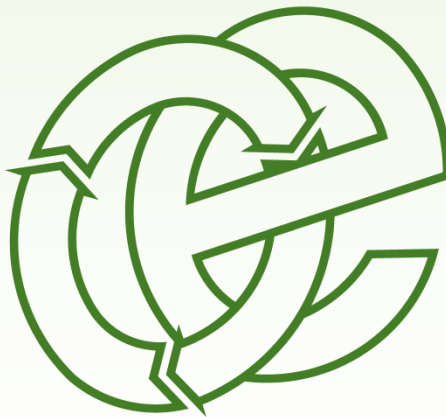


NON-TECHNICAL SUMMARY

ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA13 9BY

Neil Thomson T/A ADS Recycling

Version:	1.0	Date:	19 December 2024		
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Client No:	461	Job No:	005		



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Waste, Planning & Environmental Consultants



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CONTENTS

DOCUMENT HISTORY:	I
CONTENTS	II
LIST OF APPENDICES:	III
LIST OF TABLES	IV
1 INTRODUCTION	5
1.1 GENERAL	5
1.2 SITE HISTORY	5
1.3 PERMIT STATUS LOG	6
1.4 PRE-APPLICATION ADVICE	6
2 APPLICATION PROPOSALS	7
2.1 VARIATION PROPOSALS	7
2.3 SITE OPERATIONS / INFRASTRUCTURE	8
2.4 EWC CODES / WASTE THROUGHPUT	10
2.5 LIMITS OF ACTIVITIES	14
3 DOCUMENTATION AND FEES	16
3.1 APPLICATION FEE	16
3.2 OTHER FEES	17
3.3 DOCUMENT REFERENCES	18

List of Appendices:

Appendix I Pre-application Advice

List of Tables

Table 1.1 - Permit Status Log	6
Table 2.1 – Proposed EWC codes – HCI Waste Transfer Station	10
Table 2.2 - Proposed EWC Codes - Physical Treatment Facility (PTF).....	13
Table 2.3 -Proposed limit of activities – Non-Hazardous HCI Waste Transfer Station	14
Table 2.4 - Proposed limit of activities – Physical Treatment Facility.....	15
Table 3.1 – Base Application Fee	16
Table 3.2 – Additional Application Fees - Charges for plans and assessments.....	17
Table 3.3 – Application Form Reference Table	18

1 Introduction

1.1 General

- 1.1.1 Oaktree Environmental Ltd have been instructed to prepare this Non-Technical Summary (NTS) on behalf of Neil Thomson trading as ADS Recycling (the Operator) to support a permit variation application for Environmental Permit Ref. EPR/RP3296CB (the Permit).
- 1.1.2 The Permit authorises operations in accordance with the requirements of a SR2008 No.7: household, commercial & industrial waste transfer station with treatment and asbestos storage facility situated at ADS Recycling, 63 Camsley Lane, Lymm, Warrington, Cheshire, WA13 9BY.
- 1.1.3 The Operator is seeking to vary the Permit to authorise the external storage of non-specified wastes due to not having a sealed drainage system, removing asbestos from the authorised list of waste codes and changing to a household, commercial, industrial waste transfer station from a household transfer station further detail of the application proposals are provided in Section 2.1 overleaf.

1.2 Site History

- 1.2.1 The permit was originally issued for the site in 1992 in the form of a Waste Disposal Licence. The licence was then varied in 2009 to a Standard Rules (SR) Permit SR2008 No.7, a full status of the permit can be found in the Section 1.3 overleaf.
- 1.2.2 Since the Permit issue in 2009 there have been no changes to site operations, therefore the site has been operating in this way for approximately 15 years. It is important to note that in this time, there have been no complaints relating to dust, noise or odour, nor have there been any pollution incidents.

1.3 Permit Status Log

Table 1.1 - Permit Status Log

Status log of the permit		
Description	Date	Comments
Waste Disposal Licence 61632	07/05/1992	Original Waste Disposal Licence Issued
Licence modified	11/12/1992	
Licence modified	27/10/1994	
Licence modified	29/01/2003	
Variation determined	31/12/2009	Permit varied to SR2008 No.7

1.4 Pre-application Advice

- 1.4.1 Pre-application advice was obtained from the Environment Agency in relation to the changes proposed as part of this variation application. It was confirmed during the enhanced pre-application advice correspondence that no Noise Impact Assessment would be required to be produced as part of this variation to a bespoke permit. This is due to the site being operated under the SR permit for over 15 years and there being no previous issues relating to noise along with no changes to physical treatment operations on site. The risk of noise has been addressed in the Environmental Risk Assessment (ERA) prepared to support this variation, see document ref. CAMS/461-D. A Noise Management Plan has also been prepared outlining mitigation measures to prevent / manage noise emissions from operations on site.
- 1.4.2 A full copy of the pre-application advice received is included in Appendix I of this document.

2 Application Proposals

2.1 Variation Proposals

- 2.1.1 The operator is seeking to vary the permit to bespoke and authorise the external storage of non-specified wastes. The variation has been instigated due to the drainage in the northern part of the site not comprising of a sealed drainage system meaning the site is not able to comply with the conditions of the current SR permit which state “all waste shall be stored and treated on an impermeable surface with sealed drainage system”.
- 2.1.2 The current SR permit comprises a large number of EWC codes, a full list of waste codes proposed to be accepted at the site as part of this variation has been provided in Table 2.1 overleaf. The operator is proposing to remove asbestos from the authorised list of waste codes in the permit. If any asbestos is found mixed within loads, it will be immediately quarantined and removed from site.
- 2.1.3 There are no proposed changes to the permit boundary.
- 2.1.4 The operator is proposing a reduction in throughput of waste at the site from <75,000 tonnes per annum to <50,000 tonnes per annum.
- 2.1.5 There are no proposed changes to physical / mechanical treatment activities undertaken on site.

2.3 Site Operations / Infrastructure

2.3.1 As stated above, there are no proposed changes to the physical / mechanical treatment operations undertaken on site, which are listed in section 2.2.3 and 2.2.4 below, it is important to note these operations have been undertaken on site since the issue of the SR permit approximately 15 years ago.

2.3.2 Operations on site consist of the household, commercial, industrial (HCI) waste transfer facility operations and physical treatment activities.

2.3.3 Wastes accepted as part of the HCI waste transfer operation will undergo the following:

- a) Sorting (with loading shovel/360° excavator or by hand).
- b) Manual separation (by picking line).

2.3.4 Physical treatment operations to be undertaken consist of the following:

- a) Screening (by using appropriate mechanical screening plant and equipment).
- b) Mechanical separation (by density separator).
- c) Baling (by using an appropriate handfed manual baler).

Drainage

2.3.5 The onsite drainage is split into two areas (north and south).

2.3.6 The southern area comprises of a fully sealed drainage system, the site is laid to fall to a 3,000 litre underground sealed storage tank which is emptied by a licenced contractor and taken to a suitably permitted facility for treatment.

2.3.7 The northern area of the site drains to surface water via a three stage full retention interceptor. Waste stored externally in the northern area of the site comprises of processed non-hazardous waste stored in sealed containers and stockpiles of inert materials. An Environmental Risk Assessment has been prepared as part of the

variation, a detailed assessment of the discharge to surface from the northern area of the site has been included, see document ref. CAMS/461-D.

- 2.3.8 All wastes will continue to be stored and treated on an impermeable surface, wastes will be stored in accordance with the locations and quantities illustrated on Drawing No. CAMS/461/03. The onsite drainage is also illustrated on Drawing No. CAMS/461/03.

2.4 EWC Codes / Waste Throughput

2.4.1 There are no proposed changes to the throughput of waste at the site. The combined throughput for the non-hazardous waste transfer station and physical treatment activity will be <50,000 tonnes per annum. It is not considered possible to specify a throughput for each activity due both activities being directly connected to one another i.e. waste accepted under the waste transfer station will undergo physical treatment.

2.4.2 The EWC codes in Table 2.1 are proposed to be included in the permit under the household, commercial and industrial waste transfer station. The proposed treatment activities for each waste type are also included.

Table 2.1 – Proposed EWC codes – HCI Waste Transfer Station

Waste Code	Description	Proposed Treatment Activity
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING	
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing	
02 01 03	plant-tissue waste	Manual sorting, separation (handpicking)
02 01 04	waste plastics (except packaging)	
02 01 07	wastes from forestry	
02 01 10	waste metal	
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE PULP, PAPER, AND CARDBOARD	
03 01	wastes from wood processing and the production of panels and furniture	
03 01 01	waste bark and cork	Manual sorting, separation (handpicking)
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	Manual sorting, separation (handpicking)
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	Manual sorting, separation (handpicking)
10	WASTES FROM THERMAL PROCESSES	
10 12	wastes from the manufacture of ceramic goods, bricks, tiles, and construction products	
10 12 08	waste ceramics, bricks, tiles, and construction products (after thermal processing)	Manual sorting, separation (handpicking)
10 13	wastes from manufacture of cement, lime, plaster and articles and products made from them	
10 13 14	waste concrete and concrete sludge	Manual sorting, separation (handpicking)
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	Manual sorting, separation (handpicking)
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, protective clothing other than those mentioned in 15 02 02	Manual sorting, separation (handpicking)
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST	
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and waste from dismantling of end-of-life vehicles and vehicles maintenance (except 13, 14, 16 06 and 16 08)	
16 01 03	end-of-life tyres	Manual sorting, separation (handpicking)
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	Manual sorting, separation (handpicking)

16 02 16	components removed from discarded equipment other than those mentioned in 16 02 51	
16 03	off-specification batches and unused products	
16 03 04	inorganic wastes other than those mentioned in 16 03 03	Manual sorting, separation (handpicking)
16 03 06	organic wastes other than those mentioned in 16 03 05	
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	
17 01	concrete, bricks, tiles, and ceramics	
17 01 01	concrete	Manual sorting, separation (handpicking)
17 01 02	bricks	
17 01 03	tiles and ceramics	
17 01 07	mixture of concrete, bricks, tiles, and ceramics other than those mentioned in 17 01 06	
17 02	wood, glass and plastic	
17 02 01	wood	Manual sorting, separation (handpicking)
17 02 02	glass	
17 02 03	plastic	
17 03	bituminous mixtures, coal tar and tarred products	
17 03 02	Road base and road planings (other than those containing coal tar) only	Manual sorting, separation (handpicking)
17 04	metals (including their alloys)	
17 04 01	copper, bronze, brass	Manual sorting, separation (handpicking)
17 04 02	aluminium	
17 04 03	lead	Manual sorting, separation (handpicking)
17 04 04	zinc	
17 04 05	iron and steel	
17 04 06	tin	
17 04 07	mixed metals	Manual sorting, separation (handpicking)
17 04 11	cables other than those mentioned in 17 04 10	Manual sorting, separation (handpicking)
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	Manual sorting, separation (handpicking)
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	Manual sorting, separation (handpicking)
17 08	gypsum-based construction materials	
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01	Manual sorting, separation (handpicking)
17 09	other construction and demolition wastes	
17 09 04	mixed construction and demolition waste other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Manual sorting, separation (handpicking)
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTEWATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 01	paper and cardboard	Manual sorting, separation (handpicking)
19 12 02	ferrous metal	
19 12 03	non-ferrous metal	Manual sorting, separation (handpicking)
19 12 04	plastic and rubber	Manual sorting, separation (handpicking)
19 12 05	glass	
19 12 07	wood other than that mentioned in 19 12 06	
19 12 08	textiles	Manual sorting, separation (handpicking)
19 12 09	minerals (for example sands, stones)	
19 12 10	combustible waste (refuse derived fuel)	
19 12 12	restricted to crushed bricks, tiles, concrete and ceramics only. Does not include fines from the treatment of any non-hazardous waste or gypsum from recovered plasterboard	
19 12 12	soil Substitutes other than those containing dangerous substances only	
19 13	wastes from soil and groundwater remediation	
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01	Manual sorting, separation (handpicking)

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	Manual sorting, separation (handpicking)
20 01 02	glass	
20 01 10	clothes	
20 01 11	textiles	
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	Manual sorting, separation handpicking)
20 01 38	wood other than mentioned in 20 01 37	Manual sorting, separation (handpicking)
20 01 39	plastics	
20 01 40	metals	Manual sorting, separation (handpicking)
20 01 41	wastes from chimney sweeping	Manual sorting, separation (handpicking)
20 02	garden and park wastes (including cemetery waste)	
20 02 01	biodegradable waste	Manual sorting, separation (handpicking)
20 02 02	soil and stones	
20 03	other municipal wastes	
20 03 01	mixed municipal waste	Manual sorting, separation (handpicking)
20 03 03	street-cleaning residues	
20 03 06	waste from sewage cleaning	
20 03 07	bulky waste	

- 2.4.3 The following EWC codes in Table 2.2 will undergo physical treatment under the physical treatment of non-hazardous waste operation. Physical treatment activities for each EWC code have been provided.

Table 2.2 - Proposed EWC Codes - Physical Treatment Facility (PTF)

Waste Code	Description	Proposed Treatment Activity
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	
17 01	concrete, bricks, tiles, and ceramics	
17 01 01	concrete	Screening, density separator
17 01 02	bricks	
17 01 03	tiles and ceramics	
17 01 07	mixture of concrete, bricks, tiles, and ceramics other than those mentioned in 17 01 06	
17 04	metals (including their alloys)	
17 04 01	copper, bronze, brass	Baling
17 04 02	aluminium	
17 04 07	mixed metals	
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	Screening, density separator
17 05 08	track ballast other than those mentioned in 17 05 07	
17 09	other construction and demolition wastes	
17 09 04	mixed construction and demolition waste other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Screening, density separator
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTEWATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 03	non-ferrous metal	Baling
19 12 09	minerals (for example sands, stones)	Screening, mechanical density separator
19 12 10	combustible waste (refuse derived fuel)	
19 12 12	restricted to crushed bricks, tiles, concrete and ceramics only. Does not include fines from the treatment of any non-hazardous waste or gypsum from recovered plasterboard	
19 12 12	Soil substitutes other than those containing dangerous substances only	
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	
19 13	wastes from soil and groundwater remediation	
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01	Screening, mechanical density separator
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 40	metals	Baling
20 01 41	wastes from chimney sweeping	Screening
20 02	garden and park wastes (including cemetery waste)	
20 02 01	biodegradable waste	Screening, density separator
20 02 02	soil and stones	
20 03	other municipal wastes	
20 03 01	mixed municipal waste	Screening
20 03 03	street-cleaning residues	

2.5 Limits of Activities

2.5.1 The limits of activities for each operation are set out in Table 2.3 and Table 2.4 below:

Table 2.3 -Proposed limit of activities – Non-Hazardous HCl Waste Transfer Station

TABLE S1.1 activities		
Activity reference	Description of activities for waste operations	Limits of activities
A1: Non-hazardous Household, Commercial & Industrial Waste Transfer Station with Treatment.	<p>R3: Recycling/reclamation of organic substances which are not used as solvents</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>D14: Repackaging prior to submission to any of the operations numbered D1 to 13</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>Treatment consisting only manual sorting and separation of waste for disposal (no more than 50 tonnes per day) or recovery.</p> <p>No more than 50,000 tonnes of waste will be accepted at the site per annum.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 1 year prior to disposal or 3 years prior to recovery.</p> <p>No more than a total of 30 intact waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site at any one time.</p> <p>All wastes, other than specified wastes shall be stored and treated on an impermeable surface.</p>
	Discharge of integral site drainage in the northern yard (surface water effluent) from the emission point indicated on Drawing No. CAMS/461/03.	<p>Run-off from the impermeable surface in the external yard within the northern area of the site used to store waste drains to surface water via a three stage full retention interceptor.</p> <p>No visible oil or grease shall be present in the discharge.</p> <p>There shall be no discharge off site from the buildings used to store and or treat waste.</p> <p>All other waste storage / treatment areas shall drain to a sealed drainage system.</p>

Table 2.4 - Proposed limit of activities – Physical Treatment Facility

TABLE S1.1 activities		
Activity reference	Description of activities for waste operations	Limits of activities
A2: Physical treatment facility	<p>R3: Recycling/reclamation of organic substances which are not used as solvents</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>Treatment consisting only manual sorting, screening, baling, mechanical separation (density separator) and separation of waste for recovery as a soil, soil substitute or aggregate.</p> <p>No more than 50,000 tonnes of waste will be accepted at the site per annum.</p> <p>All wastes, other than specified wastes shall be stored and treated on an impermeable surface.</p>

3 Documentation and Fees

3.1 Application fee

3.1.1 Table 3.1 sets out the fees required for the application.

Table 3.1 – Base Application Fee

EPR Charging Scheme Ref	EPR Charging Scheme Ref & Description	Type of application	Fee
1.16.6	Household, commercial and industrial waste transfer station; includes assessment of Fire Prevention Plan and Odour Management Plan.	Normal variation	£4,588
1.16.12	Physical treatment of non-hazardous waste.	Normal variation	£3,965
		TOTAL	£8,553.00

3.2 Other Fees

3.2.1 Table 3.2 sets out the documentation to be submitted with this application:

Table 3.2 – Additional Application Fees - Charges for plans and assessments

General	Consideration	Document & Ref	Fee
Forms Part A, C2, C4 & F1	Mandatory	N/A	N/A
Evidence of technical competence	Mandatory	CAMS-461-G	N/A
Environmental Management System	Mandatory	CAMS-461-A	N/A
Fire Prevention Plan	Mandatory (assessment Included in HCI Fee).	CAMS-461-B	N/A
Emissions Management Plan	Considered necessary due to proximity of sensitive receptors	CAMS-461-F	£1,241
Odour Management Plan	Mandatory (Assessment Included in HCI Fee).	CAMS-461-E	N/A
Noise & Vibration Management Plan	Agreed Considered necessary due to proximity of sensitive receptors	CAMS-461-H	£1,246
Pests Management Plan	Considered unnecessary due to no historic pest issues arising at the site and no additional waste types being proposed.	N/A	N/A
		TOTAL	£2,487

3.2.2 Based on the above, the total fee payable to the Environment Agency on submission will be **£11,040**.

3.3 Document references

3.3.1 Table 3.3 below summarises which parts of the application forms request the above documentation which would normally be completed in Application Form Part F1; Section 6.

Table 3.3 – Application Form Reference Table

Application Form	Question Ref	Document Ref
Part C2	2b & Table 1	CAMS-461-C
Part C2	3b	CAMS-461-G
Part C2	3d	CAMS-461-A
Part C2	5a	CAMS-461-01, CAMS-461-02, CAMS-461-03, CAMS-461-04 – also found in Appendices of relevant documentation
Part C2	5c	CAMS-461-C
Part C2	5d & 5e	CAMS-461-B
Part C2	6	CAMS-461-D
Part C4	1 & Table 1a	CAMS-461-C

Appendix I

Pre-application Advice

Emma Gibson

From: Dupont, Paul <paul.dupont@environment-agency.gov.uk>
Sent: 08 November 2024 16:01
To: Chris Parry
Subject: RE: 0461 RE: Pre-application Advice - EPR/RP3296CB/P001 - A D S Recycling

Good afternoon Chris,
The site neighbours a residential property and there are a few others in close proximity.

Even if there have been no dust or noise complaints from the site, there will still need some form of consideration of these emissions in your risk assessment and management documents. I would suggest you prepare a DEMP that outlines the current controls used by the site, the changes they are proposing to the building, and anything that is relevant to preventing dust emissions. I don't know what, if any, measures they currently use, but if they are working, they should be included in your application. If there is a dust complaint in the future, the first thing our compliance team will ask for is a copy of their Dust Management Procedures and expect them to have a process in place for dealing with the situation. The consequences are worse for sites which have no plans in place.

As for noise, if you were to apply for a new bespoke permit, an NIA would be required due to the proximity of receptors. As the operator has only operated under an SR permit, there was no option for us to request one previously. Strictly speaking you should provide one, but if there have been no previous noise issues and nothing is changing on site (bearing in mind I am not assessing an application), you should be ok without a Noise Impact Assessment. This doesn't mean you won't have to address noise in your risk assessment. As with dust, I would recommend you submit a noise management plan with your application, for the same reasons mentioned above.

If you are challenged at validation to produce a Noise Impact Assessment, refer them to this email as pre-app advice.

My recommendation is based on your earlier statement that nothing other than the drainage will be changing, that there have been no compliance issues relating to dust or noise and that there will be no increase in risk at the facility. If any of these factors change, you may have to take a different approach than that outlined above.

I'm planning to add an additional hour to the cost for the pre-application advice for writing this email. Is that acceptable to you?

Regards,

Paul

From: Chris Parry <chris@oaktree-environmental.co.uk>
Sent: 08 November 2024 10:48
To: Dupont, Paul <paul.dupont@environment-agency.gov.uk>
Subject: RE: 0461 RE: Pre-application Advice - EPR/RP3296CB/P001 - A D S Recycling

Thanks Paul.

I don't think there is anything more we can discuss in relation to the drainage so we will have to discuss this with the EA during the determination stage.

One thing I would mention is the requirement for a NIA and DEMP as the site has been operating under the SRP since 2010 and to my understanding has not been subject to any noise/dust complaints. You will be aware, we are not proposing any additional operations which would increase noise/dust, the site will be operating in exactly the same manner as it has under the SR2008No3, the only reason for the change is because of the drainage which was identified by inspection officers in November 2023. The operator is also increasing the size of the transfer building so it is fully enclosed so essentially, the potential for noise and dust pollution will be reduced significantly.

If you think an NIA/DEMP will be required despite of the above then we will have to prepare these documents. We just don't want to be in a position where we submit without the documents, permitting disagree and then return the application as this puts the operator in a potential enforcement situation. I would try and explain the above in the non-technical summary/risk assessment but there is an additional cost of approx. £15k – £20k in third party & EA fees for the operator if these assessments are required so I want to ensure permitting are 100% confirming these documents will be required.

I hope you understand the query but please feel free to contact me if you wish to discuss.

Regards
Chris

Chris Parry
Principal Consultant

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From: Dupont, Paul <paul.dupont@environment-agency.gov.uk>

Sent: 08 November 2024 10:29

To: Chris Parry <chris@oaktree-environmental.co.uk>

Subject: RE: 0461 RE: Pre-application Advice - EPR/RP3296CB/P001 - A D S Recycling

Good morning Chris,

I'm glad you have come to that conclusion. All we have now is the various guidance I have referenced and it's difficult for us or applicants to justify going outside that. There may be other cases where we have allowed a discharge from what appears to be a similar site, but it will either be older permits or there is some site-specific reason we have allowed it. I can't really comment on the decisions other permitting officers have made. NRW diverged away from us a while ago a few years ago and their decision-making process on water quality issues is likely to be a bit different to ours by now. The way they permit discharges appears to be, at least.

When the standard rules permits are revised for HCI type sites, they are likely to include a permit condition to further clarify the wording preventing point-source water discharges from areas

connected with areas used for storing, treating or handling waste. The changes are likely to be in line with [inert and non-hazardous appropriate measures](#) Section 6.4, so it may be worth you reading this. If you reference these appropriate measures for an application, and they are referenced in the permit, you are essentially agreeing the permit holder will follow this approach.

I'll give it a week before I close this -preapp in case you have any further questions.

Regards,

Paul

From: Chris Parry <chris@oaktree-environmental.co.uk>
Sent: 07 November 2024 16:51
To: Dupont, Paul <paul.dupont@environment-agency.gov.uk>
Subject: RE: 0461 RE: Pre-application Advice - EPR/RP3296CB/P001 - A D S Recycling

Thanks Paul.

As discussed, it is likely we will proceed with option 1 and I am satisfied we can risk assess that no pollutants from the two waste types mentioned based on the current drainage infrastructure would escape into the surface water. Also, the two other permits we have had issued in Wales allow the activity. Although, based on your advice, it would appear the EA would not allow any surface water which has come in contact with any waste to discharge to a surface water, I don't think this would be the case for every waste site in England and would be assessed on a site-by-site basis? I would assume some sites would discharge to surface water without a water discharge activity.

Nevertheless, I don't think there is anything further we can request so we will have to go on the advice received and discussed with permitting.

Regards

Chris

Chris Parry
Principal Consultant

 01606 558833 | 07764 997730

 chris@oaktree-environmental.co.uk

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Oaktree Environmental
Waste, Planning & Environmental Consultants





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From: Dupont, Paul <paul.dupont@environment-agency.gov.uk>
Sent: 07 November 2024 15:06
To: Chris Parry <chris@oaktree-environmental.co.uk>
Subject: RE: 0461 RE: Pre-application Advice - EPR/RP3296CB/P001 - A D S Recycling

Good afternoon Chris,

Before I answer your question, I need to explain the limits of the advice we can give at pre-application. We have to be careful that we are not making decisions that could be considered the 'pre-determination' of permit applications. This is explained in section 5.4 of the [Environmental Permitting Core Guidance](#)

Regarding the current issues with A D S Recycling, we cannot directly tell you or imply whether a proposal would be acceptable as preapplication advice is given outside of the permit application process. We can advise, as I did with the preapplication document I sent you, on the requirements that you would need to satisfy for a proposal to be acceptable at permit determination, but we can't go beyond that.

Regarding your query for a potential discharge, this means you either need to justify that any discharged liquids would be clean and uncontaminated and therefore not fall under the description of a 'water discharge activity' (EP Regulations Schedule 21) or you need to carry out a 'specific substances assessment' on the effluent from the site. We do not have an option to consider any of the permitted wastes as 'low-risk' and therefore not requiring appropriate assessment. This is the limit to the advice we can give at pre-application. Your options are to either follow the previous pre-application advice or attempt to justify an alternative proposal that would be considered during the permit variation determination. The two wastes you mentioned for external storage do have the potential to release pollutants to the environment and therefore we would require evidence at permit determination that this risk has been assessed.

Regards,

Paul

From: Chris Parry <chris@oaktree-environmental.co.uk>
Sent: 06 November 2024 10:12
To: Dupont, Paul <paul.dupont@environment-agency.gov.uk>
Subject: 0461 RE: Pre-application Advice - EPR/RP3296CB/P001 - A D S Recycling
Importance: High

Hi Paul,

Many thanks for the advice.

Following a review, I am still slightly uncertain which options is best moving forward, I would consider option 1 is feasible but I was wondering if you could review an updated draft of the site layout and consider whether it is possible to respond to the following:

1. The site drainage will essentially be split into two areas, everything south of AREA 16 will drain into a sealed sump inside the waste transfer building, everything to the north will drain into the surface water via the three-stage interceptor and silt trap. This is the current arrangement of the site which has been taking place for over 10 years with the exception of the sealed sump inside the building. It is proposed all wastes stored north of AREA 16 (including AREA 16) will drain to the surface water. This area of the site will be used to store waste but either be in sealed containers or covered storage bays. The only exceptions are the following:
 - AREA 24 which comprises an open bay of either recycled stone/hardcore which falls off the end of the mechanical treatment process (19 12 12 aggregates) or source segregated stone/hardcore (17 01 07)
 - An area which is used on a temporary basis comprising a recycled wood loading area, wood may be stored for a few hours whilst awaiting a bulker lorry to collect.

It is apparent some surface water may be in contact with the above wastes but we would consider any potential contamination to be very low given the nature of the stored wastes and that they have been sorted and will not be contaminated.

2. I have also attached a couple of permits which have recently been issued by NRW, the sites granted the permits were similar to this site in that no foul sewer connection or sealed sump option was feasible. To provide you with a quick summary:

- PAN-022795 comprises a non-hazardous plastics recycling facility, the site stores non-hazardous plastic packaging bales (EWC codes 15 01 02 / 19 12 04) on areas of concrete which drain to the surface sewer.
- PAN-023809 comprises a CA site which stores skips of source segregated wastes (including hazardous items) and the whole site drains to the surface water.

We would consider the ADS site comprises a mixture of the above two permits so we would hope for a similar worded condition shown in Table S1.1 of the permits in relation to the drainage. I am aware these are purely site specific but having been to all three sites I would be confident the measures specified on page 3 of the pre-app advice.

It is very important we agree this prior to preparing the permit application as we don't want to be in a position where the application is either returned or refused and the operator is in a potential enforcement situation. The operator would be happy to pay for further advice if more time is required to respond to the above points.

I trust this is clear but please feel free to contact me if you have any queries.

Regards
Chris

Chris Parry
Principal Consultant

01606 558833 | 07764 997730

chris@oaktree-environmental.co.uk

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From: Dupont, Paul <paul.dupont@environment-agency.gov.uk>
Sent: 05 November 2024 16:48
To: Chris Parry <chris@oaktree-environmental.co.uk>
Subject: Pre-application Advice - EPR/RP3296CB/P001 - A D S Recycling

Dear Chris Parry

Pre application advice – Enhanced service

Site: A D S Recycling, Camsley Way, Lymm, WA13 9BY

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:

- Telephone conversation on 23/10/2024

What this enhanced pre application advice covers

As part of this service we have provided you with the following information:

Application reference number	EPR/RP3296CB/P001
Documents attached	Preapplication Advice Document

Exemptions

A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has limits and conditions that you must meet.

To find out if there is an exemption for your waste operation, and check that you meet the conditions, read the [Waste Exemptions](#) guidance.

Future reforms to waste exemptions will mean exemptions cannot be registered at or adjacent to (where there is a direct link) permitted waste operations or installations. Waste exemptions cannot currently be used on a permitted installation. For further details including transition periods, please read [Waste Exemptions – Getting Ready for Change](#). We do not expect changes to the Environmental Permitting Regulations (EPR) before 2025. The exact date depends on parliament and its legislative programme.

After you apply

We will check your application to make sure it is complete. We refer to these checks as ‘validation’ and ‘duly making’. This is to ensure we have enough information to start to determine your permit application. We will contact you if information is missing and can feasibly be provided within 10 working days. If we consider information cannot be provided within this time frame we will return your application with a list of what is missing.

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

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

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

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

Once an application is validated and duly made, it is ready to be allocated for determination.

The time it takes us to allocate an application depends on a number of factors, including the complexity of the specific application and the availability of a member of our team with the right skills to assess it.

The amount of time taken to determine your application will vary. It will be impacted by factors such as:

- The quality of the application
- The complexity of the application
- Whether an application is of high public interest
- Whether the application includes novel technologies or techniques
- Whether the determination requires input from others, both internal and external to the Environment Agency
- Whether modelling and/or monitoring and assessment is required, for example Air Quality modelling and assessment or water discharge or groundwater activity specific substances assessment.

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

What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: EPR/RP3296CB/P001

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to: psc@environment-agency.gov.uk

Please email applications where possible. If email is not possible you can submit by post to: Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

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 and water discharge activities 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 £400 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 Paul Dupont at paul.dupont@environment-agency.gov.uk.

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

Paul Dupont

Senior Permitting Officer – Waste Regime

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Preapplication Advice

EPR/RP3296CB/P001 - A D S Recycling

05/11/2024

Query from Chris Parry, Oaktree Environmental:

The SRP currently states as per table 2.3, point 2 (c):

- All non-hazardous waste shall be stored and treated on an impermeable surface with sealed

drainage system; and

point 3:

- Specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system.

The operator would look to seek to obtain a bespoke permit which would enable recycled non-hazardous wastes such as wood, plastics, scrap metal and specified wastes to be stored on an impermeable surface which would drain into a surface watercourse via a three-stage full retention interceptor and silt trap. All mixed waste and wastes which have the potential to cause contamination would be stored inside a separately sealed area on an impermeable surface with sealed drainage.

Please can you provide answers to the following:

- 1. Confirm the application fee*
- 2. Confirm what information would be required*

A D S Recycling (the Operator) currently hold a SR2008No7 permit, which has specific requirements relating to site surfacing and drainage. From our discussions and the site plan you provided, it does not appear that the operator can currently meet these requirements and could not without significant changes to the infrastructure of the facility. This pre-application advice will not address any issues relating to compliance with the current permit as it falls outside of the remit of the preapplication service.

I will address the discharge issue first.

Please note that the terms 'waste water' and 'wastewater' should be taken in the context of the guidance or advice they are used in. The terms generally mean contaminated water which is considered a waste, water that has come into contact with waste, or liquids from the waste itself.

Where I refer to a 'discharge consent', this means a bespoke environmental permit or part of a permit that allows the discharge of waters to the environment. Discharge consent is not current terminology in the application process as it is now called a 'bespoke water discharge activity'.

Our guidance [Discharges to surface water and groundwater: environmental permits - GOV.UK](#) sets out the circumstances in which a water discharge permit is required or not required.

The relevant parts of our guidance are as follows:

You may need an environmental permit if you discharge liquid effluent or waste water:

- **into surface waters**, for example, rivers, streams, estuaries, lakes, canals or coastal waters – known as ‘water discharge activities’
- *into or on the ground, such as spreading waste sheep dip, or discharging treated sewage effluent to ground through an infiltration system – known as ‘groundwater activities’*

Waste water includes:

- *poisonous, noxious or polluting matter*
- **polluting substances**
- **waste matter**
- **trade or sewage effluent**

If your water discharge or groundwater discharge is part of a waste operation, installation or mining waste operation, you can make the discharge part of your [installation permit](#) or [waste or mining waste permit](#).

The relevant circumstances for being able to discharge without a discharge permit are:

- *to discharge uncontaminated water, such as clean rainwater from roofs (as explained in [groundwater protection position statement G12](#)) or from small areas of hardstanding to surface water*
- *to discharge uncontaminated water collected from public roads and small parking areas (that’s been through a properly maintained oil separator) to surface water*

Based on our guidance, for your facility, there are two potential options you need to consider:

1. You apply to change to a bespoke permit without a discharge consent and discharge only clean and uncontaminated water, from areas not in contact with waste materials, or
2. You apply to change to a bespoke permit with a discharge consent.

Option 1 – No discharge consent required.

Bespoke permits allow the Environment Agency to set site-specific requirements relating to waste storage, treatment, drainage etc. that are different to the those in the relevant standard rules. When we determine an application for a bespoke permit, we must be

satisfied that an Applicant's proposals prevent or minimise the risk to the environment and that the requirements of our regulations and guidance are met.

We will only allow an unpermitted water discharge from a waste facility if we are confident that the water will be clean and uncontaminated. This must be demonstrated in a permit application through a thorough risk assessment and the relevant appropriate measures to prevent pollution clearly described in management documents and drainage plans. The easiest way to do this is to include a document with the application that specifically addresses the management of water on the site, often called a 'Surface Water Management Plan' or similar.

The following advice does not cover every aspect of what you would need to include in an application regarding the prevention of surface water pollution, but these are some general things we would expect as a starting point.

In your application documents, you would need to describe the measures that will be used for preventing water from coming into contact with waste. Typical examples include covering storage areas and storing waste inside a building or in covered containers. You would have to describe the housekeeping procedures you will use to prevent the build-up of mud, waste and other debris on areas from which water will be discharged and how you will record that you have done this.

You must have written processes to ensure waste is stored appropriately, for example, not exceeding the capacity of the storage area and not protruding from the front of the bays. If containers are to be used, these must be confirmed water-tight, checked regularly for defects and these checks recorded.

Appropriate containment must be in place to prevent waste water mixing with clean run off and leaving the site, such as impermeable surfacing and sealed drainage, sumps etc. Rain will get into open-fronted storage, therefore appropriate design features such as sloping bays and lips or kerbs at the front, should be considered. These details should be shown in site plans and described in management documents.

You must have plans in place of how to deal with any spills or leaks that may occur if waste arrives wet, becomes wet, or there is a risk of waste water leaving containment.

The site's interceptor will only be effective for the removal of oils and silt if regularly emptied and maintained, therefore procedures for doing this and recording the maintenance should be detailed in the relevant part of the management documents submitted with the permit application. As described in more detail below for Option 2, it would not remove or reduce all potential contaminants.

We would assess your proposals as part of the determination process. If approved, any relevant control measures to manage water would be referenced in the Operating Techniques table of the permit. When the permit is issued, the control measures then become a requirement of the permit and as such, enforceable.

Option 2 – obtain a discharge consent as part of a bespoke permit application.

As stated earlier, in our guidance, water which has come into contact with waste is considered 'wastewater' or trade effluent. Assuming it is not possible for the site drainage to connect to foul sewer or viable to collect the wastewater and have it tankered from the site, it leaves the option of obtaining a consent to discharge.

A discharge from the site to a surface watercourse would be considered a point-source emission from the waste facility. The application form requirements are detailed below.

The site benefits from an interceptor which, if effective, would remove oils, fuels and silt from the effluent. Waste water can contain a wide range of potential contaminants, dependant on the waste the water comes into contact with. Pollutants such as heavy metals, dissolved organic carbon, pesticides and preservatives (not an exhaustive list) would pass through the interceptor to the watercourse. If you intend to apply for a discharge consent that includes potentially contaminated water, the risk of these contaminants, and others, must be assessed in your application.

Our guidance [Surface water pollution risk assessment for your environmental permit - GOV.UK](#) sets out the requirements for screening and assessing the risk to the environment from any hazardous chemicals and elements. Please read through this guidance in detail. You may also find our H1 Risk assessment tool and associated guidance useful when carrying out the screening for the emissions [H1 Tool | ADMLC](#).

Application forms and costs.

Were you to apply to vary to a bespoke permit with a discharge consent, you would have to complete the following forms:

- Part A: about you
- Part C2: varying a bespoke permit
- Part B6 bespoke water discharge activity, groundwater activity, or point source emission to water from an installation
- Part C4: Varying a bespoke waste operation permit
- Part F1: charges and declarations

To vary your standard rules permit to a bespoke permit without the consent, omit form B6.

As per section 3.2.1 our guidance [Environmental permits: when and how you are charged - GOV.UK](#), the fee to change from a standard rules to a bespoke is the variation charge of the activity you are changing to.

The equivalent bespoke version of the SR2008 No7 permit (assuming the same waste codes and activities) would be a multi-activity permit consisting of the following charging elements:

- Hazardous waste transfer station (normal variation application). - £3,984
- Physical treatment of non-hazardous waste (normal variation application)- £3,965
- Fire Prevention Plan Assessment - £1,246
- Emissions Management Plan Assessment - £1,241
- Odour Management Plan and Pest Management Plan assessment (if required due to the quantities of odorous/putrescible waste accepted) - £1,246 and £1,241
- Noise Management Plan Assessment (if applicable) - £1,246.
- Specific Substances Assessment for a water discharge activity to surface water. £3,774

Total = £17,943 with discharge consent application

Total = £14,169 without discharge consent application

Some of the management plans may not be required if you commit to different waste types or activities to the current standard rules or your risk assessment shows there is no significant risk to receptors from that emission.

There are a few potential charges for a discharge application. These are described in application form B6 and you will have to select the most relevant. The charge depends on the volume of the effluent to be discharged. You are likely to need either 1.3.11 or 1.3.12 from the charging scheme, but you would have to work this out based on your assessment of the effluent from the site.