



ENVIRONMENTAL PERMIT SURRENDER

PEMBROKESHIRE COUNTY COUNCIL UNIT 41 WASTE TRANSFER STATION

Non-Technical Summary

Environmental Permit Reference: EPR/PB3490HV

Date: February 2024

Project code: 416.063954.00001

About WRAP

WRAP is a climate action NGO working around the globe to tackle the causes of the climate crisis and give the planet a sustainable future.

Our core purpose is to help you tackle climate change and protect our planet by changing the way things are produced, consumed, and disposed of.

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Written by: SLR Consulting Ltd



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Acknowledgements

The content of this Report has been based upon information provided by WRAP Cymru and Pembrokeshire County Council.

1.0 Introduction

The Waste and Resource Action Programme (WRAP), on behalf of Pembrokeshire County Council (PCC) has retained SLR Consulting Limited (SLR) to prepare an application to partially surrender the Environmental Permit (EP) (Ref: EPR/PB3490HV) at the Unit 41 Waste Transfer Station (WTS), located at The Dockyard, Pembroke Dock, Pembrokeshire.

This document provides a Non-Technical Summary (NTS) of the application including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the surrender application.

To support this partial surrender application, the following documentation is submitted in addition to this NTS:

- Forms A, E2, and F1;
- OPRA Spreadsheet;
- Surrender Site Condition Report;
- Updated Fire Prevention and Mitigation Plan; and
- Associated Drawings.

1.1 Site Location

The site is situated in Pembroke Dock which is approximately 3km north west of Pembroke in south west Wales. The site is located within The Dockyard and is accessed via Whites Farm Way which links to the A477 further to the east. The National Grid Reference (NGR) for the site is SM 95702 03746.

The immediate surrounding land use is predominantly industrial/commercial with a residential area to the south and Milford Haven waterway to the north.

A summary of the site's immediately surrounding land uses is identified in Table 1-1 below.

Table 1-1 Surrounding Land Uses

Boundary	Description
North	Industrial and commercial businesses located within The Dockyard and the Milford Haven waterway.

East	Industrial and commercial businesses located within The Dockyard. Beyond this lies the town of Pembroke Dock with associated residential areas.
South	An unoccupied area of The Dockyard followed by South Pembrokeshire hospital. The residential areas of Llanreath and the South Pembrokeshire golf club lie beyond this.
West	A waste water treatment works is located adjacent to the site beyond which lies the Milford Haven waterway.

1.2 Current Environmental Permit

The site operates under an EP (Ref: EPR/PB3490HV) originally issued to PCC in January 2015 under a revised number (Ref: EPR/CB3793HE). The EP was transferred to Sundorne Products (Llanidloes) Limited in March 2015 when the current EP reference number was assigned. The EP was varied four times before it was transferred back to PCC in August 2018. In September 2019 a partial surrender of a section of land from the permitted area that had not been used for any waste operations was completed. The EP was varied in March 2020 to extend the EP boundary to include Units 29 and 29A, increase the permitted waste types to be accepted on site, and to revise the permitted treatment operations to baling and bulking up of waste only.

An application to partially surrender the car parking area of land to the south of the Unit 41 entrance was submitted to NRW in December 2022 and issued 1st August 2023.

1.3 Pre-Application Discussions

WRAP requested a pre-application advice meeting with Natural Resources Wales (NRW) on the 24th April 2022, however NRW declined this request based on the discretionary nature of the service. WRAP and PCC were signposted to NRW's online guidance instead.

2.0 Partial Surrender

This partial surrender application has been prepared as a new WTS and Waste Recycling Centre (WRC) are being developed at PCC's new Eco Park site to ultimately replace PCC's current / temporary Unit 41 WTS facility.

A frontline service must be maintained during the transfer between the two sites. PCC therefore propose to surrender the Unit 41 EP in multiple phases:

- Firstly, a partial surrender (**now completed, issued August 2023**) of the permitted area covering land to the south of the Unit 41 entrance. Since the permit was transferred back to PCC in August 2018 the land was used as a carpark;
- Secondly, a partial surrender of the permitted area covering waste storage area Units 29, 29A, and 35 (**this application**). This is illustrated by the blue hatched area labelled Unit 29 Partial Surrender on Drawing 001A;
- Lastly, a final surrender of the remaining site (Unit 41) at a later date, once PCC's new Eco Park facility is operational.

Units 29, 29A and 35 are leased from the Port Authority and the land forms part of the Swansea Bay City Deal. As such, the lease for these units ends on the 31st October 2024. It is the intention to move these activities first to the Eco Park once the EP for the new facility is granted.

Therefore, this partial surrender application proposes to surrender the permitted area covering waste storage area Units 29, 29A and 35 as shown by the blue hatched area on Drawing 001A. The new EP boundary is illustrated on Drawing 002.

Units 29 and 29A have been used by PCC for the internal storage of residual (grey/black bag) waste, dry mixed recyclables (DMR), and Absorbent Hygiene Products (AHPs) in designated Legato block bays. The AHP waste has been stored within a sealed container within the designated bay. The units also housed two contingency storage bays. Unit 35 has provided welfare facilities and was used for storage of new / unused recycling containers / bags only and has therefore never had any waste stored in it.

An exemption (S2: Storing waste in a secure place) is in place on site and has been used on occasion for the storage of glass outside in a dedicated container. There is no change to the exemption as a result of this partial surrender application.

2.1 Surrender Test

As specified in Paragraph 14 of Schedule 5 to the EP Regulations, the test for surrender of an EP is as follows:

“The regulator must accept an application to surrender an environmental permit in whole or in part under Regulation 25(2) if it is satisfied that the necessary measures have been taken –

- a) To avoid a pollution risk resulting from the operation of the regulated facility; and*
- b) To return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation”*

The objective of this partial surrender application is therefore to demonstrate that these two surrender tests have been satisfied in relation to the partial surrender of the area covering Units 29, 29A, and 35 as illustrated by the blue hatching on Drawing 001A.

The surrender report has been drafted in accordance with, and to satisfy the requirements of relevant NRW Guidance, notably:

- H5 Site Condition Report – guidance and templates;
- Regulatory Guidance Note 9: Surrender; and
- Guidance for application form E2.

It is considered that the partial surrender constitutes a “low risk surrender activity” as defined in the NRW Charging Scheme 2022¹ as:

“Low risk surrender activity” – ‘any other tier 2 and tier 3 facility for which the operator has received confirmation from NRW that intrusive investigation is not required in accordance with the criteria of box 1 of “Site condition report – guidance and templates”, (H5), version 5, published by NRW in October 2014’.

¹ Environmental Permitting Charging Scheme 2022/23, Effective from 1 April 2022.

3.0 Application Contents

3.1 Application Forms

Parts A, E2, and F1 of NRW's forms have been completed in support of this partial surrender application and are enclosed as Section 2.

3.2 OPRA Spreadsheet

According to the current NRW Charging Scheme 2022², the fee for a low risk surrender is £2,593.

The OPRA spreadsheet is included as Section 3.

3.3 Surrender Site Condition Report

A Site Condition Report (SCR) was not produced for the original application or during the operation of the site by Sundorne Products (Llanidloes) Limited. Therefore, a SCR was prepared as part of the March 2022 EP variation application to establish the baseline environmental conditions within the EP boundary.

NRW application form part E2 requires the submission of a Surrender Site Condition Report (SSCR) which describes the condition of the site. The SSCR has been prepared as part of the partial surrender application and will provide a point of reference and baseline environmental data. The SSCR has been prepared in accordance with the NRW Guidance H5 (version 5), October 2014.

The site will continue to operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the site does not pose a significant risk to the surrounding human and natural environment.

The SSCR is enclosed as Section 4.

3.4 Fire Prevention and Mitigation Plan

The site currently operates under a Fire Prevention and Mitigation Plan (FPMP) that follows NRW Guidance for FPMPs³, and details the required mitigation and management methods to prevent a fire of combustible materials stored on site.

² Environmental Permitting Charging Scheme 2022/23, Effective from 1 April 2022.

³ [Guidance No. 16 Fire prevention and mitigation plan - waste management \(naturalresources.wales\)](#)

The FPMP and associated drawings have been updated to reflect the proposed surrender of the waste storage area covering Units 29, 29A, and 35 as illustrated by the blue hatching on Drawing 001A.

The updated FPMP is enclosed as Section 5.

3.5 Drawings

A suite of drawings has been produced to detail all characteristics of the site relevant to the partial surrender and are enclosed as Section 6. The full list of drawings produced is as follows:

- Drawing 001A Partial Surrender Area
- Drawing 001 Site Location Plan
- Drawing 002 Proposed Environmental Permit Boundary
- Drawing 003 Environmental Site Setting
- Drawing 004 Site Layout and Fire Management

Technical Standards and Control Measures

The key technical standards laid out in the following documents govern the partial surrender application:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- H5 Site Condition Report – guidance and templates (Version 5, October 2014);
- Regulatory Guidance Note 9: Surrender; and
- Guidance for application form E2.

The proposals have been assessed against these standards and are all considered to meet the relevant technical standards.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed partial surrender.

PCC is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with their EMS.



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