

Lancashire County Council
Development Management Group
Environment Directorate
PO Box 100
Preston
Lancashire
PR1 0LD

Our ref: NO/2022/114182/01-L01
Your ref: LCC/2022/0003
Date: 10 February 2022

Dear Sir/Madam

DEMOLITION OF EXISTING BUILDING AND ERECTION OF PURPOSE BUILT BUILDING (AND ANCILLARY STRUCTURES) TO HOUSE HIGH TEMPERATURE TREATMENT FACILITY FOR THE MANAGEMENT OF MEDICAL WASTE

CULZEAN W2E LTD, TOWER HOUSE, STOPGATE LANE, SIMONSWOOD INDUSTRIAL PARK, SIMONSWOOD

Thank you for consulting us on the above application.

The application is supported by the following Environmental Statement which we have reviewed in so far as it relates to our remit:-

- Environmental Statement for planning application for proposed high temperature treatment facility for management of medical waste, Stopgate Lane, Simonswood by Oaktree Environmental (reference 2776-005-B Version 1.2; dated 13 December 2021)

Environment Agency position

We have no objection to the proposed development but we recommend any subsequent approval is conditioned as follows:-

Groundwater

The submitted environmental statement states in Section 9.3 that there will be no impacts on land or water resources and that any effluents will be contained and tankered away. However, in section 3.3.20 on page 21, it states that the effluents and wastewater will be collected in below ground holding tanks with no further information provided. Underground storage of polluting substances poses particular risks to groundwater because of the problems of leak detection. Groundwater is

Environment Agency
PO Box 519, South Preston, Lancashire, PR5 8GD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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particularly sensitive in this location because the proposed development site is within Source Protection Zone 3 and is located upon Principal aquifer.

In light of the above, the proposed development will be acceptable if a planning condition is included requiring submission and subsequent agreement of further details as set out below. Without this condition we would object to the proposal in line with paragraph 109 of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

Condition The development hereby permitted may not commence until such time as a scheme to install the underground tanks has been submitted to, and approved in writing by, the local planning authority. The scheme shall include the full structural details of the installation, including details of the excavation, the tanks, tank surround, associated pipework and monitoring system. The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme, or any changes subsequently agreed, in writing, by the local planning authority.

Reason To ensure that the underground storage tanks do not harm the water environment in line with paragraph 109 of the National Planning Policy Framework.

Environmental Permitting

The area proposed for this development is not currently permitted for waste management operations. The facility would require an environmental permit under the Environmental Permitting (England and Wales) Regulation 2016. The applicant states that the exact specification of plant and equipment to be installed within the building is outside the scope of the planning application and will be agreed with the regulator as part of the permitting process. It is the type of plant and the maximum throughput based on the rated capacity of the plant, rather than the actual throughput or how the plant is operated, which determines how the plant is regulated and whether it will be regulated by the Environment Agency or by the Local Authority.

Yours faithfully

Philip Carter
Planning Officer - Sustainable Places

Direct dial 02030251396

Direct e-mail clplanning@environment-agency.gov.uk