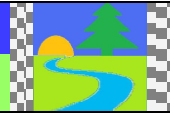


Joe Gatley

Waste Management and Environmental Services

Caldey View, Clos Sant Cenydd, Llangennith, Swansea, SA3 1JT



Wales Permitting Centre (Cardiff),
Natural Resources Wales,
Cambria House,
29 Newport Road,
Cardiff,
CF24 0TP

My Ref: NPT/VAR-2016/JG4

Your Ref: PAN-000161

Date: 21st April 2016

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

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

Response to; Application to vary permit EPR/BJ5775IF will be returned

Application reference: PAN-000161

Operator: Neath Port Talbot Recycling Limited

Facility: Materials Recovery & Energy Centre

Dear Llinos

Please treat this Letter as a Formal Complaint

Thank you for your letter dated 19/04/2016, we are very disappointed in the way that You / NRW have handled our application from the beginning and until now for the following reasons given below in chronological order:

- 1. *Refusal of acceptance of initial application by NRW*** because one of the applications forms (Part A) was submitted with the ***Environment Agency logo*** on it., the NRW Permitting Advisory Officer insisted that a valid application must be submitted on a NRW logo form, even though the formatting and all the information you required was exactly the same, this resulted in a re-submission of the same information (albeit on another Part A application form sporting a NRW logo) to NRW, a separate complaint was made to NRW, the response and reasoning (first and second responses to complaint) that I received I consider was extremely poor and unjustified.
 - 2. *Request for further information (1st letter dated 18/03/2016)*** from you was received with surprise, I contacted you by telephone to discuss your reasons, you informed me that you had concerns over the proposed ***storage of loose uncontained RDF in large quantities in outside areas! This gross misunderstanding by you is ludicrous***, the application submitted to you makes no such proposals, as discussed with, you and confirmed to you in writing in my response letter dated 18/03/2016.
- ❖ At this early stage, I would like to point out that there seems to be irrational reasoning by You / NRW for hampering and not accepting or progressing the proposed application. This trend, unfortunately, continues...

/...



3. **Request for further information (2nd letter dated 05/04/2016)** from you stated that the application submitted to you **could not be a minor variation because of the vicinity of the site was near a SSSI and a site of high public interest**. I responded to your interpretation and application of the Fees and Charging Scheme Guidance on this matter in a letter to you dated 14/04/2016.

Unfortunately you did not answer or respond to the points I raised in this letter or justify your reasoning properly, therefore I will put the question to you very simply to which I would like a reply please; so that I can understand and plan properly for any future applications I may make.

Question:

Where there are minor changes proposed to operations by the operator which require a minor change to the permit condition(s), no matter how insignificant they are, then will all variation applications be considered as never qualifying to be a minor variation because of the site location or type?

4. **Application to vary permit EPR/BJ5775IF will be returned** (letter dated 19/04/2016), this states your refusal to accept the minor variation application based on issues which I have repeatedly questioned and also simply put to you again above.

- ❖ At this *near end* stage I would like to point out that at no time have you tried to contact me to discuss the application.

Charging the operator £125 per hour on an application which has been wrongly handled, misunderstood for 13 hours and has not provided the client with clear or helpful information is bad value for money, given a choice, the client or operator would be shopping elsewhere. Your proposed charging for any future applications is not received kindly and appears to be meant as a threat and a deterrent (**do as I say, or otherwise pay**) to the operator for any future applications.

My understanding of the charging scheme for "**relevant time or materials**" is only subject to "**relevant applications**", the Neath Port Talbot MREC is a Tier 3 Facility and is not one of the listed relevant applications.

To progress the application and proposed changes to the MREC Facility, we are planning to have a meeting next week with the inspecting site officer(s), as previously pointed out to you, the MREC Facility operations are continually changing and being upgraded, therefore any future application will be incorporating these additional changes (once discussed and agreed with area site inspecting officer(s)).

This application submitted to you on 23rd February which you are refusing to process has now become outdated, **please return the application package (including the cheque) to me**.

I hope my comments are clear and I look forward to your reply.



Yours sincerely

Joe Gatley

C.c. Kevin Stewart kevin.stewart@nptrecycling.co.uk
Neath Port Talbot (Recycling) Limited
Materials Recovery and Energy Centre,
Baldwins Crescent,
Crymlyn Burrows,
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SA1 8PZ