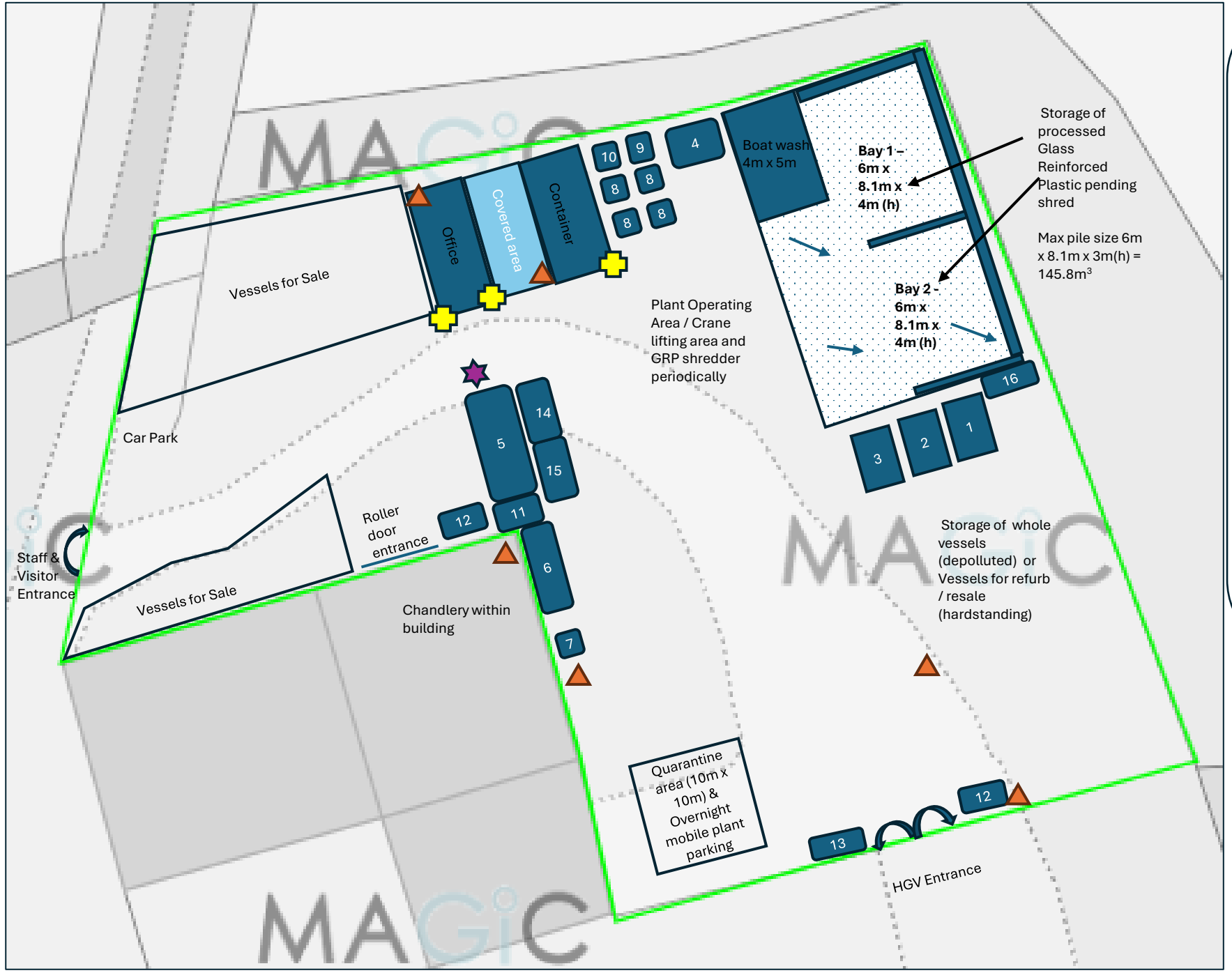

1	Wood skip
2	General waste skip
3	Metal skip
4	Water settlement system
5	Shepherds hut for parts and equipment storage
6	Waste fuel and oil storage (segregated)
7	Storage for oily rags (IBC)
8	IBCs for scrap
9	Lithium battery storage box
10	Lidded battery box
11	Rainwater storage (6m³)
12	2 No. Cages for gas bottles
13	Locked storage box for flares & pyrotechnics
14	Lifting gear and tool store
15	Props storage
16	Interceptor and soakaway
→	Drainage flow direction
	Permitted area
	Concrete area
▲	Fire extinguisher locations
✸	Spill kit location
✚	Heat Detection CCTV Location

Title: Site Layout Plan

Project: New bespoke waste operation permit application, Ottery Park Industrial Park, Tavistock, Devon, PL19 8NS

Client: Marine & Boat Recycling Limited

Reference number: SPC0126/MBR/Site Layout Plan V2.0

Date: September 2025

Produced by: Emily Shann Pitts, Shann Pitts Consulting Limited

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Appendix B – Process Flow Diagram Hub Site

Marine & Boat Recycling

Process Flow Diagram Hub Site (HUB-OD-01), V3.0, September 2025