

Jennifer Stringer
RPS
By email

Our reference: EPR/NP3940QK/A001
Date: 05/06/2023

Dear Jennifer

Pre application advice – Enhanced service

Site: Riccall Wood Treatment Facility, King Ridding Lane, Riccall, York, YO19 6QL

Thank you for your pre application enquiry on 21/04/2023.

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 accompanying supporting information.

The wood shredding activities would be disposal as the receiving incineration activities are disposal activities. As R1 does not apply to schedule 13 SWIPs or 5.1 Part B activities they cannot be permitted as recovery activities and remain as disposal activities, irrespective of their efficiency in recovering the energy from the waste. Therefore, the purpose of the treatment of the waste wood by shredding is disposal so the permitted activities will be those for disposal.

As both hazardous and non-hazardous waste wood will be treated, the applicable activities in schedule 1, part 2 of the Environmental Permitting (England and Wales) Regulations 2016 (EPR) are:

- 5.3 Part A(1)(a)(ii) – disposal of hazardous waste with a capacity >10 tonnes per day by physico-chemical treatment;
- 5.4 Part A(1)(a)(ii) – disposal of non-hazardous waste with a capacity >50 tonnes per day by physico-chemical treatment; and
- 5.6 A(1)(a) – storage of hazardous waste, if more than 50 tonnes of hazardous waste is stored.

However, if some of the non-hazardous wastes are shredded for use in animal bedding as described in the supporting information, this would be classified as physico-chemical treatment for the purpose of recovery and would be a waste operation activity in accordance with schedule 9 of EPR. This is because there is no activity listed in schedule 1 (installations) of EPR for the recovery of waste by physico-chemical treatment.

It is worth noting that if the shredded wood were to be used in a recovery activity (such as an incinerator with R1 status) and the shredding activity was not pre-treatment for

incineration as you have proposed, the shredding activity would be a waste operation as there is no treatment by physico-chemical treatment for recovery listed in schedule 1 of EPR, as described above in relation to the shredding of waste wood for use as animal bedding.

If an application for this activity is to be made, it is recommended that information is provided to justify why the shredding of non-hazardous waste for incineration would not be considered as pre-treatment for incineration as meeting a certain particle size may be a fuel specification required by the incinerator receiving the waste for disposal. The size reduction in this case could be considered to be for the purpose of improving its combustion characteristics as larger particles may not be able to be burned.

What enhanced pre application covers

Further information on the enhanced pre-application service is detailed in section 2 of the [Environmental permitting charges guidance on GOV.UK](#).

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

Application reference number	EPR/NP3940QK/A001
Habitats screening	Not requested
Documents attached	None
Application charge required	Not requested
Forms required to be submitted	Not requested
Additional documents required	Not requested
Additional information	Not requested

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

A complete application must contain the following information below:

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary
Payment	Please note your application will not be processed until we receive the full payment.

What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: EPR/NP3940QK/A001.

customer service line 03706 506 506 floodline 03459 88 11 88 incident hotline 0800 80 70 60

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

Current application timescales

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	29-33 weeks
New standard rules	14-18 weeks
Admin variation	2-6 weeks
Minor variation	22-26 weeks
Normal variation	24-28 weeks
Substantial variation	34-38 weeks
Transfer	8-12 weeks
Surrender	20-24 weeks
Medium Combustion Plant	10-14 weeks
Intensive Farming New bespoke	16-20 weeks
Intensive Farming Admin variation	2-6 weeks
Intensive Farming Normal variation	24-28 weeks
Intensive Farming Substantial variation	15-19 weeks
Intensive Farming Transfer	9-13 weeks
Intensive Farming Surrender	15-19 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 installation 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 £500 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 miriam.townshend@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

Miriam

Miriam Townshend
Senior Permitting Officer