

Benfleet Soil and Aggregates Recycling Facility

784-B073425

Non-Technical Summary Version 3

Environmental Permit Variation Application

Benfleet Scrap Co Limited

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Document prepared on behalf of Tetra Tech Limited

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1.0 Non-Technical Summary

1.1 Environmental Permit Variation Application

- 1.1.1 This Environmental Permit Variation Application has been prepared by Tetra Tech Limited on behalf of the Operator, Benfleet Scrap Co Limited (Benfleet), in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016 as amended.
- 1.1.2 This application relates to Benfleet's site Benfleet Soil and Aggregates Recycling Facility located at Towerfield Business Par, Fane Road, Benfleet, SS7 3NH and is centred at approximate National Grid Reference (NGR) TQ 78095 90299. The application site is detailed on Drawing Number 2641-005-02A.
- 1.1.3 Benfleet currently hold a Standard Rules Environmental Permit SR2015 No6 (EPR/MP3325SU) for the site [which was issued in July 2020 to D. C. Donovan and transferred to Benfleet Scrap Co Limited in January 2024.](#)
- 1.1.4 It is the intention of Benfleet Scrap to apply for a Bespoke Environmental Permit for a Waste Soil and Aggregate Facility. It was hoped to apply for the new SR 2022 No.1 standard rules permit but it was found that since the original standard rules permit was issued a new protected habitat (deciduous trees) has been found to the south east of the site.
- 1.1.5 This application is accompanied by all relevant documentation, as required by the aforementioned Regulations and in the format set out in the Environment Agency (EA) guidance documents. Details of the supporting documents are provided in the following section.

2.0 Supporting Information

2.1 Application Forms

- 2.1.1 Forms A, C2, C4 and F1 have been included as part of this application. These forms are provided as Appendix A of the Environmental Permit application.

2.2 Pre-Application Discussions

Part C2, Question 1a

- 2.2.1 Pre-application discussions were attempted with the EA but we have not received any response from the EA.

2.3 Type of Variation

Part C2, Question 2a

- 2.3.1 The application comprises of a substantial variation due to the level of assessment and consultation requirements for the increase in annual tonnages and the changes to the standard rules permitting regime.

2.4 Ability as an Operator

Part C2, Question 3b

- 2.4.1 The site will be managed by an individual who possesses the required level of technical competence.
- 2.4.2 Evidence of technical competence for the site has been provided as part of the Operating Techniques document (Appendix B of the Environmental Permit Application).

2.5 Management System

Part C2, Question 3d

- 2.5.1 Benfleet has an accredited environmental management system in place which is compliant with the requirements of ISO 14001.
- 2.5.2 According to the guidance notes that accompany the Part C2 application form, an indicative summary and relevant certificates are to be provided if the proposal involves a waste installation or waste operations. As such, an indicative summary of the site's

environmental management system is provided as part of the Operating Techniques document (Appendix B of the Environmental Permit Application).

2.6 Site Plan

Part C2, Question 5a

- 2.6.1 A site layout plan (Drawing Number 3376-002-03) has been prepared to show the indicative layout of plant and storage areas on-site.

2.7 Site Condition Report

Part C2, Question 5f

- 2.7.1 A Site Condition Report has been provided as Appendix F of the Environmental Permit Application to detail the proposed activity.

2.8 Environmental Risk Assessment

Part C2, Question 6

- 2.8.1 An Environmental Risk Assessment (Appendix C of the Environmental Permit application) has been prepared to consider the potential impact of the proposed activity. The Environmental Risk Assessment (ERA) is concerned with the nature and extent of any linkages between the source of any environmental hazards and the receptors which may be susceptible to harm; such linkages being termed pathways. Where potential for harm is identified, the assessment identifies the management techniques which will be utilised to mitigate such impacts.

2.9 Operating Techniques

Part C4, Question 3a

- 2.9.1 An Operating Techniques document has been prepared that describes how the operating techniques will be implemented at the site.
- 2.9.2 A copy of the Operating Techniques is provided as Appendix B of the Environmental Permit Application.

2.10 General Requirements

Part C4, Table 2

- 2.10.1 According to the EA's 'Control and monitor emissions for your environmental permit' guidance indicates that a dust management plan is required if a site is "*keeping or treating (or both) aggregates, soils, ashes or similar materials*". As such, a Dust Management Plan (Appendix D of the Environmental Permit Application) has been prepared to describe the measures that will be in place to prevent occurrence of dust from the proposed activities.
- 2.10.2 As noted in Section 1.1.4, Benfleet are seeking to retain the existing permitted activities and increase the annual tonnage to 200,000 tonnes. As such there is no intention to accept any waste streams that are putrescible in nature and therefore the risk of odour is expected to be low. In addition, the aforementioned guidance does not indicate that an Odour Management Plan (OMP) is required for the activities that are proposed under this application. As such, an OMP has not been provided to support this application.
- 2.10.3 Nevertheless, the Environmental Risk Assessment (Appendix C of the Environmental Permit Application) and the Operating Techniques Document (Appendix B of the Environmental Permit Application) has been prepared to address how the risk of odour from the proposed changes will be minimised.
- 2.10.4 In addition, a Noise Management Plan (NMP) has been prepared to identify the potential risk of an adverse impact regarding noise from the proposed activities, and to describe the measures that will be in place to minimise the risk of noise. A copy of the NMP is provided as Appendix E of the Environmental Permit application.

2.11 Application Fees

Part F1, Question 1

- 2.11.1 It is considered that the application fee will comprise the following: -

Activity Reference	Description	Application Type	Fee
1.16.12	Physical treatment of non-hazardous waste	Substantial Variation	£7,137
1.19.5	Emissions Management Plan	-	£1,241
1.19.7	Noise and Vibration Management Plan	-	£1,246
Total			£9,624

Drawings

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[2641-005-02B Vr 2 – Visual Dust Monitoring](#)