

Application for an environmental permit

Part A – About you



You will need to fill in this part A if you are applying for a new permit, applying to change an existing permit or surrender your permit, or want to transfer an existing permit to yourself. Please check that this is the latest version of the form available from our website.

You can apply online for Waste standard rules environmental permits, bespoke waste permits and bespoke Medium combustion plant permits

Apply online for an environmental permit.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

Note: if you believe including information on a public register would not be in the interests of national security you must enclose a letter telling us that you have told the Secretary of State. We will not include the information in the public register unless directed otherwise.

It will take less than one hour to fill in this part of the application form.

Where you see the term ‘document reference’ on the form, give the document references and send the documents with the application form when you’ve completed it.

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1 About you

Are you applying as an individual, an organisation of individuals (for example, a partnership), a company (this includes Limited Liability Partnerships) or a public body?

An individual

Now go to section 2 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

An organisation of individuals (for example, a partnership)

Now go to section 3 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

A public body

Now go to section 4

A registered company or other corporate body

Now go to section 5 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

2 Applications from an individual

2a Please give us the following details

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to section 6

3 Applications from an organisation of individuals or charity

3a Type of organisation

For example, a charity, a partnership, a group of individuals or a club

3b Details of the organisation or charity

If you are an organisation of individuals, please give the details of the main representative below. If relevant, provide details of other members (please include their title Mr, Mrs and so on) on a separate sheet and tell us the document reference you have given this sheet

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to question 3c or section 6

3c Details of charity

Full name of charity

This should be the full name of the legal entity not any trading name.

3d Company registration number

If you are registered with Companies House please tell us your registration number

3e Charity Commission number

If you are registered with the Charity Commission please tell us your registration number

Now go to section 6

4 Applications from public bodies

4a Type of public body

For example, NHS trust, local authority, English county council

4b Name of the public body

4c Please give us the following details of the executive

An officer of the public body authorised to sign on your behalf

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position

Now go to section 6

5 Applications from companies or corporate bodies

5a Name of the company

5b Company registration number

Date of registration (DD/MM/YYYY)

If you are applying as a corporate organisation that is not a limited company, please provide evidence of your status and tell us below the reference you have given the document containing this evidence.

Document reference

5 Applications from companies or corporate bodies, continued

5c Please give details of the directors

If relevant, provide details of other directors and company secretary, if there is one, on a separate sheet and tell us the reference you have given this sheet.

Document reference

Details of company secretary (if relevant) and director/s

Title (Mr, Mrs, Miss and so on)

First name

Last name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to section 6

6 Your address

6a Your main (registered office) address

For companies this is the address on record at Companies House.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

For an organisation of individuals every partner needs to give us their details, including their title Mr, Mrs and so on. So, if necessary, continue on a separate sheet and tell us below the reference you have given the sheet.

Document reference

6b Main UK business address (if different from above)

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

6 Your address, continued

Contact numbers, including the area code

Phone

Fax

Mobile

Email

Now go to section 7

7 Contact details

7a Who can we contact about your application?

It will help us if there is someone we can contact if we have any questions about your application. The person you name should have the authority to act on your behalf.

Please add a second contact on a separate sheet if this person is not always available.

Document reference of this separate sheet

This can be someone acting as a consultant or an 'agent' for you.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

7b Who can we contact about your operation (if different from question 7a)?

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

7 Contact details, continued

7c Who can we contact about your billing or invoice?

Note: Please provide the name and address that all invoices should be sent to for your subsistence fees.

As in question 7a

As in question 7b

Please give details below if different from question 7a or 7b.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

8 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it. More information on how to do this is available at: www.gov.uk/government/organisations/environment-agency/about/complaints-procedure.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

9 Where to send your application

For how many copies to send see the guidance note on part A.

For water discharges by email to PSC-WaterQuality@environment-agency.gov.uk

For waste and installations by email to PSC@environment-agency.gov.uk

For flood risk activity permits send 1 copy only to enquiries@environment-agency.gov.uk or to the local Environment Agency office for where the work is proposed to be carried out.

Or

Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form? _____

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you



For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No

Yes Amount received

£ _____

Appendix 1 – Date of birth information for installation and waste activities (applications for a new permit or transferring a permit) only

Date of birth information in this appendix will not be put onto our Public Register

Are you applying as an individual, an organisation of individuals (for example, a partnership) or a company (this includes Limited Liability Partnerships)?

An individual Now go to 2

An organisation of individuals (for example, a partnership) Now go to 3

A registered company or other corporate body Now go to 4

2 Applications from an individual

Please give us the following details

Name

Date of birth (DD/MM/YY)

3 Applications from an organisation of individuals or charity

Details of the organisation or charity

If you are an organisation of individuals, please give the date of birth details of the main representative below. If relevant, provide details of other members on a separate sheet and tell us the document reference you have given this sheet.

Name

Date of birth (DD/MM/YY)

Document reference

4 Applications from companies or corporate bodies

Name of the company

Please give the date of birth details for all directors and company secretary if there is one. If relevant, provide those details of other directors on a separate sheet and tell us the document reference you have given this sheet.

Details of company secretary (if relevant) and director/s

Name

Date of birth (DD/MM/YY)

Name

Date of birth (DD/MM/YY)

Name

Date of birth (DD/MM/YY)

Document reference

Application for an environmental permit Part E1 – Notification of surrender



(Water discharge activities and groundwater activities)

<p>Fill in this part of the form if you are notifying us of the surrender of all or part of your permit for water discharge and groundwater activities. Please check that this is the latest version of the form available from our website.</p> <p>Please read through this form and the guidance notes that came with it.</p> <p>The form can be:</p> <ol style="list-style-type: none"> 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes. 2) printed off and filled in by hand. Please write clearly in the answer spaces. <p>Note: If you are leaving the premises or moving house you do not have to surrender the permit. You can transfer it to the new occupier using part D1.</p>	<p>If you are considering surrendering a permit to dispose of waste sheep dip, please ensure that you have read the specific points relating to this practice in the guidance notes.</p> <p>It will take less than 30 minutes to fill in this form.</p> <p>Contents</p> <ol style="list-style-type: none"> 1 About your permit 2 About your notification of surrender 3 Surrendering your whole environmental permit 4 Surrendering part or parts of your environmental permit 5 Date on which you want to surrender the whole permit or parts of the permit 6 Privacy notice 7 Declaration 8 Where to send your notification 9 How to contact us
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Each individual who is applying for their name to appear on the permit must complete the declaration in section 7. You will have to print a separate copy of the declaration page for each additional individual to complete.

1 About your permit

1a Permit number

What is the permit number that this notification relates to? _____

1b What is the name of the operator or operators who hold this permit?

Name of the public body or company (if applicable) _____

Title (Mr, Mrs, Miss and so on) _____

First name _____

Last name _____

Title (Mr, Mrs, Miss and so on) _____

First name _____

Last name _____

If there are others, provide their details on a separate sheet and tell us the document reference you have given this sheet _____

1c Site details

What is the name, address and postcode of this site?

Site name _____

Address _____

Postcode _____

6 Privacy notice

The Environment Agency runs the environmental permit application service.

We are the data controller for this service. A data controller determines how and why personal information is processed.

Our personal information charter explains:

- your rights
- what we do with your personal information

We're allowed to process your personal information because we have official authority as the environmental regulator. We need this information to carry out a task in the public interest that is set out in law. As the data controller, when you apply for an environmental permit, we have a legal obligation to process your personal data under the Environmental Permitting Regulations. The second lawful basis for processing your personal data is to comply with this legal obligation.

We need your personal information to process your environmental permit application. If you do not give us this information we cannot issue a permit to you. After we've issued a permit to you, we use your personal information:

- to check that you're complying with your permit
- during any potential enforcement action

What personal information we collect

If you're the individual applicant, director or company secretary of a company applying or a technically competent manager we need your:

- name
- address
- email address

If you're the agent, consultant, employee responsible for the activity or the employee responsible for billing and invoicing we need your:

- name
- address
- email address

If you're the applicant we need details of any:

- convictions
- bankruptcy

We also collect any questions or feedback you leave, including your email address if you contact us.

Your responsibility with other people's personal information

If you've included personal information about other people on your application, you must tell them. You must provide them with a copy of this privacy notice so that they know how their personal information will be used.

What we do with your personal information

We use your personal information to help us decide whether to issue you with a permit.

The information is available online on our consultation website during the consultation period. This website is available to everyone so your information may be seen outside the European Economic Area.

After consultation we put all the information you give us in your application on our public register.

If you can demonstrate that any information you send us is commercially or industrially confidential, we'll consider withholding that information from our public register.

If you think that the information you'll send us may be a threat to national security you must contact the Secretary Of State before you apply. You must still send us that information with your application. We will not include this information on our public register unless the Secretary of State decides it can be included.

See the environmental permitting guidance for guidance on national security.

We may use your email address to contact you for user research to improve our service. You don't have to take part in the research.

Where your personal information is processed and stored

We store and process your personal information on servers in the UK. We will not host your personal information outside the European Economic Area.

We do not use your personal information to make an automated decision or for automated profiling.

6 Privacy notice, continued

How long we keep your personal information

We keep your personal information while your permit is in use and for 7 years after you surrender your permit. If the permit is for a landfill site, we keep the data for 10 years after surrender.

Removing personal information from the public register

We will remove your personal information from the public register if:

- you withdraw your application
- we refuse your application and the time limit for appealing the decision has expired or an appeal is dismissed
- the information is no longer relevant for public participation purposes under the Environmental Permitting Regulations

Contact

Our Data Protection Team gives independent advice. They monitor how the Environment Agency uses your personal information.

If you have questions or concerns about how we process personal information, or to make a complaint or request relating to data protection, please contact:

Address: Data Protection Team
Environment Agency
Horizon House
Deanery Road
Bristol
BS1 5AH

Email: dataprotection@environment-agency.gov.uk

You can also make a complaint to the Information Commissioner's Office (ICO).

The ICO is the supervisory authority for data protection legislation. The ICO website has a full list of your rights under data protection legislation.

7 Declaration

If you knowingly or carelessly make a statement that is false or misleading in relation to this environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

A relevant person should make the declaration (see guidance notes on part E1). An agent acting on behalf of an applicant is NOT a relevant person.

If there are joint permit holders each must complete their own declaration.

I declare that the information in this notification is true to the best of my knowledge and belief.

If you deliberately make a statement that is false or misleading you may be prosecuted.

Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

Name
Title (Mr, Mrs, Miss and so on) _____
First name _____
Last name _____
On behalf of (if relevant; for example, a company or organisation) _____
Today's date (DD/MM/YYYY) _____

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.

A relevant person should make the declaration (see guidance notes on part E1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this notification is true to the best of my knowledge and belief.

Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

7 Declaration, continued

Name
Title (Mr, Mrs, Miss and so on) _____
First name _____
Last name _____
On behalf of (if relevant; for example, a company or organisation) _____
Today's date (DD/MM/YYYY) _____

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.

A relevant person should make the declaration (see guidance notes on part E1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this notification is true to the best of my knowledge and belief.

Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

Name
Title (Mr, Mrs, Miss and so on) _____
First name _____
Last name _____
On behalf of (if relevant; for example, a company or organisation) _____
Today's date (DD/MM/YYYY) _____

8 Where to send your notification

For how many copies to send see guidance notes.

If your application is not complete we will return it to you. If you aren't sure about what you need to send, speak to us before you submit your application.

You must do the following:

Complete legibly all parts of this form that are relevant to you and your activities

For part surrenders, provide a plan that meets the standards given in the guidance notes on part E1

Get the declaration completed by a relevant person (not an agent)

Please send your filled-in notification form to:

Email: PSC-WaterQuality@environment-agency.gov.uk

Or

Permitting Support NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Do you want all information to be sent to you by email?

Please tick this box if you wish to have all communication about this notification sent via email (we will use the details we hold)

9 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form? _____

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you



For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No

Yes Amount received

£ _____

~~SOUTH WEST WATER AUTHORITY~~
~~DEVON RIVER AUTHORITY~~

Register of Conditions imposed under Section 7 of the Rivers (Prevention of Pollution) Act, 1951 as extended by the Clean Rivers (Estuaries and Tidal Waters) Act, 1960 and the Rivers (Prevention of Pollution) Act, 1961.

Folio No. 282
Act under which Consent is issued or
Notice is served 1960

Date of Application	Name and Address of Applicant or Person to whom Consent is issued or upon whom Notice is served imposing or varying conditions	Full Address or other sufficient description of land or premises to which the conditions relate including reference to plans if any
1-7-1983	Devon County Council County Hall Exeter Devon	Discharge of trade effluent from Chelson Meadow Refuse Tip, Devon to the estuary of the River Plym - as described in Form P/A/1 dated 1 July 1983 and accompanying drawings.

(a) General

The terms of this Consent will not, without the consent in writing of the person to whom this Consent is given (or his successor) be altered before the expiration of the period ending with the seventeenth day of August 1985.

(b) As to outlet

The 800 mm plastic pipe outlet shall be sited at NGR SX 50425445 and used only for the discharge of tip leachate during the period from the time of high water plus half an hour up to the time of high water plus two and a half hours.

*x 50435446 me see LLS BGR. DGR/WO/W2 dld.
7395
d.*

(c) As to discharge

1. The maximum rate of discharge of effluent to controlled waters shall not exceed three thousand two hundred and forty (3240) cubic metres (712000 gallons) in any one hour
2. The maximum volume of effluent discharged to controlled waters shall not exceed twelve thousand nine hundred and sixty one point seven six (12961.76) cubic metres (2,851200 gallons) in any period of twenty-four (24) hours.
3. For the purpose of applying the aforementioned conditions a sample taken from the measuring weir shall be deemed to be the same as a sample taken at the outfall to the controlled waters.

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**
incident hotline **0800 80 70 60**

floodline **03459 88 11 88**

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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 duty 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.
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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

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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**

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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.

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