1. INTRODUCTION

Starling Environmental Limited (SEL) has been commissioned by Enviro Skip Hire Limited (the operator) to prepare an environmental permit variation application for their waste treatment facility located at Norton Way, Sandbach, Cheshire, CW11 3WL.

The site is regulated under environmental permit EPR/XP33396EF which is a bespoke permit allowing hazardous waste transfer and non-hazardous waste treatment. The permit allows acceptance of a wide range of non-hazardous waste but currently limits hazardous waste to only asbestos containing waste.

The proposed changes are:

- Add a washing activity for production of recycled aggregates from non-hazardous waste. This will involve addition a waste activity for physico-chemical treatment of non-hazardous waste by soil washing. The annual throughput of this activity will be 250,000 tonnes.
- Add an installation activity S5.6 A1 (a) (i) for storage of hazardous waste. The annual throughput for this activity will be 30,000 tonnes per year.
- Extend the site boundary to include an area of land to the west and north to house the wash plant and the hazardous waste storage facility
- Addition of two non-hazardous waste codes for scrap metal to the existing waste treatment activity

Extended pre-application advice (EPR/XP3396EF/P003) was provided by the EA and this advice has been incorporated into the submission documents.

1.1 Site Details and Surrounding Area

The site is located in a built up area of Sandbach. It is situated on an industrial estate off Norton Way and bordered by industrial units to the north, east and south. Beyond the industrial estate are residential properties. The western boundary is bordered by a strip of woodland approximately 8 to 10 m wide and beyond that the Crewe to Manchester railway line. Across the railway, further west, is another strip of woodland and then residential properties.

The closest surface water body is the Trent and Mersey Canal, approximately 350 m west of the site. Further west are the Moat and Watch Lane Flashes, both of which are part of the Sandbach Flashes SSSI. A habitats assessment is required due to these qualifying sites within the 2 km screening distance.

There is an area of priority habitat deciduous woodland approximately 65 m north-west of the site, across the railway line.

1.2 Layout

Access to the site is from Norton Way via a set of palisade security gates. The site is bound by palisade fencing and concrete panel walls. The gates are locked outside working hours and the site is covered by 24 hour CCTV. Features include several waste processing and storage buildings, concrete block bays for waste storage, an office

building, garage/workshops, weighbridges and parking area. The site is surfaced with concrete which drains to foul sewer.

1.3 Current Activities

There has been some confusion over the current permit. It was varied in 2019 from a standard rules permit SR2008No7 'household, commercial and industrial waste transfer station with treatment & asbestos storage' to a bespoke permit. However the variation was not processed properly by the EA. Instead of a new bespoke permit being issued with a new set of conditions, just an updated table of waste codes was issued.

Current permitted activities are considered to be as per the standard rules set as of 2019 when the permit was varied, which allowed the activities listed below:

Table 2.1 activities

Description of activities	Limits of activities
D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	The maximum quantity of asbestos waste received at the site shall not exceed 10 tonnes per day.
R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	The maximum quantity of asbestos waste stored at the site shall not exceed 10 tonnes.
D14: Repackaging prior to submission to any of the operations numbered D1 to 13	Treatment consisting only of manual sorting, separation, screening, baling, shredding, crushing or compaction of non-hazardous waste into different components for disposal, (no more than 50 tonnes per day) or recovery.
D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12	There shall be no treatment of asbestos waste.
R3: Recycling/reclamation of organic substances which are not used as solvents	No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site.
R4: Recycling/reclamation of metals and metal compounds	
R5: Recycling/reclamation of other inorganic materials	

The current permitted waste codes are listed in table 2.2 of the permit and the maximum throughput is 75,000 tpa.

Following the updated activity descriptors which have been adopted by the EA, it is considered that the current permit allows:

- Hazardous waste transfer station (the only hazardous waste currently allowed is asbestos)
- Non-hazardous waste treatment including manual sorting, separation, screening, baling, shredding, crushing or compaction.

The site operates with two process streams: one for general mixed waste and another for construction, demolition and excavation waste. These waste streams are stored and treated separately.

General waste comes in from local businesses and households through the skip hire service. This is deposited in the transfer station area and treatment includes shredding, trommelling, manual sorting via a picking line, mechanical separation using magnets and density separation techniques, and baling. Waste is imported in skips and also in commercial vehicles. This treatment process produces recoverable fractions eg. metal, wood, glass, plastic, cardboard etc which are segregated and dispatched for recovery or recycling. Residual waste which cannot be separated for recovery is dispatched for energy recovery as RDF. Fines from trommelling are disposed to landfill.

Incoming construction and demolition waste is stored separately from the general waste. This is crushed and screened to produce recycled aggregate products in accordance with the WRAP protocol.

Asbestos containing waste is accepted for storage and transfer only, less than 10 tonnes at any time. Asbestos waste is stored in a secure skip.

During pre-application discussions the question was raised as whether the existing permitted non-hazardous waste treatment activity should be a listed activity under Section 5.4. The following explanation was put forward as to why this should not be a listed activity, and this was agreed. It has been included in this document for completeness:

Treatment is only carried out for recovery purposes, so activities listed under section 5.4 (a) do not apply as that is for treatment for disposal only. Section 5.4 (b) is relevant as this refers to treatment of non-hazardous waste for recovery and disposal. The capacity of the existing and proposed treatment activities have the potential to exceed the 75tn per day threshold, however both treatment activities would be classed as physico-chemical treatment which is not listed under S5.4(b):

5.4 (b)Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC—
(i) biological treatment;
(ii) pre-treatment of waste for incineration or co-incineration;
(iii) treatment of slags and ashes;
(iv) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.

Although the residual material from the skip waste sorting process can be dispatched for energy recovery as RDF, this does not constitute pre-treatment of waste for incineration as it does not involve changing one or more of the parameters as listed in RGN2:

The RDF is just the residual material that is left over, it hasn't been altered to change the calorific value, moisture content, ash content, chemical composition or heavy metal content. I have received previous advice form the EA on this matter and have

been advised that pulling waste out upstream in the treatment process, such as scrap metal or PVC, does not constitute pre-treatment for incineration as it does not alter the physical or chemical composition of the RDF. This is classed as treatment for another purpose, for the recovery of the removed materials, which may or may not incidentally improve the quality of the waste as a fuel, as stated in RGN2 in the extract above.

2. PROPOSED CHANGES

2.1 Addition of Washing Plant

It is proposed to install a CDE wash plant to produce recycled aggregates. This will process non-hazardous waste to produce recycled products. The wash plant will operate on a closed loop system which ensures the constant recirculation of water through the plant. Water will be treated in the onsite Aquacycle water treatment tank using flocculants prior to recirculation through the wash plant.

All filter cake produced from the wash plant will undergo sampling and analysis followed by waste classification according to EA technical guidance WM3. A Programme of washwater and filtercake sampling and testing is appended to the risk assessment.

All aggregate, sand and soil substitute outputs from the washing process will be inspected and tested as appropriate to check they meet the criteria for re-use or onward processing to become product via the aggregates protocol.

The wash plant will have the capacity to process up to 1500 tonnes per day, which over a 5-day week and 48 weeks of the year, equates to 360,000 tonnes maximum capacity. However it is unlikely that the plant would run at full capacity all year, so a maximum throughput of 250,000 tonnes is requested. Proposed waste types for washing are listed in Table 1 below. Only uncontaminated material will be accepted for washing to produce end of waste products, in alignment with the wrap protocol. The waste acceptance steps for non-hazardous waste for production of aggregates are detailed in the ESH Quality Manual v1.

Waste Code	Description
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07 *May include excavation from mineral workings*
01 04 09	Waste sand and clay *Must not include contaminated sand*
10 11 03	Waste glass based fibrous material *Waste without organic binders only*
15 01 07	Glass packaging
17 01 01	Concrete *Must not include concrete slurry*
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02 02	Clean glass Must not include fibreglass or glass fibre
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01 *Only bituminous mixtures from the repair and refurbishment of the asphalt layers of roads and other paved areas (excluding bituminous mixtures containing coal tar and classified as waste code 17 03 01)* *Must not include coal tar or tarred products*

Waste Code	Description
	Must not include freshly mixed bituminous mixtures
17 05 04	Soil and stones other than those mentioned in 17 05 03 *Must not contain any contaminated soil or stone from contaminated sites*
17 05 06	Dredging spoil other than those mentioned in 17 05 05 *Only inert aggregate from dredgings* *Must not contain contaminated dredgings* *Must not contain fines*
17 05 08	Track ballast, soil and stones other than those mentioned in 17 05 07 *Must not contain soil and stones from contaminated sites*
17 09 04	Mixed construction and demolition waste other than those mentioned in 17 09 01, 17 09 02 and 17 09 03 *mixed construction and demolition waste, limited to that generated from utilities trenching, consisting of sub base aggregates, and containing only material that would be described as 17 01 01, 17 03 02 and 17 05 04*
19 12 05	Glass *Does not include glass from cathode ray tubes*
19 12 09	Minerals (eg sand, stones) *Must not contain contaminated concrete, bricks, tiles, sand, stone or gypsum from recovered plasterboard*
19 12 12	Hardcore including bricks, concrete and stones (excluding trommel fines)
20 01 02	Glass *Must not include fibreglass*
20 02 02	Garden and park waste (including cemetery waste) – soil and stones *Must not contain contaminated stones from garden and parks waste*

Table 1: Proposed Waste Types for the Soil Washing Activity

Full construction details of the wash plant are provided in an information pack provided with the application entitled ‘wash plant construction detail’. This shows the dimensions of the different sections of the plant and the foundations beneath.

The concrete surface beneath the plant has been designed to accommodate the weight of the plant and has been installed by specialist building contractor Magna Projects Ltd, who report the specification of the concrete is C32/40 Air Entrained, 1-layer A252 Mesh Btm, 20mm dowel bars @ 300 centres. Expansion foam around all plinths and bases. And expansion joints at valleys on top and bottom yard.

The yard has been resurfaced to accommodate the plant and the activity. Structural calculations for the concrete are included within the wash plant information pack in a document titled ‘External Yard Design’.

Surface water run-off from the yard is directed towards a catchpit shown on the drainage plan, from where it is pumped back into the water storage tank for reuse. Surplus water (eg. if the plant is not operational and the water holding tank is full) will be discharged to sewer via a three-stage interceptor. The interceptor will be fitted with a penstock valve so that it can be closed off in the event of a fire to stop firewater from running directly to sewer.

The concreted surface, catchpit and interceptor provide a secondary containment system in line with the requirements of CIRIA 736. Pre-application advice stated *‘In order to evidence that the containment systems are in line with CIRIA 736 the catch pits and impermeable surfaces the design needs to be assessed for structural integrity and signed off by a competent person*’. Detailed drawings and structural calculations provided in the wash plant information pack demonstrate that these have been designed by competent engineers following established methods and practices.

2.2 Hazardous Waste Storage

It is proposed to store hazardous waste for bulking and onward transfer. Hazardous waste will be stored in a dedicated, fully enclosed building with sealed drainage. The majority of the proposed waste types are Chapter 17 construction and demolition waste. Due to the nature of construction projects, waste often has to be moved quickly and if it is suspected to be hazardous it is classified as hazardous waste as a worst-case scenario without representative testing. This is particularly the case with track ballast which has to be removed quickly to prevent prolonged railway delays.

The operator wishes to be able to accept these waste types and then carry out representative testing according to EA guidance WM3. If the waste is confirmed as hazardous it will be dispatched off-site to a suitable facility. If it is found to be non-hazardous, it will be reclassified and moved to the appropriate treatment or storage area on site. Hazardous wastes for bulking and testing are listed in Table 2a.

Waste Code	Description
17 01 06*	mixtures of, or separate fractions of concrete, bricks tiles and ceramics containing hazardous substances
17 03 01*	bituminous mixtures containing coal tar
17 03 03*	coal tar and tarred products
17 04 10*	Cables containing oil, coal tar and other hazardous substances
17 05 03*	soil and stones containing hazardous substances
17 05 05*	dredging spoil containing hazardous substances
17 05 07*	track ballast containing hazardous substances
17 06 03*	other insulating materials consisting of or containing hazardous materials
17 08 01*	gypsum-based construction materials contaminated with hazardous substances
17 09 03*	other construction and demolition wastes (including mixed wastes) containing hazardous substances
19 12 11*	other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances
19 13 01*	solid wastes from soil remediation containing hazardous substances

Table 2a: Proposed Hazardous Waste for Storage

Hazardous waste for storage will not be accepted if it is odorous, if it flows or has free-phase contamination (eg. petroleum products such as oil or diesel). Hazardous waste acceptance will be in accordance with the Hazardous Waste Management Procedures, Report No 161/7.

It is proposed to add a number of hazardous waste codes for batteries, cables and WEEE that may come in as part of mixed skip waste as household waste. These will be segregated from incoming waste and stored separately in the WEEE container shown on the site layout plan. These are listed in Table 2b below.

Waste Code	Description
16 06 01*	Lead acid batteries
16 06 02*	Ni-Cd batteries
16 06 03*	Mercury containing batteries
17 04 10*	Cables containing oil, coal tar and other hazardous substances
20 01 33*	Batteries and accumulators included in 16 06 01*, 16 06 02* or 16 06 03* and unsorted batteries and accumulators containing these batteries
20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components

Table 2b: Hazardous Waste Types for Storage

2.3 Expansion of the Site Boundary to the North and West

The permit boundary will be expanded to include land to the north and west which is owned by Enviro Skip Hire Ltd. The additional area will house the washing activity and the hazardous waste storage building. The upper and middle yard areas have been newly resurfaced and laid to a fall towards catch pits for water harvesting described in Section 2.1. The lower yard close to the site entrance and office block is concreted and drains via an interceptor to foul sewer. It is secured by a combination of concrete walls and palisade fencing.

2.4 Addition of Waste Codes to the Existing Waste treatment Activity

It is proposed to add two non-hazardous wastes for treatment for recovery under the existing non-hazardous waste treatment activity. These codes are listed in Table 3.

Waste Code	Description
19 10 01	Iron and steel waste
19 10 02	Non-ferrous waste

Table 3: Proposed Additional Codes for Treatment under the Existing Waste Treatment Activity

It is not proposed to change the existing capacity or throughput of the current operation to accommodate these extra waste codes.

3. SURFACE WATER EMISSION POINT

Surface water from the yard drains to sewer via an interceptor. Pre-application advice stated that this should be included as a point source emission as it could contain contaminated run-off from the non-hazardous waste storage operations, and that H1 emissions modelling must be carried out to assess this. This required a programme of sampling and an analysis of the surface water runoff whereby 12 surface water samples have been collected in March and April 2026. These have been analysed in an accredited laboratory and the results have been input into the H1 model as described in section 3.7 of the Environmental Risk Assessment. Application form B6 has also been completed and submitted with the application. The laboratory results are appended to the Environmental Risk Assessment. The emissions to sewer screen out as insignificant.

4. BAT ASSESSMENT

A BAT assessment has been carried out for the installation activity and is presented in Report No 161/3A. The assessment covers the general BAT requirements which overlap with the EAs appropriate measures guidance.

Emissions will be controlled by storage of hazardous waste inside a building. The building will not be enclosed with four walls and a roof and a roller shutter door. It will have sealed drainage to prevent escape of run-off. The material stored within the building will be damped down if dry to prevent dust emissions.

During enhanced pre-application advice the requirement for extraction and abatement for the storage building was discussed. It was explained that '*Hazardous waste enclosed within a building does not necessarily need extraction and abatement. If there is a risk of emissions e.g. if the waste stored is releasing harmful fumes vapours or gases, then it will be a requirement. Also, if there is a risk of explosive atmosphere then there must be ventilation under DSEAR'.*

Emissions from VOCs and odour during storage will be minimised by pre-acceptance controls, whereby waste will not be accepted for treatment if it is odorous. Only bulk solid waste will be accepted, no free-flowing sludges thereby limiting the amount of volatile (liquid) components. Waste acceptance procedures will ensure no free-phase contamination which may be a source of VOCs.

5. SUPPORTING DOCUMENTS

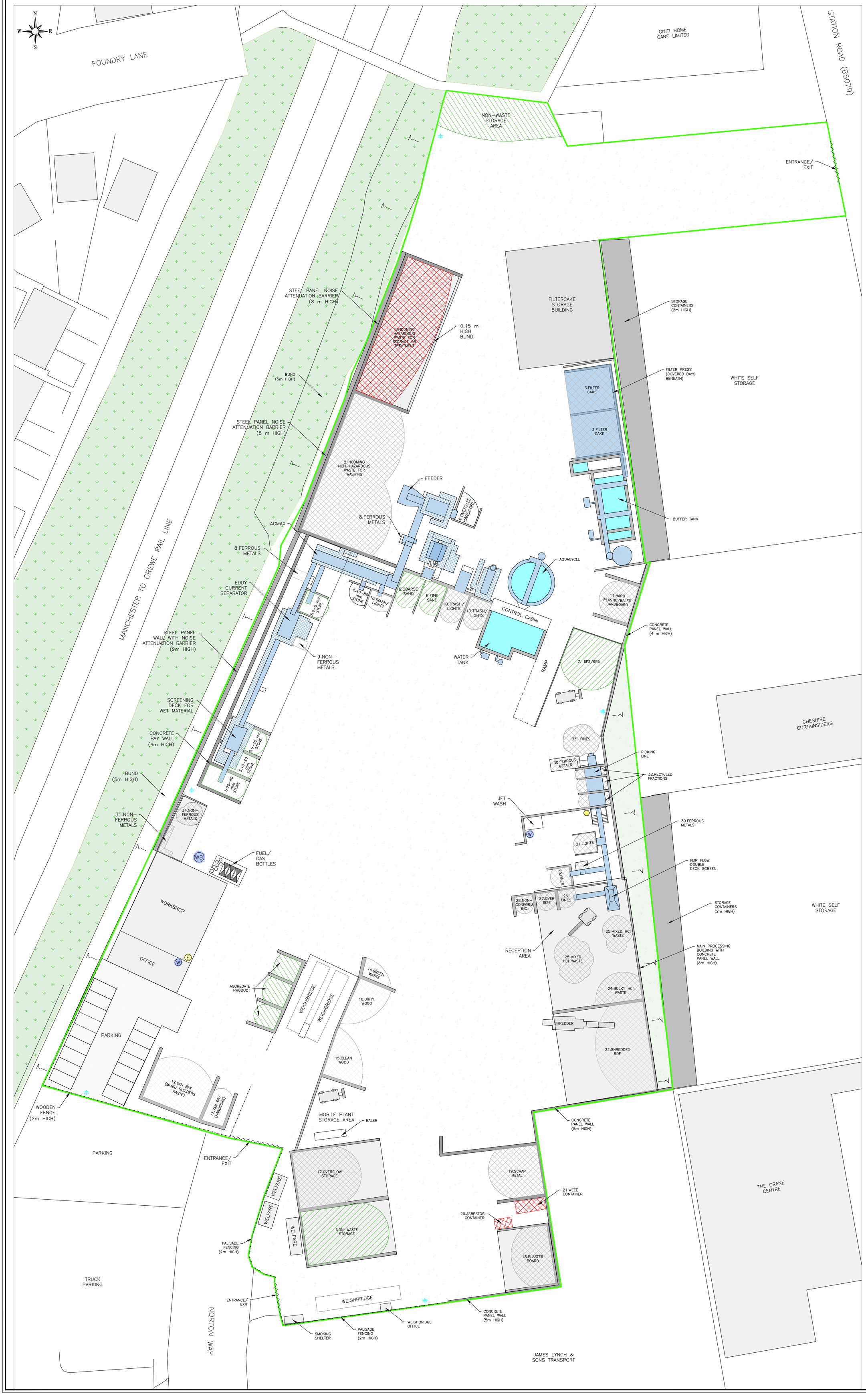
The following drawings are included within the application documents and appended to the NTS for ease of reference:

Drawing No 161/02B – Site Layout Plan
Drawing No 161/03A – Drainage Plan
Drawing No 161/05A – Existing and Proposed Permit Boundary
Drawing No 161/06A – Receptors

A full document list of information submitted with the application is presented overleaf.

Application Form Ref No	Document Name	Document Reference
	Application Forms: EP Application Form Part A EP Application Form Part B6 EP Application Form Part C2 EP Application Form Part C3 EP Application Form Part C4 EP Application Form Part F1	-
C2 2b, 6a,	Non-Technical Summary	May 2026
C2 4, C3 1, 3b C4 1 B6 8d,c,d	Environmental Risk Assessment	Report No 161/1A
C2 3b	Wamitab certificates	Roger Hudspith
C2 3d	EMS Summary	May 2026
C2 6b	Site Layout Plan	Drawing No 161/02B
C2 5	Site Condition Report	Report No 161/4A
C2 6c	Fire Prevention Plan	Report No 161/7
C3 3a, 3c, 6, Table 3a	Supporting Information (including BAT assessment, raw materials and energy efficiency)	Report No 161/3A
C3 Table 3a	Hazardous Waste Management Procedures	Report No 161/7
C3 Table 3b C4 Table 3b	Dust Emissions Management Plan	Report No 161/2A
C3 Table 3b	Noise Management Plan	Report No 161/5A
	Noise Impact Assessment plus Soundplan model files and survey data	J005693-9535-RDC-2
B6 Q3b,3c, 3d, 3e	Drainage calculations	BEK/26056/260420/1 appended to Report No 161/1A
B6 8d	Surface Water Monitoring Laboratory results	Appended to Report No 161/1A
B6 9e	H1 Model	May 2026
-	Wash Plant Information Pack	Folder ‘wash plant construction detail’

DRAWINGS



Legend

- PERMIT BOUNDARY
- CONCRETE SURFACE
- TARMACK SURFACE
- BUILDING
- WOODLAND
- NON-HAZARDOUS WASTE STORAGE
- HAZARDOUS WASTE STORAGE
- NON-WASTE STORAGE OR PRODUCT
- GATES
- BOUNDARY FENCING
- (W) MAINS WATER
- (WB) MOBILE DUST SUPPRESSION EQUIPMENT
- FUEL/OIL STORAGE
- DUST/ODOUR MONITORING POINT
- (E) ELECTRICITY MAINS

REV.	DESCRIPTION	DATE	BY
B	MINOR MODIFICATIONS	21/5/26	MYB
A	MINOR MODIFICATIONS	30/3/26	MYB

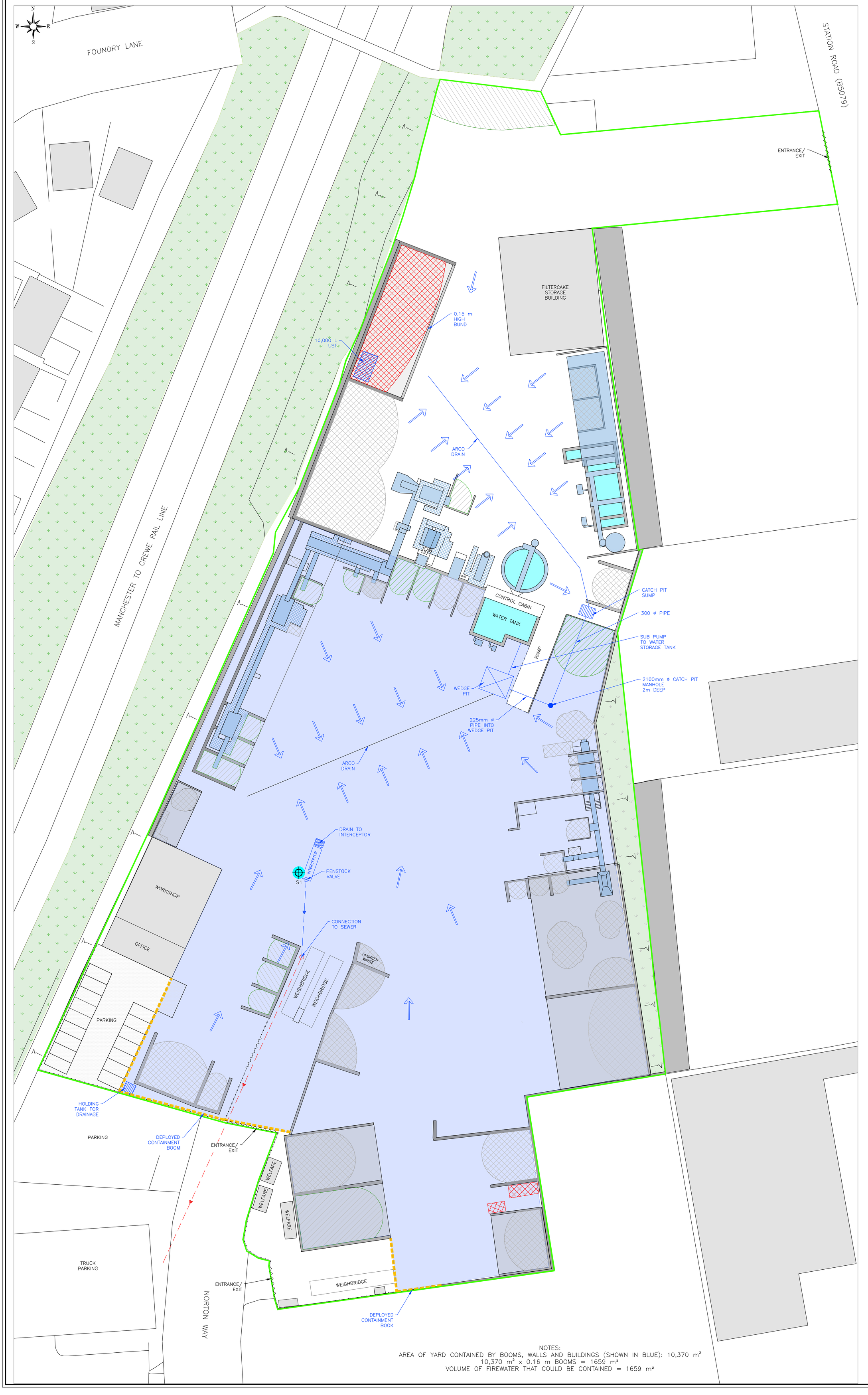
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email: claire@starlingenvironmental.co.uk
Tel: 07989 673122

CLIENT.
ENVIRO SKIPS HIRE LIMITED

JOB TITLE.
ENVIRO SKIPS HIRE LIMITED
SANDBACH
TRANSFER STATION

DRAWING TITLE.
SITE LAYOUT PLAN

DRAWN BY.	APPROVED BY.	DRAWING No.
M.Y.B	C.G	161/02B
DATE. 08/08/25	SCALE. 1:250	



Legend

- PERMIT BOUNDARY
- BUILDING
- WOODLAND
- NON–HAZARDOUS WASTE STORAGE
- HAZARDOUS WASTE STORAGE
- NON–WASTE STORAGE OR PRODUCT
- GATES
- BOUNDARY FENCING
- FIREWATER CONTAINED
- SURFACE FLOW DIRECTION
- FOUL SEWER
- CONTAINMENT BOOM
- S1 SURFACE WATER DISHCARGE AND SAMPLING POINT

NOTES:
AREA OF YARD CONTAINED BY BOOMS, WALLS AND BUILDINGS (SHOWN IN BLUE): 10,370 m²
10,370 m² x 0.16 m BOOMS = 1659 m³
VOLUME OF FIREWATER THAT COULD BE CONTAINED = 1659 m³

REV.	DESCRIPTION	DATE	BY
A	MINOR MODIFICATIONS	21/5/26	MYB

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CLIENT.
ENVIRO SKIPS HIRE LIMITED

JOB TITLE.
ENVIRO SKIPS HIRE LIMITED
SANDBACH
TRANSFER STATION

DRAWING TITLE.
DRAINAGE LAYOUT PLAN

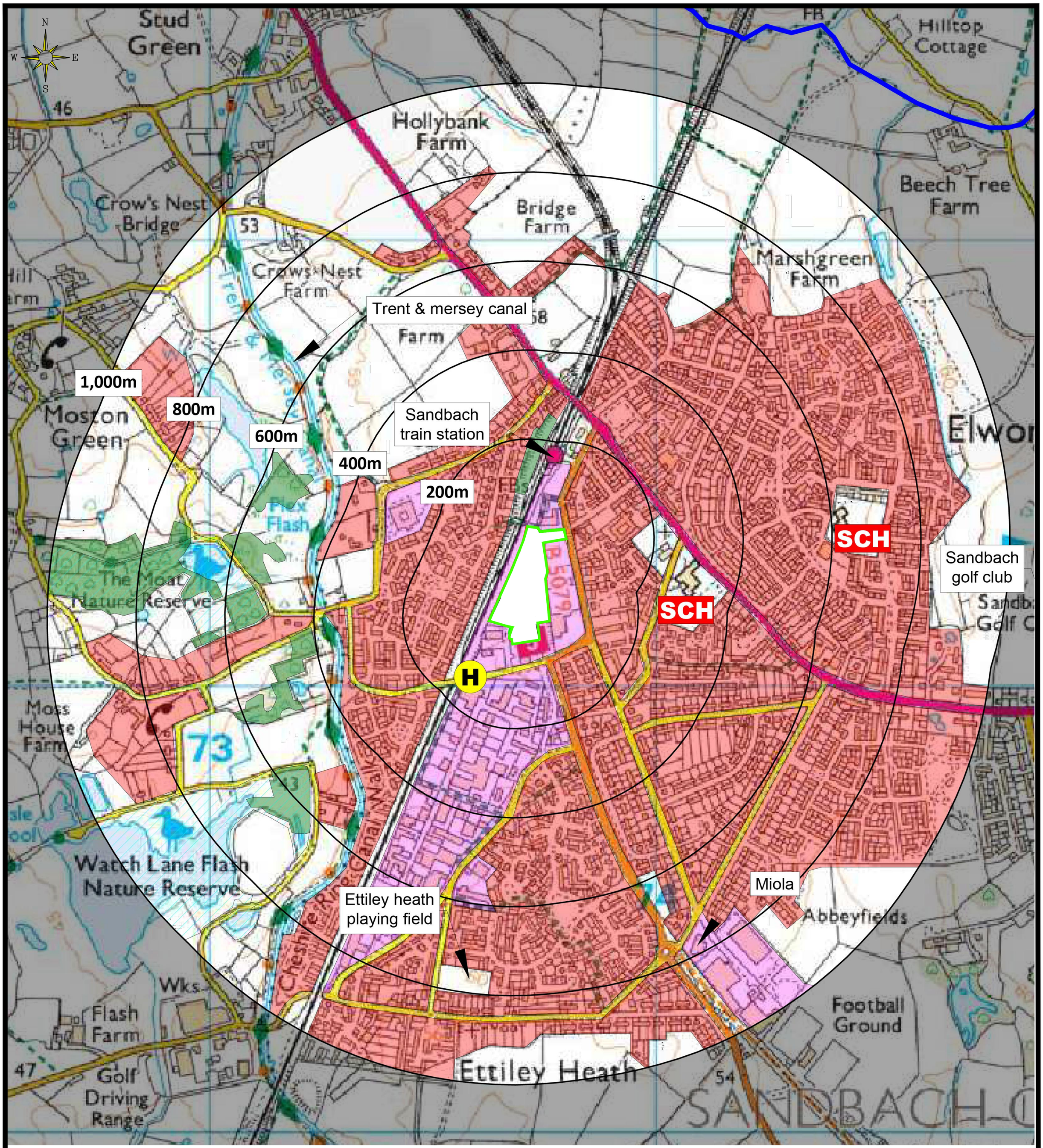
DRAWN BY.	APPROVED BY.	DRAWING No.
M.Y.B	C.G	161/03A
DATE. 08/08/25	SCALE. 1:250	



LEGEND PROPOSED PERMIT BOUNDARY EXISTING PERMIT BOUNDARY

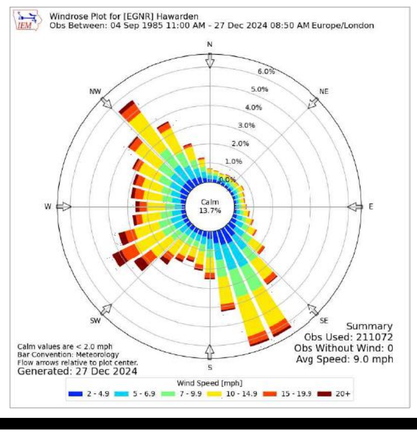
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Tel: 07989 673122

CLIENT: ENVIROSKIPS LIMITED		DRAWN BY: M.Y.B	APPROVED BY: C.G
JOB TITLE: ENVIROSKIPS LIMITED TRANSFER STATION		DATE: 18/08/25	DRAWING No.: 161/05A
DRAWING TITLE: EXISTING AND PROPOSED PERMIT BOUNDARY		SCALE @ A4: 1:1,250	



LEGEND

- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- School
- Woodland areas
- Priority habitat inventory (deciduous woodland)
- Sites of special scientific interest



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C.G

JOB TITLE.
ENVIROSKIPS LIMITED TRANSFER STATION

DATE.
18/08/25

DRAWING No.
161/06A

DRAWING TITLE.
RECEPTORS PLAN (1 Km)

SCALE @ A1.
1:1,250