



Non-Technical Summary

Otterpool Waste Transfer Station Environmental Permit Application

Countrystyle Recycling Limited

Prepared by:

SLR Consulting Limited

Treenwood House, Rowden Lane, Bradford on Avon,
BA15 2AU

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Basis of Report

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1.0 INTRODUCTION

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare a bespoke Environmental Permit (EP) application for the proposed Otterpool Waste Transfer Station (WTS), located in Ashford, Kent, under the Environmental Permitting (England and Wales) Regulations (as amended) 2016.

This document provides a Non-Technical Summary (NTS) of the bespoke EP application including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed application.

To support this EP application, the following documentation is submitted in addition to this NTS:

- EA Application Forms (Parts A, B2, B4, and F1);
- Environmental (Amenity) Risk Assessment (ERA);
- Operating Techniques (OT) and Waste Acceptance Procedures (WAP);
- Fire Prevention Plan (FPP);
- Dust Management Plan (DMP);
- Noise Impact Assessment and Management Plan (NIAMP);
- Odour Management Plan (OMP);
- H5 Site Condition Report (SCR); and
- Associated Drawings.

1.1 The Site

The site is located on Ashford Road, Kent, TN25 6DA centred on National Grid Reference (NGR) TR 11237 36597. The town of Ashford is located approximately 11km north-west of the site.

The area surrounding the site comprises predominantly agricultural / open land. The English Channel is situated approximately 4.6km south / south-east, and the East Stour Rivers flows in a west-east direction approximately 320m north of the site at its closest point.

The site will be accessed via the A20 Ashford Road which runs adjacent to the site's northern EP boundary. The closest residential receptors are individual properties situated approximately 160m north west, 120m west, 220m south, and 240m east.

The site's location is illustrated on Drawing 01, and the EP Boundary and Site Layout are illustrated in Drawing 02. Local receptors within a 500m radius of the site are shown on Drawing 03, and Cultural and Natural Heritage Receptors on Drawing 04.

Table 1-1 below summarises the surrounding land uses.

Table 1-1: Surrounding Land Uses

Boundary	Description
North	Adjacent to the north is the A20 Ashford Road. Immediately beyond this is a commercial/industrial premises, followed by open ground, and the East Stour River.



Boundary	Description
East	Immediately to the east lies Otterpool Quarry Site of Special Scientific Interest (SSSI), followed by an individual residential property called Mink Farm. The land beyond this predominantly comprises open/agricultural land.
South	Otterpool Quarry SSSI lies immediately south of the site, followed by Upper Otterpool residential property. Open/agricultural land also lies in this direction.
West	The B2067 lies approximately 130m to the west. Land around this largely comprises open / agricultural land, in addition to Otterpool Manor, and Barrow Hill Farm Cottages residential properties, and a small commercial/industrial area.

1.2 Pre-Application Discussions

CRL received enhanced pre-application advice from the Environment Agency (EA) on the 8th of September 2023. The advice confirmed the required contents of the EP application, and the relevant technical guidance, in addition to the EA fee.

The advice is included as Appendix A to this NTS.



2.0 OVERVIEW OF PROPOSED DEVELOPMENT

Countrystyle propose to develop a new WTS facility at their Otterpool site, located on Ashford Road, Kent.

It is proposed that the site will accept up to 95,000 tonnes per annum (tpa) of predominantly non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 12,000 tpa) including nappies and sharps. Waste will be accepted on site for storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal. Treatment on site will only consist of manual sorting, and separation, storage, bulking up and transfer off site for further recover/disposal.

The proposed site will consist of a WTS building, housing designated concrete bays, and containers for the storage of waste including co-mingled recyclable materials, bulky waste, paper and cardboard, residual waste, street sweepings, garden waste, clinical waste, and food waste. A maximum of 300 tonnes of waste will be accepted per day, with a maximum of 1,500 tonnes stored on site at any one time.

Proposed on-site infrastructure will include:

- Office and welfare facilities, including car park;
- Enclosed WTS building;
- Weighbridge and office;
- Vehicle parking and manoeuvring operational area;
- Drainage and water management system,
- Perimeter fencing.

The Site Location is illustrated on Drawing 01 and the EP Boundary and Site Layout is illustrated on Drawing 02.

It is proposed that the area of land within the EP boundary which lies to the east of the weighbridge will consist of unmade ground, as illustrated on Drawing 02. At this stage no waste infrastructure or operations will take place within this area, and all waste operations will be undertaken on impermeable surfacing within the area to the west of the weighbridge. However, CRL wish to include the unmade area of land within the EP boundary at this stage to future proof the site, and provide operational flexibility going forwards. As market conditions dictate, this area of land can be developed by CRL as and when required. Until such a time, the land will not be used for any waste activities that require EA regulation.

2.1 Clinical Waste Transfer Station

It is proposed that the site will accept a small amount of clinical waste consisting of nappies and sharps (approximately 12,000 tpa). Clinical waste will be stored within designated fully enclosed containers inside the WTS building, as illustrated on Drawing 02. The WTS building will benefit from impermeable surfacing and a sealed drainage system throughout.

There will be no treatment of clinical waste undertaken on the site, only storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal. Clinical waste will be stored for a maximum of 5 days.



Clinical waste will be stored and handled, as described in the site’s OT document and in accordance with the EA’s Guidance “*Healthcare waste: appropriate measures for permitted facilities*”¹.

2.2 Specified Waste Management Activities

The proposed site will be regulated as a bespoke waste operation as per the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **R3:** Recycling or reclamation of organic substances which are not used as solvents;
- **R4:** Recycling or reclamation of metals and metal compounds;
- **R5:** Recycling or reclamation of other inorganic materials;
- **R13:** Storage pending recovery or disposal.

2.3 Waste Types, Quantities and Storage

The site will accept up to 95,000 tpa of predominantly non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 12,000 tpa) including nappies and sharps.

All waste will be stored in designated concrete bays or containers within a fully enclosed WTS building which will benefit from impermeable surfacing and a sealed drainage system throughout.

Clinical waste will be stored within a designated bay, within the WTS building as illustrated on Drawing 02. Clinical waste will be stored for a maximum of 5 days (typically removed every 2-3 days) prior to transfer off site to a suitably permitted alternative facility for further recovery or disposal. A maximum of 50 tonnes of clinical waste will be stored on site at any one time.

The proposed waste lists for the site are as listed below in Table 2-1 and Table 2-2.

Table 2-1 Proposed Non-Hazardous Waste Types to be Accepted at the Site

EWC Code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 01	Wastes from mineral excavation
01 01 01	Wastes from mineral metalliferous excavation
01 01 02	Wastes from mineral non-metalliferous excavation
01 03	Wastes from physical and chemical processing of metalliferous minerals
01 03 06	Tailings other than those mentioned in 01 03 04 and 01 03 05
01 03 09	Red mud from alumina production other than the wastes mentioned in 01 03 07
01 04	Wastes from physical and chemical processing of non-metalliferous minerals

¹ [Healthcare waste: appropriate measures for permitted facilities - Waste storage, segregation and handling appropriate measures - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities-waste-storage-segregation-and-handling-appropriate-measures), accessed November 2023



EWC Code	Description
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays
01 04 11	Wastes from potash and rock salt processing other than those mentioned in 01 04 07
01 04 12	Tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11
01 04 13	Wastes from stone cutting and sawing other than those mentioned in 01 04 07
02	WASTES FROM AGRICULTURE HORTICULTURE AQUACULTURE FORESTRY HUNTING AND FISHING FOOD PREPARATION AND PROCESSING
02 01	Wastes from agriculture, horticulture, forestry, hunting and fishing
02 01 03	Plant-tissue waste
02 01 04	Waste plastics (except packaging)
02 01 07	Wastes from forestry
02 01 10	Waste metal
02 02	Wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 03	Materials unsuitable for consumption or processing
02 03	Wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 04	Materials unsuitable for consumption or processing
02 04	Wastes from sugar processing
02 04 01	Soil from cleaning and washing beet
02 04 02	Off-specification calcium carbonate
02 05	Wastes from the dairy products industry
02 05 01	Materials unsuitable for consumption or processing
02 06	Wastes from the baking and confectionery industry
02 06 01	Materials unsuitable for consumption or processing
02 06 02	Wastes from preserving agents
02 07	Wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea, and cocoa)
02 07 01	Wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	Wastes from spirits distillation
02 07 04	Materials unsuitable for consumption or processing
03	WASTES FROM WOOD PROCESSING, AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD



EWC Code	Description
03 01	Wastes from wood processing and the production of panels and furniture
03 01 01	Waste bark and cork
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	Wastes from pulp, paper and cardboard production and processing
03 03 01	Waste bark and wood
03 03 07	Mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	Wastes from sorting of paper and cardboard destined for recycling
03 03 10	Fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
04	WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES
04 01	Wastes from the leather and fur industry
04 01 08	Waste tanned leather (blue sheetings, shavings, cuttings, buffing dust) containing chromium
04 01 09	Wastes from dressing and finishing
04 02	Wastes from the textile industry
04 02 21	Wastes from unprocessed textile fibres
04 02 22	Wastes from processed textile fibres
06	WASTES FROM INORGANIC CHEMICAL PROCESSES
06 09	Wastes from the MSFU of phosphorous chemicals and phosphorous chemical processes
06 09 02	Phosphorous slag
06 09 04	Calcium-based reaction wastes other than those mentioned in 06 09 03
06 11	Wastes from the manufacture of inorganic pigments and opacifiers
06 11 01	Calcium-based reaction wastes from titanium dioxide production
07	WASTES FROM ORGANIC CHEMICAL PROCESSES
07 02	Wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	Waste plastic
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry
09 01 07	Photographic film and paper containing silver or silver compounds
09 01 08	Photographic film and paper free of silver or silver compounds
09 01 10	Single-use cameras without batteries
09 01 12	Single-use cameras containing batteries other than those mentioned in 09 01 11
10	WASTES FROM THERMAL PROCESSES
10 01	Wastes from power stations and other combustion plants (except 19)



EWC Code	Description
10 01 01	Bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
10 01 05	Calcium-based reaction wastes from flue-gas desulphurisation in solid form
10 01 07	Calcium-based reaction wastes from flue-gas desulphurisation in sludge form
10 01 15	Bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14
10 01 19	Wastes from gas cleaning other than those mentioned in 10 01 05, 10 01 07 and 10 01 18
10 01 24	Sands from fluidised beds
10 02	Wastes from the iron and steel industry
10 02 01	Wastes from the processing of slag
10 02 02	Unprocessed slag
10 02 08	Solid wastes from gas treatment other than those mentioned in 10 02 07
10 02 10	Mill scales
10 02 14	Filter cakes from gas treatment other than those mentioned in 10 02 13
10 02 15	Other filter cakes
10 03	Wastes from aluminium thermal metallurgy
10 03 02	Anode scraps
10 03 05	Waste alumina
10 03 16	Skimmings other than those mentioned in 10 03 15
10 03 18	Carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17
10 03 24	Solid wastes from gas treatment other than those mentioned in 10 03 23
10 03 26	Filter cakes from gas treatment other than those mentioned in 10 03 25
10 03 28	Wastes from cooling-water treatment other than those mentioned in 10 03 27
10 03 30	Wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29
10 04	Wastes from lead thermal metallurgy
10 04 10	Wastes from cooling-water treatment other than those mentioned in 10 04 09
10 05	Wastes from zinc thermal metallurgy
10 05 01	Slags from primary and secondary production
10 05 09	Wastes from cooling-water treatment other than those mentioned in 10 05 08
10 05 11	Dross and skimmings other than those mentioned in 10 05 10
10 06	Wastes from copper thermal metallurgy
10 06 01	Slags from primary and secondary production
10 06 02	Dross and skimmings from primary and secondary production



EWC Code	Description
10 06 10	Wastes from cooling-water treatment other than those mentioned in 10 05 10
10 07	Wastes from silver, gold and platinum thermal metallurgy
10 07 01	Slags from primary and secondary production
10 07 02	Dross and skimmings from primary and secondary production
10 07 03	Solid wastes from gas treatment
10 07 05	Filter cakes from gas treatment
10 07 08	Wastes from cooling-water treatment other than those mentioned in 10 07 07
10 08	Wastes from other non-ferrous thermal metallurgy
10 08 09	Other slags
10 08 11	Dross and skimmings other than those mentioned in 10 08 10
10 08 13	Carbon-containing wastes from anode manufacture other than those mentioned in 10 08 12
10 08 14	Anode scrap
10 08 18	Filter cakes from flue-gas treatment other than those mentioned in 10 08 17
10 08 20	Wastes from cooling-water treatment other than those mentioned in 10 08 19
10 09	Wastes from casting of ferrous pieces
10 09 03	Furnace slag
10 09 06	Casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05
10 09 08	Casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07
10 09 14	Waste binders other than those mentioned in 10 09 13
10 09 16	Waste crack-indicating agent other than those mentioned in 10 09 15
10 10	Wastes from casting of non-ferrous pieces
10 10 03	Furnace slag
10 10 06	Casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05
10 10 08	Casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
10 10 14	Waste binders other than those mentioned in 10 10 13
10 10 16	Waste crack-indicating agent other than those mentioned in 10 10 15
10 11	Wastes from manufacture of glass and glass products
10 11 03	Waste glass-based fibrous materials
10 11 10	Waste preparation mixture before thermal processing, other than those mentioned in 10 11 09
10 11 12	Waste glass other than those mentioned in 10 11 11
10 11 16	Solid wastes from flue-gas treatment other than those mentioned in 10 11 15



EWC Code	Description
10 11 18	Filter cakes from flue-gas treatment other than those mentioned in 10 11 17
10 12	Wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 01	Waste preparation mixture before thermal processing
10 12 05	Filter cakes from gas treatment
10 12 06	Discarded moulds
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 10	Solid wastes from gas treatment other than those mentioned in 10 12 09
10 12 12	Wastes from glazing other than those mentioned in 10 12 11
10 13	Wastes from the manufacture of cement, lime, and plaster and articles and products made from them
10 13 01	Waste preparation mixture before thermal processing
10 13 04	Wastes from calcination and hydration of lime
10 13 07	Filter cakes from gas treatment
10 13 10	Wastes from asbestos-cement manufacture other than those mentioned in 10 13 09
10 13 11	Wastes from cement-based composite materials other than those mentioned in 10 13 09
10 13 13	Solid wastes from gas treatment other than those mentioned in 10 13 12
10 13 14	Waste concrete
11	WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO METALLURGY
11 01	Wastes from chemical surface treatment and coating of metals and other materials (for example galvanic processes, zinc coating processes, pickling processes, etching, phosphating, alkaline degreasing, anodising)
11 01 10	Filter cakes other than those mentioned in 11 01 09
11 01 14	Degreasing wastes other than those mentioned in 11 01 13
11 02	Wastes from non-ferrous hydrometallurgical processes
11 02 03	Wastes from the production of anodes for aqueous electrolytical processes
11 02 06	Wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05
11 05	Wastes from hot galvanising processes
11 05 01	Hard zinc
11 05 02	Zinc ash
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS



EWC Code	Description
12 01	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	Ferrous metal filings and turnings
12 01 03	Non-ferrous metal filings and turnings
12 01 05	Plastic shavings and turnings
12 01 13	Welding wastes
12 01 17	Waste blasting material other than those mentioned in 12 01 16
12 01 21	Spent grinding bodies and grinding materials other than those mentioned in 12 01 20
15	WASTE PACKAGING: ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	Packaging (including separately collected municipal packaging waste)
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07	Glass packaging
15 01 09	Textile packaging
15 02	Absorbents, filter materials, wiping cloths and protective clothing
15 02 03	Absorbents, filter materials, wiping cloths, and protective clothing other than those mentioned in 15 02 02
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	End-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	End-of-life tyres
16 02	Wastes from electrical and electronic equipment
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15
16 03	Off-specification batches and unused products
16 03 04	Inorganic wastes other than those mentioned in 16 03 03
16 03 06	Organic wastes other than those mentioned in 16 03 05
16 06	Batteries and accumulators
16 06 04	Alkaline batteries (except 16 06 03)



EWC Code	Description
16 06 05	Other batteries and accumulators
16 11	Waste linings and refractories
16 11 02	Carbon-based linings and refractories from metallurgical processes other than those mentioned in 16 011 01
16 11 04	Other linings and refractories from metallurgical processes other than those mentioned in 16 11 03
16 11 06	Linings and refractories from non-metallurgical processes other than those mentioned in 16 11 05
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	Wood, glass and plastic
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 04	Metals (including their alloys)
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals
17 04 11	Cables other than those mentioned in 17 04 10
17 05	Soil (including excavated soil from contaminated sites) stones and dredging spoil
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 05 08	Track ballast other than those mentioned in 17 05 07
17 06	Insulation materials and asbestos-containing construction materials
17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03



EWC Code	Description
17 08	Gypsum-based construction material
17 08 02	Gypsum-based construction materials other than those mentioned in 17 08 01
17 09	Other construction and demolition wastes
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02, and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 01	Wastes from incineration or pyrolysis of waste
19 01 02	Ferrous materials removed from bottom ash
19 01 12	Bottom ash and slag other than those mentioned in 19 01 11
19 01 18	Pyrolysis wastes other than those mentioned in 19 01 17
19 01 19	Sands from fluidised beds
19 02	Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	Premixed wastes composed only of non-hazardous waste
19 02 10	Combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 04	Vitrified waste and wastes from vitrification
19 04 01	Vitrified waste
19 05	Wastes from aerobic treatment of solid wastes
19 05 01	Non-composted fraction of municipal and similar wastes
19 05 02	Non-composted fraction of animal and vegetable waste
19 05 03	Off-specification compost
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	Paper and cardboard
19 12 02	Ferrous metal
19 12 03	Non-ferrous metal
19 12 04	Plastic and rubber
19 12 05	Glass
19 12 07	Wood other than that mentioned in 19 12 06
19 12 08	Textiles
19 12 09	Minerals (for example sand, stones)
19 12 10	Combustible waste (refuse derived fuel)
19 13	Wastes from soil and groundwater remediation
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01



EWC Code	Description
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions (except 15 01)
20 01 01	Paper and cardboard
20 01 02	Glass
20 01 08	Biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 34	Batteries and accumulators other than those mentioned in 20 01 33
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 10 23, and 20 01 35
20 01 38	Wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	Wastes from chimney sweeping
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 03	Street-cleaning residues
20 03 07	Bulky waste

Table 2-2 Proposed Clinical Waste Types to be Accepted at the Site

EWC Code	Description
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry
09 01 01*	Water-based developer and activator solutions ²
09 01 02*	Water-based offset plate developer solutions ³
09 01 03*	Solvent based developer solutions ³
09 01 04*	Fixer solutions ³

² This is limited to wastes of this type arising from medical practices or associated research activities.



EWC Code	Description
09 01 05*	Bleach and bleach fixer solutions ³
09 01 07	Photographic film and paper containing silver or silver compounds ³
09 01 08	Photographic film and paper free of silver or silver compounds ³
18	WASTES FROM HUMAN OR ANIMAL HEALTHCARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)
18 01	Wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	Sharps (except 18 01 03)
18 01 02	Body parts and organs including blood bags and blood preserves (except 18 01 03)
18 01 03*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection (e.g. dressings, plaster casts, linen, disposable clothing, nappies)
18 01 04	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 01 06*	Chemicals consisting of or containing hazardous substances
18 01 07	Chemicals other than those mentioned in 18 01 06
18 01 08*	Cytotoxic and cytostatic medicines
18 01 09	Medicines other than those mentioned in 18 01 08
18 01 10*	Amalgam waste from dental care
18 02	Wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	Sharps (except 18 02 02)
18 02 02*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 03	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 02 05*	Chemicals consisting of or containing hazardous substances
18 02 06	Chemicals other than those mentioned in 18 02 05
18 02 07*	Cytotoxic and cytostatic medicines
18 02 08	Medicines other than those mentioned in 18 02 07
20	MUNICIPAL WASTES (HOUSEHOLD AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions (except 15 01)
20 01 31*	Cytotoxic and cytostatic medicines
20 01 32	Medicines other than those mentioned in 20 01 31



EWC Code	Description
20 01 99	Other fractions not otherwise specified (consisting of nappies and absorbent hygiene products (AHPs) only)

3.0 APPLICATION CONTENTS

3.1 Application Forms

Parts A, B2, B4, and F1 of the EA's EP application forms have been completed by CRL in support of this EP application.

3.2 Application Fee

In accordance with the EA's enhanced pre-application advice included as Appendix A to this NTS, the application fee is as follows:

- 1.16.11 – Material Recycling Facility - £7,930 (full application fee);
- 1.16.7 – Clinical Waste Transfer Station - £7,930 (50% of application costs for second activity) - £3,965;
- Habitats Assessment - £779;
- Fire Prevention Plan - £1,241;
- Emission Management Plan - £1,241;
- Odour Management Plan - £1,246;
- Noise and Vibration Management Plan - £1,246.

Therefore, the total application fee is **£17,648**.

3.3 Environmental (Amenity) Risk Assessment

The Environmental Risk Assessment (ERA) has been prepared to assess the environmental risk posed by the proposed activities on site.

Strict operational procedures will be implemented at the site to monitor and manage amenity risks from the activities and include provision for the monitoring of scavenging birds, vermin, insects and litter, mud on road, odour and noise. The impact of the proposed activities is assessed in the ERA. Potential receptors are illustrated on Drawing 03, and Drawing 04.

Subject to the implementation of the stated management measures, the conclusion has been reached that the proposed activities are unlikely to result in a significant accident risk or risk to the amenity of the local environment.

The ERA (ref. 402.065068.00001_ERA) is enclosed as part of this EP application.

3.4 Operating Techniques and Waste Acceptance Procedures

The site will be operated in accordance with the Operating Techniques (OT) document. This document sets out best practice for operating the site, based on legislation and best available techniques in the industry.

The OT document will ensure that:

- The risks that the activities pose to the environment are identified;



- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system and the OT document;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

This document also details the Waste Acceptance Procedures (WAP) to be followed at the site. The purpose of the WAP is to ensure that the site only accepts waste that is:

- Suitable for the activity;
- Allowed by the EP; and
- Appropriately considered by the ERA.

The WAP will also assist with:

- Ensuring the activities do not cause pollution;
- The waste sourcing decision making process; and
- Preventing the receipt of non-permitted wastes.

The OT and WAP (ref. 402.01376.00034/OT) is included as part of this EP application.

3.5 Fire Prevention Plan

The Fire Prevention Plan (FPP) has been prepared by CRL in accordance with EA's guidance for FPPs³. The FPP details the required mitigation and management methods to prevent a fire of combustible materials stored on site.

The FPP identifies measures to be employed to reduce the likelihood of fires at the site. In addition, the plan identifies measures to be employed in the event of a fire to limit the damage caused to the environment or human health.

The FPP is enclosed with this EP application.

3.6 Dust Management Plan

The Dust Management Plan (DMP) has been prepared by CRL and aims to ensure that the EP is complied with through identification of all potential dust sources, pathways and receptors. The DMP also details information regarding monitoring, investigations and reporting of dust emissions from site and management for the control of emissions.

The DMP will be incorporated into the site procedures and will be revised as necessary to ensure that it remains appropriate to the activities occurring on site, and that any changes in conditions relating to dust management are dealt with as part of those revisions.

The DMP has been prepared in accordance with the EA's Guidance, Control and Monitor Emissions for your EP⁴.

The DMP is enclosed with this EP application.

³ <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits>, accessed November 2023

⁴ [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/control-and-monitor-emissions-for-your-environmental-permit), accessed November 2023



3.7 Noise Impact Assessment and Management Plan

A Noise Impact Assessment was completed in 2023. The impact assessment has been undertaken in accordance with British Standard 4142:2014 and compared the background noise against operational noise received at noise-sensitive receptors. The NMP aims to identify all noise mitigation measures, prevent exposure of people to noise and minimise the risk of unplanned noisy events.

A copy of the Noise Impact Assessment and Management Plan (ref. 402.065068.00001/NIA) is enclosed with this EP application.

3.8 Odour Management Plan

The Odour Management Plan (OMP) prepared by CRL, aims to ensure that the EP is complied with through identification of all potential odour sources, pathways and receptors. The OMP also details information regarding monitoring, investigations and reporting of odour emissions from Site and management for the control of emissions.

The OMP is enclosed within this EP application.

3.9 Site Condition Report

CRL have prepared the Site Condition Report (SCR) in support of this EP application to establish the baseline environmental conditions within the proposed EP boundary. The SCR has been prepared in accordance with EA guidance H5 (version 3), April 2013⁵.

The facility will operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the site does not pose a significant risk to the surrounding human and natural environment.

The SCR is enclosed as part of this EP application.

3.10 Drawings

The following drawings have been prepared in support of the EP application:

- Drawing 01 Site Location Plan;
- Drawing 02 Environmental Permit Boundary and Site Layout;
- Drawing 03 Site Setting; and
- Drawing 04 Cultural and Natural Heritage.

4.0 Environmental Standards and Control Measures

The key technical standards laid out in this NTS will govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- EA Guidance, Risk assessments for your environmental permit, August 2022;
- EA Guidance, Control and Monitor Emissions from your EP, November 2022;
- EA Guidance, Develop a Management System: EP, April 2023;

⁵ [Environmental permitting: H5 Site condition report - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/environmental-permitting-h5-site-condition-report), accessed November 2023.



- EA Guidance, Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities, August 2023;
- EA Guidance, Healthcare Waste: Appropriate Measures for Permitted Facilities, December 2021; and
- Relevant EA Guidance e.g. Environmental Risk Assessments, Fire Prevention Plans, and Site Condition Reports.

The site will be managed and operated in accordance with CRL's EMS.

The control measures relevant to the proposed activities are described in the OT and WAP document submitted with this EP application.

The proposals have been assessed against these standards and are considered to meet the relevant technical standards.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed activities on site.

CRL 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 EMS and associated procedures.





Appendix A EA Enhanced Pre-Application Advice

