

Your Ref: EPR/MP3325SU/T006

Our Ref: BEN/B07342/EA-01

Permitting and Support Centre  
Pre-application Service  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

29 April 2025

Dear Sir/Madam

## **Benfleet Waste Transfer Station currently under SR 2015 No 6 EPR/MP3325SU – Pre-Application Advice Request**

This letter is provided in connection with a request for enhanced pre-application advice for the above site. In the following sections we provide the background, a brief description of the proposed activities and the topics that we would like to address as part of our request.

### **Background**

The Benfleet Site is located at Benfleet Scrap Company, Towerfield Business Park, Fane Road, Benfleet, SS7 3NH and is operated by Benfleet Scrap Company (Number 03031502).

The site is situated on an industrial park in between New Thundersley to the south and Rayleigh to the east just to the southeast of the busy junction between the A127 and the A1245 and is centred at approximate National Grid Reference (NGR) TQ 78095 90299. A site location plan is provided below:-



It is the intention of Benfleet Scrap to apply for a Bespoke Environmental Permit for a Waste Transfer Station Soil Washing Facility. It was hoped to apply for the new SR2022 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. Please see the attached EA screening report.

The bespoke permit will be exactly in line with the conditions set out in the new SR2022 No.1 permit so the treatment is limited to sorting, separation, screening, crushing and blending of waste for recovery as a soil, soil substitute or aggregate.

## Summary of Proposal

The bespoke permit will be exactly in line with the conditions set out in the new SR2022 No.1 permit as follows:-

- Only specified waste types will be treated to produce aggregates;
- Only specified waste types will to be treated to produce soils;
- Up to 250,000 tonnes of waste per year to be accepted at the site;
- Up to 75,000 tonnes of waste per year for specified waste types to be accepted at the site;
- Up to 10,000 tonnes of waste for specified waste types to be stored on site at any time;
- Up to 50,000 tonnes of waste to be stored on site at any time;
- Sorting, separation, screening, crushing, and blending; and
- Treatment will be done in accordance with the specified rules as below:-

- enclosures or hoods will be installed on feed hoppers and conveyor outlet points to minimise dust;
- point-source water misting systems or water sprays will be installed over the feed hoppers and outlet points;
- drop heights from equipment and conveyors will be minimised or hoods installed on the outlet points to reduce dust;
- a combination of fixed and mobile dust suppression units will be used to control point sources of dust;
- wind breaks will be used to minimise wind whip and dust from stockpiles and the treatment area;
- plant will be inspected daily and managed to ensure it is operating to minimise the generation of dust; and
- plant and the areas around it and including access roads will be cleaned to prevent dust generation.

## Environmental Permit Application

Owing to the new deciduous trees protected habitat, the proposal will require a Bespoke Environmental Permit Application. We have outlined points which Benfleet Scrap seek clarification from the Environment Agency (EA) to ensure that the correct risk assessments, application documents and fees are provided to minimise any delays during the duly making and determination process.

## Topics to Address under Pre-application Advice

### 1. *Noise Impact Assessment and Management Plan*

We seek clarification as to whether a Noise Impact Assessment will be required to accompany the application. It is crucial to note that the site is located within an industrial park and is situated to another recycling facility plus the junction of the A127 and the A1245.

The additional industrial and commercial properties border the north and east of the site and include car servicing, freight service, several vehicle repair shops, caravan sales and scaffolding service. The proposed activities will not be dissimilar to the activities already occurring in the immediate environment and will only occur within the permitted operating hours. The closest residential receptor is located circa 280m to the south west of the proposed activity. Any additional noise made by this site would have no detrimental impact on the deciduous trees nearby.

A Noise Management Plan will be prepared in support of the application to describe the measures that will be in place to minimise the risk of noise from the proposed activities. Due to the location and scale of the proposals, it is considered a Noise Impact Assessment is not required to support the application.

We believe the proposals to be in a suitable location, inherently similar to the surrounding operations in the industrialised area and that a Noise Management Plan will be sufficient to support the permit application.

## 2. *Concreting of Yard*

Benfleet Scrap would also like to confirm that they will not need to concrete any part of the yard to carry on working in the same manner as they do currently once the new permit is issued. The yard is constructed out of hardstanding at the moment and they wish the EA to confirm that this is still acceptable,

## Summary of Application Documentation

As part of the application, we propose to prepare the following documents: -

**Table 1: Proposed Application Documents**

Document	Description
Application Forms	Completion of the required application forms.
Non-Technical Summary	Summary of the application and documents submitted to accompany the application.
Operating Techniques	Preparation of an Operating Techniques document that details how the soil washing facility will operate.
Environmental Risk Assessment	Preparation of a risk assessment that assesses the risk associated with the proposal and sets out how risks will be managed to an acceptable level.
Dust Management Plan	Preparation of a dust management plan to describe the measures that will be in place to prevent occurrence of dust from the proposed activities.
Noise Management Plan	Preparation of a noise management plan to describe the measures that will be in place to minimise the risk of noise from the proposed activities.
Site Condition Report	Preparation of a baseline site condition report.

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Site Plans	Preparation of site plans including site layout plan, environmental permit boundary, and environmental receptors.
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## Summary of Pre-application Request

To summarise, we request the following to be agreed with yourselves:-

1. We seek confirmation that the scope of the application documents presented in Table 2 is correct and there is no requirement for a Noise Impact Assessment.
2. We seek confirmation that Benfleet Scrap will not need to concrete any part of the yard to carry on working in the same manner as they do currently.

We trust that the above is clear and will be considered in a timely manner. However, should you wish to discuss this in further detail we would be happy to facilitate a teleconference at your earliest convenience and if this is deemed necessary, please feel free to contact the undersigned.

Yours sincerely,

**Michael Jones**

Technical Director

Tetra Tech Limited

## Waste permits: ask for pre-application advice

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

Yes

Q3. Is your pre-application request related to a priority tracked application?

No

Q5. Do you only need a free habitats and conservation screening?

The screening will tell you if there are protected areas or species close to your site or proposed site. We recommend you ask for a screening before applying for a new site.

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

Q6. Is your enquiry only about the resale of car parts?

No

Q8. Will you be accepting hazardous waste as part of your activity?

No

Q14. Please choose the category your main activity will or does fall into.

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

Q25. What type of permit application do you want pre-application advice about?

A change (variation) to an existing permit

Q26. We can carry out a free nature and heritage conservation screening for you to consider as part of your application.

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

I do not want a free screening

Q38. Do you have an existing Environment Agency permit or pre-application reference? It's usually in the format EPR/AB1234CD/X001.

I have an existing permit reference

**Enter your reference, if you have one.**  
MP3325SU

What is your role?

Consultant or agent

Q39. Your full name

Michael Jones

Q40. Your email address

michael.jones2@tetrattech.com

Q41. Your telephone number

07500 072 812

Q42. Permit applicant name or business name

Benfleet Scrap Company

Q43. Company number (if the applicant has one)

03031502

Q44. What is the applicant's address?

**Building or street** Towerfield Business Park, Fane Road,

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**Town or city** Benfleet

**County** Essex

**Postcode** SS7 3NH

Q45. What is the site name?

Benfleet Waste Transfer Station

Q46. What is the address of the site?

**Building and street** Towerfield Business Park, Fane Road,

-

**Town or city** Benfleet

**County** Essex

**Postcode** SS7 3NH

Q47. What is the National Grid reference for the centre of the site? This should be 2 letters and 10 digits, such as ST 58132 72695.

TQ 78095 90299

Q48. What is the distance from the centre of the site to the site boundary in metres?

40

Q49. The Environment Agency can give free basic pre-application advice on: which application forms you should use what guidance you must follow how much you will need to pay if there are standard rules relevant to your activities and if you meet the criteria for them risk assessments you may need to complete and send with your application the administrative tasks the Environment Agency may need you to do as part of your application Do you need any more advice that is not mentioned here?

Yes

Q50. If you need more in depth advice about your application, the Environment Agency offers an enhanced pre-application advice service. The enhanced service costs £100 an hour plus VAT. For example, this could cover: the type of permit you need complex modelling preparing risk assessments parallel tracking for complex permits with planning applications monitoring requirements (including baseline) what guidance you must follow before you submit your application public engagement plans for high public interest applications Please note: we cannot normally confirm whether you qualify for a low-risk surrender charge via enhanced pre-application advice. You should discuss this first with your site officer. You can get contact details for your site officer by contacting 03708 506 506 or [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Do you need this enhanced pre-application advice service?

Yes

Q51. Is your enhanced pre-application request regarding a permanent deposit of waste (landfill or deposit for recovery activities)

No



Q52. What chargeable pre-application advice do you need? Try to include any specific technical questions you would like to ask us.

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Please see attached letter.

Q57. The information you give in this form will not appear on the public register in accordance with our privacy notice (opens in a new tab) but may be made available (disclosed) under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004 when requested. More information can be found on the Information Commissioner's Office website (opens in a new tab)

Is there an exception to disclosure under the above mentioned legislation which applies to any of the information you have given in this form?

No

## Give your feedback

Q59. Overall, how did you feel about completing this form today?

Neither satisfied or dissatisfied

**How could we improve this form?**

Be able to attach letter