



Mr Glynn Leppitt
Plymouth City Council
Chelson Meadow LTP
The Ride
Plymstock
Plymouth
Devon
PL9 7JA

Our reference: EPR/CP3731LZ/V005

Date: 06/04/2020

Dear Mr Leppitt

**Pre application advice – Basic service
Chelson Meadow Leachate Treatment Plant
Activity Reference - S5.4 A(1) a) (i)**

Following your pre-application request dated 19/03/20 we have the following advice:

You will need to submit the following forms. Please ensure you download the latest version of the forms, as your application will be returned if an old version of the forms is used:

- <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you>
- <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c2-varying-a-bespoke-permit>
- <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c3-varying-a-bespoke-installation-permit>
- <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f1-opra-charges-declarations>

Link: <https://www.gov.uk/search?q=environmental+permit+application+forms>

We have recently updated our application forms for waste and installations new bespoke permits to incorporate consideration of climate change adaptation. From the 1st December 2019, application forms will not be accepted if a version without this section is submitted.

And provide these additional documents / supporting information:

Non-Technical Summary: You need to send us a simple explanation of what the activities or changes are. This should include a summary your operations, a summary of the key technical standards and control measures arising from your risk assessment.

A summary of your Environment Management System If the EMS will change, provide an updated summary of the EMS. A summary should cover all the points in 'Develop a management system: environmental permits' at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

Environmental Risk Assessment: You should describe the environmental risk posed by your proposals. This must take the form of an environmental risk assessment which should follow the methodology set out in 'Risk assessments for your environmental permit' at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

In addition you may need to undertake the following risk assessments in relation to your discharge to water. It is expected that the flow rate/amount discharged to water will change as a result of the increase in the amount of Leachate treated at the plant from 650,000 to 800,000 tonnes per year. Therefore, you will need to undertake an assessment of 1. Hazardous substances and 2. Sanitary determinands may need to be undertaken.

1. You will need to assess the risk of hazardous pollutants to surface water, you need to follow this guidance: <https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit>

The assessment should include all hazardous substances in your trade effluent consent and incorporate any limits for hazardous substances specified in your permit. A copy of your trade effluent consent should be include with the application.

2. You will need to assess the risk from sanitary determinands you should follow the methodology set out in our guidance <https://www.gov.uk/government/publications/h1-annex-d2-assessment-of-sanitary-and-other-pollutants-in-surface-water-discharges>

If you need to undertake detailed modelling of the risk to surface water following the outcome of assessments 1 or 2 then you should follow this methodology <https://www.gov.uk/government/publications/modelling-surface-water-pollution-risk-assessment>

Site Layout Plan: If the site layout has changed as a result of the inclusion of additional infrastructure, please provide an updated site layout plan. It is presumed that any additional infrastructure will be within the existing installation boundary. If this is not the case then an updated installation boundary plan drawn to scale and an updated Site Condition Report should be submitted.

Technical Description and BAT assessment: Any additional infrastructure (storage tanks, treatment equipment etc) that will be added to the installation will need to comply with Best Available Techniques. We will also require a technical description of the equipment that will be installed, its purpose within the treatment process and a description of operating techniques. More detailed explanation of the requirements are set out below:

You will need to provide a technical description of the changes you propose to make, detailing any changes to plant, equipment and infrastructure, including design capacities. You must demonstrate how you will meet any relevant Best Available Techniques. This should include consideration for any relevant Directives, such as Medium Combustion Plant Directive (MCPD), Energy Efficiency Directive

and Waste Framework Directive (WFD). <https://www.gov.uk/guidance/best-available-techniques-environmental-permits>

This should also include details of your operating techniques and the infrastructure you are using to minimise the risk of pollution, including any details of secondary containment (e.g. bunds) used and how this meets any relevant standards. Further guidance on this can be found at <https://www.gov.uk/guidance/pollution-prevention-for-businesses#storing-materials-products-and-waste>

You should also tell us how you monitor and control the emissions from the site <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits>

Additional technical considerations to be addressed in application

-Is existing Leachate storage to be used or will extra capacity be included? If additional storage is required provide justification as to its suitability for storage of Leachate and that there will be sufficient volume for the amount of Leachate that is expected to arrive on site.

-Is there sufficient containment in place? If additional leachate storage capacity is to be put in place then additional containment should also be provided. Demonstrate how any additional storage will comply with the storage requirements as detailed 'Waste Treatment BREF'.

-How long will the Leachate be stored? Will pressure release valves be required on the storage tanks? Will these valves be fitted?

- Provide an outline of the treatment process and justification that there is sufficient treatment capacity to process the increased throughput of Leachate.

Odour Management Plan: If your Environmental Risk Assessment indicates that there will be an increase in the risk of odour then you will need to send in an updated odour management plan with your application. You should follow the H4 guidance on our website:

<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#odour>

Type of application:

Substantial Variation - The proposed increase in waste of 150,000 tonnes per annum would make it a listed activity in its own right. Therefore, it would be classed as a substantial variation in accordance with point 3.6.2 of the charging guidance.

<https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance>

Application Fee:

The application fee will be: **£14,401**

This fee is comprised of: the cost of a Bespoke Application - 1.17.4 – Section 5.4 – leachate treatment plant with a capacity of 50 or more tonnes a day, as detailed in the charging scheme.

The baseline fee for a variation should not exceed the cost of a new bespoke application for the activities listed in the permit. This application is classed as a substantial variation. The substantial variation fee is £17,779. This is incorrect. A substantial variation should be 90% of the cost of a bespoke application fee (£16,001), therefore, the baseline fee will be £14,401 as stated above

The following additional charge should be added to the above fee should an odour management plan be required following the completion of your Environmental Risk Assessment:

- odour management plan – a fixed charge of **£1,246**

The subsistence charge is likely to be: No change to subsistence

Link: <https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

Additional advice:

It is understood that the additional leachate being treated is from the same adjacent landfill site and is not from a new source. Therefore, the existing waste acceptance procedures will not require alteration as the composition of the leachate being treated is the same.

There is provision in our guidance for operators to not have to comply with the periodic monitoring requirements of condition 3.3.1 in your permit. If you believe we should not require periodic monitoring of groundwater and soil as a condition in your permit, you should justify this as part of your environmental risk assessment in terms of a systematic appraisal of the risk of contamination. We will review this during the determination.

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to a full technical check during duly making and determination, and additional information may be required based on your detailed submission and site specific requirements.

This advice covers Installations. Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.'

What happens next?

This pre-application request is now closed. Further enquiries resulting from this response must be logged as a new request using the online form:

<https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>

If you need more extensive or technical pre-application advice, you can ask for our Enhanced service. The enhanced pre-application advice is charged at £100 per hour plus VAT. You will need to complete and submit a new online pre-application request to request enhanced pre-application advice.

Applying for a permit

If you submit an environmental permit application then please quote this pre-application reference number EPR/CP3731LZ/V005.

Completed applications should be sent via email to:

psc@environment-agency.gov.uk

Or by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

A permit application must contain the following information:

Declaration

Please ensure the Declaration section is completed by each “relevant person”.

For an application from an individual, a relevant person is the person to be named on the permit.

For an application from more than one individual, each person who is applying for their name to be on the permit must complete the declaration – you will have to print a separate copy of the declaration page for each additional individual to complete.

In the case of a company, a relevant person must be an active director/company secretary as listed on Companies House – <https://beta.companieshouse.gov.uk/>

For a charity, a relevant person is a key postholder, ie, chair, chief executive, director or trustee.

Please ensure the declaration tick box is completed.

The Declaration section is found on Form F1 section 5 (or if you are completing Forms B6.5 or B6.6, it is in section 9).

Site Plan The site plan must be clearly marked with the full site boundary

Application fee Please note that your application will not be processed until we receive the full application fee payment.

If you have any questions please find my contact details below.

Yours sincerely

James Lidgett
James.lidgett@environment-agency.gov.uk

A

Mr Glyn Leppitt
leppitt-associates@live.com

Our ref: ENV PAP/CP3731LZ/V005
Date: 24 March 2021

Dear Glyn

Pre application advice – Enhanced service

I am pleased to provide you with your enhanced level of pre-application advice for Chelson Meadow Leachate Treatment Plant (LTP), as requested on behalf of your client Plymouth City Council. Our response set out in **Part A** below is based on the information provided on your pre application advice form and conversations/emails recorded on the following dates:

- email correspondence on 6th January 2021
- telephone conversation on 8th January 2021; and
- email correspondence from 14th to 16th March 2021.

This letter supercedes our basic pre-application response letter dated 6th April 2020. Where relevant any elements of that earlier response have been carried over and included in this letter. This approach was agreed on our call of 8th January such that a single letter covers all of the operator's proposals and requests, namely:

- an increase in the amount of leachate that can be accepted for treatment by the LTP from 650,000 to 800,000 tonnes per annum.
- the potential removal of condition 3.1.3 in relation to the periodic monitoring of soil and groundwater, because the site is built on an old landfill.
- merging (consolidating) the old discharge consent from 1983, ref. SWWA 289/1/1 with the current installation permit, ref. EPR/CP3731LZ. Note that under the Environmental Permitting Regulations we now refer to the old discharge consent as a Water Discharge Activity (WDA) environmental permit.
- formalising the provision for discharge of treated effluent at any state of tide during peak leachate production, a scenario you refer to as 'Emergency mode'
- confirmation of the variation application fee, the effect on subsistence charging, the application forms and supporting information required.

In addition you asked:

- if the permit limits in table S3.1 would be altered as part of a variation and whether any additional parameters would be added.
- if Direct Toxicity Assessment (DTA) was still required and if so what procedures should be followed. Your request to remove the need to test fish on 'conscientious grounds' was also noted.

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

Page 1 of 15

Finally you requested advice on how to surrender discharge consent SWWA 289/1/1. This is covered in **Part B** below.

What enhanced pre application covers

Further information on the enhanced pre-application service is detailed on section 2 of the [Environmental permitting charges guidance on GOV.UK](#).

Part A

As part of this service we have provided you with the following information regarding the variation of the installations permit:

Application reference number	EPR/CP3731LZ/V005 (Variation)
Habitats screening	<p>A Nature and Heritage Conservation screening report is included as part of this response. You should note from the report that several designated sites are identified within the relevant screening distance downstream of the effluent discharge point.</p> <p>The information contained in the screening report remains valid for a period of 6 months from the date of this letter. If the operator submits their variation application more than 6 months after the date of this letter, they should request a further screening report via our basic pre-app service. This will ensure that they have used the most current information on heritage and nature conservation interests in their application.</p>
Documents attached	Nature and Heritage Conservation screening report
Application charge required	<p>Baseline charge</p> <p>You will need to apply for a substantial variation to your environmental permit, the baseline charge being £14,401. This is the cost associated with varying the existing Section 5.4 A(1)(a)(i) leachate treatment plant activity to increase waste throughput from 650,000tpa to 800,000tpa.</p> <p>This charge falls under ref. 1.17.4 in Table 1.17 of our charging scheme. However note that the stated cost for a substantial variation in the charging table (of £17,779) is incorrect. A substantial variation should be 90% of the cost of a new bespoke application (which would</p>

be £16,001), therefore, your baseline charge is calculated as 90% of £16,001 as stated above.

You need to apply for a substantial variation, rather than a normal variation, because the proposed waste throughput increase of 150,000 tonnes per annum would make the leachate treatment activity a Part A(1) activity in its own right because it exceeds the Part A(1) activity threshold of 50 tonnes per day. This is indicated in section 3.6.2 of our [charging scheme guidance](#).

Charges for plans and assessments

Where the assessments listed in table 1.19 of the [charging scheme](#) are required there will be an additional charge, as set out below. Where relevant these charge(s) should be added to the baseline charge.

Table 1.19 - Charges for plans and assessments

Ref	Plan or assessment	Charge
1.19.2	Habitats assessment (except where the application activity is a flood risk activity).	£779
1.19.3	Fire prevention plan (except where the application activity is a farming installation).	£1,241
1.19.4	Pests management plan (except where the application activity is a farming installation).	£1,241
1.19.5	Emissions management plan (except where the application activity is a farming installation).	£1,241
1.19.6	Odour management plan (except where the application activity is a farming installation).	£1,246
1.19.7	Noise and vibration management plan (except where the application activity is a farming installation).	£1,246

	<p>Your site is within our screening distance(s) for one or more of these conservation sites:</p> <ul style="list-style-type: none"> • European Site within the meaning of the Conservation of Habitats and Species Regulations 2017; • Site referred to in the National Planning Policy Framework 2018 as requiring the same assessment as a European Site; • Site of special scientific interest within the meaning of the Wildlife and Countryside Act 1981; <p>You must assess the risks posed by your activity for the identified sites and include the additional Habitats assessment charge of £779 to cover the additional assessment work we must undertake unless the nature of your proposed change is such that there is no potential mechanism (source) for any impact. Where you consider there is no impact this should be supported by a justification. We may apply the charge in situations where we consider there is a potential impact.</p>
<p>Forms required to be submitted</p>	<p>Fully completed version of forms A, C2, C3 and F1 will need to be submitted. If sections are not applicable to your permit please indicate this rather than leaving a section blank.</p> <p>Please ensure you download the latest version of the forms, as your application will be returned if an old version of the forms is used. The forms are available at:</p> <p>https://www.gov.uk/guidance/change-transfer-or-cancel-your-environmental-permit</p> <p>You must read all accompanying guidance when completing the forms to ensure you do not miss anything out.</p>
<p>Additional documents required</p>	<p>General Requirements</p> <p>The following documents will be required as part of the application:</p> <p><u>Non-technical Summary</u></p> <p>You need to send us a simple explanation of what the activities are. This should include a summary of your operations, a summary of the key technical standards and control measures arising from your risk assessment.</p> <p><u>A summary of your Environment Management System</u></p> <p>If the EMS will change, provide an updated summary of the EMS you will have in place. A summary should cover all the points in 'Develop a</p>

management system: environmental permits' at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

Environmental Risk Assessment

You should describe the environmental risk posed by your proposals. This must take the form of an environmental risk assessment which should follow the methodology set out in 'Risk assessments for your environmental permit' at

<https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

You should consider using our assessment tool to assess your environmental risk. Our assessment tool will inform you when more detailed modelling is required.

If your site is located in a flood risk zone you should assess the risk of pollution in the event of a flood.

Depending on the outcome of your initial environmental assessment, you may be required to undertake detailed modelling of your environmental risk.

It is expected that the amount of effluent discharged to the Plym Estuary will increase as a result of the increase in the amount of leachate treated at the plant from 650,000 to 800,000 tonnes per year. Therefore, you will need to undertake an assessment of (1) hazardous substances and possibly (2) sanitary determinands.

The assessment should take account of all hazardous substances contained within the influent to the leachate treatment plant. Our understanding is that the influent to the plant contains a mixture of both landfill leachate and potentially contaminated surface run-off from other infrastructure areas at the landfill. You should ensure that the monitoring data used in your assessment is representative of all received flows.

You will need to assess the risk of hazardous pollutants to surface water, by following this guidance:

<https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit>

If you need to assess the risk from sanitary determinands you should follow the methodology set out in our guidance

<https://www.gov.uk/government/publications/h1-annex-d2->

[assessment-of-sanitary-and-other-pollutants-in-surface-water-discharges](#)

If you need to undertake detailed modelling of the risk to surface water you should follow this methodology

<https://www.gov.uk/government/publications/modelling-surface-water-pollution-risk-assessment>

If you need to assess the risk to groundwater you should follow this methodology

<https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit>

Habitats and receptors

Habitats and receptors will need to be assessed and will impact the application fee as indicated above.

Site Condition Report

If the site layout is changing as a result of the variation proposals please provide an updated site layout plan. It is presumed that any changes will be within the existing installation boundary. If this is not the case then an updated installation boundary plan drawn to scale and an updated Site Condition Report should be submitted. Guidance can be found at

<https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report>

Any proposals to extend the installation boundary would need to include a conceptual site model and identify any relevant hazardous substances on site. Quantitative baseline soil and groundwater monitoring data on the condition of the site should be included or a justification on why this is not required should be provided. You should also consider if you need to undertake soil gas monitoring.

(You stated via email on 15/03/21 that the installation boundary would remain the same as a result of the proposed variation application. In that case a site condition report would not need to be submitted with the application)

Site Plan(s)

You must send us a site plan(s) that identifies all of the land on which your activities will take place. The site plan should provide a date and a reference and must be drawn accurately to a defined scale. The outline of the site must be clearly marked. It will be helpful if local features are shown on the plan to help us place the site in its local environment.

If you are sending us a paper copy of your site plan it must be either A3 or A4 size. Alternatively you can send us an electronic copy on CD or via email.

You will need to include a drainage plan that covers the permit area.

You should include a site layout plan to help us understand which activities will be undertaken and shows the location of emission points.

If there are no changes to the existing site plan and drainage plan, and the installation boundary, then you may disregard the above items.

Technical Description and BAT assessment

Any new plant (storage tanks, treatment equipment, etc) that will be added to the installation will need to comply with Best Available Techniques (BAT). We will also require a technical description of the equipment that will be installed, its purpose within the treatment process and a description of operating techniques. More detailed explanation of the requirements are set out below:

You will need to provide a technical description of the changes you propose to make, detailing any changes to plant, equipment and infrastructure, including design capacities. You must demonstrate how you will meet any relevant BAT set out in BREFs, BAT conclusions and Environment Agency sector guidance. The relevant BAT Conclusions for this installation will be the Waste Treatment BAT Conclusions (Aug 2018). This should also include consideration for any relevant Directives, such as Industrial Emissions Directive, Medium Combustion Plant Directive (MCPD), Energy Efficiency Directive and Waste Framework Directive (WFD).

<https://www.gov.uk/guidance/best-available-techniques-environmental-permits>

You should also include details of your operating techniques and the infrastructure you are using to minimise the risk of pollution, including any details of secondary containment (e.g. bunds) used and how this meets any relevant standards. Further guidance on this can be found

at <https://www.gov.uk/guidance/pollution-prevention-for-businesses#storing-materials-products-and-waste>

You should also tell us how you monitor and control the emissions from the site.

<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits>

Odour Management Plan

If your Environmental Risk Assessment indicates that there will be an increase in the risk of odour then you will need to send in an updated odour management plan with your application. You should follow the H4 guidance on our website: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#odour>

Noise Impact Assessment

If your Environmental Risk Assessment indicates that there will be an increase in the risk of noise you must provide a quantitative noise impact assessment (NIA) based on BS4142:2014+A1:2019 – ‘Methods for rating and assessing industrial and commercial sound’.

<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#noise-and-vibration-management-plan>

Where your assessment has used calculations or modelling to predict sound pressure levels at receptors, you must follow our guidance on the presentation of your acoustic data: Noise impact assessments involving calculations or modelling.

<https://www.gov.uk/guidance/noise-impact-assessments-involving-calculations-or-modelling>

Noise Management Plan

Our current position is that where a quantitative Noise Impact Assessment is required it must always be accompanied by a Noise Management Plan (NMP). This is clearly stated in our duly making checklists and as such an application without an NMP is unlikely to be duly made. Therefore if relevant you must provide a Noise and Vibration Management Plan. The aim of the management plan is to prevent, or where that is not possible minimise, impacts to receptors.

Your noise management plan (if relevant) must take into consideration the outcomes of any noise and vibration impact assessment and

	<p>provide evidence that appropriate mitigation measures have been taken to control the risks from the activity and operations undertaken on your site.</p> <p>The Environment Agency have published guidance on appropriate measures and requirements of a management plan to assist you in the preparation of the plans.</p> <p>https://www.gov.uk/government/publications/environmental-permitting-h3-part-2-noise-assessment-and-control</p> <p><u>Accident prevention and management plan</u></p> <p>You need to include an updated accident prevention and management plan which considers the requirements of this guidance https://www.gov.uk/guidance/develop-a-management-system-environmental-permits#accident-prevention-and-management-plan</p> <p>While a detailed plan does not necessarily need to be submitted with the application, at the very least a summary of what the updated accident management plan will cover should be included, indicating how it has been updated as a result of the variation proposals.</p>
<p>Additional information</p>	<p>The following will need to be addressed within your application:</p> <ul style="list-style-type: none"> • Leachate storage during normal operation <ul style="list-style-type: none"> - How will the additional leachate flows of up to 800,000tpa be stored? - Is the existing leachate storage provision sufficient to cope with the additional flow or will extra capacity be necessary? Your response must be supported with appropriate figures and/or monitoring data. - If any additional storage tanks are required during normal operation, the information below will be required: <ul style="list-style-type: none"> (i) Technical description (ii) Storage capacity (iii) Storage time (iv) Confirmation of suitability of materials for storage of leachate (v) Monitoring systems and accident mitigation (vi) Compliance with BAT.

	<ul style="list-style-type: none"> • Leachate treatment and discharge <ul style="list-style-type: none"> - Confirmation of how the LTP will be operated to manage the additional requested flow. - Provide an outline of the treatment process and discharge scenario during both normal operation and 'emergency mode'. This is particularly important during emergency mode when the effluent is discharged direct from the SBR's. - Will sufficient capacity and retention time in the existing SBR's be available to ensure that the effluent remains appropriately treated during emergency mode prior to discharge outside of the high tidal window? - If it is your judgement that the existing treatment capacity is sufficient to process the increased throughput of leachate this will need to be justified in the application with supporting evidence / explanation. - How will you ensure that the effluent discharged during emergency mode remains compliant with the permit ELVs? What operational controls / measures will be in place? - Provide a definition of 'emergency mode' including confirmation of the operational on-site (e.g. monitoring) criteria that will be used to determine the start and end of 'emergency mode' • Containment for pollution control <ul style="list-style-type: none"> - Is there sufficient containment in place? If additional leachate storage capacity is to be put in place then consideration should be given to whether additional containment is necessary. - You should demonstrate how any additional storage (if required) will comply with BAT and industry best practice.
Responses to additional queries	<ul style="list-style-type: none"> • You asked whether the permit limits in table S3.1 would be altered as part of a variation and whether any additional parameters would be added. <p>It is not possible to say at this stage. This would depend on (a) the results of your monitoring of leachate flows into the LTP to</p>

	<p>determine whether hazardous pollutants are present, and (b) the results from your impact assessment of hazardous pollutant discharges to surface water, required as part of your variation application.</p> <ul style="list-style-type: none"> You asked whether Direct Toxicity Assessment (DTA) was still required and if so what procedures should be followed. Your request to remove the need to test fish on 'conscientious grounds' was also noted. <p>Our view is that annual monitoring of treated effluent using DTA will no longer be required. We will remove DTA monitoring from the permit upon request by the operator within their variation application.</p> <ul style="list-style-type: none"> You asked whether the proposed variation would have any effect on subsistence charged. <p>Based on the information we have at the moment, varying the Section 5.4 A(1)(a)(i) listed activity, and consolidating the two existing permits should not have any effect on subsistence.</p> <ul style="list-style-type: none"> You asked whether permit condition 3.1.3 in relation to the periodic monitoring of soil and groundwater could be removed because the site is built on an old landfill. <p>There is provision in our guidance for operators to not have to comply with the periodic monitoring requirements of condition 3.3.1 in your permit. If you believe we should not require periodic monitoring of groundwater and soil as a condition in your permit, you should justify this as part of your environmental risk assessment in terms of a systematic appraisal of the risk of contamination. We will review this during the determination.</p>
Informatives	<ul style="list-style-type: none"> In consolidating your existing permits we will retain the requirement for treated effluent to be discharged in the period just following high tide as per the existing WDA permit, unless the plant is operating in emergency mode. We will consider how best to achieve this during our determination of the variation application. For example, it could be via a bespoke condition, or as a footnote to table S3.1 of the installations permit. The permit will thus be conditioned to make it clear when the discharge is permitted to take place with respect to the tidal cycle. This is why you have been asked to define 'emergency

	mode.' We anticipate including this definition in Schedule 6 of the permit (Interpretation) in order to formalise this operational scenario.
--	--

A complete application must contain the following information below:

Declaration	Please ensure the declaration section in Form F1 is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary
Payment	Please note your application will not be processed until we receive the full payment.

Part B

As part of this service we have provided you with the following information regarding the surrender of the WDA permit:

Application reference number	SWWA 289/1/1 (Surrender)
Habitats screening	N/A
Documents attached	N/A
Application charge required	Free - no charge
Forms required to be submitted	<p>Fully completed version of forms A and E1 will need to be submitted. If sections are not applicable to your permit please indicate this rather than leaving a section blank.</p> <p>Please ensure you download the latest version of the forms, as your application will be returned if an old version of the forms is used. The forms are available at:</p> <p>https://www.gov.uk/guidance/change-transfer-or-cancel-your-environmental-permit</p> <p>You must read all accompanying guidance when completing the forms to ensure you do not miss anything out.</p>

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

Page 12 of 15

Additional documents required	None
Additional information	<p>We recommend that the operator explains in an application cover letter / email that they are surrendering this permit because it is being consolidated into their installations permit via a separate variation application. The operator should also reference this pre-application advice letter in their correspondence.</p> <p>Please ensure the declaration section in Form E1 is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.</p>

What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: [EPR/CP3731LZ/V005](#).

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to:

psc@environment-agency.gov.uk for your substantial variation application, and

psc-waterquality@environment-agency.gov.uk for your surrender application.

We are not currently processing paper applications as our offices are closed. Any applications submitted via post will be stored at the Permitting Support Centre until we are able to re-open the office. For further information, please check our latest operational update on the [Environment Agency website](#).

Current application timescales

Dealing with the impact of COVID-19

We are following Government advice to manage the risks of Coronavirus to our organisation, to protect the health, safety and wellbeing of our staff and sustain our critical operations.

We are doing all we can to maintain our service, however it may take us longer than usual to respond to you. It is important that you inform us of any applications that are critical to maintain national resilience, national infrastructure and critical environmental protection.

customer service line **03706 506 506**

floodline **03459 88 11 88**

incident hotline **0800 80 70 60**

Page 13 of 15

Our current queues are large and we are taking longer than usual to allocate work for duly made checks.

Please see the table below for current average queue times for the installations permitting regime.

Application type	Average time on queue
New standard rules	8-10 weeks
New Bespoke	18-20 weeks
Admin variation	6-8 weeks
Minor variation	12-14 weeks
Normal variation	21-23 weeks
Substantial variation	21-23 weeks
Transfer	13-15 weeks
Surrender	15-17 weeks
Medium Combustion Plant	12-14 weeks

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers installations and water discharge activities only. Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

Enhanced pre application cost estimate

At this stage the pre-application advice is expected to cost up to £300 plus VAT. An invoice will be sent separately at a later date.

This pre-application request is now closed.

customer service line 03706 506 506

incident hotline 0800 80 70 60

floodline 03459 88 11 88

Page 14 of 15

We consider this pre application request is now closed however if you have any questions regarding this letter please contact Mike Alexander. If you require additional enhanced pre-application advice please complete our [online form](#).

We look forward to working with you on this project.

If you have any questions please call 03708 506 506.

Yours sincerely

Mike Alexander

Senior Permitting Officer, National Permitting Service

mike.alexander@environment-agency.gov.uk

Nature and Heritage Conservation

Screening Report: Bespoke installations

Reference	EPR/CP3731LZ/V005
NGR	SX5043054460
Buffer (m)	0
Date report produced	28/01/2021
Number of maps enclosed	4

The nature conservation sites identified in the table below must be considered in your application.

Nature and heritage conservation sites	Screening distance (km)	Further information
Special Areas of Conservation (cSAC or SAC) Plymouth Sound & Estuaries	10	Joint Nature Conservation Committee
Local Wildlife Sites (LWS) Plym Estuary	2	Appropriate Local Record Centre (LRC) Appropriate Wildlife Trust

Protected Species	Screening distance (m)	Further Information
Smelt migratory route European eel migratory route Atlantic salmon migratory route Allis shad migratory route Unidentified shad migratory route Sea lamprey migratory route	up to 500m	Environment Agency. Dial 03708 506 506 for your local Fisheries and Biodiversity team



Protected Habitats

Screening distance (m)

Further Information

Mudflats

up to 500m

[Natural England](#)

Where protected species are present, a licence may be required from Natural England or the Welsh Government to handle the species or undertake the proposed works.

The relevant Local Records Centre must be contacted for information on the features within local wildlife sites. A small administration charge may also be incurred for this service.

Please note we have screened this application for protected and priority sites, habitats and species for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be required.

Please note, the enclosed pre-application map(s) is valid for a period of **6 months**. If you plan to submit your application more than 6 months after the map(s) was generated, you must request that the screen is re-run. This will ensure that you have used the most current information on heritage and nature conservation interests in your application.


customer service line
03708 506 506

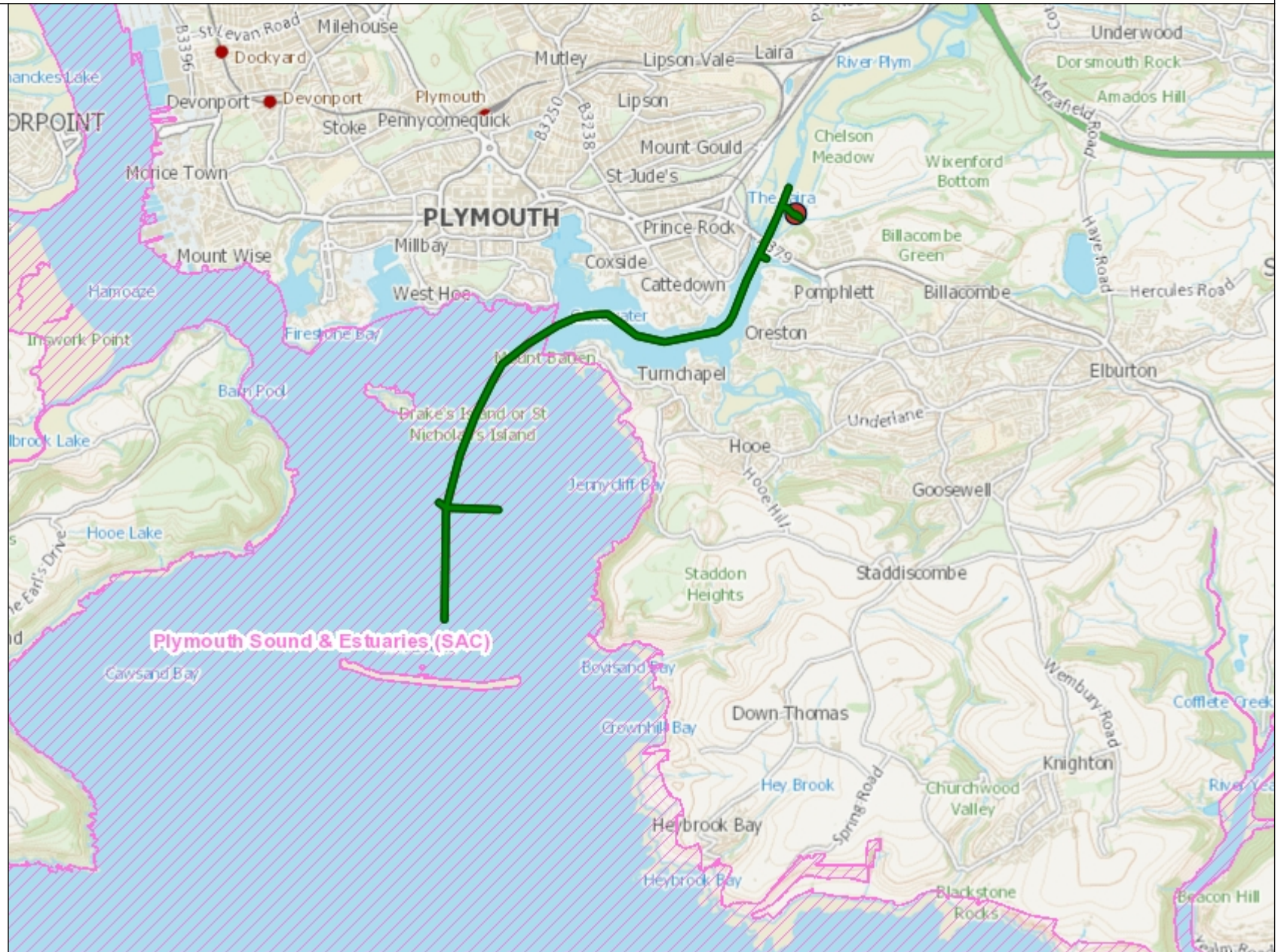
incident hotline
0800 80 70 60

floodline
0845 988 1188

www.environment-agency.gov.uk

Legend

 SAC (England)



1: 50,000

0 1,250

Metres

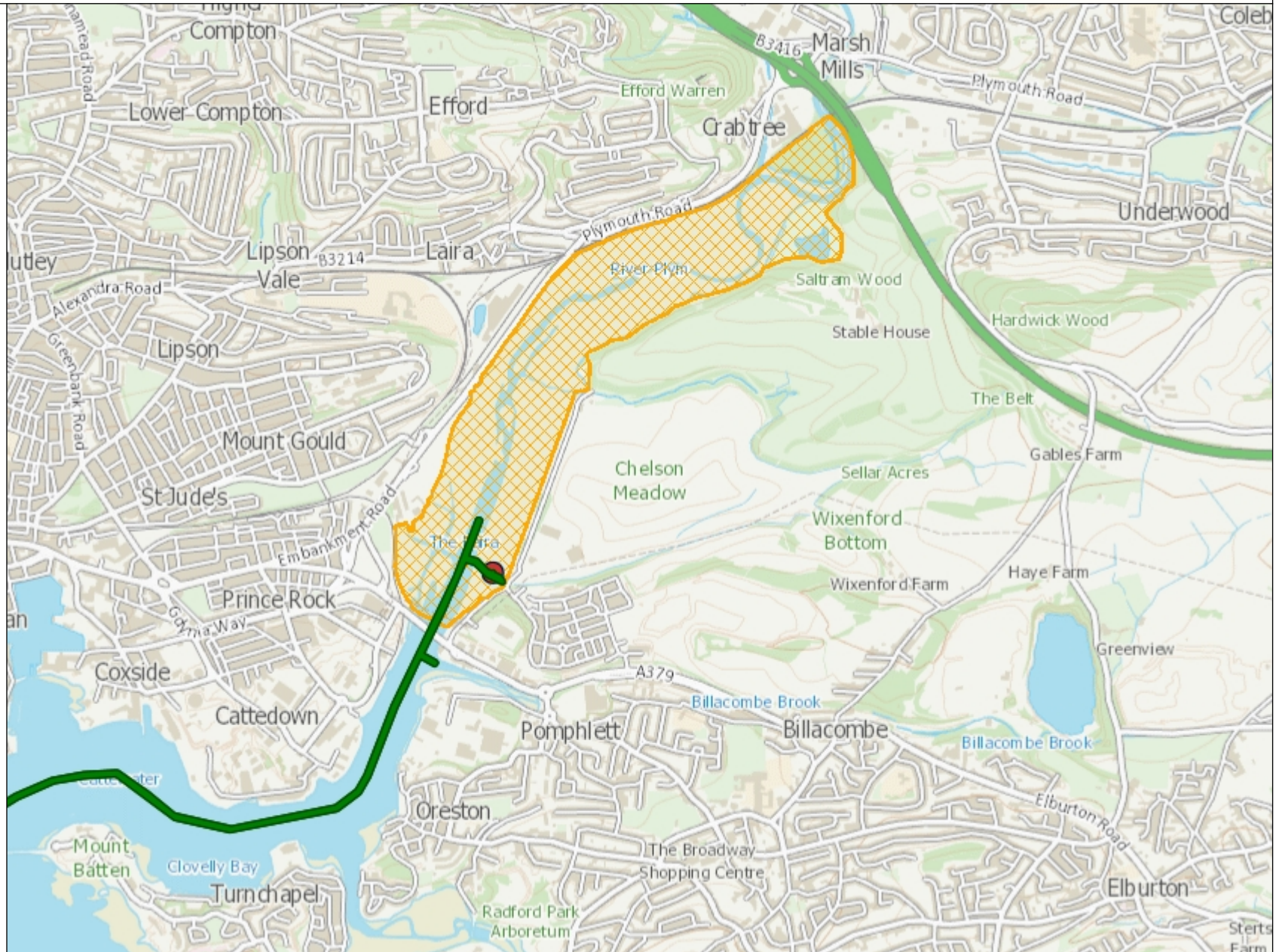


Local Wildlife Site



Legend

 Local Wildlife Sites



1: 25,000

0 625




Metres

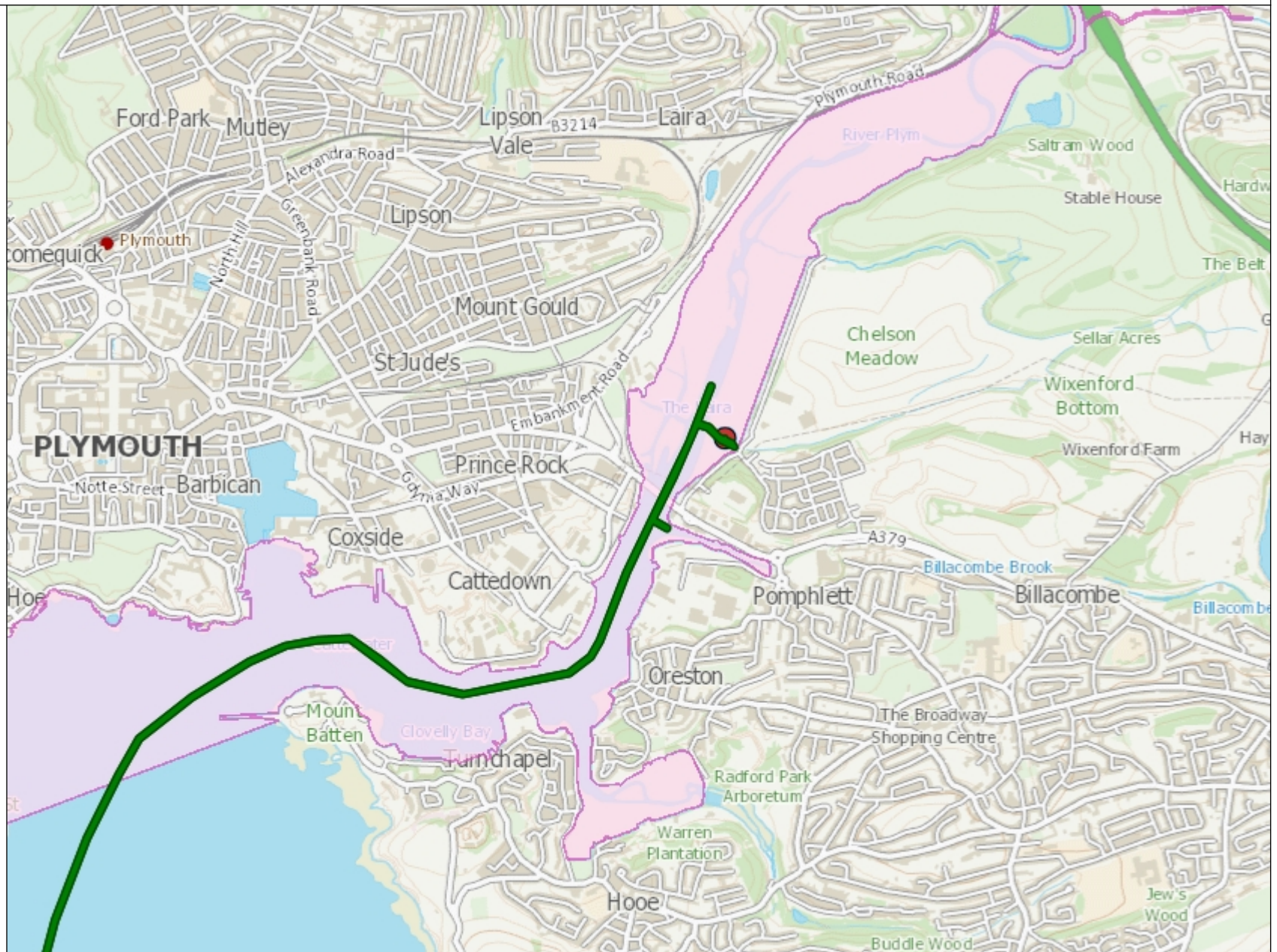


Protected Species

Legend

Protected species screened for Env Permits - complete set

-  Protected species, non fish
-  Protected fish
-  Protected fish migratory route



1: 25,000


0 625

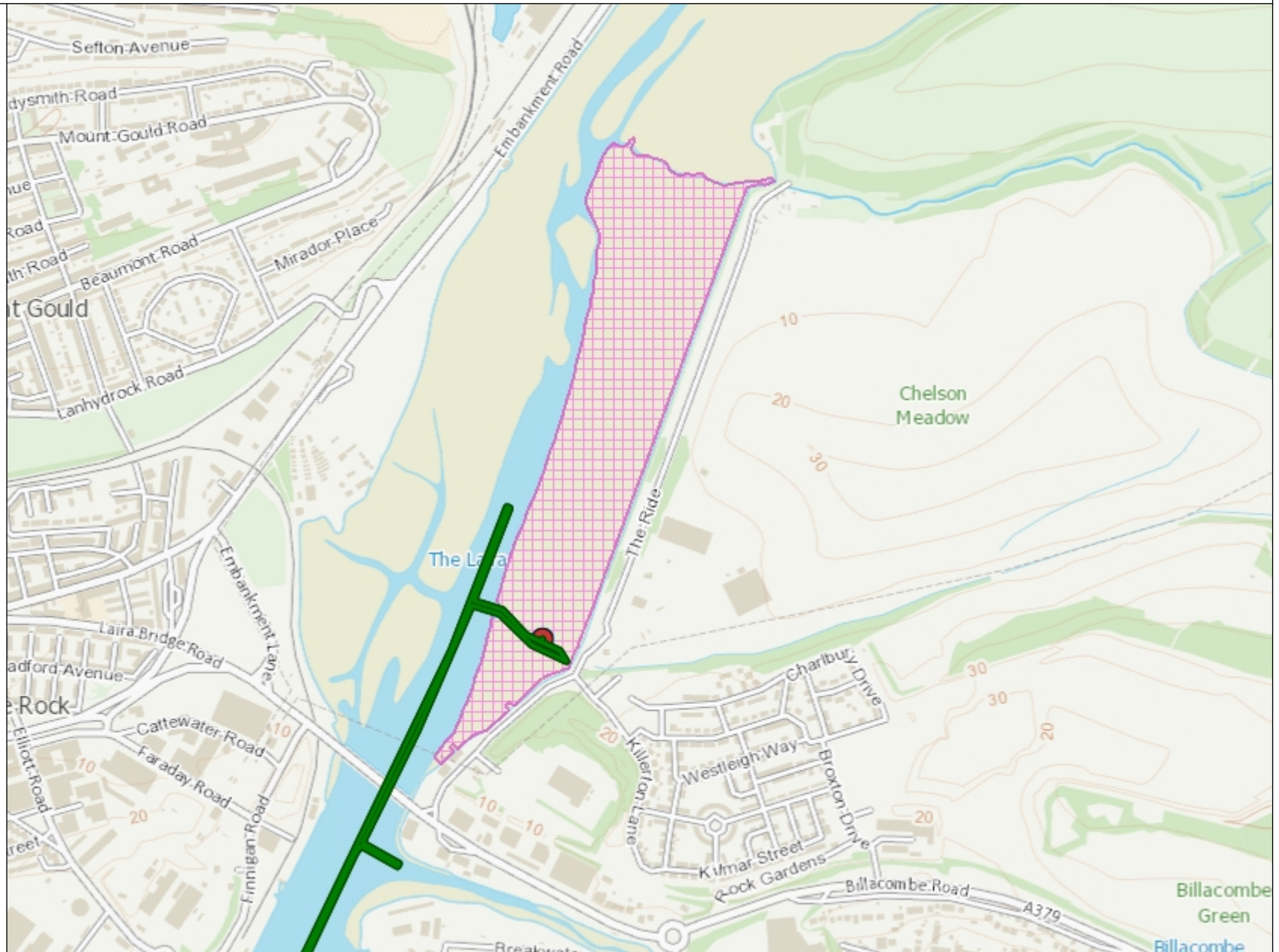
Metres



Protected Habitats

Legend

-  Protected Habitats screened for En Permits



Waste permits: ask for pre-application advice

Q1. Will or does your activity take place in England?

Yes

Q2. What is your main activity?

Using, treating, storing or disposing of waste or mining waste

Q3. Do you only need a free habitats and conservation screening?The screening will tell you if there are protected areas or species close to your site or proposed site. We recommend you ask for a screening before applying for a new site.

No - I would like pre-application advice (you will be able to request a screening as well as advice)

Q4. Is your enquiry only about the resale of car parts?

No

Q5. What is your enquiry about?

None of the above

Q6. Will you be accepting hazardous waste as part of your activity?

No

Q12. Please choose the category your main activity will or does fall into.

Household, commercial or industrial waste site - including household amenity waste and inert waste and aggregate sites

Q22. We can carry out a free nature and heritage conservation screening for you to consider as part of your application. You should request this if you're applying for a new site close to a protected site or species, because: some types of permit may not be allowed, such as a standard rules permit you may have to carry out a risk assessment Please choose your site type below or select 'I do not want a screening'.

Household, commercial and industrial waste, including waste transfer stations, aggregate and inert waste sites and waste treatment facilities and household amenity sites

Q24. What kind of site do you want a screening for?

Waste storage and waste transfer stations - including with or without treatment

Q25. Please select the screening you would like us to carry out.Each screening is specific to the standard rules set described. If you cannot operate within the conditions of a standard rules permit you need to apply for a bespoke permit. In this case, choose 'Bespoke permit screening'.

Bespoke permit screening

Q30. If you have already received pre-application advice regarding this application, you do not need to give us your contact and site details again unless something has changed or you need further advice. Do you only need a screening and want us to use your existing details?

No - I also need pre-application advice or I want to change my contact details

Q31. Enter your pre-application reference number. It will be in the format EPR/AB1234CD/A001. We also need a contact number and phone number in case we cannot locate your details. If you do not have a reference, click 'previous page' and select 'No - I also need pre-application advice or I want to change my contact details'.

Reference number ENVPAP/CP3731LZ/V005

Name Glyn Leppitt

Phone number 07771901418

Q32. Do you have an existing Environment Agency permit or pre-application reference? It's usually in the format EPR/AB1234CD/A001.

I have an existing permit reference

Enter your reference, if you have one.
ENVPAP/CP3731LZ/V005

What is your role?

Consultant or agent

Q33. Your full name

Glyn Leppitt

Q34. Your email address

leppitt-associates@live.com

Q35. Your telephone number

07771901418

Q36. Permit applicant name or business name

Plymouth City Council - ENVPAP/CP3731LZ/V005

Q38. What is the applicant's address?

Building or street	Chelson Meadow LTP The Ride
	-
Town or city	Plymstock, Plymouth
County	Devon
Postcode	PL9 7JA

Q39. What is the site name?

Chelson Meadow Leachate Treatment Plant

Q40. What is the address of the site?

Building and street	Chelson Meadow LTP The Ride
	-
Town or city	Plymstock, Plymouth
County	Devon
Postcode	PL9 7JA

Q41. What is the National Grid reference for the centre of the site? This should be 2 letters and 10 digits, such as ST 58132 72695.

SX50612 54476

Q42. What is the distance from the centre of the site to the site boundary in metres?

10

Q43. The Environment Agency can give free basic pre-application advice on: which application forms you should use what guidance you must follow how much you will need to pay if there are standard rules relevant to your activities and if you meet the criteria for them risk assessments you may need to complete and send with your application the administrative tasks the Environment Agency may need you to do as part of your application Do you need any more advice that is not mentioned here?

Yes

Q44. If you need more in depth advice about your application, the Environment Agency offers an enhanced pre-application advice service. The enhanced service costs £100 an hour plus VAT. For example, this could cover: the type of permit you need complex modelling preparing risk assessments parallel tracking for complex permits with planning applications monitoring requirements (including baseline) what guidance you must follow before you submit your application public engagement plans for high public interest applications Do you need this enhanced pre-application advice service?

Yes

Q45. What chargeable pre-application advice do you need? Try to include any specific technical questions you would like to ask us.

I sent the following question and received this response:
Good morning

Please accept our apologies for the delay in responding.

Unfortunately this isn't something our team can advise on.

You will need to contact our Pre-application Service for advice.

Initial contact is made via the following link

<https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

Once you've submitted your information, someone from the Service will be in touch.

Kind Regards

Annette Morton
Permitting Support Advisor, Permitting Support

Environment Agency | Regulated Industry Team, Permitting Support, NPS Sheffield, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

THE ORIGINAL QUESTION

3c Finances (installations, waste operations and mining waste operations only)

You will need to provide details of any insolvency or bankruptcy proceedings against the applicant or any relevant person, or a company in which you were a relevant person. We may also want to contact a credit reference agency to verify your financial standing. You are giving your consent to this check by completing and submitting the application form. Please note that if you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

3a Relevant offences (installations and waste operations only)

Relevant people

Relevant people for these checks mean each applicant, and in the case of a company, a director, manager, company secretary or any similar officer or employee. In the case of a Limited Liability Partnership (LLP), it includes any partner. It also includes any person who has held a position in a company or LLP when it was convicted of a relevant offence.

Relevant offences

You must tell us if any of the relevant people or the company itself in your application have been convicted of a relevant offence.

A relevant offence is one relating to the environment or environmental regulation. A list of relevant offences can be found by searching for 'Relevant conviction guidance for permit applications for waste activities and installations only' at www.gov.uk or by calling 03708 506 506. If any of the relevant people in your application have been convicted of an offence you must look at our relevant offences guidance. This will help you complete this section and any extra information about the offence that you feel we should take into account.

Post conviction plan

If you are applying to add a waste operation or installation you should provide a post conviction plan. This is your opportunity to explain what steps you have taken to ensure you will not offend again. We will consider the severity of the offences along with your post conviction plan before deciding whether to proceed with your application or refuse it. If you have already provided a post conviction plan that covers all your relevant convictions and you have received a concern letter you only need provide a copy of that letter or, if that is not available, let us know who sent it out.

Hello

I am working on a permit variation on behalf of Plymouth CC.

Trying to complete the application form (I have looked at the guidance on completing the application form – not much help) – I have to answer the two questions above.

I want to make sure I answer it correctly.

Is the finance question to do with Plymouth CC as a whole or relevant individuals within PCC (who would these be? Chief Executive or Councillors?????)

Q45. What chargeable pre-application advice do you need? Try to include any specific technical questions you would like to ask us.

Relevant Offence: Plymouth CC or individual relevant people within PCC (Chief Executive or Councillors????)

Is there a data base to check if PCC has a relevant offence?

From memory I think 7 years was the cut off.

Thank you in advance?

Glyn

Q49. The information you give in this form will not appear on the public register in accordance with our privacy notice (opens in a new tab) but may be made available (disclosed) under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004 when requested. More information can be found on the Information Commissioner's Office website (opens in a new tab) Is there an exception to disclosure under the above mentioned legislation which applies to any of the information you have given in this form?

No

Give your feedback

Q51. Overall, how did you feel about completing this form today?

Dissatisfied

How could we improve this form?

The form cannot be used for the question I have asked.

Glyn Leppitt

From: Haddock, Samantha <samantha.haddock@environment-agency.gov.uk>
Sent: 17 September 2021 16:09
To: glyn.leppitt@outlook.com
Subject: Pre-app request -Plymouth City Council ENVPAP/CP3731LZ/V005

Hi Glyn

I am responding to your request for enhanced pre-app.

The link below has further information on convictions

[Relevant convictions for waste and installations environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/relevant-convictions-for-waste-and-installations-environmental-permits)

As this is a council I would suggest that you consider the Chief Executive and the permitting manager for the site in your convictions.

We do not have a database we can share with you to use.

Thanks

Samantha Haddock

Permitting Team Leader (Bristol Installations)
National Permitting Service (Part of Operations – Regulation, Monitoring and Customer)
Environment Agency | Horizon House, Deanery Road, Bristol, BS1 5AH

My working days are Tuesday - Friday

samantha.haddock@environment-agency.gov.uk

External: 02030 254710

Mobile: 07796997145

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.