

Our ref: AC/BR10255/DM1

Date: 16 January 2025

Your ref:

Mr T Ross

Environment Agency

By e-mail to

[tim.ross@environment-agency.gov.uk](mailto:tim.ross@environment-agency.gov.uk)

[psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk).

[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)

Dear Tim,

**EPR/VP3527SJ/A001, Middlemore Lane WTS and HWRC**

**Response to Duly Making Queries**

Thank you for your e-mail of 2<sup>nd</sup> January requesting further information in order to duly make the above application. Please find a response to your queries below.

***1. Unfortunately the application payment you sent is incorrect. The correct application charge is £16,407 including the assessment of a Noise Management Plan (NMP), where the site also includes a clinical waste transfer station the application charge is £20,372. This leaves a balance of £1,246 or where it is confirmed through the response to question 4 below the balance to pay is £5,211.***

The additional £1,246 for assessment of the Noise Assessment and Noise Management Plan has been paid by Walsall Council.

We do not believe that the activities on site constitute a separate clinical waste transfer station and so we do not consider that that part of the fee applies. See the response to question 5 below.

***2. Provide an update part B form with questions 3d completed to confirm that your Management system will meet the guidance.***

I have enclosed a copy of part B of the application form with this box ticked.



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***3. Provide a Noise Impact Assessment and Noise Management plan for the application, the site is in proximity to residential receptors that the proposed activities may have an impact upon.***

A Noise Assessment Report was prepared for the planning application. This demonstrated that the site would not impact on nearby receptors. A copy is enclosed. We have also provided a Noise Management Plan as requested.

***4. Provide an updated risk assessment that addressed noise generated by the waste management operation of Civic Amenity site around the compaction of waste within the bins (skips) using plant and movement of the waste storage bins (skips). In addition, in Table 3.1 type please confirm what the acronym STS stands for, should this read WTS.***

An updated Risk Assessment is enclosed including two additional lines to address compaction of waste within skips and movement of waste storage bins or skips.

The Acronym “STS” stands for small traders’ scheme. As set out in the application, the Council intend to operate a separate area for use by small traders, in order to encourage the legal management of waste arisings from this source. This is separate to the HWRC but will operate in a similar way.

***5. The waste types listed for the Waste Transfer Station (WTS) include a number of waste codes that would potentially fall under a separate clinical (healthcare) waste transfer activity under the permit. To allow consideration of whether the site will be operating a separate clinical (healthcare) transfer station activity in addition the WTS, for the chapter 18 EWC codes please confirm the actual source of the waste.***

Having read your note, we do not believe that the site will operate a separate clinical waste transfer station. None of the wastes to be accepted on site will arise from health care facilities.

The chapter 18 codes have been included in the permit application to facilitate the service that the Council provides to local householders, in separate collection of healthcare related wastes from people in their own homes. Potentially there may also be sharps arising from the Council’s own service in collecting waste or litter left in public spaces.

Any chapter 18 wastes will only be received in very small quantities and are incidental to the Councils waste collection and street care and cleaning services.

We see you have suggested that these wastes could be accepted under 20 01 99 but the chapter 18 codes were included as we know the Environment Agency prefers to avoid the use of 99 codes where possible and the chapter 18 codes more accurately describe what the waste actually is, even though it arises from a household.



**6. Please provide a copy of the WAMITAB award for TCM Simon Guest.**

Since the application was submitted Martin Bladon has been appointed as the TCM for the site. A copy of his certificate is enclosed..

We trust that this addresses your queries and will allow you to progress the application however please contact us if you require any further clarification.

**Yours sincerely**  
**for Wardell Armstrong LLP**

**ALISON COOK**  
**Technical Director**  
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