



**VIKING PLACE RECYCLING FACILITY  
– NATIONWIDE WORKS, VIKING PLACE,  
ROATH DOCK, CARDIFF, CF10 4TS**

**ENVIRONMENTAL PERMIT  
TRANSFER APPLICATION**

**PERMIT REFERENCE EAWML30190  
(EPR/SP3795FZ)**

**APPLICATION SUPPORTING STATEMENT  
AND NON TECHNICAL SUMMARY**

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**1.0 EXECUTIVE SUMMARY**

UK Waste Management Limited holds an environmental permit ("Permit") for a recycling site at Viking Place, Cardiff, permit reference EAWML30190 (EPR/SP3795FZ). An application by UK Waste Management Ltd for the Permit was determined by the Environment Agency and the Permit issued on 23<sup>rd</sup> August 1996, as licence reference SEW/202. The Permit has been varied twice since issue, on 30<sup>th</sup> March 1999 to update conditions relating to making of waste returns, and again on 5<sup>th</sup> December 2003 to return financial provision made and remove the condition relating to financial provision. By the time of the latter modification, the former waste management licence had been renumbered to EAWML30190, and subsequently falling to be treated as an environmental permit, the Permit was renumbered to SP3795FZ. UK Waste Management Ltd continues to hold the Permit.

The Permit was to keep and treat wastes, including for the provision of a building for the transfer and recycling of wastes. The facility was permitted to accept non-hazardous household, industrial and commercial wastes, including recyclable materials at a rate of 74,999 tonnes per annum, and subjecting these to a number of physical treatment methods including sorting, storing and baling to separate recyclable materials for re-use, with residual wastes being disposed of. The facility has been operated as a materials recycling facility on this basis since issue of the Permit.

UK Waste Management Ltd was wholly purchased and so became part of the Biffa Group in 2000, the purchase including multiple sites around the UK many of these comprising landfills sites, transfer stations and waste treatment facilities, with corresponding environmental permits. UK Waste Management Ltd is a wholly owned subsidiary of Biffa Group Limited, as is Biffa Waste Services Limited, and both are separate legal entities and trading companies. As such, all permits held by UK Waste Management Ltd have remained with UK Waste Management Ltd since purchase by Biffa Group, although UK Waste Management Ltd has used the strong Biffa brand of the parent company for marketing purposes. On this basis, and also taking into account the tests for a permit holder being in control of the permitted operation, Biffa had previously held discussions nationally with the Environment Agency (who were at the time also the regulator for the Viking Place facility) and agreed that it was accepted that the permits could remain in the name of UK Waste Management Ltd as well as other permits remaining with any other relevant legal entities, as Biffa Group through acquisition has a number of such wholly owned subsidiaries each holding their own environment permits.

Recently, Natural Resources Wales (NRW) have expressed a desire that it would be better for regulatory reasons if the Permit were held by Biffa Waste Services Limited. Following pre-application discussions with NRW, Biffa have agreed to submit an application for the transfer of the Permit to Biffa Waste Services Ltd. For the reasons outlined in section 2, the application is being submitted as an administrative permit transfer and it has been agreed following discussions between David Griffiths and Holly Noble at NRW that no fee will be required for this application.

## **2.0 SUPPORTING INFORMATION**

### **2.1 Pre-application discussions**

Biffa have discussed the aspect of transferring the Permit for the Viking Place facility from UK Waste Management Ltd to Biffa Waste Services Ltd. Whereas Biffa had previously agreed with NRW's predecessor that it was permissible for a permits held by various wholly owned subsidiaries of Biffa Group Limited to continue to be held by those subsidiaries, and this included the Permit for Viking Place that is currently held by UK Waste Management Ltd, it has been agreed that it would be desirable for regulatory purposes if the Permit were to be transferred to Biffa Waste Services Ltd.

During these pre-application discussions, it was highlighted that NRW's charging scheme made provision that there would be no charge for such a permit transfer where the permit used to be a waste management licence and the proposed new permit holder was on 6<sup>th</sup> April 2008 the operator by reason of Regulation 69(2) of the Environmental Permitting (England and Wales) Regulations 2007, and NRW believes the transfer is desirable for regulatory reasons. As such it is noted that the purchase of UK Waste Management Ltd by Biffa took place during 2000, so prior to 6<sup>th</sup> April 2008 and that the Permit was originally issued as a waste management licence during 1996, again prior to 6<sup>th</sup> April 2008. Further, the operation has effectively been under the control of Biffa, since both UK Waste Management Ltd and Biffa Waste Services Ltd have common directors, it is further noted that the site staff would be the same, and there would be no change to the management system at the site as a result of the transfer to Biffa Waste Services Ltd of the Permit.

Appendix 1 contains e-mails containing pre-application discussions relating to the above aspects. Following the most recent e-mail within the chain, David Griffiths is understood to have discussed the matter with Holly Noble at NRW, and subsequently advised by telephone that NRW had agreed to the transfer application being determined without the requirement for an application fee.

Accordingly, as the permit transfer application is subject to the above requirements, in that the operator is effectively the same operator that was in place prior to 6<sup>th</sup> April 2008, and the management system will be the same, the application has been submitted as an administrative application without the normal application fee.

### **2.2 Relevant Convictions**

Details of relevant convictions have been submitted for the Biffa Group Limited companies, in order to comply with requirements of the Part D2 application form, although it is noted that there will effectively be no change in the management of the site as a result of the Permit transfer. It is noted that there have been no further convictions since the list was last submitted to NRW and assessed by them in relation to permit application BB3090HA during February 2015.

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### **2.3 Technical Competence**

Although there will be no change to the technically competent management at the site, as the existing site manager will remain in place post transfer of the Permit to Biffa Waste Services Ltd, details of technical competence, including the relevant certificate of continuing competence have been included at Appendix 3, in order to comply with the requirements of the Part D2 application form.

### **2.4 Management System**

As with technical competence, there will be no change to the Environmental Management System for the site. The site is subject to an existing working plan, which will remain in place, although has been, and will continue to be, subject to periodic review. The site is also subject to an Environmental Management System under ISO14001. The EMS will remain in place and will be unchanged following transfer of the Permit. A copy of the most up to date ISO14001 registration certificate, which has recently been renewed and which covers a number of sites within the Biffa Group is included at Appendix 4. It will be noted that the Viking Place facility is covered by this registration and this represents no change on the previous situation. A summary of the Integrated Management System, of which the ISO14001 accreditation forms a part, is also included in Appendix 4.

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### **3.0 CONCLUSIONS**

This application has been submitted to transfer the Permit from UK Waste Management Ltd to Biffa Waste Services Ltd. There is no effective change to operations on site as a result of the proposed transfer, as effectively the management of the site will be same, and the operator is deemed to be the same, by virtue of provisions in the NRW permit charging scheme, which provides for changes implemented through the Environmental Permitting (England and Wales) Regulations 2007. As a result, it has been agreed with NRW through pre-application discussions that no fee will be levied for this application.

The application comprises this non-technical summary, and the relevant application forms, parts A, D2 and F1. A revised opira profile has been submitted to comply with the requirements of the Part F1 application form, as well as information to comply with the requirements of the Part D2 application form relating to technical competence, relevant convictions and the Environmental Management System, notwithstanding that these documents are the same as currently.

A letter of authorisation has also been submitted in relation to the completion of the declaration on the Part F application form. Again it should be noted, that in the same way that the management will be same under the transferred Permit, the declaration itself relates to signatories under both companies involved and the declaration has accordingly been completed by the same person as a result, demonstrating that there is effectively no change and underpinning the approach in submitting this Permit transfer application.