

SUEZ Recycling and Recovery UK Ltd
Packington House
Packington Lane
Meriden
CV7 7HN

Our reference: EPR/LB3906HB/A001
Date: 04/07/2023

Dear Geraldine

Pre application advice – Enhanced service

Site: Hallenbeagle Refuse Transfer Station and Material Recycling Facility, Cornwall Business Park, Hallenbeagle, Scorrier, Redruth, Cornwall, TR16 5EN

Thank you for your pre application enquiry on 27/03/2023.

I am pleased to provide you with your enhanced level of pre-application advice. This advice is based on the information provided on your pre application advice form and conversations/emails recorded on the following dates:

- Email on 20/04/2023 to introduce myself as the allocated Permitting Officer to work on the response.
- Telephone conversation on 20/04/2023 introducing myself and to request a copy of the site layout plan and site location.
- Email on 21/04/2023 with receipt of the site layout plan and site location.
- Email on 25/04/2023 with cost estimate letter sent to the enquirer.
- Email on 15/05/2023 from the enquirer accepting the cost estimate.
- Email on 01/06/2023 sent to enquirer asking for further information about the proposed application.
- Email on 06/06/2023 from the enquirer providing information to all my questions.

Pre-application information

We have reviewed the information you provided in the pre-application enhanced request form.

The activities you propose will involve the registration of a multi activity permit.

You will need to pay the full fee for a 'household, commercial and industrial transfer station. The activity code in our charging scheme is 1.16.6. The application fee would be £9,176.00 which includes the assessment of a fire prevention plan and odour management plan. This also includes the secondary fees (50% of the associated application charge) for the physical treatment of non-hazardous waste and operation as a clinical waste transfer station.

The waste codes you have confirmed in previous correspondence will overlap if a material recycling facility is to be included in the permit. This is why it has not been included. This will enable the waste codes to be more succinct to the activities I have covered and avoid you paying extra for the same activities.

The table states the associated fees to the information included above.

| Charge code | Activity | Fee |
|----------------|---|--------------------------------|
| 1.16.16 | Household, commercial and industrial transfer station | £9146.00 (full fee) |
| 1.16.12 | Physical treatment of non-hazardous waste | £3965.00 (50% of original fee) |
| 1.16.7 | Clinical waste transfer station | £3965.00 (50% of original fee) |

You must also submit a risk assessment with your application that considers the potential impact of the proposed facility on the environment and human nearby receptors. Please read through the following guidance before preparing your risk assessment [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Your risk assessment may identify the need for additional management plans to help control emissions. For a household, commercial and industrial waste transfer station this is likely to include the plans shown in the table below. The assessment of these plans attracts a fee, as stated in the table.

| Management plan | Fee |
|--|-----------|
| Noise Impact Assessment and Management Plan | £1,246.00 |
| Dust and Emissions Management Plan | £1,241.00 |
| Pest Management Plan | £1,241.00 |

customer service line **03706 506 506**

floodline **03459 88 11 88**

incident hotline **0800 80 70 60**

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The total charge taking into account both tables of fees is £20,804.

Charging information is on GOV.UK:

<https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

You can apply for a bespoke permit using our online system at:

<https://apply-for-environmental-permit.service.gov.uk/start/start-or-open-saved>

Alternatively, you can complete the application forms Part A, B2, B4 and F1 which are available at:

<https://www.gov.uk/government/collections/environmental-permit-application-forms-for-a-new-bespoke-permit>

You must send one electronic copy (email, CD or memory stick) or one paper copy of the application.

The email address for completed forms is PSC@environment-agency.gov.uk or these can be posted to:

Environment Agency
Permitting and Support Centre
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

We have completed a habitats and conservation screening report as requested. This is attached to the correspondence.

Appropriate Measures for Clinical/Healthcare Wastes

Your list of potential waste types includes 'Offensive Health Care and Clinical Waste'. This means you will have to consider our Appropriate Measures Guidance for Healthcare Wastes in your application.

[Healthcare waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities)

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We will expect you to either demonstrate how you will either meet the requirements of each relevant point in the guidance or justify an alternative approach. The Healthcare waste appropriate measures guidance and any other relevant technical standards should be referenced in your application form part B4.

Street Cleaning and Street Sweeping Wastes

If these wastes will be dewatered as part of the bulking up process, you will have to explain how you will do this. Include details of where the wastes will be stored and in what form. If any liquids will be stored or discharged in specific areas, include details of these on your drainage plan. If you plan to discharge liquids from a dewatering process, you will have to ensure you have the appropriate permissions to do this.

Noise Impact Assessment/Noise Management Plan.

A Noise Impact Assessment will be required due to the proximity of nearby residential receptors to the proposed facility.

You need to carry out an assessment to understand the potential impact on the nearby receptors and whether abatement measures are required.

There are other major noise sources close by, such as the railway line and A30 road, but we would still need to see an assessment that considers the site location in relation to receptors and other noise sources.

A Noise Management Plan will be required which is based on the outcomes of your Noise Impact Assessment. Your indicative site plans suggest acoustic screening will be used in some parts of the site and you should manage these, in addition to any other operational measures in accordance with a written plan.

The guidance below should be used when preparing Noise Impact Assessment and Noise Management Plans.

[Noise and vibration management: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/noise-and-vibration-management-environmental-permits)

[Method implementation document \(MID\) for BS 4142 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/method-implementation-document-mid-for-bs-4142)

[Noise impact assessments involving calculations or modelling - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/noise-impact-assessments-involving-calculations-or-modelling)

Current application timescales

customer service line **03706 506 506**

floodline **03459 88 11 88**

incident hotline **0800 80 70 60**

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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 | 38-42 weeks |
| New standard rules | 6-8 weeks |
| Admin variation | 12-16 weeks |
| Minor variation | 32-36 weeks |
| Normal variation | 42-46 weeks |
| Substantial variation | 51-53 weeks |
| Transfer | 10-12 weeks |
| Surrender | 20-24 weeks |

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers waste only.

Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

Enhanced pre application cost estimate

At this stage the pre-application advice is expected to cost up to £300.00 plus VAT. An invoice will be sent separately at a later date.

This pre-application request is now closed.

We consider this pre application request is now closed however if you have any questions regarding this letter please contact Richard Melbourne using the details below.

customer service line **03706 506 506**

floodline **03459 88 11 88**

incident hotline **0800 80 70 60**

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If you require additional enhanced pre-application advice please complete our [online form](#).

We look forward to working with you on this project.

If you have any questions please call 03708 506 506.

Yours sincerely

Richard Melbourne – Permitting Officer

richard.melbourne@environment-agency.gov.uk

Screening Results for: Bespoke Environmental Permit - Waste Operations, including inert landfills and non-landfill SWMAs

Date Produced: 19/04/2023

Reference number: EPR/LB3906HB/A001



NGR of search: SW 72700 44778

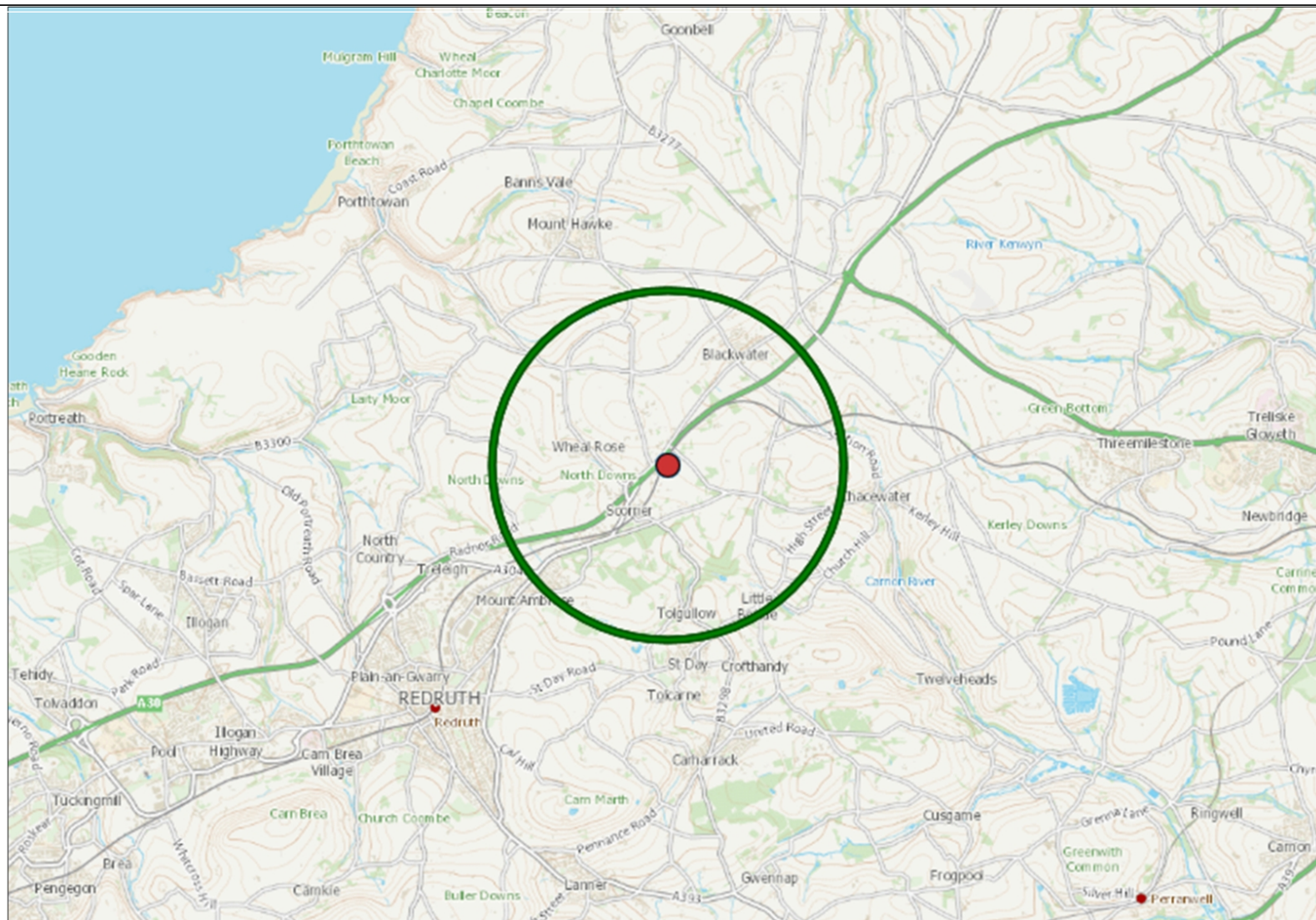
Notes:

Site centre distance (m): 0



Legend

-  Search area
-  Protected Habitats screened for Environ Permits



[Launch EasiMap](#)

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Easimap Screening Results

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Reference number: EPR/LB3906HB/A001
Notes:

Date produced: 19/04/2023
NGR of search: SW 72700 44778
Site centre distance (m): 0

| Data | Details | Within | Search Direction | Action |
|---|---|--------|------------------|--|
| Protected Habitats - Lowland Heathland | Level of Protection: Natural Environment and Rural Communities Act (2006) Section 41 habitats of principal importance | 0m | Radial | Check data restrictions. More info from F&B |
| Aquifer Designation (Bedrock) | Aquifer type: Secondary A | 0m | Radial | |
| EPR Installation Team | EPR Team: Installations Devon and Cornwall | 0m | Radial | |
| EPR Waste Team | EPR Team: Waste Cornwall | 0m | Radial | |
| EPR Land and Water Team | EPR Team: Land and Water West | 0m | Radial | |
| Local Authorities | Name: Cornwall | 0m | Radial | |
| EA Water Management Areas | Area name: Devon and Cornwall | 0m | Radial | |
| Historic Landfill Sites | no information | 1482m | Radial | Check for the presence of a historic landfill |
| | no information | 1400m | Radial | |
| Authorised Landfill Sites | no information | 1471m | Radial | Check for the presence of an authorised landfill |
| Ancient Woodland - England | None present | 200m | | |
| Ancient Woodland - Wales | None present | 200m | | |
| Aquifer Designation (Superficial) | None present | 0m | | |
| Flood Zone 2 | None present | 0m | | |
| Flood Zone 3 | None present | 0m | | |
| Local Nature Reserves - England | None present | 200m | | |
| Local Nature Reserves - Wales | None present | 200m | | |
| Local Wildlife Sites | None present | 200m | | |
| Marine Conservation Zones | None present | 1000m | | |
| National Nature Reserves - England | None present | 200m | | |
| National Nature Reserves - Wales | None present | 200m | | |
| Counties | None present | 0m | | |
| Protected Habitats - Upland Heathland | None present | 50m | | |
| Protected Habitats - Deciduous woodland | None present | 50m | | |

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Notes:

Date produced: 19/04/2023
NGR of search: SW 72700 44778
Site centre distance (m): 0

| Data | Details | Within | Search Direction | Action |
|---|--------------|--------|------------------|--------|
| Protected Habitats - Wet Woodland | None present | 50m | | |
| Protected Habitats - Coastal Saltmarsh | None present | 50m | | |
| Protected Habitats - Upland Hay Meadows | None present | 50m | | |
| Protected Habitats - Upland Calcareous grassland | None present | 50m | | |
| Protected Habitats - Lowland meadows | None present | 50m | | |
| Protected Habitats - Lowland dry acid grassland | None present | 50m | | |
| Protected Habitats - Lowland Calcareous grassland | None present | 50m | | |
| Protected Habitats - Intertidal mudflats | None present | 0m | | |
| Protected Habitats - Aquifer fed water bodies | None present | 50m | | |
| Protected Habitats - Chalk rivers | None present | 50m | | |
| Protected Habitats - Saline lagoons | None present | 50m | | |
| Protected Habitats - Purple moor grass and Rush Pasture | None present | 50m | | |
| Protected Habitats - Maritime Cliff and Slope | None present | 0m | | |
| Protected Habitats - Fens | None present | 50m | | |
| Protected Habitats - Coastal vegetated shingle | None present | 0m | | |
| Protected Habitats - Coastal sand dunes | None present | 0m | | |
| Protected Habitats - Mudflats | None present | 0m | | |
| Protected Habitats - Culm/Rhos pasture | None present | 50m | | |
| Protected Habitats - Blanket Bog | None present | 50m | | |
| Protected Habitats - Lowland Raised bog | None present | 50m | | |
| Protected Habitats - Coastal and Floodplain Grazing Marsh | None present | 50m | | |
| Protected Habitats - Reedbeds | None present | 50m | | |
| Protected Species - Brown/Sea Trout Salmo trutta | None present | 500m | | |

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Notes:

Date produced: 19/04/2023
NGR of search: SW 72700 44778
Site centre distance (m): 0

| Data | Details | Within | Search Direction | Action |
|---|--------------|--------|------------------|--------|
| Protected Species - Sea Trout migratory route <i>Salmo trutta</i> migratory route | None present | 500m | | |
| Protected Species - Smelt <i>Osmerus eperlanus</i> | None present | 500m | | |
| Protected Species - Smelt migratory route <i>Osmerus eperlanus</i> migratory route | None present | 500m | | |
| Protected Species - European eel <i>Anguilla anguilla</i> | None present | 500m | | |
| Protected Species - European Eel migratory route <i>Anguilla anguilla</i> migratory route | None present | 500m | | |
| Protected Species - Vendace <i>Coregonus albula</i> | None present | 500m | | |
| Protected Species - Powan <i>Coregonus lavaretus</i> | None present | 500m | | |
| Protected Species - Bullhead Cottus <i>gobio</i> | None present | 500m | | |
| Protected Species - Spined Loach <i>Cobitis taenia</i> | None present | 500m | | |
| Protected Species - Atlantic Salmon <i>Salmo salar</i> | None present | 500m | | |
| Protected Species - Atlantic Salmon migratory route <i>Salmo salar</i> migratory route | None present | 500m | | |
| Protected Species - Unidentified Shad <i>Alosa</i> | None present | 500m | | |
| Protected Species - Twaite Shad <i>Alosa fallax</i> | None present | 500m | | |
| Protected Species - Twaite Shad migratory route <i>Alosa fallax</i> migratory route | None present | 500m | | |
| Protected Species - Allis Shad <i>Alosa alosa</i> | None present | 500m | | |
| Protected Species - Allis Shad migratory route <i>Alosa alosa</i> migratory route | None present | 500m | | |
| Protected Species - Unidentified Shad migratory route <i>Alosa</i> migratory route | None present | 500m | | |
| Protected Species - River Lamprey <i>Lampetra fluviatilis</i> | None present | 500m | | |
| Protected species - Unidentified Lamprey <i>Petromyzontidae</i> | None present | 500m | | |

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NGR of search: SW 72700 44778
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| Data | Details | Within | Search Direction | Action |
|---|--------------|--------|------------------|--------|
| Protected Species - River Lamprey migratory route <i>Lampetra fluviatilis</i> migratory route | None present | 500m | | |
| Protected Species - Brook Lamprey <i>Lampetra planeri</i> | None present | 500m | | |
| Protected Species - Sea Lamprey <i>Petromyzon marinus</i> | None present | 500m | | |
| Protected Species - Sea Lamprey migratory route <i>Petromyzon marinus</i> migratory route | None present | 500m | | |
| Protected Species - Arctic Charr <i>Salvelinus alpinus</i> | None present | 500m | | |
| Protected Species - Brown Diving Beetle <i>Agabus brunneus</i> | None present | 50m | | |
| Protected Species - One-grooved Diving Beetle <i>Bidessus unistriatus</i> | None present | 50m | | |
| Protected Species - Pale Pin-palp <i>Bembidion testaceum</i> | None present | 50m | | |
| Protected Species - Gravel Water Beetle <i>Hydrochus nitidicollis</i> | None present | 50m | | |
| Protected Species - Shingle Rove Beetle <i>Meotica anglica</i> | None present | 50m | | |
| Protected Species - Newberys Rove Beetle <i>Thinobius newberyi</i> | None present | 50m | | |
| Protected Species - Depressed (or Compressed) River Mussel <i>Pseudanodonta complanata</i> | None present | 50m | | |
| Protected Species - Fine-lined Pea Mussel <i>Odhneripisidium tenuilineatum</i> | None present | 50m | | |
| Protected Species - Greater Water-parsnip <i>Sium latifolium</i> | None present | 50m | | |
| Protected Species - Hairy Click Beetle <i>Synaptus filiformis</i> | None present | 50m | | |
| Protected Species - Lagoon Spire Snail <i>Semisalsa stagnorum</i> | None present | 50m | | |
| Protected Species - The Shining Rams-horn <i>Segmentina nitida</i> | None present | 50m | | |
| Protected Species - Slender Stonewort <i>Nitella gracilis</i> | None present | 50m | | |
| Protected Species - Stary Stonewort <i>Nitellopsis obtusa</i> | None present | 50m | | |

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| Data | Details | Within | Search Direction | Action |
|--|--------------|--------|------------------|--------|
| Protected Species - Southern Silver-stiletto <i>Clorismia rustica</i> | None present | 50m | | |
| Protected Species - Tassel Stonewort <i>Tolypella intricata</i> | None present | 50m | | |
| Protected Species - Bembridge Beetle <i>Paracymus aeneus</i> | None present | 50m | | |
| Protected Species - Fairy Shrimp <i>Chirocephalus diaphanus</i> | None present | 0m | | |
| Protected Species - Fen Raft Spider <i>Dolomedes plantarius</i> | None present | 0m | | |
| Protected Species - Glutinous Snail <i>Myxas glutinosa</i> | None present | 50m | | |
| Protected Species - Lesser Silver Water Beetle <i>Hydrochara caraboides</i> | None present | 50m | | |
| Protected Species - Medicinal Leech <i>Hirudo medicinalis</i> | None present | 50m | | |
| Protected Species - Mire Pill Beetle <i>Curimopsis nigrita</i> | None present | 50m | | |
| Protected Species - Threatened bryophyte record - WaC Act Schedule 8 <i>Dendrocryphaea lamyana</i> | None present | 50m | | |
| Protected Species - Ribbon-Leaved Water Plantain <i>Alisma gramineum</i> | None present | 50m | | |
| Protected Species - Threatened lichen record - WaC Act Schedule 8 <i>Collema dichotomum</i> | None present | 50m | | |
| Protected Species - Spangled Diving Beetle <i>Graphoderus zonatus</i> | None present | 0m | | |
| Protected Species - Tadpole Shrimp <i>Triops cancriformis</i> | None present | 50m | | |
| Protected Species - Triangular Club-rush <i>Schoenoplectus triqueter</i> | None present | 50m | | |
| Protected Species - Triangular Club-rush Hybrid <i>Schoenoplectus tabernaemontani</i> x <i>triqueter</i> = <i>S. x kuekenthalianus</i> | None present | 50m | | |
| Protected Species - Water Germander <i>Teucrium scordium</i> | None present | 50m | | |
| Protected Species - European Water Vole <i>Arvicola amphibius</i> | None present | 50m | | |
| Protected Species - Sand Lizard <i>Lacerta agilis</i> | None present | 50m | | |

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|---|--------------|--------|------------------|--------|
| Protected Species - Natterjack Toad <i>Epidalea calamita</i> | None present | 50m | | |
| Protected Species - Code 4 | None present | 50m | | |
| Protected Species - Creeping Marshwort <i>Apium repens</i> | None present | 50m | | |
| Protected Species - Code 2 | None present | 250m | | |
| Protected Species - Marsh Fritillary <i>Euphydryas aurinia</i> | None present | 50m | | |
| Protected Species - White-clawed Freshwater Crayfish <i>Austropotamobius</i> <i>pallipes</i> | None present | 50m | | |
| Protected Species - Southern Damsel fly <i>Coenagrion mercuriale</i> | None present | 50m | | |
| Protected Species - Desmoulins Whorl Snail <i>Vertigo (Vertigo) moulinsiana</i> | None present | 50m | | |
| Protected Species - Narrow-mouthed Whorl Snail <i>Vertigo (Vertilla) angustior</i> | None present | 50m | | |
| Protected Species - Geyers Whorl Snail <i>Vertigo (Vertigo) geyeri</i> | None present | 50m | | |
| Protected Species - Little Whirlpool Rams-horn Snail <i>Anisus (Disculifer)</i> <i>vorticulus</i> | None present | 50m | | |
| Protected Species - Floating Water-plantain <i>Luronium natans</i> | None present | 50m | | |
| Protected Species - Code 3 | None present | 50m | | |
| Protected Species - Marsh Saxifrage <i>Saxifraga hirculus</i> | None present | 50m | | |
| Protected Species - Code 1 | None present | 500m | | |
| Protected Species - Threatened bryophyte record - WaC Act Schedule 8 <i>Petalophyllum ralfsii</i> | None present | 50m | | |
| Protected Species - Shore Dock <i>Rumex</i> <i>rupestris</i> | None present | 50m | | |
| Protected Species - Threatened bryophyte record - WaC Act Schedule 8 <i>Hamatocaulis vernicosus</i> | None present | 50m | | |
| Ramsar Sites - Wales | None present | 1000m | | |
| Ramsar Sites - England | None present | 1000m | | |

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Screening Results for:

Bespoke Environmental Permit - Waste Operations, including inert landfills and non-landfill SWMAs

Reference number:

EPR/LB3906HB/A001

Notes:

Date produced:

19/04/2023

NGR of search:

SW 72700 44778

Site centre distance (m):

0

| Data | Details | Within | Search Direction | Action |
|--|--------------|--------|------------------|--------|
| Special Areas of Conservation - England | None present | 1000m | | |
| Sites of Special Scientific Interest - Wales | None present | 1000m | | |
| Special Protection Areas - England | None present | 1000m | | |
| Special Areas of Conservation - Wales | None present | 1000m | | |
| Special Protection Areas - Wales | None present | 1000m | | |
| Sites of Special Scientific Interest - England | None present | 1000m | | |

Guiguet-Doron, Geraldine

From: Melbourne, Richard <richard.melbourne@environment-agency.gov.uk>
Sent: 11 August 2023 09:16
To: Guiguet-Doron, Geraldine
Subject: RE: Pre-application advice for SUEZ Recycling and Recovery UK Ltd (EPR/LB3906HB/A001) - further information

Hello Geraldine

The information in the table is correct.

I happened to be in Nottingham yesterday. My colleague who assisted with me with charge codes was with me and they also confirmed these are appropriate for the application.

Kind regards,

Richard Melbourne
Permitting Officer
National Permitting Service
Environment Agency

Office Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5BR
Email address richard.melbourne@environment-agency.gov.uk
External 0203 025 8282
Mobile 07385 414703

From: Guiguet-Doron, Geraldine <geraldine.guiguet-doron@suez.com>
Sent: 10 August 2023 09:51
To: Melbourne, Richard <richard.melbourne@environment-agency.gov.uk>
Subject: RE: Pre-application advice for SUEZ Recycling and Recovery UK Ltd (EPR/LB3906HB/A001) - further information
Importance: High

Richard,

Thank you for providing clarification to the below questions. I have managed to have a look following my return from Annual Leave and following consultation with my colleagues we now have a better understanding. However we just would like to clarify one aspect that have an implication on how the application will be laid out as we often have to provide a list of EWC codes for each listed activities on the permit.

From the answer provided on point 1 on your Email below we understand that the following activities will be listed on the permit and the following corresponding application fees will be applied as per the below table. Could you please confirm that this is correct.

| Listed Activities on the Permit | Corresponding Application charge |
|--|---|
| Household, commercial and industrial waste transfer station activity with physical treatment | 1.16.16 Household, commercial and industrial transfer station And 1.16.12 Physical treatment of non-hazardous waste (due to the treatment undertaken at the Transfer Station) |
| Material recycling facility | 1.16.11 Material recycling facility |
| Clinical Waste Transfer Station | 1.16.7 Clinical waste transfer station |

I am happy to have a call if you need clarification.

Many Thanks

Regards

Geraldine

Geraldine Guiguet-Doron
Environment Permit Manager
Recycling and recovery UK

Mobile: +44 7970 233842



SUEZ Recycling and Recovery UK Ltd
Packington House – Packington Lane – Little Packington - Meriden – CV7 7HN - United Kingdom
www.suez.co.uk



From: Melbourne, Richard <richard.melbourne@environment-agency.gov.uk>

Sent: 26 July 2023 11:38

To: Guiguet-Doron, Geraldine <geraldine.guiguet-doron@suez.com>

Subject: RE: Pre-application advice for SUEZ Recycling and Recovery UK Ltd (EPR/LB3906HB/A001) - further information

Hello Geraldine

I have the answers to the five questions you recently asked. The answers are written in italics:

1. I understand that the activity listed in the Table below will be reflected as the activities listed on the permit once issued.
Due to the common practice of having a household, commercial and industrial waste transfer station activity with additional treatment, for ease this has been commonly referenced a household, commercial and industrial waste transfer station activity with physical treatment, i.e. transfer and treatment activity as is also described in the subsistence charges.
2. The following statement does not reflect what we have recently experienced. "However, if you are wanting to carry out treatment such as shredding and crushing, this will be considered a separate activity. While these treatment activities are allowed on a standard rules permit, they are not considered as part of the base activity for a bespoke permit".

It seems that if we want to do shredding and crushing this will come under a different listed activity 1.16.12 Physical treatment of Non Haz waste. This is an interesting statement as we just had a TS permit issued for our site at Connon Bridge and this has been issued with the wording Shredding and Crushing. Please see

attached. We also have many Bespoke TS permit with the same wording and the Shredding and Crushing is certainly not listed as a separate activity.

Please note that the referenced permit is a variation to an existing permit, and as such we are limited in the changes we can make in terms of the activities and charging unless requested by the operator for a number of reasons, including what the permit previously allowed under it. As stated it has been common to include the transfer and treatment wording together.

It should be noted that the separate physical treatment activity is intended to be implemented where there is a clear separation or distinction of treatment activities in relation to the proposed activity.

For example, a transfer station should carry out basic transfer operations which we would consider and sorting and separation. Treatment such as shredding, crushing and dewatering is considered separate as you are treating them for a specific purpose other than the basic transfer operations. This is mirrored in our standard rules permits with some being for transfer and some being for transfer and treatment.

We are aware there are some historical inconsistencies with how permits have been laid out, we will be looking to rectify this as the permits get reviewed over time.

3. From your Pre app advice we also understand that you have included activity 1.16.12 Physical treatment of Non Haz waste for Dewatering. I just would like to clarify the process that we are planning to undertake at the site. The site will receive street sweeping at the site. The materials will be unloaded and stored within a bay at the site prior to further transport to another site. We are not actively and physically dewatering the waste at the site. The materials might be slightly moist on arrival and any potential liquid will drains to gullies and then a series of tanks.

We receive at various of our site street sweepings in the same manner and we have never been asked to permit this as a standalone activity. Cannon Bridge permit also allows us to receive street sweeping under the TS activity.

Could you please confirm that we do not need a standalone activity (1.16.12) listed in our permit to accept street sweeping.

Dewatering as you describe is considered as a physical treatment activity which has been included for the shredding, crushing and dewatering of waste.

4. We have in the past been told that the MRF activity will have to be separated from the TS Activity. This is different to the advice received in the original concept where it is suggested that the waste can be recycled and disposed of under the HCI activity and treated under the physical treatment activity

The advice being given is based on the information currently available and I cannot speak to the specific circumstances around when the previous advice was given. An MRF operation and a HCI operation would usually differ due to the disposal allowed under the HCI and the level of treatment allowed under the MRF. By combining the HCI and physical treatment activities, this grants you more freedom in your operations as the treatments were the same, as were / are many of the EWC codes that can fall under a MRF and HCI activity.

5. You have advised that the fee attract a 50% rebate for the subsequent activities. This is not in line with recent experience where no rebate has been given. I understand that according to the charging scheme you pay 50% for any other activities which are reasonably associated with each other. Could you please explain the reasoning behind being charged for 50% of the original fee for the subsequent activities. Could you also please clarify what is meant by 'any other activities which are reasonably associated with each other' in the charging scheme.

We cannot comment on the 50% not applying in a different circumstance without knowing the specifics of the operations. Please note that if you are referring to a variation application our charging scheme does not presently allow for 50% discounts to multiple activities being added.

With regard to reasonably associated, this can be demonstrated by a mixed metals – Metal Recycling Site and an End-of-Life Vehicle treatment facility. Whilst we consider ELV treatment to be a separate activity, it would be reasonable to allow the metals from the ELV operations be processed under the MRS.

For example, for the allowance of a HCI activity and a chemical treatment activity on a new permit we may require justification to demonstrate they are 'reasonably associated' if this is not clear to us.

The enhanced pre-application query we have been working together with, is now closed. If you need to ask any further questions in the future, you will need to submit a new pre-application query.

Relevant information is on GOV.UK at:

<https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

Kind regards,

Richard Melbourne
Permitting Officer
National Permitting Service
Environment Agency

Office Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5BR

Email address richard.melbourne@environment-agency.gov.uk

External 0203 025 8282

Mobile 07385 414703

From: Guiguet-Doron, Geraldine <geraldine.guiguet-doron@suez.com>

Sent: 21 July 2023 13:56

To: Melbourne, Richard <richard.melbourne@environment-agency.gov.uk>

Subject: RE: Pre-application advice for SUEZ Recycling and Recovery UK Ltd (EPR/LB3906HB/A001) - further information

Richard,

Following our call this morning please see below the question relating to the Pre app and what we have discussed in more details this morning.

1. I understand that the activity listed in the Table below will be reflected as the activities listed on the permit once issued.
2. The following statement does not reflect what we have recently experienced. "However, if you are wanting to carry out treatment such as shredding and crushing, this will be considered a separate activity. While these treatment activities are allowed on a standard rules permit, they are not considered as part of the base activity for a bespoke permit".
It seems that if we want to do shredding and crushing this will come under a different listed activity 1.16.12 Physical treatment of Non Haz waste. This is an interesting statement as we just had a TS permit issued for our site at Connon Bridge and this has been issued with the wording Shredding and Crushing. Please see attached. We also have many Bespoke TS permit with the same wording and the Shredding and Crushing is certainly not listed as a separate activity.
3. From your Pre app advice we also understand that you have included activity 1.16.12 Physical treatment of Non Haz waste for Dewatering. I just would like to clarify the process that we are planning to undertake at the site. The site will receive street sweeping at the site. The materials will be unloaded and stored within a bay at the site prior to further transport to another site. We are not actively and physically dewatering the waste at the site. The materials might be slightly moist on arrival and any potential liquid will drains to gullies and then a series of tanks.
We receive at various of our site street sweepings in the same manner and we have never been asked to permit this as a standalone activity. Connon Bridge permit also allows us to receive street sweeping under the TS activity.
Could you please confirm that we do not need a standalone activity (1.16.12) listed in our permit to accept street sweeping.
4. We have in the past been told that the MRF activity will have to be separated from the TS Activity. This is different to the advice received in the original concept where it is suggested that the waste can be recycled and disposed off under the HCl activity and treated under the physical treatment activity

5. You have advised that the fee attract a 50% rebate for the subsequent activities. This is not in line with recent experience where no rebate has been given. I understand that according to the charging scheme you pay 50% for any other activities which are reasonably associated with each other. Could you please explain the reasoning behind being charged for 50% of the original fee for the subsequent activities. Could you also please clarify what is meant by “any other activities which are reasonably associated with each other” in the charging scheme.

Many Thanks.

Regards

Geraldine.

Geraldine Guiguet-Doron
Environment Permit Manager
Recycling and recovery UK

Mobile: +44 7970 233842



SUEZ Recycling and Recovery UK Ltd
Packington House – Packington Lane – Little Packington - Meriden – CV7 7HN - United Kingdom
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From: Melbourne, Richard <richard.melbourne@environment-agency.gov.uk>
Sent: 19 July 2023 10:44
To: Guiguet-Doron, Geraldine <geraldine.guiguet-doron@suez.com>
Subject: Pre-application advice for SUEZ Recycling and Recovery UK Ltd (EPR/LB3906HB/A001) - further information

Hello Geraldine

I am writing with further information which takes into account the permitting of the refuse transfer station and material recycling facility together.

Both facility types can be added to the same permit. The treatment options are the same for the refuse transfer station and material recycling facility. However, if you are wanting to carry out treatment such as shredding and crushing, this will be considered a separate activity.

While these treatment activities are allowed on a standard rules permit, they are not considered as part of the base activity for a bespoke permit. This also does not include the activity of de-watering. Therefore, the charges will be:

| Charge code | Activity | Fee |
|-------------|----------|-----|
|-------------|----------|-----|

| | | |
|---------|---|---------------------------------|
| 1.16.16 | Household, commercial and industrial transfer station | £9,146.00 (full fee) |
| 1.16.11 | Material recycling facility | £3,965.00 (50% of original fee) |
| 1.16.12 | Physical treatment of non-hazardous waste | £3,965.00 (50% of original fee) |
| 1.16.7 | Clinical waste transfer station | £3,965.00 (50% of original fee) |

| Management plan | Fee |
|---|-----------|
| Noise Impact Assessment and Management Plan | £1,246.00 |
| Dust and Emissions Management Plan | £1,241.00 |
| Pest Management Plan | £1,241.00 |

The total charge including the fee charges and management plans is £24,769.

The original proposal will potentially save you just under £4,000.00 but it is your decision in how you would like the permit to be registered.

Material recycling facilities are only permitted to allow recovery codes, whereas household, commercial and industrial transfer stations allow recovery and disposal codes.

The original concept removes the material recycling facility and allows all waste to be potentially recycled and disposed of (HCI activity) and can be treated under the one activity (physical treatment).

If you have any further questions, you are welcome to contact to me on 03785 414703 or by replying to this email.

Kind regards,

Richard Melbourne
 Permitting Officer
 National Permitting Service
 Environment Agency

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