

30/07/2025

**Enhanced Preapplication Advice - EPR/EB3135AD/P001
Recorra Limited - Juliette Way Materials Recycling & WEEE ATF**

Original Query:

Can you confirm that the provision of two alternative site layouts to illustrate the presence of ITAD and the eventual replacement with the bin lift, small conveyor, and compactor under one application, is the appropriate approach?

Please can you confirm the scope of the application and documents required.

What are the relevant application fees?

Currently permitted activities:

- Standard Rules SR2008No14_75kte – Material Recycling Facility
- Standard Rules SR2008No23_75kte – Waste Electrical and Electronic Equipment Authorised Treatment Facility (ATF) excluding ozone depleting substances
- S2 waste exemption: storing waste in a secure place.

Variation fee to change from the above permits/exemption to a single bespoke permit:

Application Fees

MRF - 1.16.11 - £3,965 (normal variation)

Physical treatment of hazardous waste – 1.16.12 - £3,965 (normal variation).

Metal recycling site - mixed metals - 1.16.16 - £4,732 (normal variation)

Hazardous Waste Transfer Station - 1.16.5 - £7,969 (application for new activity)

Clinical Waste Transfer Station - 1.16.7 - £7,930 (application for new activity)

Management Plans and Other Assessment Fees

Fire Prevention Plan Assessment – 1.19.3 – £1,241

Odour Management Plan – 1.19.6 - £1,246

Pest Management Plan - 1.19.4 – £1,241

Habitats Assessment - 1.19.2 - £779 (there are two SSSIs within screening distance of the facility – see screening report).

Potentially Noise Impact Assessment and Noise Management Plan Assessment (see notes below) – 1.19.7 - £1,246

Total = £34,314 with Noise Management Plan Assessment

Total = £33,068 without Noise Management Plan Assessment

Abatement Option

If you were to decide to apply for the above activities, there is the possibility we would consider a fee abatement due to the high cost. This means we would keep a more detailed record of the amount of time we spend on the application with the potential for a refund if we have not accounted for the full cost of the application in permitting time. We decide whether to grant charge abatement and refunds on a case-by-case basis, therefore they are not guaranteed. If you would like us to consider this, please include your request in your application documents such as your covering letter. You can find more information regarding this in section 7.4 of our charging guidance [Environmental permits: when and how you are charged - GOV.UK](#)

Required Management Plans.

Based on the activities listed in the charging section and proposed waste types, you would need to provide: a Fire Prevention Plan, Odour Management Plan and Pest Management Plan.

The storage and treatment of the proposed waste types would present a fire, odour and pest risk therefore these plans would be appropriate.

Noise Impact Assessment/Noise Management Plan:

You will need to read our risk assessment guidance regarding noise emissions as we cannot advise you on this without more specific details of the proposals.

Factors to consider include whether any activities will take place outside the building, the hours of operation, background noise levels from other noise sources such as roads, rail and industry and the proximity of residential receptors.

The following guidance should be helpful.

[Risk assessments for your environmental permit - GOV.UK](#)

[Noise and vibration management: environmental permits - GOV.UK](#)

[Noise impact assessments involving calculations or modelling - GOV.UK](#)

If you wish, we can carry out a noise screening as further enhanced pre-application advice. You would need to submit another pre-application advice request and provide more specific information about the proposed activities and more details of the proposed operation. Noise screenings are charged at the rate of £100 (1 hour of our time).

Application Forms.

Parts A, C2, C4 and F

You will need to complete the new bespoke permit application forms, but your application would be a variation. This is because we treat a change from standard rules permits to bespoke similarly to new permit applications. As part of the application process, we will consult external partners, and the application will be publicised on our website.

Technical Standards.

The application form will prompt you to list the technical standards that will be used in the operation of the facility. You can find these listed in the relevant sections of our guidance here: [Technical guidance for regulated industry sectors: environmental permitting - GOV.UK](#)

You will be expected to state which of the relevant appropriate measures (inert and non-hazardous waste, chemical waste, healthcare waste and WEEE) you will follow or provide justification for any other standards you will use. Please read question 3a of form C4 and the associated guidance for help with this. As discussed in our call, you will need to provide information regarding appropriate measures with your application with more detail of your proposals for the higher risk activities such as clinical/healthcare and chemical (hazardous) waste storage and transfer.

General Requirements.

In addition to the application forms and required management plans, you will have to provide:

Environmental Risk Assessment

Use the source-pathway receptor model to consider the potential impacts to the environment and human health and how these impacts will be mitigated.

Ensure you explain the use of the building and how you will minimise and control all the potential emissions to air, surface water and groundwater. You will need to acknowledge the presence of the nearby protected habitats and other receptors and include consideration of the site being in a Flood Zone 3. Also consider the location of nearby residential receptors and how you will ensure they are not affected by any potential emissions from the facility.

Hazardous Waste Storage details.

This overlaps with the requirements to show the site will operate in accordance with appropriate measures guidance. Include a clear description of where and how the various types of waste will be stored so we can understand how you will prevent their accidental release into the environment. Some of the proposed wastes will be hazardous liquids, so we will need specific information about the primary and secondary containment measures that will be used to store them. Our guidance has a specific section for hazardous waste storage that covers this [Chemical waste: appropriate measures for permitted facilities - 4. Waste storage, segregation and handling appropriate measures - Guidance - GOV.UK](#)

Environmental Management System (EMS) summary.

Please do not just provide an EMS contents page to cover this as this will be rejected when your application is checked at validation. You will need to describe what the EMS contains. Refer to the Part B2 application form guidance for what to include [Form guidance EPB: Application for an environmental permit – Part B2 general – New bespoke permit](#)

Site Plans.

- A location plan showing the site boundary and nearby identifiable features in line with our guidance – for inclusion in the permit.
- A site layout plan
- A drainage plan that also shows the site surfacing
- Plan showing the location of nearby receptors
- Any site plans required to support the management plans.

Site Condition Report.

When you wish to surrender the permit, you will be required to demonstrate the site has been returned to the condition it was in prior to the permit being issued. The best way to do this is to submit a Site Condition Report with your application that creates a record of the site condition prior to permit issue. It should be produced in line with our guidance [RGN 9: Surrender - GOV.UK](#). You should include consideration of the operation of the site under the standard rules permits and exemption.

The provision of a Site Condition Report is not compulsory, but it could make it difficult to surrender the permit if you do not provide one.

Additional guidance and a template can be found here: [Environmental permitting: H5 Site condition report - GOV.UK](#)

Waste Codes and Tonnages.

You will need to provide a list of waste codes to be included to the permit.

The list you previously provided includes hazardous wastes, therefore we would include a limit in the permit restricting the maximum storage of hazardous waste to 50 tonnes in aggregate at any one time. The facility would also be limited to treating less than 10 tonnes per day of hazardous waste (this limit does not apply to WEEE wastes being treated for repair or refurbishment). If you wish to exceed these limits, you will need to apply for an installation permit.

Guidance and templates for the various emissions plans can be found on the .gov website. Please let me know if you need help finding this information.

Advice Regarding Changing the Site Layout.

Your first question relates to whether two site layouts may be proposed at the point of the bespoke permit application, with one superseding the other when you relocate the ITAD to a different facility. I discussed the situation with our local permit compliance team. I can advise that if there is no change in risk at the facility, you would be able to change the site layout without a permit variation. Examples of a change in risk would be (not an exhaustive list): activities moving closer to receptors, indoor operations moving outdoors, changes in the hours of operation or greater traffic movements on site. You will have to do your own risk assessment.

Before you make the change, you would need to inform the local Environment Agency team in writing and provide the updated layout plans.

Please note the above advice is provided in response to the questions posed and following our phone call on 25/07/2025. Our approach to a variation may be different to the above when we have considered more detailed proposals submitted with an application.

Paul Dupont
Senior Permitting Officer
Waste Permitting Regime.