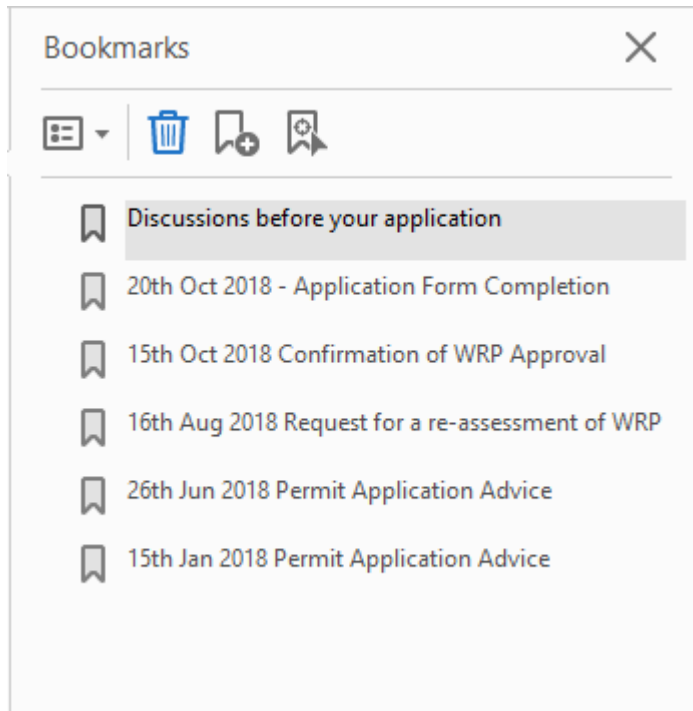


## Part C2- Discussions before your application

### C2 – Q1a - Discussions held before application are detailed the below document

Please use the bookmarks to navigate the document in chronological order



## Rhys Lewis

---

**From:** Thomas, Kate <Kate.Thomas03@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 24 October 2018 16:58  
**To:** Rhys Lewis  
**Cc:** White, Steven  
**Subject:** RE: EPR/XP3691EG Vary to Bespoke Application Form Completion Advice

Hi Rhys,

Apologies that it has taken me a little while to respond. Please see my comments below in response to your queries.

I trust this information is helpful to you but if you have any queries please don't hesitate to let me know.

Steve – please can you include 20 minutes for time recording.

Kind regards,  
Kate

Kate Thomas  
Uwch Swyddog Trwyddedu (Gwastraff) / Senior Permitting Officer (Waste)  
Cyfoeth Naturiol Cymru / Natural Resources Wales  
Tel: 0300 0654487  
Ty Cambria, Caerdydd / Cambria House, Cardiff

[www.cyfoethnaturiol.cymru](http://www.cyfoethnaturiol.cymru) / [www.naturalresources.wales](http://www.naturalresources.wales)

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**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi**

---

**From:** Rhys Lewis <Rhys.Lewis@aol.com>  
**Sent:** 19 October 2018 13:51  
**To:** Thomas, Kate <Kate.Thomas03@cyfoethnaturiolcymru.gov.uk>  
**Cc:** White, Steven <Steven.White@cyfoethnaturiolcymru.gov.uk>  
**Subject:** EPR/XP3691EG Vary to Bespoke Application Form Completion Advice

Hi Kate,

Now we have concluded the WRP, I mentioned before I had some questions about vary to bespoke application forms.

Following advice from Ella I am proposing to submit the following application forms :

Vary - Waste = A, C2, C4, F including the Opra profile in excel format to vary the existing SRP to bespoke.

My questions in completing the application forms are from Forms C2 and C4:

**1. Application Form C2 - Section 2 – About your proposed changes.**

I consider the proposed changes to be part of a Normal variation see below .

**2 About your proposed changes**

**2a Type of variation**

What type of variation are you applying for? (Please tick)

Standalone water discharge activity or point source groundwater activity ☐

Form: EPR Part C2

Page 1 of 7

NRW Version 1, July 2016

Minor technical ☐  
Normal variation ☒  
Substantial ☐

Do you agree with this?

**Yes, this is correct.**

**2. Application Form C2 - Section 6 of - Environment Risk Assessment. See extract below**

**6 Environmental risk assessment - if you need one** (see the guidance notes on part C2)  
Provide an assessment of the risks each of your proposed activities cause to the environment. The risk assessment must use H1 or an equal method.  
Document reference

Extract Application Form C2- Section 6

The guidance form asks for a Tier 3 waste operation to undertake a H1 type risk assessment for a bespoke application.

However I propose to substitute the Environment Risk Assessment (H1 method) with the existing SR2010 Risk assessment applied to the Clays site, and Environmental Impacts Plan contained in the Environment Management System:

The only bespoke aspect of the varied permit is the volume of waste to be deposited.

I have reviewed the standard rules permit SR2010 No08 (EA deposit waste for recovery) risk assessment and applied these to the Clays Site with two additional columns re-describing the site specific mitigating actions that are detailed in the Clays Site Management Plan, or confirming compliance with the SR2010 environmental contains, see extract below.

in any spring or well or any borehole not used to supply water

Action (by permitting)		Site Specific Risk Management at Clays Site	
Risk management	Residual risk	Risk management	Residual risk
How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).	How risk is managed to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
SR - Emissions of substances not controlled by emission limits (excluding odour and noise) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions. SR (if required) - emissions management plan.	Low	Clays Site Management Plan Section 2.8.  Includes site procedure for "Control, Monitoring and Reporting of Aerial Emissions of Dusts, Fibre and Particulates." Including dust suppression method to be used when required.	Low
As above	Low	As above	Low
As above. Appropriate measures could include clearing litter arising from the activities from affected areas outside the site.	Very low	Clays Site Management Plan Section 2.8. Control of Litter  The material acceptance and control procedures detail the control the generation and spread of litter. Clearing litter as it arises  Light weight waste trailer on site. A litterbin provided on site, for lorry drivers to use.	Very low

The above risks that require site specific mitigations have been previously captured in the Environment Management System titled "Clays Site Management Plan" in the Environmental Impacts Plan and Controls matrix, based on Environment Agency and NRW Environmental Management Toolkits.

The only additional site control in the Clays Site Management Plan is the awareness of the negative results Great Crested Newts (GCN) tests, information of how to identify GCN and in the unlikely event of finding one what action to take.

Do you support this approach?

**Yes, that's correct. If you're applying for a bespoke permit but most of your activities are covered by standard rules, you only need to do a risk assessment for the activities or risks that are not covered by the generic risk assessment for those standard rules. However, you should use the generic risk assessment associated with our SRP 2017 No1.**

### 3. Application Form C4 – Section 2 – Emissions to air, water and land

The only point source discharges to groundwater, are surface water from the roofs of site porta-cabin and portable toilet.

I have adapted the Table 2 to describe / explain how the various emission are managed by the proposed technical standards, existing SRP and the Clays Site Management Plan see below.

## 2 Emissions to air, water and land

**Table 2 – Emissions (release)**

<b>Waste Operation name</b>	<b>Use of waste in a deposit for recovery activity</b>
<b>Point Source emissions to air – Very Unlikely to be present</b>	
Technical Standard SR2010 No8	<p>Technical standard limits:</p> <p>Emissions from the activities shall be free from odour at level to cause pollution outside the site as perceived by an authorised officer of Natural Resources Wales.</p> <p>No approved odour management plan is proposed as required activity due to the limited acceptable waste types and site visit acceptance procedures.</p>
Clays Site Management Plan	Proactive odour control measures, Section 2.8 in place in the event of an emission to air occurrence from the recovery activity
<b>Point Source emissions to water (other than sewers) – Non present</b>	
Technical Standard SR2010 No8 & Waste Recovery Plan*	<p>These technical standards do not allow:</p> <p>The only point source discharges to groundwater, are surface from the roofs of site porta-cabin and porta loo</p> <p>Any other point source emissions into surface waters or groundwater</p> <p>Wastes having any of the following characteristics shall not be accepted:</p> <p>Table 2.3 Waste types - Wastes in liquid form</p>
<b>Point Source emissions to water sewers effluent treatments plants or transfers off site – Non present</b>	
Technical Standard SR2010 No8 & Waste Recovery Plan*	<p>These technical standards do not allow:</p> <p>Any point source emissions into surface waters or groundwater</p> <p>Wastes having any of the following characteristics shall not be accepted:</p> <p>Table 2.3 Waste types - Wastes in liquid form</p> <p>WRP, Section 3.7.1, limits permitted material waste types from soils and aggregates</p>
Clays Site Management Plan**	<p>Section 2.1 Amenity Facilities</p> <p>Portable toilet is only source site generated sewerage effluent disposed off site by a qualified contractor.</p>
<b>Point Source emissions to Land – Non present</b>	
Technical Standard SR2010 No8 & Waste Recovery Plan*	<p>These technical standards do not allow:</p> <p>Wastes having any of the following characteristics shall not be accepted:</p> <p>Table 2.3 Waste types - Wastes in liquid form</p> <p>WRP, Section 3.7.1, limits permitted material waste types from soils and aggregates</p>

Document Ref: \* GCI-CLA-MAN-PLAN-0001-A02 \*\* MRF-CLA-MAN-PLAN-0001-A01

Do you support this approach?

SR2010 Number 8 is not relevant to this application as it relates to an EA SRP. SRPs in themselves are not technical standards. As per the guidance for completing Part C4 application form please see the following information:

### **3a Technical standards**

*Refer to 'How to comply with your environmental permit' and, where relevant, any activity specific technical guidance note that applies to your waste facility. The activity specific technical guidance notes are listed in Part 7 of 'How to comply'.*

*'How to comply' and the activity specific notes highlight the key issues that you must address in your response to this section.*

*Decide whether or not you can meet the technical standards described.*

*Complete one table for each of the waste facilities you detailed in Table 1a as follows.*

*Relevant technical guidance note: List the relevant technical note or notes you are planning to use. This will normally be 'How to comply' plus any relevant activity specific notes referred to in Part 7 of 'How to comply'.*

*Document reference: Where the relevant standard is that set out in the technical guidance note there is no requirement to justify it.*

*Where there is no technical standard, the technical guidance is not detailed enough, or where you propose an alternative standard, you must provide justification for your decision.*

If there are no point source emissions to air water or land (which there shouldn't be), please state this.

4. Application Form C4 – Section 3 –
  - Table 3a Technical Standard

I have populated this with the existing relevant technical standards that apply to Clays Site



For each of the activities listed in Table 3a, describe the type of operation and the options you for controlling emissions from your process.

Fill in one table for each waste operation (activity). You can use Table 3a as a template.

Please provide the reference for each document.

Document references

GCI-CLA-MAN-FRM-0003 A01

Table 3a – Technical standards		
Waste operation name		
Description of waste operation	Relevant technical guidance note. You will need to refer to 'How to comply' for all permits.	Document appropriate
	'How to comply'	
Deposit for recovery	How to comply with your environmental permit	Version 2014
Deposit for recovery	SR 2010 No8 Use of waste in a deposit for recovery activity	SR2010
Deposit for recovery	Clays Site Waste Recovery Plan	GCI-CL 0001

In addition from the point highlighted in yellow above I have created a Table 3a1 and populated it accordingly see below:



### 3a Type of operation and options chosen for controlling emissions

Table 3a1 – Technical Standards	
Description of waste operation	Type of operation and options chosen for controlling emissions from waste operation Document Reference
Deposit for recovery	<p>Deposit waste for recovery activity to construct new golf facility in accordance with specifications in the approved Waste Recovery Plan</p> <p>Emissions governed by as described in Table 2:</p> <ul style="list-style-type: none"> <li>• Technical Standard SR2010 No8</li> <li>• Waste Recovery Plan*</li> <li>• Clays Site Management Plan**</li> </ul> <p>Options Chosen for controlling emissions:</p> <ul style="list-style-type: none"> <li>• limitations of permitted waste types and their form.</li> <li>• site acceptance procedures</li> <li>• site mitigation plans</li> <li>• All liquids in containers, whose emission to water or land cause pollution, shall be provided with secondary containment</li> <li>• Maintenance procedures and contracts to maintain plant and portable toilet.</li> </ul>

Document Ref: \* GCI-CLA-MAN-PLN-0001-A02 \*\* MRF-CLA-MAN-PLN-0001-A04

#### • Table 3b General Requirements

I have adopted the Table 3b and populated this with statements that are outputs from the TGNs or the Environment Risk Assessment described in Point 2 above

Table 3b – General Requirements	
Waste Operation name	Use of waste in a deposit for recovery activity
Emissions	TGN or Risk assessment shows that the emission of substances are controlled by limited acceptable waste types, site procedures such that emission limits are not needed.
Odour	TGN or Risk assessment shows that the odours are not important issue due to the limited acceptable waste types and site procedures.
Vibration	TGN or Risk assessment shows that the noise or vibration are not important issues.
Fire	No storage of combustible wastes is allowed under the TGN

Do you support this approach?

**This approach is acceptable. As above SRPs in themselves are not technical standards but if you intend on referencing an SRP in your application, this should be SR2017 Number 1.**

#### 5. Application Form C4 – Section 4 – Monitoring

**4a Describe the measures you use to monitor emissions by referring to each emission point in Table 2 above**

You should also describe any environmental monitoring. Tell us:

- how often you use these measures;
- the methods you use; and
- the procedures you follow to assess the measures.

Document references

GCI-CLA-MAN-FRM-0002 A01

Any proposed monitoring of emissions are described in the text in Table 2, so Table 2 document reference is provided here

Do you support this approach?

#### 4b Point source emissions to air only

Provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must use Technical Guidance Note M1 (Monitoring). This is available in the Guidance section on our Website.

Document references

GCI-CLA-MAN-FRM-0002 A01

□

-

There are no point source emissions to air only, consequently no monitoring locations are proposed.

Any proposed monitoring of emissions are described in the text in Table 2, so Table 2 document reference is provided here.

Do you support this approach?

**This is correct. There won't be any point source emissions from this activity and therefore monitoring is not required. You can remove the document references above to avoid any confusion.**

**6. Application Form C4 – Appendices 1 to 4**

- Not applicable to this application

**That's correct**

Please either respond by e-mail in the table below or give me a call to discuss these questions

Q No.	Comment	RESPONSE	COMMENT CLOSED? Y/N
1			
2			
3			
4			
5			
6			

Steve has advised on my amount of free pre-application consultation allowance I have used to date.

Please can you review and respond to my above questions and let Steve know what time you spend on this so he can advise on any additional costs that may become due.

Kind Regards

Rhys Lewis

07734346844

**From:** "Thomas, Kate" <[Kate.Thomas03@cyfoethnaturiolcymru.gov.uk](mailto:Kate.Thomas03@cyfoethnaturiolcymru.gov.uk)>  
**Date:** Mon, Oct 15, 2018 at 6:00 PM +0100  
**Subject:** RE: EPR/XP3691EG Revised waste recovery plan for Clays Site Rev A02  
**To:** "rhys. lewis" <[rhys.lewis@aol.com](mailto:rhys.lewis@aol.com)>  
**Cc:** "White, Steven" <[Steven.White@cyfoethnaturiolcymru.gov.uk](mailto:Steven.White@cyfoethnaturiolcymru.gov.uk)>

Thanks Rhys,

Please find this as confirmation that the revised WRP provided on 12 October (GCI-CLA-MAN-PLN-A02) is your approved WRP. This plan demonstrates the permanent deposit of waste is for recovery purposes. Please refer to this document when you submit your variation application to vary the SRP to a bespoke permit.

If you have any queries, please do not hesitate to let me know.

Kind regards  
Kate

Kate Thomas

Uwch Swyddog Trwyddedu (Gwastraff) / Senior Permitting Officer (Waste)  
Cyfoeth Naturiol Cymru / Natural Resources Wales  
Tel: 0300 0654487  
Ty Cambria, Caerdydd / Cambria House, Cardiff

[www.cyfoethnaturiol.cymru](http://www.cyfoethnaturiol.cymru) / [www.naturalresources.wales](http://www.naturalresources.wales)

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## Rhys Lewis

---

**From:** Williams, Ella <Ella.Williams@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 16 August 2018 15:49  
**To:** Rhys Lewis  
**Cc:** White, Steven  
**Subject:** RE: Clays Site Wrexham. EPR/XP 3691 EG - New Permit Application

**Flag Status:** Flagged

Hi Rhys,

We acknowledge this request for a re-assessment of your Waste Recovery Plan as received 15/08/18. 2 documents have been submitted for us to assess:

Waste Recovery Plan - GCI-CLA-MAN-PLN-0001 A01  
Site Management Plan - MRF-CLA-MAN-PLN-0001 A03

The purpose of this request is for a NRW decision on whether the proposed amendments of your activity constitutes a recovery or disposal activity, which then may inform any changes required to your permit.

[Our service level agreement](#) is to respond on waste recovery plan assessments within 25 working days from receipt. Your reference number for the waste recovery plan re-assessment is PPN-00251.

A Permitting Officer will be in touch with you to confirm when it has been allocated to them.

Regards,

Ella Williams  
Uwch Swyddog Trwyddedu (Gwastraff) / Senior Permitting Officer (Waste)  
Cyfoeth Naturiol Cymru / Natural Resources Wales  
0300 065 3154

---

**From:** Rhys Lewis <[Rhys.Lewis@aol.com](mailto:Rhys.Lewis@aol.com)>  
**Sent:** 15 August 2018 10:25  
**To:** Williams, Ella <[Ella.Williams@cyfoethnaturiolcymru.gov.uk](mailto:Ella.Williams@cyfoethnaturiolcymru.gov.uk)>  
**Cc:** White, Steven <[Steven.White@cyfoethnaturiolcymru.gov.uk](mailto:Steven.White@cyfoethnaturiolcymru.gov.uk)>  
**Subject:** RE: Clays Site Wrexham. EPR/XP 3691 EG - New Permit Application

Hi Ella,

I have received all the emails to set up the "SharFile" account and I have uploaded the files today.

Please see the ["Share File" link](#) for the submitted files. I assume I do not need to do anything else to enable you to access these files?

There are two documents, the "waste recovery plan" and the "site management plan". They have been compiled as complete PDF documents with PDF bookmarked index of chapter headings and appendices on the right hand side of the on screen documents to aid on screen navigation.

Let me know if you have any questions

Kind Regards

Rhys Lewis  
07734346844

## Rhys Lewis

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**From:** Williams, Ella <Ella.Williams@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 26 June 2018 10:10  
**To:** Rhys Lewis  
**Cc:** White, Steven  
**Subject:** RE: Clays Site Wrexham. EPR/XP 3691 EG - New Permit Application

**Flag Status:** Flagged

Hi Rhys,

If you are processing waste to WRAP end of waste quality protocol then it will not require permitting under the waste regulatory framework once a product, as it is no longer a waste. Permit still required for the treating the waste to a product spec though. Anything that falls outside of scope of the protocol will require the right permit controls for further use. Revised WRP needs to be clear about total material needed for the scheme, and what of this total will be considered waste and what will be considered non waste.

I'm unclear from the response exactly how you want the 2 activities arranged, it can either be:

- A bespoke permit with 2 waste activities: a deposit for recovery and a soil processing activity. This is one application fee, one subsistence fee.
- A bespoke permit with one bespoke activity but consolidated to include a SRP . This would be 2 separate applications, with 2 separate application fees and 2 separate ongoing annual subsistence fees.

To vary to bespoke permit, you need to submit:

- Application forms: Waste/ mobile = A, C2, C4, F1
- Opra profile. Actual spreadsheet in electronic format. See guidance to Part F of the application form
- Application fee - If you apply for a variation that will result in your permit changing from one that incurs Tier 2 charges (i.e. a standard rules permit) to one that incurs Tier 3 charges (i.e. a bespoke permit), you will need to submit an OPRA profile with your application. The variation charge you will have to pay will be based on this OPRA profile multiplied by the appropriate variation charge multiplier. [See our charging pages.](#)
- Environment Management System (EMS) summary
- Non-Technical summary – a plain English blurb of what you want to do on the site and how
- Site specific risk assessment for activities to be included – main risks associated with activity(ies) and the risks to sensitive receptors (protected sites, protected species, water courses, human occupation etc.), risk mitigation measures.
- Amended management plans as required by the type of activity. New plans for the soil processing activity if including this. Include any drainage/infrastructure requirements of activity.

The documents should cover all the activities you wish to be done under bespoke permit, so in this case either the deposit for recovery activity only or the deposit for recovery activity and the soil processing activity.

To apply for a new SRP:



- Application forms: Waste/ mobile = A, B1, F1
- Fixed fee – [see our charging pages.](#)
- Evidence of technical competence
- Any relevant convictions
- Site plan, permitted area outlined in green

This advice has been given as part of pre-application free advice allowance, which as you are varying to bespoke permit means you can get 15 hours of free advice before we use our discretion to charge if you need any further advice. Steven will be able to advise on what time has been spent on this in total so far.

*The advice set out in this email is based on the information you provided to us during our discussions. If your circumstances change, or you want to operate in a different way, the standards you need to meet may change, and the advice may no longer be completely accurate.*

*Please note: By using our pre-application service, you (the customer) acknowledges and agrees that:*

- *any advice given or materials or documentation provided by us, do not constrain or bind us in respect of our statutory functions or our role as a Statutory Consultee;*
- *any advice we give does not bind us in respect of any future decisions we may make in determining the application;*
- *any views or opinions expressed in providing the advice is without prejudice to the consideration we are required to give the application as the body with a statutory responsibility for its determination;*
- *we will make our final decision as to whether a permit can be granted/issues based on all the relevant information available to us when the application is made;*
- *we cannot and do not give any guarantee as to its determination whether or not to grant the application, or as to the nature of any conditions which may be attached to any permit granted;*
- *any advice we give in providing the services may be overtaken by changes in available information, law, policy and guidance relevant to the application;*
- *we shall be entitled to publish, present or use the methods and results arising out of providing the services in any way we consider appropriate.*

You can find more [permitting guidance](#) and advice on '[How to apply for an environmental permit](#)' on our Website. We strongly recommend you read all applicable guidance before you apply – especially if you want to operate under one of our standard rule permit options.

Regards,

**Ella Williams**

**Uwch Swyddog Trwyddedu (Gwastraff) / Senior Permitting Officer (Waste)**

**Gwasanaeth Trwyddedu / Permitting Service**

**Ffon /telephone 0300 065 3154**

**Dysgwyr Cymraeg**

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**From:** Rhys Lewis <[Rhys.Lewis@aol.com](mailto:Rhys.Lewis@aol.com)>

**Sent:** 25 June 2018 14:08

**To:** Williams, Ella <[Ella.Williams@cyfoethnaturiolcymru.gov.uk](mailto:Ella.Williams@cyfoethnaturiolcymru.gov.uk)>

**Cc:** White, Steven <[Steven.White@cyfoethnaturiolcymru.gov.uk](mailto:Steven.White@cyfoethnaturiolcymru.gov.uk)>

**Subject:** Clays Site Wrexham. EPR/XP 3691 EG - New Permit Application

Hi Ella,

Following discussion with Steven regarding your responses to the below e-mail chain.

The purpose for the proposed SR2010No12, is twofold:

1. Segregate / Materials to aid the construction of the golf course mounds.
2. Manufacture quality certified products, to assure the performance and maintenance of the golf course's Tees, Fairways and Putting Greens see diagram below to illustrate e.g:
  - a. granular subsoils and topsoils\*
  - b. clean stone for drainage\*
  - c. Root Zone (High Performance topsoil)\*
  - d. Type 1 stone for footpaths

\*Requirements as per the recovery plan



I have mapped out the waste streams of the proposed bespoke permit to understand the possible regulatory controls. The key point from this map is, the high performance golf course areas, (Tee, Fairways, Greens and footpaths) require quality assured products that the proposed bespoke permit allows to be manufactured. Are these certified products to be considered to be deposited for recovery (box 3.1.2.b) or as additional products outside recovery plan (box 3.1.2.a)? Similarly when the existing waste deposited is processed, how is it best for the products to be classified, 4.1.2a or 4.1.2b?

The resulting bespoke permit application to vary the existing permit would be made up of:

- The existing SR2010 No08, and its supporting documents.
- The reassessed and accepted waste recovery plan to include the remaining circa 30,000 tonnes.
- Ecological survey including Great Crested Newt assessment
- The SR2010No12 with the waste storage limits, 10,000 tonnes & 40,000 tonnes for the respective waste types, treatment limit of 75,000 tonnes per year.

For this type of bespoke permit application, would you require any other pre-requestees than those mentioned above or already provided to support the existing SR2010 No8 Permit, to allow you review and issue the bespoke permit?

Can I call you some time to discuss this matter with you? Let me know when would be a good date and time?

Kind Regards

Rhys Lewis  
07734346844

# Clays Site Wrexham Permitting Proposals

## Legend

Bespoke Permit Area  
(Former SR2010 No08.  
Permit)



SR2010 No12 Permit  
Area.



Operations uses existing site  
infrastructure  
within limits shown.  
2 acre area.

## Notes

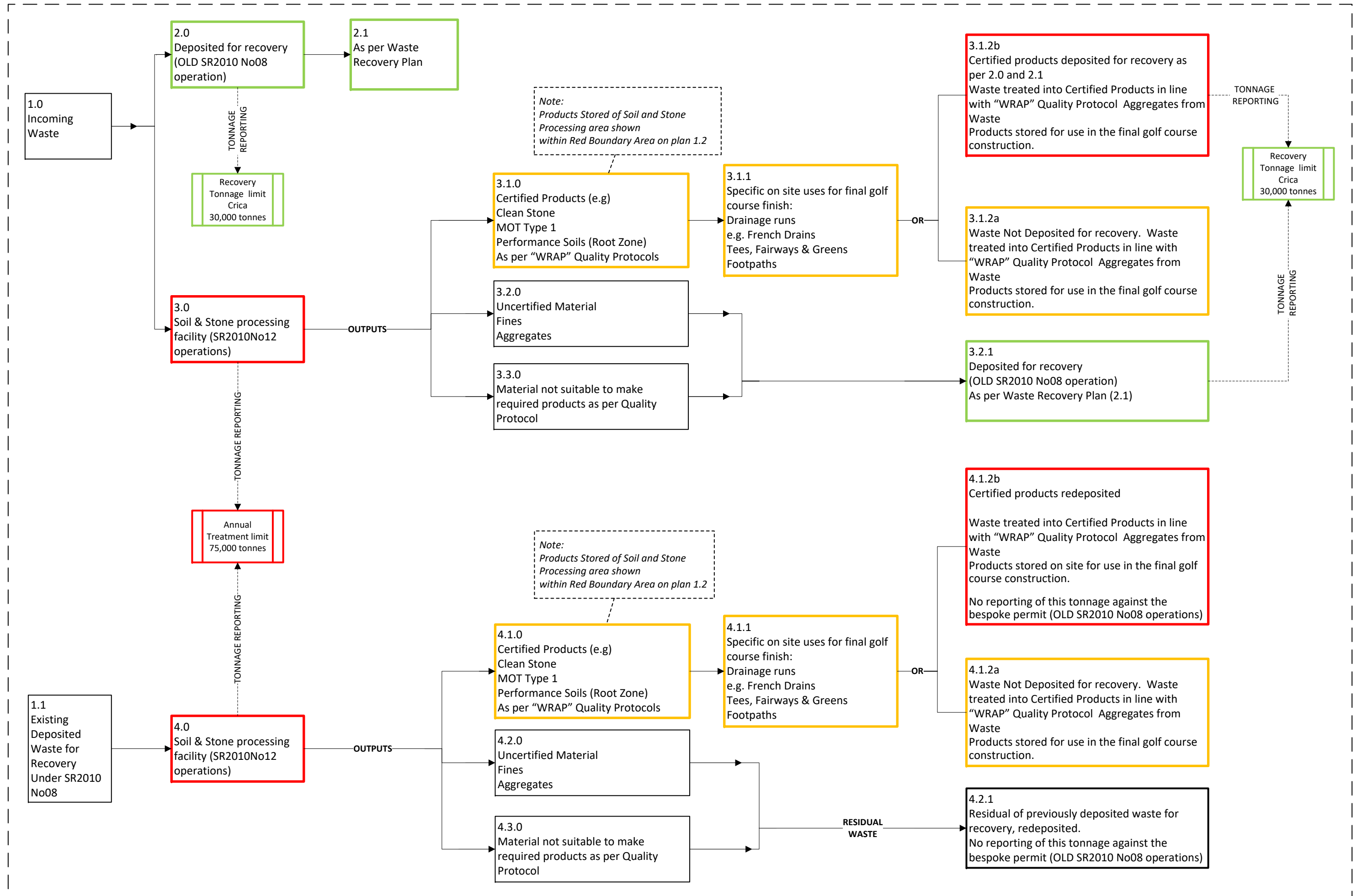


0.2 0 0.11 0.2 Kilometers

British\_National\_Grid

© Crown Copyright and database rights Ordnance Survey, Natural Resources Wales, 100019741, 2015. © Hawlfraint y Goron a hawl cronfa ddata Arolwg Ordnans, Cyfoeth Naturiol Cymru, 100019741, 2015. This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

## Clays Site Bespoke Permit – Waste stream & Regulatory Controls





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**From:** White, Steven [<mailto:Steven.White@cyfoethnaturiolcymru.gov.uk>]  
**Sent:** 20 June 2018 12:52  
**To:** Rhys Lewis <[Rhys.Lewis@aol.com](mailto:Rhys.Lewis@aol.com)>  
**Subject:** RE: Clays Site Wrexham. EPR/XP 3691 EG - New Permit Application

Hi Rhys,

Apologies it took a while to get back to you – I discussed this with Ella a couple of weeks ago and both of us thought the other was going to reply to you! Comments below:

If you want to apply as 2 separate applications you can, but you can also add in the soil processing facility to the R vs D activity when varying to a bespoke; this may be cheaper both in application fee and subsistence fee - it would be worth a look at the [charging pages](#) on our website to work out the costs.

There will be a charge for re-assessment of the waste recovery plan, Ella has suggested that this is done prior to a permit application as I assume if this isn't agreed then this may impact the requirement for the permits, but it can be done as part of the variation (but the additional cost will still apply).

Could you clarify the purpose of the SR2010No12 for us please, I assume it is it to treat the specified wastes to then be deposited for recovery under the other permit – is this a correct assumption?

As well as the application forms, there will need to be other supporting information provided with the applications, this will be different depending if bespoke or standard rules but these are explained in more detail with the application forms.

I am out of the office for the next couple of days but Ella should be available for any further queries you may have in that time (I think her contact details are further down in this email chain).

**Regards**

**Steven White**  
**Environment Officer: Waste Regulatory Team**  
**Natural Resources Wales**  
✉ Chester Road, Buckley, Flintshire, CH7 3AJ  
☎ 03000 653 913 (Internal 3913)  
Email [steven.white@naturalresourceswales.gov.uk](mailto:steven.white@naturalresourceswales.gov.uk)



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*Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.*

---

**From:** Rhys Lewis <[Rhys.Lewis@aol.com](mailto:Rhys.Lewis@aol.com)>  
**Sent:** 19 June 2018 11:08  
**To:** White, Steven <[Steven.White@cyfoethnaturiolcymru.gov.uk](mailto:Steven.White@cyfoethnaturiolcymru.gov.uk)>  
**Subject:** RE: Clays Site Wrexham. EPR/XP 3691 EG - New Permit Application

Hi Steve,

Do you know when can get back to me with your comments to the permitting proposals at Clays Site sent previously?

Let me know if you need any further information.

Kind Regards

Rhys Lewis  
07734346844

**From:** rhys.lewis [<mailto:rhys.lewis@aol.com>]  
**Sent:** 01 June 2018 15:48  
**To:** [Steven.White@cyfoethnaturiolcymru.gov.uk](mailto:Steven.White@cyfoethnaturiolcymru.gov.uk)  
**Subject:** RE: Clays Site Wrexham. EPR/XP 3691 EG - New Permit Application

Hi Steven,

They are to be submitted as two separate proposals.

Kind Regards

Rhys

Rhys Lewis  
[rhys.lewis@aol.com](mailto:rhys.lewis@aol.com)

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On Friday, 1 June 2018 White, Steven <[Steven.White@cyfoethnaturiolcymru.gov.uk](mailto:Steven.White@cyfoethnaturiolcymru.gov.uk)> wrote:

Hi Rhys,

To clarify with the proposals below are they two separate proposals or to be submitted as a whole?

**Regards**

**Steven White**


**Environment Officer: Waste Regulatory Team**


**Natural Resources Wales**

✉ **Chester Road, Buckley, Flintshire, CH7 3AJ**

☎ **03000 653 913 (Internal 3913)**

Email [steven.white@naturalresourceswales.gov.uk](mailto:steven.white@naturalresourceswales.gov.uk)

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 *Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.*



## Rhys Lewis

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**From:** White, Steven <Steven.White@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 15 January 2018 16:06  
**To:** Rhys Lewis  
**Cc:** Williams, Ella  
**Subject:** RE: Clays Site Wrexham. EPR/XP 3691 EG - New Permit Application  
**Attachments:** Clays map.pdf

Hi Rhys,

As discussed earlier - I've had chance to discuss the application with our Permitting team (as they are the ones who determine the applications) and we believe that rather than apply for the 2017No1 Standard rules Permit (SRP) you would need to vary the current SRP to a Bespoke one, and the Waste Recovery Plan (WRP) would also require re-assessing. The reasons for this are as follows:

If you applied for a new SRP it would likely be rejected as it would be seen as 'topping up' a previous SRP with another, you would have to surrender the previous permit in order to apply for the new one.

Due to the below factors it is likely that the application for a new SRP would be refused

### **Volume of waste:**

- 223194 m3 for entire project. 150000 m3 was permitted in the WRP assessed under the permit, does not meet 2017no1 SRP (limit of 60000m3) - Note: the total volume for the project equates to 334791 tonnes, activity originally done under exemption and last 100,000 tonnes was to be completed using the SRP permit, using 1.5 conversion factor this would bring the total volume under the permit as 150000m3.

**Waste types:** Some waste types listed in the approved WRP are now restricted in the SRP.

- 17 03 02 Restrictions- road planings only (Note: WRP states specifically that road planings will not be used under this code)
- 19 12 09 Restrictions in new SRP- wastes from treatment of waste aggregates that are otherwise naturally occurring minerals only. Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard
- 20 02 02 - Restrictions- topsoil, peat, subsoil and stones only.

### **Location checks**

- According to our maps the site is within 10 metres of a watercourse (there is a waterbody (stream and constructed pond) within 10m – map attached with waterbodies annotated as a red cross)
- The application would also need a conservation assessment as there is proximity to Great Crested Newt sites and a derogation licence may also be needed for the site.

It is advised to therefore apply to vary the current permit and re-assess the WRP for the site to show the justified increase in waste onto site, guidance on this can be found on the .gov.uk website (link below). With regards to a template there isn't a specific one but so long as you include everything set out in the guidance below there shouldn't be an issue.

<https://www.gov.uk/guidance/waste-recovery-plans-and-permits>

As discussed the application can be sent to us through various means (paper, email, CD, Dropbox, the link you sent for the Onedrive folder worked for me – whether it is a route Permitting would use I am unsure), I have copied in Ella Williams on this email (the Permitting Officer who has been looking at the application) her direct number is 03000 653 154 if you wish to discuss the permitting side of the case (e.g. costs, OPRA scores, ) in more detail. She will also be able to clarify some of the points I have put above in more detail.

Regards

Steven White

**Environment Officer: Waste Regulatory Team**

**Natural Resources Wales**

✉ Chester Road, Buckley, Flintshire, CH7 3AJ

☎ 03000 653 913 (Internal 3913)

Email [steven.white@naturalresourceswales.gov.uk](mailto:steven.white@naturalresourceswales.gov.uk)



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*Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.*

## Legend

## Notes



0.2 0 0.11 0.2 Kilometers

British\_National\_Grid

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