

Joe Gatley

Waste Management and Environmental Services

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Wales Permitting Centre (Cardiff),
Natural Resources Wales,
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My Ref: NPT/VAR-2016/JG3

Your Ref: PAN-000161

Date: 14th April 2016

Sent by Email to: Llinos.Owen@cyfoethnaturiolcymru.gov.uk

For the attention of: Llinos Owen, Senior Permitting Officer (RSR and Installations)

Further Response to request for further information, letters dated 18/03/2016 and 05/04/2016

Application reference: PAN-000161

Operator: Neath Port Talbot Recycling Limited

Facility: Materials Recovery & Energy Centre

Dear Llinos

Thank you for your follow-up letter dated 05/04/2016, *your reasons* for not accepting this application as a minor technical change in our opinion is based on a stretched and loose interpretation of the fees and charging guidance as follows:

- **Contentious or sites of high public interest**

" However, the activities listed are simply examples and are not limited. Variation applications for sites of high public interest even if they are not one of the contentious industrial sectors used as examples above can therefore also be classed as normal."

We consider the minor changes to storage arrangements only as not contentious and of no public interest, again I must stress that the site is currently operating without the incinerators.

- **If they are on sites with sensitive receiving environments.**

" This is not a relevant argument as the Charging Scheme and Guidance does not consider the effect of proposed changes of the sensitive environment. The application is for a site which is within the relevant screening distance of a sensitive receiving environment."

I cannot find the references or justification to your reasoning in the fees and charging guidance, I have, however found references and examples to this with relevance and regards **to new sensitive receiving environments**.

We consider that screening or in this case, re-screening is not required for the minor changes proposed, because there are no changes to the permit boundary, no new sensitive receptors or emissions from the Kerbside Recyclate Collection Building which previously operates under an exemption.

/...



We accept that updated and reviewed fire and noise management plans, details and dimensions of external storage area will need to be undertaken and provided in due course i.e. to be supplied to you during the permit variation determination process.

The site boundary plan remains the same, and the local receptors plan should be available in your archives.

My closing comments on this a principle one;

The Materials Recovery and Energy Centre operated by Neath Port Talbot Recycling Facility is a constantly evolving and changing facility, it has to be to meet the demands of the changes to markets, alternative recovery outlets and regulations, the proposed minor technical variation application is to merely update and regularise current minor changes to the recycling operations.

Your responses and reasoning for what we consider as minor changes, are not minor changes, surely cannot be true in all cases?, if so, then it follows that even the slightest change to a storage area (e.g. internal storage area for metal cans changed to glass bottles storage area etc.) would need a full variation application at cost to the operator and the local council tax payer, this approach is operationally highly restrictive and also like robbing Peter to pay Paul.

I hope my comments are acceptable and help to clarify this application further and that you will be able to accept and proceed with this application.

Yours sincerely

Joe Gatley

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