



Non-Technical Summary

Sheffield IBA Facility

Blue Phoenix Limited

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Basis of Report

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Appendix A Pre-Application Advice



1.0 INTRODUCTION

SLR Consulting Limited (SLR) has been instructed by Blue Phoenix Limited (BPL) to prepare an environmental permit variation application for their Sheffield IBA Processing Facility, Beeley Wood Recycling Village, 2 Beeley Wood Lane, Sheffield, South Yorkshire, S6 1QT (hereafter referred to as 'the Site').

This Non-Technical Summary (NTS) provides a summary of what is being applied for, the regulated facility and outlines the key technical standard and control measures that will be implemented at the Site as a result of the risk assessments.

In addition to this NTS, the EP variation application comprises the following documents:

- Section 2 - Application Forms Part A, C2, C3 and F1;
- Section 3 – Best Available Techniques Assessment;
- Section 4 – Environmental Risk Assessment;
- Section 5 – Site Condition Report;
- Section 6 – Dust Assessment
- Section 7 - Dust and Emissions Management Plan;
- Section 8 - Drawings; and
- Section 9 – CIRIA C736 Risk Assessment.

1.1 Site Location

The Site is centred on National Grid reference SK 32129 92089, on an industrial park on the outskirts of Sheffield. The Site lies within the local authority of Sheffield City Council. Access to the Site is gained via an internal road to the Beeley Wood Recycling Park off Clay Wheels Lane to the south-east of the Site. The Site boundary is defined by a perimeter fence on the east, south and west sides and a retaining wall to the north.

The Site is bordered to the north by woodland, beyond which lies a railway line and then agricultural land. Land to the south and west of the Site consists of woodland, some of which comprises the Beeley Wood West Ancient & Semi-Natural Woodland. To the south and east of the Site are industrial premises within the Beeley Wood Recycling Village.

The closest residential properties lie on Middlewood Road North, approximately 200m to the south. The River Don lies 115m to the south of the Site.

1.2 Pre-Application Discussions with the Environment Agency

Basic pre-application advice was obtained from the Environment Agency (EA) on 13/07/2022.

Enhanced pre-application discussions was provided by the EA on 08/01/2024.

A copy of the pre-application advice received can be found within Appendix A.

2.0 SUMMARY OF THE REGULATED FACILITY

The Site is an existing Incinerator Bottom Ash (IBA) processing facility undertaking the following activities:

- Receipt and acceptance of unprocessed IBA on an area with an impermeable surface and sealed drainage;



- Storage of IBA in the open on an impermeable surface for a period of time for conditioning prior to further processing;
- Storage of surface water run-off in a lagoon;
- Processing of conditioned IBA inside an enclosed building comprising vibrating screens and magnetic separation to remove the ferrous and non-ferrous metals and grading the product into different sizes; and
- Storage of processed IBA and metals on an impermeable surface prior to despatch off-site for recovery.

The facility is currently permitted to accept no more than 200,000 tonnes per annum (tpa) of IBA, which is produced by off-site Energy from Waste facilities (EfW). Unprocessed IBA is imported to the Site and stored outside for a minimum of three weeks, during which time the IBA is tested to confirm its non-hazardous status. IBA processing provides a sustainable alternative to landfilling, instead processing the material for re-use, as Incinerator Bottom Ash Aggregate (IBAA) replacing the need for primary won aggregates.

The IBA is processed through vibrating screens and magnetic metal separation which removes the ferrous and non-ferrous metals and produces different sized fractions of IBAA to a defined specification. This takes place within the processing building. The finished IBAA is stored within dedicated stockpiles ready for onwards delivery.

All finished IBAA is used as aggregate, ferrous and non-ferrous metals are sent for recycling at an appropriate facility, any unsuitable material is returned to the source energy from waste facility (EfW).

The Site's operating hours are:

- 07:00h-20:00h Monday-Friday;
- 07:00h-16:00h Saturday;
- 07:00h-16:00h Sunday; and
- No operation on Bank Holidays.

3.0 WHAT IS BEING APPLIED FOR?

BPL propose to extend the Site boundary to expand the existing storage area and increase storage capacity at the Site. The proposed extension area will be outside.

To enable this, BPL are applying to vary the Site's environmental permit (EP) (EPR/ZP3492EG/V005) as follows:

- Extension of the current environmental permit boundary to incorporate additional storage space;
 - The extension will increase the Site's maximum storage capacity at any one time from approximately 100,000 tonnes at present to 175,000 tonnes.
- Increase the permitted annual throughput at the site by 100,000tpa, increasing the sites annual throughput to 300,000tpa;
- Addition of a second attenuation lagoon for attenuation of surface water runoff from the Site's extension area; and
- Incorporate a point source discharge to sewer at SK 32263 92013 from the new attenuation lagoon.



4.0 APPLICATION CONTENTS

4.1 Application Forms

Application forms and associated appendices have been completed and are enclosed in Section 2 of this variation application.

4.2 Best Available Techniques Assessment

A BAT Assessment has been completed. The BAT Assessment describes how the extension area will be designed and operated in accordance with requirements outlined within the Waste Treatment BREF, Waste Incineration BREF and Emissions from Storage BREF, and associated BAT Conclusions.

This document also assesses the extension area against the EA Appropriate Measures guidance¹ and EA's draft guidance 'Storing and treating incinerator bottom ash'. This describes how the extension area will be designed and operated in accordance with the requirements outlined within the Appropriate Measures guidance.

The BAT Assessment is enclosed in Section 3 of this application.

4.3 Environmental Risk Assessment

The Environmental Risk Assessment considers odour, fugitive emissions, dust, releases to water, litter, mud, birds, vermin and insects, potential for accidents and incidents and the point source discharge to sewer from the proposed new attenuation lagoon. The assessment concludes that with the implementation of the risk management measures described, potential hazards from the proposed development are not likely to be significant.

This updated risk assessment supersedes those submitted previously in support of the original permit application and any variations to the Site's permit.

The Environmental Risk Assessment is enclosed in Section 4 of this application.

4.4 Site Condition Report Update

The SCR completed for the original permit for the Site in 2010 has been updated to incorporate the extension area.

The objective of the SCR is to record and describe the condition of the land at the site prior to operation, thereby providing a point of reference and baseline environmental data for when the EP is surrendered. The SCR comprises an overview of the site details, condition of the land at EP issue, pollution history, historic contamination and permitted activities. Sections 4 to 7 of the SCR template are maintained and updated during the life of the permit to include any changes to activity and subsequent measures taken to protect the land, pollution incidents and monitoring.

The SCR is enclosed within Section 5 of this variation application.

4.5 Dust Assessment

A Dust Assessment has been undertaken to assess the potential impacts of dust on air quality and local amenity associated with the proposed extension. The potential impact associated with dust emissions on human and ecological receptor locations within the Site

¹ EA Guidance: Non-hazardous and Inert Waste: Appropriate Measures for Permitted Facilities (December 2022)



locale have been assessed using methodologies as outlined within the IAQM mineral dust guidance.

The conclusions of the assessment are that the revised Site operations proposed at the IBA Processing Facility would result in a 'not significant' effect with regard to dust at sensitive receptors within the Site locale, in consideration of the existing and designed-in mitigation measures. The measures proposed are therefore considered appropriate.

The Dust Assessment can be found in Section 6 of this application.

4.6 Dust and Emissions Management Plan

A Dust and Emissions Management Plan (DEMP) has been prepared which outlines the mitigation measures in place at the facility to reduce the residual risk to receptors from fugitive dust emissions. It is considered that with the mitigation measures in place, the risk to receptors from storage, handling, and processing of the materials on Site will be low.

This updated DEMP supersedes those submitted previously in support of the original permit application and any variations to the Site's permit.

The DEMP can be found in Section 7 of this application.

4.7 Drawings

The following drawings have been prepared for the Site and are included within Section 8:

- EP1 Site Location Plan;
- EP2 Site Layout and Environmental Permit Boundary;
- EP3 Environmental Site Setting.

4.8 CIRIA C736 Risk Assessment

A CIRIA C736 Risk Assessment has been undertaken to identify the containment classification for both the extension area's storage slab and proposed attenuation lagoon. The risk assessment identifies implications for the design of the storage slab and attenuation system to comply with the requirements of CIRIA C736 guidance.

A copy of the C736 Risk Assessment was submitted as addendum to the variation application in February 2024.

4.9 Application Fee

The EA's 'Environmental permits: when and how you are charged guidance' (2022) states in Section 3.6.2 that where an operator is increasing the treatment or storage capacity on an existing part A(1) by more than the threshold specified in the Schedule 1 activity description, then this would constitute a substantial variation.

Blue Phoenix are applying to increase the capacity by 200,000 tonnes per annum (average of 548 tonnes per day). As this is in excess of the 75 tonnes per day threshold for an Schedule 1 activity description, the application is considered to comprise a substantial variation..

On the basis of the application being a substantial variation application under 1.16.2.4 (Section 5.4 – non-hazardous waste installation – treatment of slags and ashes) an application fee of £11,121 has been determined in accordance with the EA's Environmental Permitting Charging Scheme (2024). A charge of £779 for a habitats assessment and a charge of £1,241 for assessment of the emissions management plan will also apply to the Site. On this basis, the total charge for the Site is £13,141.



5.0 TECHNICAL STANDARDS AND KEY CONTROL MEASURES

5.1 Technical Standards

Key technical standards laid out in the following documents govern the operation of the plant:

- EA – Non-hazardous and inert waste: Appropriate measures for permitted facilities (December 2022);
- Draft EA guidance – Storing and Treating Incinerator Bottom Ash (February 2023);
- European Commission – Best Available Techniques Reference Document for Waste Treatment (2018);
- European Commission – Best Available Techniques Reference Document for Waste Incineration (2019);
- European Commission - Best Available Techniques Reference Document for Emissions from Storage (2006);
- EA – Control and monitor your emissions for your environmental permit (November 2022);
- EA – Risk assessment for your environmental permit (August 2022);
- EA – A1 installations: environmental permits (April 2023).

5.2 Key Control Measures

The key technical standards and control measures that are necessary to ensure the Site does not give rise to significant environmental impact have been determined through the risk assessment process and are summarised below:

- The extension area will be provided with a concrete surface which drains to a concrete attenuation lagoon. Surface water run-off will be captured and reused for dust suppression or discharged to sewer;
- Activities will be managed in accordance with an environmental management system;
- Performance against the management system will be audited at regular intervals;
- A dust suppression system will be employed;
- All waste unsuitable for processing (un-burnt material) will be returned to the EfW;
- Daily observational monitoring will be undertaken at the Site boundary for odour, noise, and dust emissions.
- Routine dust monitoring is undertaken at the site boundary to assess fugitive emissions.

6.0 CONCLUSIONS

With the proposed changes to the Site, the Site is still predicted to continue to provide a high level of protection to the environment as a whole.

The Environmental Risk Assessment submitted in support of this variation application determines that there will be a low residual risk to receptors from the Site from the expanded operations.



The Dust and Emissions Management Plan submitted in support of this variation application outlines the mitigation techniques that are in place at the facility to minimise the risk of fugitive emissions from the Site.

BPL is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the company's management system.





Appendix A Pre-Application Advice

Installations basic general pre-application advice

Check if you need an environmental permit

If you are unsure whether your activity requires an environmental permit or what kind of permit you require, you should read our [guidance on whether you need an environmental permit](#).

How do I apply for a new permit?

To apply for a new permit, you must complete the relevant application forms and provide the required supporting information.

For some operations you can apply for a [standard rules](#) environmental permit. These have fixed conditions and are only suitable for a limited number of activities and locations. For all other activities and locations, you need to apply for a bespoke permit.

Standard rules:

- [Apply for a new standard rules online](#)
- You can also use the [application forms for a new standard rules permit](#). You need to email the completed forms, along with supporting documentation, to psc@environment-agency.gov.uk

Bespoke permit:

- To apply for a bespoke installation permit you must complete application forms A, B2, B3 and F1.
- You will also need to complete application form part B6 if your installation includes a point source emission(s) to water, groundwater or sewer.

You should read the guidance notes that accompany each form. You should download the application forms and open with an Adobe Acrobat Reader. You may not be able to complete the form using other pdf readers, such as the one built into your internet browser.

[Application forms and guidance for a bespoke permit application.](#)

You need to email the completed forms, along with supporting documentation, to psc@environment-agency.gov.uk

How do I change, transfer or cancel my permit?

If you already have a permit, and want to change (vary) it, transfer it to another person or business, or surrender it, you must provide the correct forms and supporting information.

[How to change details of your environmental permit, transfer it to somebody else or surrender it.](#)

How much will my permit cost?

Before applying, you should read the [Environmental permitting charges guidance](#). This sets out how to calculate the relevant charge and when certain charges apply.

Baseline charge

You can find a full list of activity charges in table 1 in the tables of charges in the [Environmental permitting charging scheme](#). The baseline charge for an application covers the work the Environment Agency carries out each time they determine a typical permit application.

There are fixed baseline charges for new applications, variations to permits, transfer applications and surrender applications.

Add-on charges

You may have to pay an add-on assessment charge for the assessment of plans, for example an odour management plan.

If we need to carry out additional assessments, for example a habitats assessment, we may charge extra for this work.

You must pay the add-on charge when applying for a new permit or if you need to submit a new plan when applying for a permit variation.

In some cases the costs of assessing these plans is included in the baseline application charge. The activity description in table 1 in the tables of charges will say if this is the case.

The plans and assessments are listed in table 1.19 in the tables of charges in the charging scheme.

Habitats assessment

For certain protected sites we need to carry out a habitats assessment. For these sites we charge a fixed amount of £779.

This is an assessment of the risks to one or more of these sites, a:

- 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
- marine conservation zone within the meaning of the Marine and Coastal Access Act 2009

We have included further information on when this is required in the supporting documents section below.

Subsistence

If we grant a permit, you will need to pay an annual subsistence charge to cover the ongoing costs of regulating the permit. The subsistence charges are listed in the tables of charges in Part 3 of the charging scheme.

Sites of High Public Interest (SHPI)

If your site is designated as a SHPI a different charging process is applied. Additional information on SHPI is included in [section 2.5 of the Environmental Permitting Charges Guidance](#).

- An application for a SHPI is subject to a newspaper advertising charge of £500.
- The number of hours it takes to determine the application will be calculated at £100 per hour (commonly referred to as a ‘time and materials’ charge). If this is higher than the standard application charge listed in the Charging Scheme, the additional charge component will be applied – please see [section 2.5 of the Environmental Permitting Charges Guidance](#).

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 complete a separate copy of the declaration page for each additional individual.
- In the case of a company a relevant person must be an active director/company secretary as listed on [Companies House](#).
- For a limited liability partnership, the declaration must be completed by a partner.
- For a charity, a relevant person is a key post holder: chair, chief executive, director or trustee.

Further information on who should complete the declaration can be found in section 5 of the [guidance notes for the F1 application form](#).

Supporting documents

You need to supply supporting documents with your application. The online guidance and application form guidance explain what documents you need to provide. Depending on the type of application, you might not be required to provide all the documents listed below.

If you do not provide the correct supporting information this may delay the processing your application.

We will check your application to make sure it is complete. We refer to these checks as 'duly making'. This is to ensure we have enough information to start to determine your permit application. We will contact you if information is missing.

If we cannot progress your application past this stage for any reason, we will return it and refund the application charge minus 20% to cover our costs to that point.

We will not charge this if we return an application after having done very little work – for example, because it contained obvious errors or omissions.

The amount we will keep is capped at £1,500.

Once we have duly made an application we will start to determine it. This is when we do our technical checks. We may need to ask you for further information or additional documents at this stage.

Non-Technical Summary

For new bespoke permits and most variation applications you need to send us a simple explanation of your proposed activities (or in the case of a variation, what changes you propose to make). This should include a summary of your operations and a summary of the key technical standards and control measures arising from your risk assessment.

As a guide, this summary document should be no more than one to two pages in length.

Site plan

New installations applications require a site plan. It is also required when you propose to increase or reduce your site boundary.

The plan must clearly show the full site boundary in a single unbroken line. For standard rules permits, the boundary must be in green.

Your plan should clearly mark the site layout, infrastructure and drainage arrangements.

Environmental Management System

For new bespoke permit applications and transfer applications you must send a summary of your environmental management system (EMS). An update to your EMS may also be required for some variation applications. You should follow the [guidance on developing a management system](#).

Habitats risk assessment

You should check if your site is located within the relevant screening distance of a designated site. If so, you need to assess the risk to the site(s) from your activity. You may need to pay an additional charge to cover the assessment of the risk. Further information is included in the 'How much will my permit cost' section above.

To help you identify relevant sites, you can ask us to complete a Nature and Heritage Conservation Screening assessment for you, using the [online pre-application service](#). The screening assessment service is free of charge.

If you are applying for a variation and emissions or impacts are increasing as a result of that change then depending on the location of the facility you may need to assess how the increased impact will affect habitat sites.

Environmental Risk Assessment

For new applications or when you make changes, you must consider 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](#).

You should read our guide to [risk assessments for specific activities](#) and consider using our assessment tool to evaluate your environmental risk. Our assessment tool will inform you when more detailed modelling is required.

You should [check if your site is located in a flood risk zone](#). If the site is in a flood 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.

- If you need to assess the risk of emissions to air, use the [air emissions risk assessment for your environmental permit guidance](#).

You must carry out detailed modelling assessment on any emissions that you didn't screen out through your air emissions risk assessment. Your modelling report needs to follow the [air dispersion modelling reports guidance](#).

- If you need to assess the risk of hazardous pollutants to surface water, you need to follow the [surface water pollution risk assessment guidance](#).

- If you need to assess the risk from sanitary determinands you should follow the [assessment of sanitary and other pollutants in surface water discharges methodology](#).
- If you need to undertake detailed modelling of the risk to surface water you should follow the [surface water pollution risk assessment methodology](#).
- If you need to undertake an assessment of the risk to groundwater you should follow the [groundwater risk assessment guidance](#).

Technical Description and BAT assessment

For new permit applications, you will need to provide a technical description of the activity (or in the case of a variation, the changes you propose to make).

You need to detail the plant, equipment and infrastructure, including design capacities. You must demonstrate how you will meet any relevant [Best Available Techniques \(Including compliance with BAT conclusions where these have been published for your activity\)](#). This should include consideration for any relevant Directives, such as Medium Combustion Plant Directive (MCPD), Energy Efficiency Directive and Waste Framework Directive (WFD).

The technical assessment 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 used (such as bunds) and how this meets any relevant standards. Please see the [pollution prevention guidance](#) for additional advice.

If you are varying your permit, you should detail any existing operating techniques (as listed in table S1.2 of your permit) that are subject to change by the application being made and demonstrate how they will meet any relevant BAT. Note any new equipment or activities are likely to need to meet any new and relevant BAT standards.

Amenity management plans

You must read our guidance on how to [control and monitor emissions for your environmental permit](#).

This includes guidance on controlling pollution from odour, dust, noise, pests and other 'fugitive emissions' (emissions without set emission limits).

You may be required to produce standalone management plans to demonstrate how you will control and monitor emissions. These will be assessed as part of your application. For odour and dust, we can supply a management plan template. The templates have been designed to cover the aspects of your operations that we will assess. You do not have to use this template, but if you do and provide all the

information requested, it makes it more likely your plans will be accepted. You should contact the following teams to request a copy the template:

- Odour: odourteam@environment-agency.gov.uk
- Dust: air.quality@environment-agency.gov.uk

For activities where dust and or odour has the potential to be a high risk, we have included the relevant templates with this advice. You may need to pay an additional charge for the assessment. Further information on this is included in the 'How much will my permit cost' section above.

This also applies to variations which may lead to an increase in emissions as a result of the changes being proposed.

We have included additional notes below on specific considerations for noise impact assessments below.

Risks from Noise and Vibration, Industrial and Commercial Sound and Noise Management Plans

If your risk assessment shows your operation is likely to cause pollution from noise or vibration beyond your site boundary you must [provide a noise impact assessment](#) (NIA) based on BS4142:2014+A1:2019 – 'Methods for rating and assessing industrial and commercial sound'.

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](#).

We have attached some supplementary advice on producing a NIA.

Your NIA must be accompanied by a [Noise Management Plan](#) based on the results of your NIA. We have attached a template to help you produce a noise management plan.

Fire Prevention Plan (FPP)

If you store combustible wastes at your site you need to provide an FPP. You must follow our [guidance on Fire Prevention Plans](#). This tells you what to include in your FPP and the fire prevention measures you must put in place. We have also produced a template to help you prepare your plan.

If you are varying your permit and this will lead to an increased fire risk, then a new or updated plan will be required.

Accident prevention and management plan

Your EMS should include a plan for dealing with any incidents or events that could result in pollution. This should follow our [guidance on producing an accident](#)

[prevention and management plan](#). If applying for a variation, you may need to update this plan to incorporate the proposed changes.

Climate Change Risk Assessment

For new bespoke applications you will need to complete the screening questions in part B2 of the application form. As a result you may need to submit a climate change risk assessment. [Part B2 guidance](#) provides more information on this.

Technical Competence

If your activities include waste management, you must meet [legal operator and competence requirements](#). You will need to send in evidence of appropriate technical competence for the proposed activities (or in the case of variations, the proposed changes). You will need to include valid certificates or other acceptable evidence.

Site condition report

For new bespoke permits or variations to increase the area of your facility you should send us a site condition report which covers the area that will be covered by the permit. This should be in line with our guidance [H5 Site condition report – guidance and templates](#).

This needs 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.

Water Discharges

If your application will include water quality discharges which form part of the same installation facility you must complete the installation application forms and water quality application forms. If the discharge is standalone (not technically linked to the installations facility) on another separate permit you can access pre-application advice [here](#) or follow the guidance [here](#).

Waste Activities

If you require pre-application advice about a standalone waste activity, then you can access advice [here](#). If the waste activity will be included with your installations permit application, and is not a directly associated activity, you should follow the guidance [here](#) and complete application form's part [B4](#) or [B1](#) as appropriate.

Other permissions required

The above advice covers installations activities only. Other permissions from the Environment Agency and/or other bodies may be required for your activity or if you carry out any associated or additional activities, for example:

- [List of activities that need an environmental permit](#)
- [If you abstract or impound water](#)
- [Planning permission](#)
- [If you work on or near a river, flood defence or sea defence](#)

Submitting an application

Please submit your application by email or, if applicable, by using the online form as detailed in the 'How do I apply for a new permit?' section above.

Application Timescales

Our current queues are large, and we are taking longer than usual to allocate work for initial assessment, known as duly making. The table below shows our estimated queue times by application type. Please note, this is based on our average times and some applications may be picked up before or after the timescales listed below.

Application type	Estimated time to allocation
New bespoke	24-28 weeks
New standard rules	21-25 weeks
Admin variation	15-19 weeks
Minor variation	21-25 weeks
Normal variation	25-27 weeks
Substantial variation	41-45 weeks
Transfer	25-29 weeks
Surrender	21-25 weeks

Once an application is duly made, the amount of time taken to determine your application will vary. It will be impacted by factors such as:

- The quality of the application
- The complexity of the application
- Whether an application is of high public interest
- Whether the application includes novel technologies or techniques
- Whether the determination requires input from others, both internal and external to the Environment Agency

- Whether modelling and/or monitoring and assessment is required, for example Air Quality modelling and assessment

The Permitting Officer determining your application will be able to keep you updated with the progress of your application.

I still have questions about my application, and I'd like further advice

If you have remaining basic questions about your application which have not been answered by.gov.uk guidance pages or the advice given in this document (and any supplementary activity document) you can email us with your application specific question to: preapplicationservice@environment-agency.gov.uk

Please quote your unique Environment Agency EPR number found in your pre-app response email. Please note this basic free advice is limited to:

- The correct application charges
- The correct application forms to use
- What guidance you must follow
- Information about administrative tasks the Environment Agency may need you to do as part of your application
- If there are standard rules sets relevant to your activities and if you meet the criteria for them
- Information about risks assessment you may need to do to accompany your application

Alternatively, if you have decided that you now need chargeable enhanced pre-application advice to ask more detailed site-specific technical questions about your application then you will need to complete this [form](#) to access this service, insert your unique EPR number found in the basic pre-app response email when prompted by the form.

This enhanced service could include advice on:

- the type of permit you need
- complex modelling
- preparing risk assessments
- parallel tracking for complex permits with planning applications
- specific substances assessments
- monitoring requirements (including baseline)
- what guidance you must follow before you submit your application
- the correct application charge

Greg Altria

From: Smith, Bethany <Bethany.Smith@environment-agency.gov.uk>
Sent: 08 January 2024 14:56
To: Greg Altria
Cc: Joanna Holland; Taylor, Mark
Subject: RE: Enhanced Pre Application - Sheffield IBA Facility - EPR/ZP3492EG/P001

Good Afternoon Greg,

Apologies for the delay in response I was awaiting a response from the groundwater contaminated land officer. They offered their apologies the comments regarding leachate treatment were made in error related to a different site similarly named I believe. They have rechecked through the documents and their response and confirmed:

The first two requirements are still needed.

- Copies of logs from boreholes drilled in November 2023 to ascertain the ground conditions, groundwater height and extent of groundwater slab.
- There is an incomplete sentence on pg12 in the C736 assessment.

However, the following documents are **not** required:

- A Hydrological Risk Assessment of the discharge – this has been supplied for the sewer.
- Designs for transport and discharge of treated water from the lagoon – this references an incorrect design. I am satisfied with the design drawings and documentation they have supplied.

As such, as long as you progress the project and design as described in the documents and supply the first two requirements, GWCL are satisfied with the proposals from their perspective.

Hope this helps. If you confirm you do not require a meeting, I will draft an updated full response letter removing the irrelevant requests. If we have a call I will await for the outcome of the call to redraft in case this make any changes to the contents.

Kind regards

Beth Smith

Installations Senior Permitting Officer, National Permitting Service
Environment Agency | Lateral, 8 City Walk, Leeds, LS11 9AT

Bethany.Smith@environment-agency.gov.uk

Mobile: 07341796370

Pronouns: she/her

From: Greg Altria <galtria@slrconsulting.com>
Sent: Wednesday, January 3, 2024 9:30 AM
To: Smith, Bethany <Bethany.Smith@environment-agency.gov.uk>
Cc: Joanna Holland <joanna.holland@bluephoenix-group.com>; Taylor, Mark <mark.taylor@environment-agency.gov.uk>
Subject: RE: Enhanced Pre Application - Sheffield IBA Facility - EPR/ZP3492EG/P001

Hi Beth

Happy New Year. I hope you had an enjoyable break.

Thank you for forwarding on the GW&CL team's advice. It's certainly useful to have had this feedback.

With respect to the additional information to submit with the application, I have summarised that requested below and how Blue Phoenix would propose to address.

There is a question regarding one of the points as the section on pg 2 under the heading 'Surface Water' seems to relate to another site for example it discusses mention of a leachate treatment plant within the Non-Technical Summary and the discharge being via 'a series of settlement ponds and ultimately to the water environment'. This is not what is proposed for the extension of the Sheffield IBA facility (there will be no leachate treatment plant and only one attenuation lagoon prior to discharge to sewer). I have checked the Non-Technical Summary submitted with the application to check such statements weren't made in error, but there is no such mention. Please could you revert to query this?

- Copies of logs from boreholes drilled in November 2023 to ascertain the ground conditions, groundwater height and extent of groundwater slab. **Blue Phoenix will update the C736 risk assessment with this information and submit it in support of the application.**
- There is an incomplete sentence on pg12 in the C736 assessment. **Blue Phoenix will update the C736 risk assessment to address this and submit it in support of the application.**
- A Hydrological Risk Assessment of the discharge. **This has already been completed for the discharge to sewer and was submitted with the application.**
- Designs for transport and discharge of treated water from the lagoon. **See query above – no leachate treatment plant is proposed and discharge will be to sewer? Comments appear to relate to another site / scheme?**

Many thanks

Greg

Greg Altria

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From: Smith, Bethany <Bethany.Smith@environment-agency.gov.uk>

Sent: Wednesday, January 3, 2024 8:20 AM

To: Greg Altria <galtria@slrconsulting.com>

Cc: Joanna Holland <joanna.holland@bluephoenix-group.com>; Taylor, Mark <mark.taylor@environment-agency.gov.uk>

agency.gov.uk>

Subject: Enhanced Pre Application - Sheffield IBA Facility - EPR/ZP3492EG/P001

Good Morning Greg,

Happy New Year, I hope you were able to have a break over the festive period.

I received a response from the groundwater contaminated land officer who reviewed the plans and information you provided for this pre application. They provided a written response commenting on various aspects – see attached document. They have included their thoughts, highlighted some missing information and recommended further information to provide with the application.

Once you have had chance to review the information let me know if you would like to arrange a further pre application call to discuss the information, the GWCL officer would be also able to attend a future call to discuss this further if required.

Kind regards

Beth Smith

Installations Senior Permitting Officer, National Permitting Service
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