



## Supporting Information

### Radlett SRFI Area 2

January 2024

**Waterman Infrastructure & Environment Limited**

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### Quality Assurance – Approval Status

This document has been prepared and checked in accordance with  
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001: 2018)

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<b>Issue</b>	<b>Date</b>	<b>Prepared by</b>	<b>Checked by</b>	<b>Approved by</b>
32-3-2	January 2024	Sarah Owen Senior Associate	Freddie Alcock Technical Director	Sarah Owen Senior Associate



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### Comments

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## Disclaimer

This report has been prepared by Waterman Infrastructure & Environment Limited, with all reasonable skill, care and diligence within the terms of the Contract with the client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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## 1. Introduction

### 1.1 The Brief

Waterman Infrastructure & Environment Limited (“Waterman”) has been appointed to prepare an application for an Environmental Permit (EP). The EP application is to authorise the permanent deposit of waste on land as a recovery activity. The waste recovery activity is for site-derived waste to be used in the construction of landscape bunds associated with the construction of the Radlett Strategic Rail Freight Interchange (SFRI), located at North Orbital Road, Upper Colne Valley, Hertfordshire, AL2 2ET – specifically the two landscape bunds on Area 2.

SEGRO Radlett Ltd is the master developer – the party responsible for bringing the scheme to fruition. It has appointed VolkerFitzpatrick Limited (VFL) to undertake the earthworks including bund construction and other enabling activities. VFL is therefore the EP applicant and will be the EP operator.

Various items of supporting information are required to respond to EP application form questions. This document provides that information and the application forms.

### 1.2 Report Structure and Scope

This report is a summary and collation of the supporting information required for the EP application.

The report is structured to answer the application forms questions as follows:

Part A – question 5c;

Part B2 – questions 1a, 3a, 3b, 3d, 5a, 5c; and

Part B4 –question 1, 1c, 3a.

This report contains the non-technical summary required by Part B2 question 5c.

Plans and drawings have been prepared and are presented separately elsewhere in the application bundle (“ESSD drawings and information bundle”).

### 1.3 Limitations and Constraints

Waterman has endeavoured to assess all information provided to them during the preparation of this document, but makes no guarantees or warranties as to the accuracy or completeness of this information.

The conclusions resulting from this report are not necessarily indicative of future conditions or operating practices at or adjacent to the site.

## 2. Non-Technical Summary

### *Part B2 Question 5c*

The non-technical summary below provides a description of the day-to-day activities on the permitted site and how it is set up.

### 2.1 Context of Project

Through the Radlett SRFI scheme SEGRO Radlett Ltd proposes to develop an intermodal terminal, with rail and road distribution units. The SRFI is located to the south of St. Albans, adjacent to the M25 and Midland Main line (MML) railway. The terminal will be serviced by a new dual track rail chord connected to the MML.

The SRFI comprises a 419-hectare (ha) development area that is sub-divided into eight plots referred to as Areas 1 to 8. The areas have the following proposed uses:

- Areas 1 (146 ha) and 2 (26 ha) – the SRFI Development Area. Area 1 will comprise an intermodal terminal and a rail and road served distribution facility consisting of several large warehouses. The rail chord connecting Area 1 to the MML will run through Area 2. Area 2 will also feature two landscape bunds (LS1 and LS2) that will help to screen the SRFI from public view and provide acoustic screening; and
- Area 3 to 8 (247 ha) – will be developed with additional works and landscaping to provide publicly accessible open land and a community forest.

The Areas are shown on plan “Different Development Phases (Areas 1 – 8) of the SRFI” (D-ESSD1A - drawings are to be found in the separate “ESSD drawings and information bundle”).

To enable construction of the SRFI, earthworks are required to prepare the SRFI Development Area as summarised below:

#### Area 1

Earthworks material will be excavated from the northern half of Area 1 where the levels need to be lowered to enable access from the public highway to the north, to install surface water flow attenuation features and to create suitable development platform levels. The cut will be used to raise levels across the southern half of Area 1, to construct landscape bunds around the perimeter of Area 1 and to construct the landscape bunds on Area 2.

#### Area 2

Excavation is required in Area 2 to construct the new rail chord linking the MML and the SRFI – the rail chord needs to pass under the MML. Some of the excavation will be into historic landfill, with the waste arising to be processed by mobile treatment EP to generate useable earthworks material (i.e. meeting the specification for the works) with the unusable waste despatched for recovery or disposal elsewhere. The waste recovered from processing the historic landfilled waste as well as restoration soils and capping material from Area 2 and excavation arisings cut from Area 1 will be used to construct the landscape bunds on Area 2.

The cut and fill locations across Areas 1 and 2 are shown on plan “Earthworks Analysis Cut and Fill Volumes” (D-ESSD4A).

## Earthworks Programme

The current earthworks programme for the Radlett SFRI Scheme commences in spring 2024 and concludes in summer 2026. The construction of LS1 will occur in campaigns across the entire period, the construction of LS2 will occur in 2026. Earthworks will be happening at the same time on Areas 1 and 2.

## Regulatory Control of Earthworks

Pre-application liaison has been undertaken with both local (Hertfordshire and North London) and national (Permitting Support Centre) EA teams, seeking to establish the waste / non-waste status of various excavation arisings and the appropriate mechanisms to regulate the use of the arisings as earthworks materials. Aspects of this liaison are not concluded at the time of writing.

The southern part of Area 1 has been subject to mineral extraction and restoration. The land is recorded in Landmark data as “EA historic landfill polygon” and “LA recorded landfill site”. If the restoration material can be demonstrated to comprise overburden and interburden from the mineral extraction activity, excavation arising generated from that area will be excluded from the scope of waste. In that case, the reuse of such material will be managed under the Definition of Waste Development Industry Code of Practice (DoWCoP) in order to maintain an auditable record of the materials use within the earthworks. If the non-waste status of such material cannot be demonstrated / agreed, the arisings would be managed as waste. The local EA team has been provided with evidence to support non-landfill history of the southern part of Area 1 and the information has been passed forward to the EA team responsible for maintaining the historic landfill dataset with a request that the record is removed.

Natural soils and Made Ground will arise from excavation into the northern part of Area 1 – i.e. from land outside the historic mineral workings. Whilst natural soils excavated and able to be used in construction on the same site are excluded from the scope of waste, their use in earthworks on this scheme would be managed under the DoWCoP, as would the use of Made Ground.

The arisings from excavation into the historic landfill in Area 2 will be waste. The arisings will be treated under mobile treatment EP and the useful products of treatment will retain their waste label until their permanent deposit into earthworks, regulated by waste recovery EP. For the avoidance of doubt, the treatment will not be regulated by the site-based waste recovery EP.

Due to the unsettled status of the material to be cut from the mineral restoration area in Area 1, the waste recovery EP will include both bunds on Area 2. The permitted area boundary is limited to the areas occupied by landscape bunds LS1 and LS2 and is shown on plan “Area 2 Bunds Waste Recovery Area Boundary”) (D-ESSD1C). The boundary for Area 2 is shown on plan “Site Location Plan” (D-ESSD1B).

## 2.2 Site Setting

The environmental setting is described in detail in the ESSD and ERA. A table of all potentially sensitive receptors within 500m of Area 2 is included. The Receptors Map (D-ESSD2A) shows receptors within a study area of 500m from Area 2. Area 2 is not located in an air quality management area.

Area 2 is in a sensitive controlled waters setting. Wetland is present within Area 2 which drains to a stream running north to south on the eastern boundary. Area 2 is underlain by Kesgrave Catchment Subgroup (sand and gravel mineral deposit) which is classified as a secondary A aquifer, underlain by the Chalk, a principal aquifer, supplying a public water supply to the south. The south of Area 2 is in groundwater source protection zone (SPZ) 1 (Inner Zone) with SPZ2 (Outer Zone) across the north of Area 2.

Great Crested Newt (GCN) are present in and around Area 2, and wetland and terrestrial habitat will be provided and secured within Area 2 during the works. Local Wildlife Sites are present in the vicinity of the site, noting one of them will be lost to the development on Area 1.

The EMS documents (e.g. DEMP) included in the application consider the nearby residential properties (e.g. Napsbury Park to the north east), commercial uses (e.g. to the south west), and trees and vegetation. Transport infrastructure is present to the immediate south (M25 London Orbital Motorway) and to the immediate west (Midland Mainline Railway).

The operation should be considered in the context of the earthworks and other construction activities on the Radlett SRFI Development Area – which will also be a potential emitter of noise and dust for example.

At different stages of the construction works Area 2 will be accessed from Beningfield Drive to the south and from Area 1 to the west.

## 2.3 The Waste

The two landscape bunds on Area 2 will be constructed using waste arising from Area 1 and Area 2 – no waste will be imported from outside Radlett SRFI Development Area.

In general terms there will be two sources of waste. Waste will arise from excavations into an historic landfill beneath Area 2 in order to create the route of the new rail chord. The waste will be treated to turn it into a useable earthworks material. A separate mobile treatment EP will regulate the treatment. In addition, excavation arisings from Area 1 will be used.

Waste acceptance procedures including sampling and laboratory testing will be implemented to confirm the wastes meet the chemical and physical specifications. The waste will not be inherently dusty or containing loose fines or powders, nor will it be classified as hazardous waste.

The waste may be held in temporary stockpiles on Area 2 or delivered directly to the landscape bunds.

## 2.4 Site Activities and Infrastructure

### 2.4.1 Movements of waste

The waste will be delivered by dump trucks (25 tonne). The waste will be tipped into stockpiles (pending recovery) or in permanent deposit locations.

The tip and subsequent contouring of stockpiles is assisted by mobile plant (excavator). In the deposit locations, the waste will be tipped then spread and compacted using a road roller.

### 2.4.2 Plant and equipment

Vehicle and mobile plant used in waste handling will include:

- dump trucks (25 tonne);
- excavators; and
- a road roller.

Dust suppression equipment will be used including:

- Bell B30E water tanker fitted with dribble bar, spray valves, hose reel and water cannon;
- Fog cannon; and



- Towable bowser.

Wetting agents and binders will be used as required.

### 2.4.3 Fixed plant

There is no fixed plant associated with the permitted activity (i.e. no trommels, shakers, conveyors, crushers or picking stations etc).

### 2.4.4 Site boundaries

There are no boundary markers on the permitted site. It sits within Area 2, and is open to it. The permitted site in relation to Area 1 is shown on drawing D-ESSD1C.

The earthworks are carefully controlled, assisted by Geographic Information Systems (GIS) to ensure the waste is only deposited within the permitted site. The Area 2 security measures ensure the permitted site is secure.

### 2.4.5 Stockpiling of waste

Stockpiles will be located away from the northeastern boundary and the duration of stockpiling will be known at the outset for each stockpile. The stockpiles will be constructed in layers and lightly compacted as they build up, with the sides sealed with the back of the excavator bucket.

Stockpiles of treated historic landfill waste may be in place for more than three months. Long-term stockpiles will be constructed to a maximum height of 5m (as described above), facilitating the use of dust suppression additives such as Dustbuster1 (wetting agent in dust suppression water) and binders.

Daily site inspections of all stockpiles undertaken by the Works Manager will include checks on dust controls / dust emissions from stockpiles.

### 2.4.6 Site surfacing

The site surfaces in Area 2 will consist of unsurfaced ground including in active earthworks locations and haul roads.

### 2.4.7 Site drainage and run off

Once complete, the landscape bunds will have lined filter drains and swales around the base of the bunds to collect rainwater runoff for discharge to the stream on the eastern boundary of Area 2. During the construction works excess rainwater and flooding will be managed.

### 3. Supporting Information

#### 3.1 The Operator

##### *Part A Question 5c*

Volker Fitzpatrick Limited has eight directors;

- Joanna Clare Dyne
- David John Griffin
- Anita Suzanne Harris
- James Richard Hindes
- Richard Andrew Offord
- Alan Robert Robertson
- Matthew Gordon Woods
- Volkerwessels UK Limited

Their dates of birth are given in Appendix 1 of the application form (Part A).

#### 3.2 Pre-application Discussions

##### *Part B2 Question 1a*

Liaison regarding regulatory control of earthworks is summarised in section 2.1. The Hertfordshire and North London reference is ENVPAC/1/HNL/00328. Conservation and natural heritage screening was received (reference EPR/LB3906TZ/A001). The waste recovery plan was submitted for pre-application assessment and allocated a further reference EPR/ZP3225SV/P001 (see section 3.8 below).

#### 3.3 Relevant Offences

##### *Part B2 Question 3a*

See Appendix B for further details of the relevant offence and actions taken to prevent reoccurrence.

#### 3.4 Technical Ability

##### *Part B2 Question 3b*

Technically Competent Management (TCM) will be provided by VFL. Mr Mark Dodd (Remediation Manager) will be the TCM for the operation.

VFL chooses to use the CIWM/WAMITAB<sup>1</sup> Operator Competence Scheme. Mr. Dodd's primary award certificate and continuing competency certificates are included in Appendix C. Mr. Dodd's date of birth has been provided in Appendix 2 of Part B2.

#### 3.5 Management System

##### *Part B2 Question 3d*

VFL operates a management system certified as meeting the requirements of the ISO14001:2015 standard. A copy of the certificate and a document outlining the EMS are included in Appendix D.

<sup>1</sup> Waste Management Industry Training and Advisory Board.

### 3.6 Site Plans

#### Part B2 Question 5a

Technical plans and drawings for this EP application can be found in the bundle prepared for the ESSD document. This is referred to as the “ESSD drawings and information bundle” and includes:

- Area 2 Location Plan (D-ESSD1B);
- Area 2 Bunds Waste Recovery Area Boundary (D-ESSD1C); and
- Receptors Map (D-ESSD2A)

### 3.7 Permitted Wastes

EWC codes

#### Part B4 Question 1

The treated historic landfill waste will be coded as a Chapter 19 waste. The excavation arisings from Area 1 will be coded as a Chapter 17 waste.

Table 1: Proposed list of site-derived wastes

EWC code	EWC description	Limitations
17 05 04	Soil and stones other than those mentioned in 17 05 03	Limited to site-derived material meeting the chemical and physical specifications for the works
17 09 04	Mixed construction and demolition waste other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	Limited to site-derived material meeting the chemical and physical specifications for the works
19 12 09	19 12 09 minerals (for example sand, stones)	Limited to site-derived material meeting the chemical and physical specifications for the works
19 12 12	19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	Limited to site-derived material meeting the chemical and physical specifications for the works

### 3.8 Waste Recovery Plan

#### Part B4 Question 1c

The Waste Recovery Plan (WRP - reference RAD-WAT-A2EX-XX-RP-I-0026 August 2023) was submitted to the EA for pre-application assessment. The EA agreed the activity to be recovery operation by letter dated 18 September 2023, reference EPR/ZP3225SV/P001 (Appendix E).

### 3.9 Technical Standards

#### Part B4 Question 3a

Technical standards relevant to the deposit for recovery waste operation are listed below:

- Non-hazardous and inert waste: appropriate measures for permitted facilities<sup>2</sup>

<sup>2</sup> [Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities) (accessed 01/08/2023)

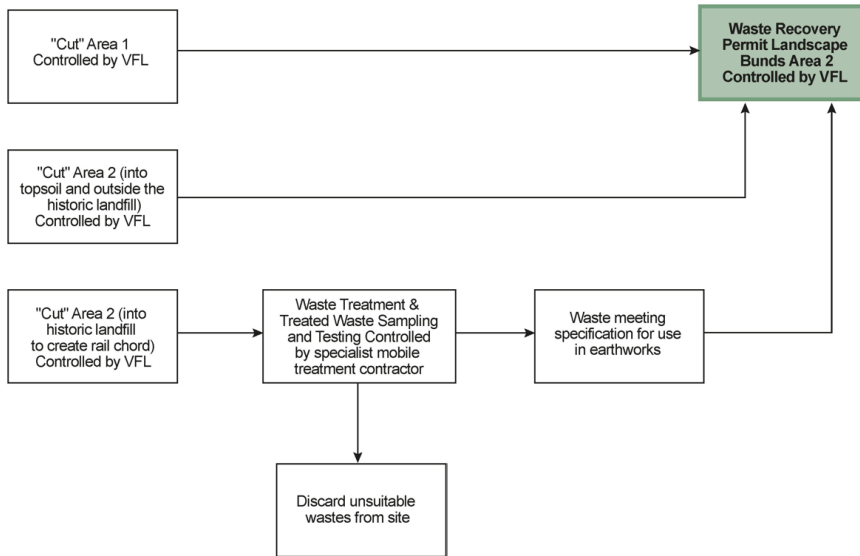
- Risk assessments for your permit<sup>3</sup>
- Waste recovery plans and deposit for recovery permits<sup>4</sup>
- Control and monitor emissions for your environmental permit<sup>5</sup>
- EA Example Dust Emission Management Plan version 10.

The facility is a deposit for recovery waste operation. Suitable non-hazardous waste will be used to construct two landscape bunds on Area 2 of the Radlett SRFI. The waste will arise from earthworks within the Radlett SRFI Development Area. No waste will be imported.

See section 3.7 for directions to site plans.

The sources of waste are set out in the figure below.

Figure 1: Process flow



<sup>3</sup> [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit) (accessed 01/08/2023)

<sup>4</sup> [Waste recovery plans and deposit for recovery permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/waste-recovery-plans-and-deposit-for-recovery-permits) (accessed 01/08/2023)

<sup>5</sup> [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit) (accessed 01/08/2023)

## APPENDICES

## **A. Application Forms**

Part A

Part B2

Part B4

Part F1

# Application for an environmental permit

## Part A – About you



You will need to fill in this part A if you are applying for a new permit, applying to change an existing permit or surrender your permit, or want to transfer an existing permit to yourself. Please check that this is the latest version of the form available from our website.

You can apply online for Waste standard rules environmental permits, bespoke waste permits and bespoke Medium combustion plant permits

Apply online for an environmental permit.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

**Note:** if you believe including information on a public register would not be in the interests of national security you must enclose a letter telling us that you have told the Secretary of State. We will not include the information in the public register unless directed otherwise.

It will take less than one hour to fill in this part of the application form.

Where you see the term ‘document reference’ on the form, give the document references and send the documents with the application form when you’ve completed it.

### Contents

- 1 About you
  - 2 Applications from an individual
  - 3 Applications from an organisation of individuals or charity
  - 4 Applications from public bodies
  - 5 Applications from companies or corporate bodies
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  - 7 Contact details
  - 8 How to contact us
  - 9 Where to send your application
- Appendix 1 – Date of birth information for installation and waste activities (applications for a new permit or transferring a permit) only

## 1 About you

Are you applying as an individual, an organisation of individuals (for example, a partnership), a company (this includes Limited Liability Partnerships) or a public body?

An individual

Now go to section 2 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

An organisation of individuals (for example, a partnership)

Now go to section 3 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

A public body

Now go to section 4

A registered company or other corporate body

Now go to section 5 and if you are applying for a new permit or transferring a permit for an installation or waste activity please also fill in Appendix 1

## 2 Applications from an individual

### 2a Please give us the following details

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to section 6

### 3 Applications from an organisation of individuals or charity

#### 3a Type of organisation

For example, a charity, a partnership, a group of individuals or a club

#### 3b Details of the organisation or charity

If you are an organisation of individuals, please give the details of the main representative below. If relevant, provide details of other members (please include their title Mr, Mrs and so on) on a separate sheet and tell us the document reference you have given this sheet

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Now go to question 3c or section 6

#### 3c Details of charity

Full name of charity

This should be the full name of the legal entity not any trading name.

#### 3d Company registration number

If you are registered with Companies House please tell us your registration number

#### 3e Charity Commission number

If you are registered with the Charity Commission please tell us your registration number

Now go to section 6

### 4 Applications from public bodies

#### 4a Type of public body

For example, NHS trust, local authority, English county council

#### 4b Name of the public body

#### 4c Please give us the following details of the executive

An officer of the public body authorised to sign on your behalf

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position

Now go to section 6

### 5 Applications from companies or corporate bodies

#### 5a Name of the company

VolkerFitzpatrick Limited

#### 5b Company registration number

02387700

Date of registration (DD/MM/YYYY)

22/05/1989

If you are applying as a corporate organisation that is not a limited company, please provide evidence of your status and tell us below the reference you have given the document containing this evidence.

Document reference



## 5 Applications from companies or corporate bodies, continued

### 5c Please give details of the directors

If relevant, provide details of other directors and company secretary, if there is one, on a separate sheet and tell us the reference you have given this sheet.

Document reference	<input type="text" value="Supporting Information"/>
Details of company secretary (if relevant) and director/s	
Title (Mr, Mrs, Miss and so on)	<input type="text"/>
First name	<input type="text"/>
Last name	<input type="text"/>
Title (Mr, Mrs, Miss and so on)	<input type="text"/>
First name	<input type="text"/>
Last name	<input type="text"/>
Now go to section 6	

## 6 Your address

### 6a Your main (registered office) address

For companies this is the address on record at Companies House.

Contact name	
Title (Mr, Mrs, Miss and so on)	<input type="text" value="Mr"/>
First name	<input type="text" value="Graeme"/>
Last name	<input type="text" value="Howard"/>
Address	<input type="text" value="Hertford Road"/>
	<input type="text" value="Hoddesdon"/>
	<input type="text" value="Hertfordshire"/>
	<input type="text"/>
Postcode	<input type="text" value="EN11 9BX"/>
Contact numbers, including the area code	
Phone	<input type="text" value="+44 (0)1992 305 000"/>
Fax	<input type="text"/>
Mobile	<input type="text" value="07392134148"/>
Email	<input type="text" value="Graeme.Howard@volkerfitzpatrick.co.uk"/>

For an organisation of individuals every partner needs to give us their details, including their title Mr, Mrs and so on. So, if necessary, continue on a separate sheet and tell us below the reference you have given the sheet.

Document reference	<input type="text"/>
--------------------	----------------------

### 6b Main UK business address (if different from above)

Contact name	
Title (Mr, Mrs, Miss and so on)	<input type="text" value="Mr"/>
First name	<input type="text" value="Graeme"/>
Last name	<input type="text" value="Howard"/>
Address	<input type="text" value="Same as 6a"/>
	<input type="text"/>
	<input type="text"/>
	<input type="text"/>
Postcode	<input type="text"/>

## 6 Your address, continued

Contact numbers, including the area code

Phone

Fax

Mobile

Email

Now go to section 7

## 7 Contact details

### 7a Who can we contact about your application?

It will help us if there is someone we can contact if we have any questions about your application. The person you name should have the authority to act on your behalf.

Please add a second contact on a separate sheet if this person is not always available.

Document reference of this separate sheet

This can be someone acting as a consultant or an 'agent' for you.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

### 7b Who can we contact about your operation (if different from question 7a)?

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

## 7 Contact details, continued

### 7c Who can we contact about your billing or invoice?

**Note:** Please provide the name and address that all invoices should be sent to for your subsistence fees.

As in question 7a

As in question 7b

Please give details below if different from question 7a or 7b.

Contact name

Title (Mr, Mrs, Miss and so on)

Mr

First name

Mark

Last name

Dodd

Address

Same as 6a

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

07384 537326

Email

Mark.Dodd@volkerfitzpatrick.co.uk

## 8 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it. More information on how to do this is available at: [www.gov.uk/government/organisations/environment-agency/about/complaints-procedure](http://www.gov.uk/government/organisations/environment-agency/about/complaints-procedure).

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

## 9 Where to send your application

For how many copies to send see the guidance note on part A.

For water discharges by email to [PSC-WaterQuality@environment-agency.gov.uk](mailto:PSC-WaterQuality@environment-agency.gov.uk)

For waste and installations by email to [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)

For flood risk activity permits send 1 copy only to [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk) or to the local Environment Agency office for where the work is proposed to be carried out.

Or

Permitting Support, NPS Sheffield  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

## Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form? \_\_\_\_\_

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you



### For Environment Agency use only

Date received (DD/MM/YYYY)  
\_\_\_\_\_

Our reference number  
\_\_\_\_\_

Payment received?

No

Yes  Amount received

£ \_\_\_\_\_

## Appendix 1 – Date of birth information for installation and waste activities (applications for a new permit or transferring a permit) only

### Date of birth information in this appendix will not be put onto our Public Register

Are you applying as an individual, an organisation of individuals (for example, a partnership) or a company (this includes Limited Liability Partnerships)?

- An individual  Now go to 2
- An organisation of individuals (for example, a partnership)  Now go to 3
- A registered company or other corporate body  Now go to 4

### 2 Applications from an individual

Please give us the following details

Name

Date of birth (DD/MM/YY)

### 3 Applications from an organisation of individuals or charity

#### Details of the organisation or charity

If you are an organisation of individuals, please give the date of birth details of the main representative below. If relevant, provide details of other members on a separate sheet and tell us the document reference you have given this sheet.

Name

Date of birth (DD/MM/YY)

Document reference

### 4 Applications from companies or corporate bodies

Name of the company

Please give the date of birth details for all directors and company secretary if there is one. If relevant, provide those details of other directors on a separate sheet and tell us the document reference you have given this sheet.

#### Details of company secretary (if relevant) and director/s

Name

Date of birth (DD/MM/YY)

Name

Date of birth (DD/MM/YY)

Name

Date of birth (DD/MM/YY)

Document reference

Name	Date of birth (DD/MM/YY)
Joanna Clare Dyne	04/11/72
David John Griffin	25/08/73
Anita Suzanne Harris	03/10/75
James Richard Hinds	25/11/71
Richard Andrew Offord	03/09/64
Alan Robert Robertson	21/06/62
Matthew Gordon Woods	14/05/65
Volkerwessels UK Limited	N/A

# Application for an environmental permit Part B2 – General – new bespoke permit



Fill in this part of the form together with parts A and F1 if you are applying for a new bespoke permit. You also need to fill in part B3, B4, B5, B6, or B7 (this depends on what activities you are applying for).

Please check that this is the latest version of the form available from our website.

You can apply online for: waste operations; medium combustion plant; and specified generator bespoke environmental permits at <https://apply-for-environmental-permit.service.gov.uk/start/start-or-open-saved>

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces

It will take less than two hours to fill in this part of the application form.

## Contents

- 1 About the permit
- 2 About the site (excludes mobile plant)
- 3 Your ability as an operator
- 4 Consultation
- 5 Supporting information
- 6 Environmental risk assessment
- 7 How to contact us

**Appendix 1 – Low impact installation checklist**

**Appendix 2 – Date of birth information for Relevant offences and/or Technical ability questions only**

## 1 About the permit

### 1a Discussions before your application

If you have had discussions with us before your application, give us the permit reference or details on a separate sheet. Tell us below the reference you have given this extra sheet.

Permit or document reference

Supporting Information

## 1 About the permit, continued

### 1b Is the permit for a site or for mobile plant?

Mobile plant Now go to **question 1c**

Site Now go to **section 2**

Note: The term ‘mobile plant’ does not include mobile sheep dipping units.

#### Mobile plant only

### 1c Have we told you during pre-application discussions that we believe that a mobile permit is suitable for your activity?

No

Yes

### 1d Have there been any changes to your proposal since this discussion?

No Now go to **section 3**

Yes You should send us a description of the activity you want to carry out, highlighting the changes you have made since our pre-application discussions

Document reference

\_\_\_\_\_

Now go to **section 3**

## 2 About the site (excludes mobile plant)

### 2a What is the site name, address, postcode and national grid reference?

Site name

Area 2

Address

Radlett Strategic Rail Freight Interchange (SFRI)  
located at North Orbital Road  
Upper Colne Valley  
Hertfordshire

Postcode

AL2 2ET

National grid reference for the site (for example, ST 12345 67890)

TL 16114 03242

## 2 About the site (excludes mobile plant), continued

### 2b What type of regulated facility are you applying for?

Note: if you are applying for more than one regulated facility then go to **2c**.

- Installation
- Waste operation
- Mining waste operation
- Water discharge activity
- Groundwater activity (point source)
- Groundwater activity (discharge onto land)

What is the national grid reference for the regulated facility (if only one)?  
(See the guidance notes on part B2.)

- As in 2a above
- Different from that in 2a Please fill in the national grid reference below

National grid reference for the regulated facility

\_\_\_\_\_

Now go to **question 2d**

### 2c If you are applying for more than one regulated facility on your site, what are their types and their grid references?

See the guidance notes on part B2.

#### Regulated facility 1

National grid reference

\_\_\_\_\_

What is the regulated facility type?

- Installation
- Waste operation
- Mining waste operation
- Water discharge activity
- Groundwater activity (point source)
- Groundwater activity (discharge onto land)



## 2 About the site (excludes mobile plant), continued

### Regulated facility 2

National grid reference

\_\_\_\_\_

### What is the regulated facility type?

- Installation
- Waste operation
- Mining waste operation
- Water discharge activity
- Groundwater activity (point source)
- Groundwater activity (discharge onto land)

Use several copies of this page or separate sheets if you have a long list of regulated facilities. Send them to us with your application form. Tell us below the reference you have given these extra sheets.

Document reference

\_\_\_\_\_

Now go to **question 2d**

### 2d Low impact installations (installations only)

Are any of the regulated facilities low impact installations?

- No
- Yes If yes, tell us how you meet the conditions for a low impact installation (see the guidance notes on part B2 – Appendix 1).

Document reference

\_\_\_\_\_

- Tick the box to confirm you have filled in the low impact installation checklist in **appendix 1** for each regulated facility

### 2e Treating batteries

Are you planning to treat batteries? (See the guidance notes on part B2.)

- No
- Yes Tell us how you will do this, send us a copy of your explanation and tell us below the reference you have given this explanation

Document reference for the explanation

\_\_\_\_\_

## 2 About the site (excludes mobile plant), continued

### 2f Ship recycling

Is your activity covered by the Ship Recycling Regulations 2015? (See the guidance notes on part B2.)

No

Yes Tell us how you will do this. Please send us a copy of your explanation and your facility recycling plan, and tell us below the reference numbers you have given these documents

Document reference for the explanation

\_\_\_\_\_

Document reference for the facility recycling plan

\_\_\_\_\_

### 2g Multi-operator installation

If the site is a multi-operator site (that is there is more than one operator of the installation) then fill in the table below the application reference for each of the other permits.

**Table 1 – Other permit application references**

N/A

## 3 Your ability as an operator

If you are only applying for a standalone water discharge or for a groundwater activity, you only have to fill in **question 3d**.

### 3a Relevant offences

Applies to all except standalone surface water discharges and groundwater discharges (see the guidance notes on part B2).

#### 3a1 Have you, or any other relevant person, been convicted of any relevant offence?

No Now go to **question 3b**

Yes Please give details below

### 3 Your ability as an operator, continued

#### Name of the relevant person

Title (Mr, Mrs, Miss and so on)

VolkerFitzpatrick Ltd

First name

Last name

Position held at the time of the offence

Name of the court where the case was dealt with

Swansea Crown Court

Date of the conviction (DD/MM/YYYY)

19/11/2019

Offence and penalty set

breach s34 Environmental Protection Act 1990; fine £112,620

Date any appeal against the conviction will be heard (DD/MM/YYYY)

If necessary, use a separate sheet to give us details of other relevant offences and tell us below the reference number you have given the extra sheet.

Supporting Information

Now go to **question 3b**

Please also complete the details in **Appendix 2**.

#### 3b Technical ability

**Relevant waste operations only (see the guidance notes on part B2).**

Please indicate which of the two schemes you are using to demonstrate you are technically competent to operate your facility and the evidence you have enclosed to demonstrate this.

##### ESA/EU skills

Please select one of the following:

I have enclosed a copy of the current Competence Management System certificate

or

We will have a certified Competence Management System within 12 months and have enclosed evidence of the contract with an accredited certification body

### 3 Your ability as an operator, continued

#### CIWM/WAMITAB scheme

Your answers below must relate to the person(s) providing technically competent management when the permitted activities start.

Please select **one** of the following:

- I have enclosed a copy of:
  - the relevant qualification certificate/s
  - or
  - evidence of deemed competence Certificates attached to Supporting Information
  - or
  - Environment Agency assessment
  - or
  - evidence of nominated manager status under the transitional provisions for previously exempt activities

and, if deemed competent or Agency-assessed, or nominated manager, or if the original qualification is over two years old:

- I have enclosed a copy of the relevant current continuing competence certificate/s
- The technically competent manager will complete their qualification within four weeks of starting the permitted activities and I have enclosed evidence of their registration with WAMITAB or their EPOC booking as appropriate
- **For medium- and high-risk tier activities other than landfill**

The technically competent manager will complete the qualification within 12 months and I have enclosed evidence of their registration with WAMITAB and, where relevant, EPOC booking.

 I understand they must complete either four specified units of the relevant qualification or an EPOC within four weeks of the permitted activities commencing

For each technically competent manager please give the following information. If necessary, use a separate sheet to give us these details and tell us below the document reference you have given the extra sheet.

Title (Mr, Mrs, Miss and so on)

Mr

First name

Mark

Last name

Dodd

Phone

Mobile

07384 537326

Email

Mark.Dodd@volkerfitzpatrick.co.uk

### 3 Your ability as an operator, continued

Please provide the environmental permit number/s and site address for all other waste activities that the proposed technically competent manager provides technical competence for, including permits held by other operators. Continue on a separate sheet as required.

Permit number	Site address	Postcode
N/A		

Document reference

\_\_\_\_\_

Now go to **question 3c**

Please also complete the details in **Appendix 2**.

#### 3c Finances

Installations, waste operations and mining waste operations only.

Please note that if you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

Do you, or any relevant person, or a company in which you (or they) (or any relevant person) were a relevant person, have current or past bankruptcy or insolvency proceedings against you?

No

Yes Please give details below, including the required set-up costs (including infrastructure), maintenance and clean up costs for the proposed facility against which a credit check may be assessed

We may want to contact a credit reference agency for a report about your business's finances.

### 3 Your ability as an operator, continued

#### Landfill, Category A mining waste facilities and mining waste facilities for hazardous waste only

How do you plan to make financial provision (to operate a landfill or a mining waste facility you need to show us that you are financially capable of meeting the obligations of closure and aftercare)?

- Renewable bonds
- Cash deposits with the Environment Agency
- Other – provide comprehensive details

Document reference

\_\_\_\_\_

Provide a cost profile and expenditure plan of your estimated costs throughout the aftercare period of your site.

Document plan reference

\_\_\_\_\_

Now go to **question 3d**

#### 3d Management systems (all)

You must have an effective, written management system in place that identifies and reduces the risk of pollution. You may show this by using a certified scheme or your own system.

Your permit requires you (as the operator) to ensure that you manage and operate your activities in accordance with a written management system.

You need to be able to explain what happens at each site and which parts of the overall management system apply. For example at some sites you may need to show you are carrying out additional measures to prevent pollution because they are nearer to sensitive locations than others.

For waste and installation permits only: your management system must also explain your resilience to climate change.

You can find guidance on management systems on our website at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

- Tick this box to confirm that you have read the guidance and that your management system will meet our requirements**

What management system will you provide for your regulated facility?

- ISO 14001
- BS 8555 (Phases 1–5)
- Green dragon
- Own management system
- EMAS Global
- Other

Please make sure you send us a summary of your management system with your application.

Document reference/s

Supporting Information  
\_\_\_\_\_

## 4 Consultation

Fill in 4a to 4c for installations and waste operations and 4d for installations only.

Could the waste operation or installation involve releasing any substance into any of the following?

### 4a A sewer managed by a sewerage undertaker?

- No  
 Yes Please name the sewerage undertaker

\_\_\_\_\_

### 4b A harbour managed by a harbour authority?

- No  
 Yes Please name the harbour authority

\_\_\_\_\_

### 4c Directly into relevant territorial waters or coastal waters within the sea fisheries district of a local fisheries committee?

- No  
 Yes Please name the fisheries committee

\_\_\_\_\_

### 4d Is the installation on a site for which:

4d1 a nuclear site licence is needed under section 1 of the Nuclear Installations Act 1965?

- No  
 Yes

4d2 a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards Regulations 2015, or a safety report is needed under regulation 7 of those Regulations?

- No  
 Yes

## 5 Supporting information

### 5a Provide a plan or plans for the site

**But not any mobile plant**

Clearly mark the site boundary or discharge point, or both. Also include site drainage plans, site layout plans, and plant design drawings/process flow diagrams (as required).

(See the guidance notes on part B2.)

Document reference/s of the plans

Supporting Information  
\_\_\_\_\_

## 5 Supporting information, continued

### 5b Provide the relevant sections of a site condition/baseline report if this applies

See the guidance notes on part B2 for what needs to be marked on the plan.

Document reference of the report

N/A see ESSD report

If you are applying for an installation, tick the box to confirm that you have sent in a baseline report

### 5c Provide a non-technical summary of your application

See the guidance notes on part B2.

Document reference of the summary

Supporting Information

### 5d Are you applying for an activity that includes the storage of combustible wastes?

This applies to all activities excluding standalone water and groundwater discharges.

No

Yes Provide a fire prevention plan (see the guidance notes on part B2). You need to highlight any changes you have made since your pre-application discussions.

Document reference of the plan

## 6 Environmental risk assessment

Provide an assessment of the risks each of your proposed regulated facilities poses to the environment. The risk assessment must follow the methodology set out in 'Risk assessments for your environmental permit' at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit> or an equivalent method.

Document reference for the assessments

Environmental Risk Assessment; Landfill Gas RA

## 7 How to contact us

If you have difficulty using this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**



## 7 How to contact us, continued

### Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

- Yes please  
 No thank you



### For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

- No  
 Yes

Amount received (£)

Plain English Campaign's Crystal Mark does not apply to Appendix 1.

## Appendix 1 – Low impact installation checklist

See the guidance notes on part B2.

Installation reference		
Condition	Response	Do you meet this?
<b>A – Management techniques</b>	Provide references to show how your application meets A References	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>B – Aqueous waste</b>	Effluent created <span style="float: right;">m<sup>3</sup>/day</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>C – Abatement systems</b>	Provide references to show how your application meets C References	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>D – Groundwater</b>	Do you plan to release any hazardous substances or non-hazardous pollutants into the ground? <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>E – Producing waste</b>	Hazardous waste <span style="float: right;">Tonnes per year</span>	<input type="checkbox"/> Yes
	Non-hazardous waste <span style="float: right;">Tonnes per year</span>	<input type="checkbox"/> No
<b>F – Using energy</b>	Peak energy consumption <span style="float: right;">MW</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>G – Preventing accidents</b>	Do you have appropriate measures to prevent spills and major releases of liquids? <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Provide references to show how your application meets G References	
<b>H – Noise</b>	Provide references to show how your application meets H References	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>I – Emissions of polluting substances</b>	Provide references to show how your application meets I References	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>J – Odours</b>	Provide references to show how your application meets J References	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>K – History of keeping to the regulations</b>	Say here whether you have been involved in any enforcement action (as described in 'Appendix 1 – Compliance history' section of part B2 guidance notes) <input type="checkbox"/> Yes <input type="checkbox"/> No	

## Appendix 2 – Date of birth information for Relevant offences and/or Technical ability questions only

Date of birth information in this appendix will not be put onto our Public Register.

Have you filled in the Relevant Offences question?

Yes

No

Have you filled in the Technical ability question?

Yes

No

### Relevant Offences – date of birth information

Please give us the following details

Name

\_\_\_\_\_

Date of birth (DD/MM/YYYY)

\_\_\_\_\_

Not relevant, company prosecution not an individual

### Technical ability – date of birth information

Name

Mark Dodd  
\_\_\_\_\_

Date of birth (DD/MM/YYYY)

06/05/1981  
\_\_\_\_\_

# Application for an environmental permit Part B4 – New bespoke waste operation permit



Fill in this part of the form, together with parts A, B2 and F1, if you are applying for a new bespoke permit for a waste operation. Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

You can apply online for waste bespoke environmental permits.

Apply online for an environmental permit.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

## Contents

- 1 What waste operations are you applying for?
- 2 Point source emissions to air, water and land
- 3 Operating techniques
- 4 Monitoring
- 5 How to contact us

Appendix 1 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes

Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations

## 1 What waste operations are you applying for?

Fill in Table 1a with details of what you are applying for.

Fill in a separate table for each waste operation you are applying for. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given the extra sheet.

Document reference

### Types of waste accepted

For each line in Table 1a, fill in a separate document to list those wastes you will accept on the site for that operation, giving the List of Wastes catalogue code (search for 'Technical guidance on how to assess and classify waste' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)). If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

**1 What waste operations are you applying for?, continued**

**Table 1a – Waste operations which do not form part of an installation**

Name of the waste operation	Description of the waste operation	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 1)	Non-hazardous waste treatment capacity (if this applies) (See note 1)
Add extra rows if you need them. If you do not have enough room, go to the line below or send a separate document and give us the document reference here	Use the description from the guidance. Include any extra detail that you think would help to accurately describe what you want to do			
Radlett SRF1 Area 2	Deposit for recovery	R5: recycling or reclamation of other inorganic materials R13: storage of waste pending any of the operations numbered R1 - R12	0.00	392,446.45
For all waste operations	Total storage capacity (see note 2)		0.00	784,892.91
	Annual throughput (tonnes each year)		0.00	392,446.45

**Notes**

- 1 By 'capacity', we mean:
  - the total landfill capacity (cubic metres) for landfills
  - the total treatment capacity (tonnes each day) for waste treatment
  - the total storage capacity (tonnes) for waste-storage operations
  
- 2 By 'total storage capacity', we mean the maximum amount of waste in tonnes you store on the site at any one time.
 

Note on Table 1a: conversion factor of 2 tonnes per m3 in the ground applied to convert "capacity" (earthworks fill volume) to tonnes for total storage capacity. Works to be completed in up to three years so (maximum) annual throughput estimated as half the total storage capacity (tonnes).

## 1 What waste operations are you applying to vary?, continued

Please provide the document reference. You can use Table 1b as a template.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description of the waste in the document, (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste.

Document reference

Supporting Information

**Table 1b – Template example – types of waste accepted and restrictions**

Waste code	Description of the waste
Example	Example
02 01 08*	Agrochemical waste containing hazardous substances
18 01 03*	Infectious clinical waste, not contaminated with chemicals or medicines – human healthcare (may contain sharps) for alternative treatment
17 05 03*/17 06 05*	Non-hazardous soil from construction or demolition contaminated with fragments of asbestos cement sheet

### 1c Deposit for recovery purposes (see Appendix 4 and the guidance notes on part B4)

Are you applying for a waste recovery activity involving the permanent deposit on waste on land for construction or land reclamation (including landfill restoration)?

No  Go to section 2

Yes

Are you applying for an inert landfill permit that includes a restoration activity using waste?

No  Go to section 2

Yes  Please send us a copy of your restoration plan in accordance with our guidance at <https://www.gov.uk/guidance/landfill-operators-environmental-permits/restore-your-landfill-site>

Have we advised you during pre-application discussions that we believe the activity is waste recovery?

No  Go to section 2

Yes

Have there been any changes to your proposal since the discussions?

No

Yes

Please send us a copy of your waste recovery plan that complies with our guidance at <https://www.gov.uk/guidance/waste-recovery-plans-and-permits>. You need to highlight any changes you have made since your pre-application discussions. Also give us the reference number of the document with your justification.

**Please note that there is an additional charge for the assessment of a waste recovery plan that must be submitted as part of this application. For the charge see <https://www.gov.uk/topic/environmental-management/environmental-permits>.**

Document reference

Waste Recovery Plan (see also Supporting Information)

## 2 Point source emissions to air, water and land

Fill in Table 2 below with details of the point source emissions that result from the operating techniques at each of your waste operations.

Fill in one table for each waste operation.

**Table 2 – Emissions**

Name of the waste operation		Radlett SRFI Area 2		
<b>Point source emissions to air</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
not applicable				
<b>Point source emissions to water (other than sewers)</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
not applicable				
<b>Point source emissions to sewers, effluent treatment plants or other transfers off site</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
not applicable				
<b>Point source emissions to land</b>				
Emission point reference and location	Source	Parameter	Quantity	Unit
not applicable				

## Supporting information

### 3 Operating techniques

#### 3a Technical standards

Fill in Table 3a for each waste operation you refer to in Table 1a above and list the ‘appropriate measures’ you are planning to use. If you are using the standards set out in the relevant technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a.

You must justify your decisions in a separate document if:

- there is no technical standard
- the technical guidance provides a choice of standards, or
- you plan to use another standard

This justification could include a reference to the Environmental Risk Assessment provided in part B2 of the application form.

Table 3a should summarise:

- the operations undertaken
- the measures you will use to control the emissions from your process, as identified in your risk assessment or the relevant technical guidance
- how you will meet other standards set out in the relevant technical guidance

#### Table 3a – Technical standards

Fill in a separate table for each waste operation.

Waste operation	Radlett SRFI Area 2	
Description of the waste operation Add extra rows if you need them	Appropriate measure (TGN reference)	Document reference (if appropriate)
Deposit for recovery	See Supporting Information	

In all cases, describe the type of facility or operation you are applying for and provide site infrastructure plans, location plans and process flow diagrams or block diagrams to help describe the operations and processes undertaken. Give the document references you use for each plan, diagram and description.

Document reference

Supporting Information

#### 3b General requirements

Fill in a separate table for each waste operation.

#### Table 3b – General requirements

Name of the waste operation	
If the technical guidance or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references Dust & Emissions Management Plan (DEMP)
If the technical guidance or your risk assessment shows that odours are an important issue, send us your odour management plan. <b>If your activity type is listed in the guidance document ‘Control and monitor emissions for your environmental permit’ as needing an odour management plan, or your risk assessment shows that odours are an important issue, you need to send us your odour management plan.</b>	Document reference or references not applicable, see Environmental Risk Assessment (ERA)
If the technical guidance or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references not applicable, see ERA



### 3 Operating techniques, continued

We may need to ask for management plans or risk assessments in other circumstances based on our regulatory experience. If you are unsure as to whether you need to submit a management plan with your application, please discuss this with the Environment Agency prior to submission.

Search for 'Risk assessment for your environmental permit' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency).

#### 3c Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed in Table 3c, you must answer the questions in the related document.

**Table 3c – Questions for specific sectors**

Sector	Appendix
Recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes	See the questions in appendix 1
Inert landfill and deposit of waste on land for construction, land reclamation, restoration or improvement	See the questions in appendix 2

### General information

#### 4 Monitoring

##### 4a Describe the measures you use for monitoring 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
- the procedures you follow to assess the measures

Document reference

DEMP; ERA; Monitoring Plan & CQA Plan

##### 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 M1 (search for 'M1 sampling requirements for stack emission monitoring' at [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)).

Document reference of the assessment

no point source emissions to air

#### 5 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.gov.uk/government/organisations/environment-agency](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.**

## Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form? \_\_\_\_\_

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you



### For Environment Agency use only

Date received (DD/MM/YYYY)

\_\_\_\_\_

Our reference number

\_\_\_\_\_

Payment received?

No

Yes  Amount received

£ \_\_\_\_\_

**Plain English Campaign’s Crystal Mark does not apply to appendices 1 to 2.**

**Appendix 1 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes**

**1 Please provide an accurate and reliable characterisation of your compost like outputs (CLO). This should be based on sampling and analysis of the CLO produced by the treatment (MBT) process over a 12-month period and in accordance with section 2 of TGN 6.15**

Document reference

**2 Please provide an agricultural benefit assessment for the use of your CLO. This should be based on section 2 of TGN 6.15 and should be signed and dated by an appropriate technical expert**

Document reference

**3 Please provide a site-specific risk assessment of risks to soil and food chain receptors. This should be based on Schedule 2 of TGN 6.15 and include a map with a green outline showing the boundary of the area being treated and include:**

- locations where the waste will be stored and spread
- any spring, well or borehole used to supply water for domestic or food production purposes that is within 250 metres of the area being treated
- any spring, well or borehole not being used for domestic or food production purposes that is within 50 metres of the area being treated
- any European designated sites (candidate or Special Area of Conservation, proposed or Special Protections Area in England and Wales or Ramsar Site) or Sites of Special Scientific Interest (SSSI) which are within 500 metres of the place where waste is to be stored or spread
- the location of public rights of way
- any Groundwater Source Protection Zones
- surface watercourses
- any buildings or houses within 250 metres of the area being treated
- land drains within the boundary

Document reference

**4 Are the technical standards and measures fully in line with those set out in section 3 of TGN 6.15?**

No  Provide justification for departure from TGN 6.15 and a copy of the proposed technical standards, measures or procedures

Document reference

Yes

**Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations**

**1 Please provide your Environmental Setting and Site Design (ESSD) report**

Document reference

Note: You should use the Environment Agency template to help you develop an environmental setting and site design (ESSD) report.

**2 Please provide your Waste Acceptance Procedures (including Waste Acceptance Criteria)**

Document reference

**3 Have you provided a hydrogeological risk assessment (HRA) for the site?**

No  Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  Document reference

**4 Have you completed an outline engineering plan for the site?**

No  Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  Document reference

**5 Have you provided a stability risk assessment (SRA) for your site?**

No  Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  Document reference

## Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations, continued

### 6 Have you completed a monitoring plan for the site?

No  Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  Document reference Monitoring Plan & CQA Plan

### 7 Have you completed a plan for closing the site and procedures for looking after the site once it has closed?

No  If no for deposit for recovery activities please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes  For inert waste landfill you must provide a closure plan

Document reference Conceptual Site Model, ESSD (section 5.4)

## Spreading waste to support plant growth

### 8a Does the activity involve the deposit of waste to create or treat a growing medium (R10 for land treatment)?

No

Yes

### 8b If you answered 'yes' to question 8a, does the R10 activity include the spreading of waste to improve the quality of the growing medium (e.g. soil conditioner to improve existing soil profile)?

No

Yes  Go to question 8c

### 8c If you have answered 'Yes' to question 8b, have you completed a benefit statement?

No  Please explain why

Document reference

Yes

Note: Refer to our guidance when completing your statement (including EPR 8.01, section 6).

# Application for an environmental permit Part F1 – Charges and declarations



You will need to use an Adobe Acrobat reader product to complete this form. The form may not work properly if you use a different pdf reader, such as the one built-in to your internet browser.

Fill in this part for all applications for:

- installations (excluding new permit and variation applications for intensive farming. Use application form Part B3.5 or C3.5 instead)
- waste operations
- mining waste operations
- medium combustion plant
- specified generators
- water discharges (excluding small discharges of 23m<sup>3</sup> per day if using Part B6.5)
- groundwater activities (excluding small discharges of 15m<sup>3</sup> per day or less if using Part B6.5 OR existing small discharges to Source Protection Zone1 if using Part B6.6)

Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

## Contents

- 1 **Working out charges**
- 2 **Payment**
- 3 **Privacy notice**
- 4 **Confidentiality and national security**
- 5 **Declaration**
- 6 **Application checklist**
- 7 **How to contact us**
- 8 **Where to send your application**

## 1 Working out charges

You must fill in this section.

You have to submit an application fee with your application. For guidance on the fee and how to pay your charges, please see our charging guidance (<https://www.gov.uk/government/publications/environmental-permitting-charges-guidance>) and associated links to the current charging scheme. You can also contact us for pre-application to help work out charges

Please that there is an annual subsistence charge to cover the costs we incur in the ongoing regulation of the permit.

## 1 Working out charges, continued

Table 1 – Type of application (fill number of activity being applied for in each column)

Installation	Waste	Mining waste	Medium Combustion Plant (MCP)/ Specified Generator (SG)	Water discharge	Groundwater activity
	1				

Table 2 – Charge type (A)

Charge activity reference	Charge activity description	What are you applying to do? For example, a new permit, minor variation, normal variation, substantial variation, surrender, low risk surrender, transfer	Amount
e.g. 1.17.3	e.g. Section 5.2 – landfill for hazardous waste	e.g. transfer application	e.g. £5,561
1.17.9	deposit of waste for recovery	new permit	£9,207
Total A			9207

## 1 Working out charges, continued

Table 3 – Additional assessment charges (B)

Part 1.19 Charges for plans and assessments			Tick appropriate
Reference	Plan or assessment	Charge	
1.19.1	Waste recovery plan	£1,231	<input type="checkbox"/>
1.19.2	Habitats assessment (except where the application activity is a flood risk activity)	£779	<input type="checkbox"/>
1.19.3	Fire prevention plan (except where the application activity is a farming installation)	£1,241	<input type="checkbox"/>
1.19.4	Pests management plan (except where the application activity is a farming installation)	£1,241	<input type="checkbox"/>
1.19.5	Emissions management plan (except where the application activity is a farming installation)	£1,241	<input checked="" type="checkbox"/>
1.19.6	Odour management plan (except where the application activity is a farming installation)	£1,246	<input type="checkbox"/>
1.19.7	Noise and vibration management plan (except where the application activity is a farming installation)	£1,246	<input type="checkbox"/>
1.19.8	Ammonia emissions risk assessment (intensive farming applications only)	£620	<input type="checkbox"/>
1.19.9	Dust and bio-aerosol management plan (intensive farming applications only)	£620	<input type="checkbox"/>
	Advertising	£500	<input type="checkbox"/>
Total B			

### Total charges

Total A plus total B

£10,448

## 2 Payment

Tick below to show how you have paid.

- Cheque
- Credit or debit card
- Electronic transfer (for example, BACS)

Please see submission email. We require a "payment request" in order to be able to make the payment.

### Cheques

You should make cheques payable to 'Environment Agency' and make sure they have 'A/c Payee' written across them if it is not already printed on.

Please write the name of your company and application reference number on the back of your cheque. We will not accept cheques with a future date on them.

## 2 Payment, continued

### Credit/debit cards

If you are paying by credit or with debit card we will call you. We can accept payments by Visa, MasterCard or Maestro card only.

Call me to arrange payment by debit or credit card

### Electronic transfer BACS

If you choose to pay by electronic transfer, you will need to use the following information to make your payment:

Company name	Environment Agency
Company address	SSCL (Environment Agency), PO Box 797, Newport Gwent, NP10 8FZ
Bank	RBS/NatWest
Address	London Corporate Service Centre, CPB Services, 2nd Floor, 280 Bishopsgate, London EC2M 4RB
Sort code	60-70-80
Account number	10014411
Account name	EA RECEIPTS
Payment reference number	PSCAPPXXXXYYY

You need to create your own reference number. It should begin with PSCAPP (to reflect that the application is for a permitted activity) and it should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). The reference number that you supply will appear on our bank statements.

You should also email your payment details and reference number to [ea\\_fsc\\_ar@gov.sscl.com](mailto:ea_fsc_ar@gov.sscl.com).

If you are making your payment from outside the United Kingdom, it must be in sterling. Our IBAN number is GB23NWBK60708010014411 and our SWIFTBIC number is NWBKGB2L.

If you do not quote your reference number, there may be a delay in processing your payment and application.

Provide a unique reference number for the application, i.e. do not only use the company name only

\_\_\_\_\_

State who is paying (full name and whether this is the agent/applicant/other)

Waterman Infrastructure & Environment Ltd

Agent. We require a "payment request" in order to make the payment.

Fee paid

£ \_\_\_\_\_

Date payment sent (DD/MM/YYYY)

\_\_\_\_\_

## 3 Privacy notice

The Environment Agency runs the environmental permit application service.

See <https://www.gov.uk/guidance/environmental-permits-privacy-notice> for how we use your personal information in services to services to support environmental permitting.



## 4 Confidentiality and national security

### Confidentiality

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential.

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application. You can find guidance on confidentiality in ‘Environmental permitting guidance: core guidance’, published by Defra and available at <https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>.

Only tick the box below if you wish to claim confidentiality for parts of your application

Please treat the specified information in my application as confidential

### National security

You can tell the Secretary of State that you believe including information on a public register would not be in the interests of national security. You must enclose a letter with your application telling us that you have told the Secretary of State and you must still include the information in your application. We will not include the information in the public register unless the Secretary of State decides that it should be included.

You can find guidance on national security in ‘Environmental permitting guidance: core guidance’, published by Defra and available at <https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>

You cannot apply for national security via this application.

Now fill in section 5

## 5 Declaration

If you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

Each individual (or individual trustee) who is applying for their name to appear on the permit must complete this declaration. You will have to print a separate copy of this page for each additional individual to complete.

If you are transferring all or part of your permit, both you and the person receiving the permit must make the declaration. You must fill in the declaration directly below; the person receiving the permit must fill in the declaration under the heading ‘For transfers only’.

Note: we will issue a letter to both current and new holders to confirm the transfer. If you are changing address we will need to send this letter to your new address; therefore please tell us your new address in a separate letter.

If you are unable to trace one or more of the current permit holders please see below under the transfers declaration.

## 5 Declaration, continued

I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

- Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)
- I confirm that my standard facility will fully meet the rules that I have applied for (this only applies if the application includes standard facilities)
- Tick this box if you do not want us to use information from any ecological survey that you have supplied with your application (for further information please see the guidance notes on part F1)

### Name

Title

Mrs

First name

Joanna

Last name

Dyne

on behalf of (if relevant; for example, a company or organisation and so on)

Volker Fitzpatrick Limited

Position (if relevant; for example, a company or organisation and so on)

Finance Director

Today's date (DD/MM/YYYY)

19/09/2023

### For transfers only – declaration for person receiving the permit

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this application to transfer an environmental permit to me is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

Note: If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration as above. Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

- Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

## 5 Declaration, continued

Name

Title

\_\_\_\_\_

First name

Last name

\_\_\_\_\_

\_\_\_\_\_

on behalf of (if relevant; for example, a company or organisation and so on)

\_\_\_\_\_

Position (if relevant; for example, a company or organisation and so on)

\_\_\_\_\_

Today's date (DD/MM/YYYY)

\_\_\_\_\_

Now go to section 6

## 6 Application checklist

You must fill in this section.

If your application is not complete, we will return it to you. If you aren't sure about what you need to send, contact us before you submit your application. For further information on pre-application advice, see <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>.

You must do the following:

- Complete legibly all parts of the application form that are relevant to you and your activities
- Identify relevant supporting information in the form and send it with the application
- List all the documents you are sending in the table below. If necessary, continue on a separate sheet. This separate sheet also needs to have a reference number and you should include it in the table below
- For new permit applications or any changes to the site plan, provide a plan that meets the standards given in the guidance note on part F1
- Provide a supporting letter for any claim that information is confidential
- Get the declaration completed by a relevant person (not an agent)
- Send the correct fee      Fee will be paid after "payment request" received.

## 6 Application checklist, continued

Question reference	Document title	Document reference
Part A Q5c	Supporting Information	RAD-WAT-A2EX-XX-RP-I-0036
B2 Q1a, 3a,b,d, 5a,c	Supporting Information	RAD-WAT-A2EX-XX-RP-I-0036
Part B4 Q1, 1c, 3a	Supporting Information	RAD-WAT-A2EX-XX-RP-I-0036
Part B2 Q5b and	Conceptual Site Model; Environmental	RAD-WAT-A2EX-XX-RP-I-0028
Part B4 App2 Q1, 7	Setting and Site Design report	
Part B4 App2 Q3	Hydrogeological Risk Assessment	RAD-WAT-A2EX-XX-RP-I-0029
Part B4 App2 Q5	Stability Risk Assessment	RAD-WAT-A2EX-XX-RP-I-0031
Part B2 Q6	Environmental Risk Assessment	RAD-WAT-A2EX-XX-RP-I-0032
Part B4 Q3b, 4a	Environmental Risk Assessment	RAD-WAT-A2EX-XX-RP-I-0032
Part B2 Q6	Gas Risk Assessment	RAD-WAT-A2EX-XX-RP-I-0030
Part B4 Q1c	Waste Recovery Plan	RAD-WAT-A2EX-XX-RP-I-0026
Part B4 Q3b, 4a	Dust & Emissions Management Plan	RAD-WAT-A2EX-XX-RP-I-0033
B4 Q4a, App2 Q4, 6	Monitoring Plan & CQA Plan	RAD-WAT-A2EX-XX-RP-I-0035
Part B4, App2 Q2	Waste Acceptance Procedures	RAD-WAT-A2EX-XX-RP-I-0034

## 7 How to contact us

If you have difficulty filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422549 (Monday to Friday, 8am to 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.gov.uk/government/organisations/environment-agency](https://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, or you would like us to review a decision we have made, please let us know. More information on how to do this is available at: <https://www.gov.uk/government/organisations/environment-agency/about/complaints-procedure>.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

## 8 Where to send your application

For how many copies to send see the guidance note on part F1.

Please send your filled in application form and supporting documents to:

For water discharges and groundwater activities by email to

**[PSC-WaterQuality@environment-agency.gov.uk](mailto:PSC-WaterQuality@environment-agency.gov.uk)**

For waste, installations, medium combustion plant and specified generators by email to

**[PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)**

For large electronic documents (too large for email attachment) you can upload your applications to file sharing sites and send us a link to download the documents. Alternatively, you can send more than one email with documents attached.

Or by post to:

Permitting Support, NPS Sheffield

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

S9 4WF

Do you want all information to be sent to you by email?

- Please tick this box if you wish to have all communication about this application sent via email (we will use the details provided in part A)

## Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

- Yes please
- No thank you



**For Environment Agency use only**

Date received (DD/MM/YYYY)

Our reference number

Payment received?

- No
- Yes

Amount received (£)

## **B. Details of Relevant Conviction**

**Contract No:** C10871  
**Contract Name:** Intercity Express Programme - Stoke Gifford Rail Depot  
**Charge:** Breach of Section 34 of the Environmental Protection Act 1990  
**Type of Notice:** Prosecution  
**Notice received from:** Natural Resource Wales  
**Date of Nuisance:** June 2015  
**Date of Prosecution:** 19 November 2019  
**Fine Paid:** £112,620.00

### **Details of the incident**

During works on a new railway depot in Swansea, waste soils removed from site during June 2015 were taken by the waste carrier without our knowledge to a location not permitted to accept the waste.

In November 2019, Natural Resources Wales (NRW) prosecuted the waste carrier, the landowner and VolkerFitzpatrick.

The waste carrier was given a 15-month custodial sentence, and the landowner was given a 12-month custodial sentence suspended for two years with a £2,000 fine.

VolkerFitzpatrick were prosecuted for failing to comply with our statutory duty of care for waste (section 34 of the Environmental Protection Act), for handling controlled waste without taking reasonable measures, and fined £109,000 with costs of £3,620.

The judge stated that the attitude displayed by both the waste carrier and the landowner throughout the proceedings and investigations was one of contempt for and defiance of environmental waste regulations. Both defendants know of the system and flaunted it, especially the waste carrier.

The landowner used his farm for landfilling and for depositing and treating of waste without permit, over several years from multiple waste carriers, for financial gain coupled with concealment for same reason.

The waste carrier's offending went on over a prolonged period, for commercial and domestic clients and persisted over years even when given clearest possible warnings by NRW. NRW said the waste carrier knew the landowner and arranged with him to tip this soil at his farm. NRW also stated that the waste carrier falsified documentation to show VolkerFitzpatrick that the waste was taken to another site in Carmarthenshire.

### **Action Taken**

Since this incident, the waste management procedures were reviewed, and the environmental awareness training carried out by VolkerFitzpatrick has been updated with the learning from this incident. The training uses the example of the failings at Swansea to ensure that employees are fully aware of the requirements of removing waste soils (and any other wastes) and the particular need to be vigilant with all waste carriers, even those with which we had a long history of compliant practice prior to their offending. The training also stresses how the actions of others, even without our knowledge, can have an impact on our ability to demonstrate compliance with the duty of care for waste and result in our prosecution.

The environmental team have also briefed the procurement department into the issues encountered and have revised order terms and conditions to specifically address duty of care issues identified. Even greater emphasis is put on waste management during audits and inspections by HSEQS staff (other than environmental managers / advisors), and senior management. VolkerFitzpatrick have also subsequently appointed preferred waste suppliers so local site teams can call upon national brokers to manage waste streams, rather than having to find waste suppliers themselves and gather all the required duty of care documentation.



## **C. Technical Competence Certificates**

Primary Awards

Continuing Competence Certificate



**Qualification Title:**

**WAMITAB Level 4 Diploma in Waste Management Operations : Managing  
Physical & Chemical Treatment - Hazardous Waste (QCF) - 4MPH**

**Qualification Accreditation Number:**

600/0331/5

**This Certificate is awarded to**

**Mark Dodd**

**Awarded:** 06/08/2013

**Serial No:**23891/4MPH/1

**Authorised**

**Ray Burberry  
Qualifications Manager, WAMITAB**



00057468



Certificate No. OCC4069

# Operator Competence Certificate

**Qualification Title:**

**Managing Physical & Chemical Treatment - Hazardous Waste - 4MPH**

**This Certificate is awarded to**

**Mark Dodd**

**Awarded: 06/08/2013**

**Authorised**

A handwritten signature in black ink, appearing to read "D. James".

**WAMITAB Chief Executive Officer**

A handwritten signature in black ink, appearing to read "J. Fisher".

**CIWM Chief Executive Officer**



**The Chartered Institution  
of Wastes Management**

This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.



00057466



CIWM

# Continuing Competence Certificate

This certificate confirms that

Mark Dodd

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 31/08/2023

CLR Contaminated Land Remediation  
TMH Treatment - Hazardous Waste

Expiry Date:  
31/08/2025

Verification date: 24/08/2023

Authorised:

Professional Services Director

Learner ID: 23891

Certificate No.: 5233167

Date of Issue: 31/08/2023

CIWM Chief Executive Officer



The Chartered Institution  
of Wastes Management



## **D. EMS Documentation**

In date ISO14001:2015 certificate

VolkerFitzpatrick Environmental Policy and Practice January 2023

**bsi.**



# Certificate of Registration

ENVIRONMENTAL MANAGEMENT SYSTEM - ISO 14001:2015

This is to certify that:

VolkerFitzpatrick Ltd  
Hertford Road  
Hoddesdon  
EN11 9BX  
United Kingdom

Holds Certificate Number:

EMS 70162

and operates an Environmental Management System which complies with the requirements of ISO 14001:2015 for the following scope:

**The delivery of multi-disciplinary construction work within the UK, in the public and private sectors. Projects undertaken with design responsibility (i.e. "Design and Build") and without design responsibility. Working under, but not limited to, standard forms of contract, joint ventures and term maintenance contracts. Projects involving civil engineering, building, rail, highway maintenance, facilities management and slip formed concrete paving.**

For and on behalf of BSI:



Andrew Launn, EMEA Systems Certification Director

Original Registration Date: 2002-10-08

Latest Revision Date: 2021-11-08

Effective Date: 2021-11-24

Expiry Date: 2024-11-23

Page: 1 of 2



...making excellence a habit.™

This certificate was issued electronically and remains the property of BSI and is bound by the conditions of contract. An electronic certificate can be authenticated [online](#). Printed copies can be validated at [www.bsigroup.com/ClientDirectory](http://www.bsigroup.com/ClientDirectory)

Information and Contact: BSI, Kitemark Court, Davy Avenue, Knowlhill, Milton Keynes MK5 8PP. Tel: + 44 345 080 9000  
BSI Assurance UK Limited, registered in England under number 7805321 at 389 Chiswick High Road, London W4 4AL, UK.  
A Member of the BSI Group of Companies.

## Appendices

Supporting Information

RAD-WAT-A2EX-XX-RP-I-0036



# Environmental Policy and Practice

January 2023



## ENVIRONMENTAL POLICY STATEMENT

VolkerFitzpatrick Limited is a multi-disciplinary engineering and construction contractor operating in the United Kingdom and internationally providing complex engineering solutions across a wide range of sectors including commercial, industrial, education, rail infrastructure and depots, airports, waste and energy, with particular regard to avoiding and minimising adverse environmental impacts of all company operations. Further arrangements for its implementation are detailed within VolkerFitzpatrick company processes, procedures, and site management plans.

VolkerFitzpatrick will strive to continually improve our environmental performance through the reduction and control of waste, reusing and recycling materials, prevention of pollution, protection of local environmentally sensitive locations, and conserving natural resources.

Specifically, we are committed to:

- Maintaining an Environmental Management System (EMS) compliant with the requirements of BS EN ISO 14001:2015 and implementing this EMS throughout our project activities and fixed office locations
- Complying with relevant environmental legislation, corporate and other requirements to which VolkerFitzpatrick subscribes, e.g. client environmental requirements, Considerate Constructors Scheme, construction codes of practice, or trade associations
- Establishing and reviewing quantifiable environmental objectives and targets according to the nature of our activities, business and other legal requirements, including the reduction of waste, water and energy consumption and our carbon footprint, seeking year on year improvements.
- Developing site-specific Environmental Management Plans to mitigate adverse environmental risks, opportunities and impacts such as noise, dust, odour, waste and emergency situations, and taking into consideration local community concerns and the control of hazardous substances
- Wherever possible influencing project design by offering solutions to reduce environmental impact, or provide an overall positive impact
- Considering 'whole life impacts and / or circular economy principles' during material selection and procurement for a project wherever we have influence.
- Progressing towards a lower carbon business using lower carbon technologies and methods of working to mitigate the impacts of climate change
- Recognising the importance of the circular economy and identifying where we can work towards it minimising the adverse impacts of our operations on local communities, wherever we have an influence
- Working with our suppliers and subcontractors to improve both parties' environmental performance
- Providing appropriate environmental information and guidance to employees and others working on behalf of VolkerFitzpatrick as well as leading in the creation and adoption of best practice
- Continually improve the environmental management system to enhance environmental performance
- Protect the environment by considering climate change and doing what we can through mitigation, adaption, and protection of biodiversity and ecosystems

All employees and others working for VolkerFitzpatrick are required to comply with this policy. In particular, by cooperating and carrying out activities in such a manner that does not endanger the environment. It is the responsibility of VolkerFitzpatrick management and supervisory staff to ensure that this policy and its arrangements are implemented.

This policy will be reviewed annually and revised as often as may be deemed appropriate by VolkerFitzpatrick, and then brought to the attention of all employees. It is accessible to interested parties via the VolkerFitzpatrick website, Workspace, noticeboards and reception areas or is available on request.

James Hinds  
Managing Director  
January 2023

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**INTRODUCTION**

The construction industry is a major consumer of the earth's resources and produces vast quantities of construction and demolition waste. It affects the environment in which we will live and work in the future. The road, building, rail and infrastructure projects we construct become part of the landscape, making us responsible for their environmental impacts.

VolkerFitzpatrick takes this responsibility very seriously. Caring for the environment has been part of our culture for many years and every working day we genuinely endeavour to work in line with the highest environmental principles.

The way in which VolkerFitzpatrick identifies and subsequently manages external and internal issues that are relevant to its purpose and its strategic direction is described within operational procedure Q19 *Determining the Context of our Organisation*.

Assessing context, together with the management of relevant issues arising, allows assurance of the business' ability to achieve the intended result(s) of its environmental management system.

VolkerFitzpatrick core values define the organisation's ethics and guide decisions, actions and behaviours, which drives the desire to achieve the very best delivery of service and product.

VolkerFitzpatrick fully supports the aims and objectives of the Environmental Protection Act 1990, together with associated statutory provisions, and will cooperate fully with the requirements of the Environment Agency (EA) / Scottish Environmental Protection Agency (SEPA) / Natural Resources Wales (NRW), Local Authorities, and other regulatory or enforcing bodies.

Everyone working in the construction industry has a special and shared responsibility for the environment. The Board of VolkerFitzpatrick is committed to maintaining high environmental standards throughout the company's operations. The company's aims stated in this document are to secure, so far as is reasonably practicable, the environmental wellbeing of employees and others, including the general public, who may be affected by our operations.

Formal amendment to this document is the responsibility of the Head of Sustainability.

The purpose of this document is to outline the Environmental Management System (EMS) operated by VolkerFitzpatrick, which is based on the requirements of BS EN ISO 14001:2015. The EMS is complementary to our Quality and Occupational Health & Safety Management Systems.

This document serves as a cross reference between the requirements of ISO 14001, and other environmental documentation in use such as the company procedures and details contained within respective Site Management Plans.

This policy document shall be made available to all employees and any other interested parties. Staff appointed responsible for the management and implementation of the VolkerFitzpatrick Environmental Policy will ensure that a copy is displayed in a prominent position at all VolkerFitzpatrick temporary and permanent offices.

It is intended to assist every individual and organisation working with VolkerFitzpatrick in understanding the environmental considerations, which should influence them in:

- Sound working practices, especially in preventing pollution and ensuring proper waste management
- Operating procedures designed to encourage waste minimisation and re-use of materials
- Implementing innovative solutions that provide a better environmental outcome
- Standards of handling and storage of construction materials, particularly those of a toxic nature or containing hazardous substances
- The procurement and use of materials and products, especially oils, glues, paints, preservatives and other materials, which may contain pollutants
- Selection of recycled materials
- The use of sustainable resources

Construction activities shall be carefully planned to avoid unnecessary nuisance, disruption of natural habitats, destruction of trees and other landscape features. Proper safeguards for the protection of features of particular historic or conservation significance are especially important. Commissioning procedures for services shall be clearly defined to prevent any risk of pollutant emissions during handling and testing. Decommissioning procedures shall be equally well defined.

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**1. PRIME CONCERNS**

Each day we deal with a number of environmental issues that relate specifically to our industry. The key areas of concern are:

**WATER POLLUTION**

As defined in The Water Resources Act 1991 covering controlled waters and all watercourses and water in underground strata.

**NOISE POLLUTION**

Particularly where it may affect the quality of life for people living and working in the vicinity, as well as those people on the site.

**AIR POLLUTION**

Where it poses a risk to people on site, in the vicinity or further afield.

**SUSTAINABILITY**

Which involves balancing the seemingly conflicting needs of social, economic and environmental aspects of a project. Environmental sustainability is concerned with protecting, conserving and enhancing both biodiversity and the environment, by reducing waste, preventing pollution and by using water and other natural resources as efficiently as possible.

VolkerWessels UK (VW UK) People-Planet-Purpose sustainability framework, launched in 2020, commits us to a Decade of Action whereby we will use the 9 themes in the strategy to grow responsibly, with respect for communities and the natural environment, and to leave a legacy we are proud of.

**RESOURCE USE**

Local communities value their surrounding environment and whilst working in their communities we shall look for opportunities to enhance environmental protection and education, we will look at the use of social enterprises within the supply chain to optimise resource efficiency while providing benefits to local communities. Review of wasteful practices which make inefficient use of materials and consumables, both in the office and on-site.

**WASTE MATERIALS AND EFFLUENT**

As defined in the Environmental Permitting Regulations and Hazardous Wastes Regulations (not applicable in Scotland).

**CONTAMINATED LAND**

Its increasing use for re-development poses special problems and requires particular consideration for its remediation.

**REUSE AND RECYCLING**

The reuse or recycling of materials, in accordance with industry guidelines and relevant environmental legislation.

**ENERGY CONSUMPTION**

The environmental impacts of energy use are numerous from initial extraction, production and transport through to conversion, consumption and disposal of waste products. Inefficient energy use or wastage at temporary and fixed locations, including use by plant and equipment, is a concern throughout our activities.

**Climate Change**

It is scientifically proven that human produced emissions are speeding up the general warming of the earth and limiting this increase to 1.5oC. VolkerFitzpatrick have committed to a science-based Net Zero target by 2035 for Scope 1 and 2 emissions. Our emissions are annualised targeting a 5% year-on-year reduction. Our carbon reduction plan is published for external parties on the VF website identifying our reduction strategy.

**BIODIVERSITY**

Which encompasses the whole variety of life on earth. It includes all plant and animals species. It is not restricted to the rare or threatened species but includes the whole of the natural world from the commonplace to the critically endangered. We aim to conserve biodiversity on all projects by promoting good practice in relation to wildlife.

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## 2. ORGANISATION AND ARRANGEMENTS

### 2.1 Arrangements for Implementation of This Policy

Our aim is to plan activities and implement control measures to protect the environment, ensure compliance with relevant statutory provisions and client requirements associated with our works. We seek to do this in such a way that we avoid the need for complaint or issue of enforcement (improvement or prohibition) notice, or prosecution.

These requirements and our management controls are detailed within a specific *Site Management Plan* prepared for each project and our fixed operational locations.

The company will achieve the aims and objectives of this policy by:

- Mitigating the environmental impact of our operations by paying particular attention to the concerns of the local and wider community that could be affected
- Minimising use of the earth's resources through appropriate reuse or recycling procedures, as well as using materials from renewable sources wherever practical
- Monitoring water, energy consumption and use of hydrocarbon fuel resources
- Selecting offices, and establishing site facilities, which utilise water and energy saving technologies
- Applying best appropriate environmental standards at all of our sites and offices wherever we have an influence
- Trialling innovative technologies and solutions to see where these can be embedded into our day-to-day activities
- Encouraging environmental awareness among staff, suppliers and subcontractors, by working with companies whose environmental attitude reflects our own, and increase awareness by appropriate training
- Sharing company and industry best practice across VolkerFitzpatrick projects
- Being environmentally forward thinking by reviewing our policy in line with the latest environmental concerns as they unfold in the everyday world
- Seeking alternative solutions where we have influence over the design elements of our projects, evaluating alternatives with reduced environmental impact where possible
- Assessing our environmental aspects and impacts, together with objectives and targets which are identified and recorded in accordance with company procedures
- Addressing site specific environmental aspects and impacts prior to carrying out any activities on site
- Obtaining prior consent to certain activities being carried out, where it is our responsibility to do so
- Maintaining compliance to relevant environmental legislation

### 2.2 Leadership

Leadership and commitment with respect to the quality of the services and products provided by, and the effectiveness of the environmental management system used by VolkerFitzpatrick, is displayed down through the various levels of senior management. From the VolkerFitzpatrick Board, to the Senior Management Team, on through business unit and operations senior management, support specialists, and through line management functions, to team leaders.

Performance against the requirements of the Environmental Management System is regularly monitored and supported by leadership via Senior Manager's Tours, Project Reviews, Business Briefings and specifically promoting continual improvement.

## 2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

### 2.3 Responsibility for Environmental Management

ISO 14001 uses the term 'top management' to identify a number of key responsibilities with regard to environmental management. The roles that fall within VolkerFitzpatrick's 'top management' for the environment are shown below.

- Managing Director
- Divisional Managing Directors
- Operations Directors
- Pre-Construction Directors
- Project Director
- Commercial Director
- Health & Safety Director
- Head of Sustainability
- VolkerWessels UK Corporate Responsibility Director

'Top management' responsibilities for the environment include:

- Developing the environmental policy and objectives for VolkerFitzpatrick and ensuring that the correct organisational structure and resources are in place to support these goals
- Promoting the policy and objectives to employees to increase awareness, motivation and involvement
- Ensuring that the goals and responsibilities for individual employees reflect our overall environmental objectives
- Ensuring our focus is on client requirements
- Ensuring the EMS is implemented to meet the needs of VolkerFitzpatrick, its clients and other interested parties
- Reviewing the EMS periodically
- Identifying ways in which to improve the EMS
- Appointing a management representative to monitor and report on the development, performance and improvement of the EMS

Different roles have varying levels of authority with regard to our EMS, and are explained as follows:

#### **Managing Director**

The Managing Director (MD) in coordination with the Board Director responsible for environment management is ultimately accountable holding overall responsibility for the operations of VolkerFitzpatrick, from developing long term strategy for the business to overseeing its day-to-day activities.

#### **Divisional / Project / Operations Directors**

Responsible to the Managing Director for:

- The safe delivery of all VolkerFitzpatrick contracts
- Overseeing and supporting the effective implementation of the EMS and liaising with clients to ensure their satisfaction
- Training, supporting and mentoring their direct staff to develop their knowledge / application of the EMS
- Accepting their individual role in providing environmental leadership and engaging active participation of workers in improving environmental performance
- Directing management under their control to implement the environmental policy at all times
- Cooperating with the HSES team to ensure proper communication exists at all levels
- Ensuring adequate planning is undertaken to provide appropriate resources, training and systems of working
- Ensuring the provision of this policy is kept under review having regard to changes in legislation, best practice and the company's business
- Treating the environmental management of sites under their control as a matter of the highest importance
- Promote the reporting of close calls

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**2. ORGANISATION AND ARRANGEMENTS (CONTINUED)****2.3 Responsibility for Environmental Management (Continued)****Contracts Management / Site Management**

It is the responsibility of Contracts / Site Management to:

- Be familiar with and observe all relevant statutory provisions applicable to construction and related industries
- Implement the company's procedures for dealing with subcontractors and ensure proper cooperation and coordination takes place between the various parties who may share the workplace / site
- Provide an overall Environmental Management Plan for each project, making an adequate assessment of the risks involved and ensuring that systems of work and method statements are produced, followed and reviewed in line with the EMS
- Ensure activity and / or substance-specific assessments under the Control of Substances Hazardous to Health (COSHH) Regulations are made and communicated to those at risk
- Ensure employees, self-employed, temporarily employed, trainees and non-employed persons have received adequate training and information about the activity they are required to undertake, particularly by ensuring an induction is provided for those attending a location for the first time
- Ensure employees are aware of the company's policy for environmental management and that they have understood its requirements
- Liaise with others as applicable and support initiatives for environmental representation
- Report all environmental incidents to the appointed Environmental Manager, carry out investigations, make recommendations to prevent reoccurrence and ensure this information is effectively communicated
- Arrange environmental inspections and audits with the appointed Environmental Manager
- Ensure that weekly health, safety and environment inspections are carried out
- Implement the advice given by the company's appointed Environmental Manager
- Attend environmental training arranged by the company
- Promote the reporting of close calls

**General Site Foremen / Gangers**

It is the responsibility of Foremen and Gangers to:

- Ensure operatives are suitable, competent, trained and authorised to carry out the work
- Provide effective front-line supervision on site and ensure that operatives are instructed in the detail of environmental protection as it applies to particular construction operations
- Encourage the workforce to work in an environmentally acceptable and tidy manner and where necessary, disciplining offenders
- Be familiar with and observe all relevant statutory provisions applicable on site and take immediate action in respect of advice given by the company's appointed Environmental Managers
- Cooperate and liaise where appropriate with other contractors' site supervision
- Promote the reporting of close calls

**Health & Safety Director**

The Health and Safety Director leads a coordinated approach to all environmental management in consultation and direction from the Head of Sustainability.

**EMS Management Representative - Head of Sustainability**

The Head of Sustainability is the appointed Management Representative for environmental management and has the authority to take any action necessary to ensure that environmental management is maintained. Formal amendment to the EMS is the responsibility of the Management Representative. Reporting to the Managing Director, it is the responsibility of the Head of Sustainability to:

- Ensure the effective use of the HSES department and its' resources
- Ensure the advisory service provided by the department is an effective and practical interpretation of applicable regulatory and company requirements
- Assist the Managing Director in setting realistic goals for the continual improvement in environmental performance
- Develop the EMS to achieve the goals set
- Ensure the goals set are periodically monitored to agreed standards

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**2. ORGANISATION AND ARRANGEMENTS (CONTINUED)****2.3 Responsibility for Environmental Management (Continued)****EMS Management Representative - Head of Sustainability (Continued)**

- Ensure the company is audited against the standards detailed in the EMS
- Promote the reporting of close calls

**Environmental Management - HSES Team**

For the purposes of clarification under BS EN ISO 14001:2015, environmental management is not outsourced. Dedicated Environmental Managers are directly employed by the operational divisions of VolkerFitzpatrick.

In addition to this, VW UK Corporate Responsibility provides strategic direction, performance management, occupational health, IMS management, technical services and compliance support to all of the VW UK companies.

**Divisional HSES Managers**

The Heads of HSES for Building and Infrastructure report to the Health & Safety Director who leads a coordinated approach to all Environmental Management with the Head of Sustainability. Senior H&S Managers in turn report to their divisional Head of HSES. In addition to the duties detailed for an Environmental Manager below, both roles are responsible for effective allocation of environmental support across operational divisions within their designated remit.

**Environmental Managers / Advisors**

Reporting to the Head of Sustainability, Environmental Managers are part of a divisional HSES team responsible for ensuring effective implementation of the EMS. As a technical specialist they provide support, guidance and training.

The responsibilities of an Environmental Manager / Advisor are to:

- Play a key part in improving the environmental performance of our activities
- Inform, guide and support the workforce and in doing so create workplaces with a positive attitude to environmental management
- Visit sites regularly and monitor performance in relation to the policy and procedures
- Discuss and plan the implementation of future works with respect to the environment
- Carry out auditing in accordance with company procedure Q03 *Audit* to ensure compliance with existing requirements and identify any areas for improvement
- Represent VolkerFitzpatrick in communications with the EA / SEPA / NRW, Local Authorities and other external enforcing authorities or organisations
- Ensure that reports are compiled where necessary to enable corrective action to be implemented by site management
- Ensure thorough investigation is made and appropriate records are compiled where environmental incidents occur, and make recommendations to prevent recurrence
- Advise of appropriate environmental training requirements
- Ensure that VolkerFitzpatrick's environmental management documentation is appropriate and maintained to reflect any changes in legislation and company requirements
- Maintain their competence through continual professional development
- Adhere to the professional code of conduct as set through membership of the Institute of Environmental Management and Assessment (IEMA), the Chartered Institution of Wastes Management (CIWM) and the Chartered Institute of Ecology and Environmental Management (CIEEM)
- Identify opportunities for improvement and share best practice from across the business and industry
- Promote the reporting of close calls

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**2. ORGANISATION AND ARRANGEMENTS (CONTINUED)****2.3 Responsibility for Environmental Management (Continued)****Rail Standards and Compliance Manager**

Reporting to the Health & Safety Director is responsible for:

- Establishing the rail specific EMS requirements in line with BS EN ISO 14001
- Working in close collaboration with the IMS Manager to ensure legal, sector specific, and other requirements are integrated within the EMS
- Promote the reporting of close calls

**Corporate Responsibility Director**

The Corporate Responsibility (CR) Director is responsible for the implementation and development of sustainable business practices throughout VW UK shared services and business units, to maintain compliance to corporate, legal, and stakeholder requirements. Reporting to the VW UK CEO, the responsibilities of the CR Director are:

- Oversight of health, safety, environment, quality and sustainability activities and staff across VW UK business units
- Oversight of corporate governance and risk management
- Development of CR strategy through a strategic view of the business environment
- CR management reporting and communications within VW UK and to VolkerWessels
- Management of the integrated management system, its related systems and applicable memberships, affiliations and registration schemes
- Provision of occupational health services to VW UK and its business units
- Commitment to the growth and development of employees, including the delivery of training services and external course provision
- Development of sustainable business practices including the selection and integration of tools and techniques
- Understanding the role of government, business, NGOs, society, global and local issues and how they interact with each other and their impact on VW UK
- Development of systems and protocols, including IT platforms, to support the needs of the business units
- Lead officer for major incidents and provision of legal support services

**Integrated Management Systems Managers**

Reporting to the CR Director, the Integrated Management Systems (IMS) Managers are responsible for:

- The coordination of activities related to the implementation, development and maintenance of the EMS
- Control, publishing and maintenance of the IMS within the document management system

**Commercial / Estimating / Procurement and Design Managers**

It is the responsibility of the Commercial, Estimating and Procurement Managers to:

- Ensure subcontractors and suppliers working on behalf of VolkerFitzpatrick are aware of the environmental policy and practice document and provided with the site-specific procedures and environmental management plans
- Ensure the Procurement Policy is communicated to all subcontractors and suppliers
- Check the environmental performance of suppliers and subcontractors for incidents, regulator liaison, fines and court proceedings relating to environmental offences through the use of Constructionline prior to contract award
- Arrange audits of suppliers and subcontractors with the Environmental Manager
- Undertake a HSEQ start-up meeting with the appointed subcontractor or supplier at contract award
- Review Environmental risks and opportunities
- Be familiar with statutory provisions relating to ethical and responsible procurement for specific contracts
- Understand the environmental resourcing and monitoring requirements when tendering a contract

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## 2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

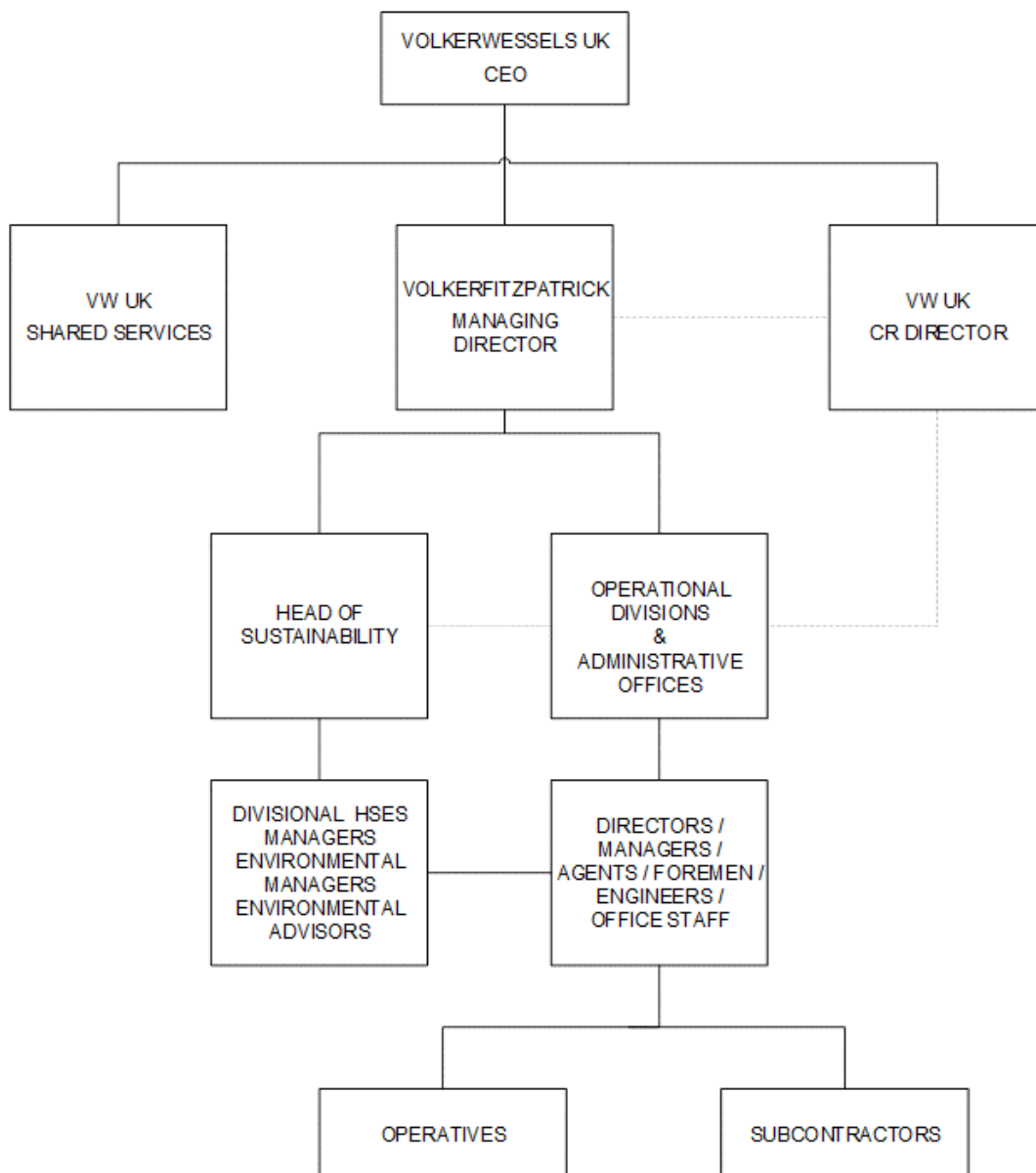
### All Employees, Subcontractors and any other Persons Working on our Behalf

It is their responsibility to:

- Be familiar with the Environmental Policy and cooperate with management / supervision in its implementation
- Understand the parts of the Environmental Policy applicable to them and take part in the protection of the environment
- Follow the instructions given regarding the prevention of pollution as part of working methods for particular tasks
- Keep equipment in good order, use the correct equipment for the task and report any defects in plant and equipment or any shortcoming in environmental protection to their manager / supervisor
- Contribute to a responsible culture, be aware of the significant environmental risks, relevant site environmental rules and abide by requirements

### 2.4 Organisation and Structure

The company is managed by the board of directors, with the structure for environmental management as detailed below:



## 2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

### 2.5 Interested Parties

BS EN ISO 14001:2015 requires the Interested Parties of an organisation to be determined; Interested Parties include people or organisations that can affect, be affected by, or perceive themselves to be affected by a decision or activity of VolkerFitzpatrick / VolkerWessels UK. VolkerFitzpatrick understands the importance of meeting the requirements of its Interested Parties. Interested Parties (including their needs and expectations) that are affected by the VF EMS include:

Interested Parties	Needs and Expectations
<ul style="list-style-type: none"> <li>VW UK Employees</li> </ul>	<ul style="list-style-type: none"> <li>Quality of work / life, Job Security, challenge, personal and professional development, career opportunities.</li> </ul>
<ul style="list-style-type: none"> <li>Shareholders (e.g. VW NL)</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable growth and profitability.</li> </ul>
<ul style="list-style-type: none"> <li>Sub-contractors</li> </ul>	<ul style="list-style-type: none"> <li>Surety of work, paid on time, collaborative working, respectable working environment, desire to work with a responsible organisation.</li> </ul>
<ul style="list-style-type: none"> <li>Clients / Customer</li> </ul>	<ul style="list-style-type: none"> <li>High level of service delivery, on time and on budget, in line with client expectations.</li> </ul>
<ul style="list-style-type: none"> <li>Suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Information of what is required and when, payment terms are met.</li> </ul>
<ul style="list-style-type: none"> <li>Government agencies</li> </ul>	<ul style="list-style-type: none"> <li>Compliance to applicable requirements</li> </ul>
<ul style="list-style-type: none"> <li>Regulatory bodies</li> </ul>	<ul style="list-style-type: none"> <li>Compliance to all regulatory and statutory requirements</li> </ul>
<ul style="list-style-type: none"> <li>Local community</li> </ul>	<ul style="list-style-type: none"> <li>Considerate construction company when working within local communities.</li> </ul>
<ul style="list-style-type: none"> <li>General Public</li> </ul>	<ul style="list-style-type: none"> <li>Minimal disruption to their everyday lives, enhancing the infrastructure and communities.</li> </ul>

Q19 *Determining the Context of our Organisation* further explains our Interested Parties.

## 2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

### 2.6 Documented Information

#### 2.6.1 Control of Documented Information

Documented information can be in any format and media and from any source. Documented information can refer to:

- The environmental management system itself, including related processes
- Information created in order for the organisation to operate (documentation)
- Evidence of results achieved (records)

To operate in a consistent manner, and to meet legal, corporate, client and other requirements we maintain an Integrated Management System (IMS) which includes all VW UK policies, procedures, forms, standards, and reference information.

Q01 *Control of Documented Information - Overview* describes the business approach towards control. Q01-01 *Control of the Integrated Management System (IMS)* defines how we establish, create, format, reference, control, and make available the IMS documentation. This document also defines how we control the IMS screens and other storage areas within Workspace including the document library and the project folder structure.

#### 2.6.2 Control of Records

Q01-02 *Control of Records and Workspace on Projects* defines the controls for retaining documented information, including but not limited to construction information, specifications (including drawings) and records (completed forms, plans or emails). It includes guidance on project-based document storage and access to records through Workspace and permissions determined by folder security and individual employee access rights.

Q01-03 *Control of Records and Workspace in Offices and Departments* defines the controls for retaining documented information, including but not limited to shared services departments and regional business unit offices. It includes guidance on document storage and access to records through Workspace.

Q01-04 *Control of Archiving* defines the controls for archiving project and office records.

### 2.7 Implementation

*The Site Management Plan* shall assign responsibility to relevant parties to ensure these policy and practice requirements are met. The system is implemented by preparation of Site Management Plans, incorporating specific requirements for the site concerned. These include requirements identified in documents produced by the client or their representative, together with documented company management procedures, which ensure compliance with legislation, regulations and codes of practice relevant to the environment. The VolkerFitzpatrick EMS is summarised on the following page.

Emergency requirements shall be detailed within the Site Management Plan where identified as necessary or specified with contract documents. These shall include details of provisions and procedures for control of incidents, such as oil spillage, to prevent detrimental effects on the environment. Where necessary, these measures may be tested by carrying out an exercise such as a mock environmental spill.

### 2.8 Risks and Opportunities

One of the fundamentals of environmental management planning is to determine the risks and opportunities to be addressed towards:

1. Giving assurance that the Environmental Management System can achieve its intended outcomes
2. Prevent, reduce, or otherwise mitigate undesired effects
3. Achieve continual performance improvement

The determination of risks and opportunities must include the identification of hazards, the assessment of risk and opportunities, and the meeting of legal and contractual requirements.

Hazard means a source, or a situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the environment, or a combination of these.

Hazard identification is the identification of undesired events that lead to the materialisation of the hazard and the mechanism by which those undesired events could occur. This includes long-term hazards to health (eg high levels of noise or exposure to harmful substances)

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**2. ORGANISATION AND ARRANGEMENTS (CONTINUED)****2.8 Risks and Opportunities (Continued)**

In its most simple terms, risk is a concept involving the possibility of an adverse outcome, and the level of certainty / uncertainty over the occurrence, the timing, or the magnitude of an adverse outcome. If either of these is absent, then there is no risk.

Risk assessment is a systematic process for describing and quantifying the risks associated with hazardous actions, or events, substances, or processes,

Hazard identification and risk assessment is the responsibility of the relevant manager for sites, offices and operational locations with the assistance of the Environmental Manager.

**2.9 Environmental Aspects and Associated Impacts**

Aspects of our activities which have an impact on the environment shall be identified, and we shall endeavour to mitigate adverse effects.

The use of environmental procedure E01 *Environmental Aspects and Impacts*, is mandatory for all activities undertaken by VolkerFitzpatrick. This procedure shall apply to the operations and activities over which VolkerFitzpatrick has direct control. Also, those supplier, subcontractor and Client impacts, over which VolkerFitzpatrick can exert a significant influence.

A centrally held register, E01-01 *Environmental Aspects and Impacts Register* is maintained. It is reviewed at least annually, to ensure changes within business operation and delivery are considered. Other review may be undertaken to reflect changing legislation or business activity.

E01-02 *Environmental Risk Assessment* is to be used by VolkerFitzpatrick projects, as part of environmental management project planning.

**2.10 Work Methods**

Operations with environmental effect shall be carried out in accordance with detailed method statements, company procedures and details identified within specific Site Management Plans, together with relevant codes of practice produced by statutory / regulatory bodies.

**2.11 Community Relations**

We will inform appropriate parties of how and when our operations will affect them, through public meetings, notices and signage or by verbal or written means.

VolkerFitzpatrick will assess sites against the Considerate Constructors Scheme (CCS), where appropriate. Projects where VF are acting in the Principal Contractor role over six weeks' duration will be registered with CCS and abide by the CCS code of practice unless agreed otherwise in the EMS-01 *Environmental Planning Meeting Agenda*. The CCS code assesses sites over the following categories:

- Respect the Community
- Care for the Environment
- Value their Workforce

Project performance against these criteria will be evaluated by an independent assessment by the CCS.

**2.12 Competency**

We take care that the Directors and Departmental Managers allocate responsibilities to those who have the appropriate competence (skills, knowledge and experience) for their role.

The VolkerFitzpatrick Mission Statement is - "Working together to Experience Excellence for our clients and our people." Delivery against the mission statement is supported by key business drivers, the 6Cs, setting out the parameters within which all staff are expected to operate as a business:

- Challenge yourself and others
- Communicate with the team
- Certainty of programme
- Cost awareness
- Campaign against rework
- Care about our people, projects and business

**2. ORGANISATION AND ARRANGEMENTS (CONTINUED)****2.12 Competency (Continued)**

All staff have and continue to attend Experience Excellence and 6Cs training and briefing updates.

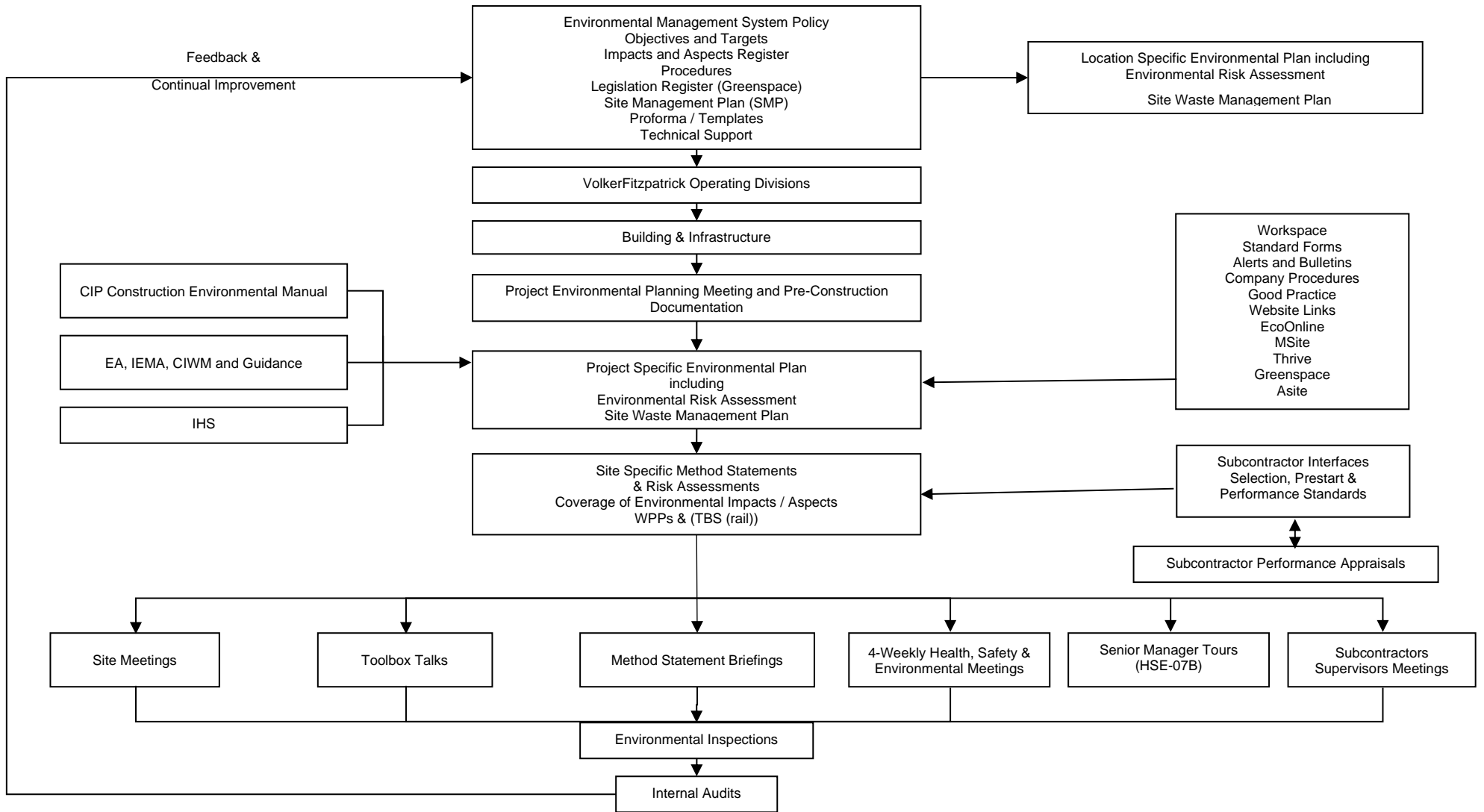
Staff needs assessment of competency is undertaken against a skills matrix. Further, VolkerFitzpatrick is committed to offering training opportunities for all employees, and training needs are identified at annual Development Performance Reviews. Training can be undertaken either through a formal or informal approach, after which it is evaluated and recorded by the relevant team who also retain copies of certificates and cards that have been gained.

Functional roles are outlined in job descriptions where identified as appropriate for the role concerned.

Environmental Awareness Training is delivered to all relevant members of staff, this covers both site-based personnel and persons from relevant support functions. This gives persons a base knowledge on environmental risks, ways of improving environmental performance and shares learning from previous incidents.

Individual training requirements are identified through Development Performance Reviews or requested by individuals responsible for an activity.

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## 2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

### 2.13 Environmental Procedures

Company procedures and details, relating to 'Organisation and Arrangements':

- E01 *Environmental Aspects and Impacts*
- E03 *Pollution Prevention*
- E04 *Waste Management*
- H03 *Legislation Compliance*
- H48 *Control of Substances Hazardous to Health*
- H53 *Local Rules for use of Nuclear Density Moisture Gauges*
- Q01 *Control of Documented Information - Overview*
- Q03 *Audit*
- Q04 *Non-conformance and Corrective Action*
- Q07 *Management Review*
- Q08 *Measure and Test Equipment*
- Q18 *Objectives, Targets, Measures and Actions*

## 3. CHECKING AND CORRECTIVE ACTION

A health, safety and environmental meeting is held at four weekly intervals on each contract, at which environmental issues identified within the Site Management Plan are discussed.

Regular inspections are undertaken during construction to ensure that work is being carried out in an environmentally sensitive manner until the project is completed.

Internal environmental audits are completed 6-8 weeks after project commencement and every six months thereafter to ensure that the company policy and objectives are being complied with.

All monitoring / measure and test equipment shall be of known status in relation to recognised standards, with records of location and findings maintained accordingly.

Any non-conformance or incident regarding an environmental issue shall be recorded, with appropriate corrective and preventive action identified and implemented.

Environmental records will be maintained on the IMS and upon completion of a project, hard copy environmental records shall be retained for the contract-specified period, usually a minimum of 12 months, and shall only be destroyed after checking the legal requirements for retention.

Where a complaint is raised, prompt action will be taken to resolve the situation to avoid further upset.

Company procedures and details relating to 'Checking and Corrective Action':

- Q03 *Audit*
- Q04 *Non-Conformance and Corrective Action*
- Q08 *Measure and Test Equipment*

## **4. PREVENTIVE MEASURES**

### **4.1 Water Pollution & Works Close to Water Courses**

We will take every reasonable precaution to ensure the protection of rivers, streams and other watercourses:

- Environmental permits Exemptions / Controlled Activity Regulations Licenses will be obtained from the suitable regulator before works near to, or before discharge into, a watercourse, and provisions made to ensure such discharge is safe
- Where there is a risk of contamination to a watercourse, control measures shall be identified and where necessary agreed with the suitable regulator

### **4.2 Noise / Vibration Pollution**

VolkerFitzpatrick recognises that noise and vibration are very sensitive issues. For this reason, our operations will be controlled to comply with the Control of Pollution Act 1974.

To help meet this requirement we will assess areas of concern before commencing operations. This will be especially important when operating near sensitive receptors such as hospitals, schools, residential areas and places of work.

We will:

- Based on the programme of works, assess environmental noise / vibration impact
- Adopt Best Practicable Means measures to minimise nuisance
- Consider all alternative construction methods, which offer the minimum noise / vibration levels
- Maintain plant to ensure optimum performance and to eliminate avoidable noise and vibration (including the use of silencers / mufflers where applicable)
- Use noise reduction screens where necessary
- Restrict working hours to avoid particularly sensitive times, such as evenings, wherever possible
- Undertake noise / vibration monitoring to assess our impact on surrounding receptors where a requirement is identified in environmental planning meetings

### **4.3 Airborne Pollution**

The effects of airborne pollution shall be considered by site personnel. Fundamental factors they will need to consider include:

- The ease with which particles contained in dust and smoke can spread, especially in strong or prevailing winds
- The consequent danger to people in the immediate area and further afield

Where operations will create dust, appropriate actions will be taken to keep it to a minimum.

### **4.4 Visual Pollution**

We will do everything we can to behave in an environmentally sensitive way and will look to mitigate visual impacts where possible.

### **4.5 Waste**

In recognition of the fact that the earth's resources are finite, every step possible will be taken to minimise waste through the implementation of the waste hierarchy. Waste should be dealt with as per E04 *Waste Management* (also refer to section 5.0 for further information).



#### **4. PREVENTIVE MEASURES (CONTINUED)**

##### **4.6 Energy Consumption**

Energy consumption shall be monitored both during our construction activities and at fixed offices, with a view to seeking opportunities for reduction wherever practical. Wherever possible we will select fixed offices and seek to establish site offices, with energy saving measures / technology.

Due to the harmful emissions associated with the use of diesel-powered vehicles, the company encourages the use of cleaner and more energy efficient fuels. Consideration should also be given to the use of alternatively fuelled (i.e. hybrid / electric) vehicles. Vehicles operated by the company shall also be serviced in accordance with the manufacturer's details to maintain efficiency and minimise pollution.

Inductions will include, where practical and relevant, advice on reduction of energy consumption.

The company is committed to the reduction in energy consumption and pollution and will do so where relevant and practical as per our pledge under Pillar 2 of People - Planet – Purpose. Reduction in energy consumption is important in reducing our overall carbon footprint.

##### **4.7 Carbon Reduction Strategy**

Our pledge under Pillar 2 of People - Planet - Purpose shows our commitment to lowering our carbon footprint, as demonstrated in *the VolkerFitzpatrick Carbon Reduction Strategy* and our *2035 Net Zero commitment*. Our carbon footprint will be measured on an annual basis. Relevant reports will be issued in accordance with recognised emission reporting protocols and where necessary be validated by a third party. Where possible, and when requested, the company will disclose our carbon footprint data in accordance with standard Carbon Disclosure protocols. Progress towards reducing our carbon footprint will be communicated to all employees and any feedback from the business will be used to further improve our footprint.

##### **4.8 Water Consumption**

Water consumption shall be monitored both during our construction activities and at fixed offices, with a view to seeking opportunities for reduction wherever practical. Appropriate water saving measures and devices will be made available where practical to do so. The company is committed to the reduction in water consumption and will do so where relevant and practical.

##### **4.9 Responsible Timber Procurement**

The UK government recognises wood certified under the FSC and PEFC schemes as “verified legal and sustainable”. In line with these policies, VolkerFitzpatrick will ensure that we and our supply chain only procure timber, timber products and timber sheet materials from FSC or PEFC schemes. Those which cannot demonstrate they are from FSC or PEFC schemes must not be used. Timber from illegal and unsustainable sources must also not be used.

##### **4.10 Biodiversity**

We aim to conserve biodiversity on all projects by promoting good practice in relation to wildlife along with the initiative of biodiversity net gain which aims to leave the natural environment in a measurably better state than before. Where we have design responsibilities the mitigation hierarchy will be followed.

##### **4.11 Company Procedures**

Company procedures and external Guidelines relating to ‘Preventive Measures’:

- *E03 Pollution Prevention*
- *E04 Waste Management*
- *E09 Use of Materials on Projects*
- Environment Agency Pollution Prevention Guidelines
- NWR & SEPA Pollution Prevention Guidelines

## 5. WASTE MANAGEMENT

### 5.1 Strategy

A Waste Coordinator is appointed on all VolkerFitzpatrick projects and whilst everyone on site will be called upon to do everything they can to minimise waste, it is the Waste Coordinator's responsibility to comply with the waste hierarchy and ensure that the following actions are addressed:

- Reducing waste to landfill
- Eliminate hazardous soils and stones from landfill
- Ensure materials do not become waste under Material Management Plans
- Efficient use of waste a resource through the use of waste exemptions and low risk waste position statements
- Drive the use of VolkerSwitch

### 5.2 Waste Disposal Procedures

All waste will be taken to locations authorised to accept the waste in accordance with an appropriate Environmental Permit / Waste Management Licence or Exemption. Hazardous waste and non-hazardous waste will be separated and handled as appropriate. Transport of waste materials to the appropriate location will only be undertaken by a licensed waste carrier.

### 5.3 Waste Control Documentation

To ensure correct disposal of waste, documented procedures will be implemented and fully complied with, as detailed in company procedure E04 *Waste Management*.

### 5.4 Non-Hazardous Waste

A Waste Transfer Note will be completed for movements of non-hazardous waste, this will be recorded on the project Site Waste Management Plan along with details of the registered waste carrier and the disposal location. Where regular movements of the same waste are required, a season ticket may be used to replace individual waste transfer notes for each movement.

### 5.5 Hazardous Waste

All sites or locations in Wales producing more than 500kg annually of hazardous waste will register with NRW as a hazardous waste producer. This registration is not required in either England or Scotland (in Scotland this is referred to as 'Special Waste'). Consignment notes will be completed in accordance with the requirements of the Hazardous Wastes Regulations, as detailed in company procedure E04 *Waste Management*.

The Waste Coordinator on site in charge of waste disposal will obtain the name and address of the disposal location before the consignment leaves. That person will ensure that the location has an appropriate permit / license and if in doubt shall contact the EA / SEPA / NRW. Documentation shall also be obtained from the carrier validating correct disposal.

### 5.6 Site Waste Management Plans

All sites, regardless of size or value will complete Site Waste Management Plans (SWMPs). The SWMP includes the collection of data relating to waste (including reuse of waste on site), as well as Duty of Care information on waste carriers and final destinations. SWMP data is gathered by HSES / CR Director for reporting on a monthly basis and for annual objectives, benchmarking and for the driving of waste reduction strategies.

### 5.7 Company Procedures

Company procedures and details relating to 'Waste Management':

- E03 *Pollution Prevention*
- E04 *Waste Management*
- E09 *Use of Materials on Projects*

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## **6. CONTAMINATED LAND**

We shall only remove contaminants where instructed to do so. Wherever possible, we shall carry out remediation as an alternative to eliminate or minimise the environmental risk.

### **6.1 Assessing the Hazard**

An assessment will be made prior to appropriate remediation plan being taken. The area(s) of hazardous waste shall be identified on site and cordoned off accordingly.

### **6.2 Employee / Public Safety**

All work will be carried out in accordance with appropriate HSE publications and specific method statements, with dirty / clean areas being established and identified as appropriate.

### **6.3 Personal Protective Equipment**

All visitors and persons working on a contaminated site shall wear suitable protective clothing. Further precautions will depend upon the activities being carried out on site as well as the type of work being undertaken by the person(s) in question.

### **6.4 Dealing with Contaminated Material**

Hazardous waste will be removed and taken to a location authorised to accept the waste under an Environmental Permit / Waste Management Licence, or wherever possible, materials that can remain on site will be isolated by an appropriate encapsulation method or be suitably remediated. Before leaving the site, all vehicles shall be checked to prevent contaminants being spilt or deposited on the public highway. Validation will be carried out to ensure protection of human health and protection of controlled waters is ensured where remediated material is reused on site.

### **6.5 Bunded Storage Areas**

These will be used to avoid the spillage and spread of contaminated materials around the site.

### **6.6 Storage Tanks for Contaminated Liquids**

These will be located on firm foundations above the ground so that they can be regularly inspected for corrosion or leaks. They will be bunded and lined with an appropriate impermeable material, with clear markings to show capacity and contents. Where existing tanks are in place, these shall be used and removed if required upon completion of the works.

## 7. PROCUREMENT POLICY

### 7.1 Introduction to The Procurement Policy

The environment and sustainability are key issues within our business. This strategy seeks to balance commercial considerations and quality whilst ensuring that environmental impact is considered.

VolkerFitzpatrick spends a significant sum each year on a wide range of materials. The vast majority of these materials are incorporated into the works that we construct.

Environmental and sustainability issues can be incorporated into the whole procurement process: defining the need, evaluating options, design and specifying, supplier selection, and post-contract management. For this reason, the procurement function is ideally situated to facilitate the development of procurement options that address environmental issues.

The objective is to deliver workable and commercially acceptable environmental solutions specific to each contract and our input and level of resources will directly relate to the potential environmental benefit.

This strategy is intended to facilitate incremental improvements, leading to significant benefits in the long-term.

Wherever possible within the constraints of the individual contracts, we will:

- Assess the environmental impacts of our procurement
- Seek continual improvement of our environmental performance and publicise the results annually
- Work with our suppliers and clients to ensure that, wherever practical, we procure materials to make a more sustainable environment for future generations

Addressing environmental and sustainability issues through the procurement process has the potential to deliver on these commitments in a cost-effective manner. This also provides opportunities to use our influence to ensure that our suppliers and clients also assist us in meeting these commitments.

This strategy demonstrates that we intend to proactively carry out our procurement function whilst equally recognising our responsibilities to the environment.

VW UK is absolutely committed to preventing slavery and human trafficking in its corporate activities. Our statement of compliance with the Modern Slavery Act 2015 sets out actions to understand the potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This commitment is also made in our Responsible Procurement Charter.

This strategy is endorsed and supported by the Main Board of Directors and Senior Managers of the company.

### 7.2 Aims of The Procurement Policy

The strategy is designed to support this Environmental Policy and Practice and in doing so:

- Reduces the consumption of raw materials throughout our business
- Increases the amount of recycled materials that we use
- Increases the percentage of materials that we procure from sustainable sources
- Procure lower embodied carbon materials, fuels and transport options
- Deliver sustainable scope 3 emissions reductions
- Influences our suppliers in adopting positive approaches to the environment
- Delivers the most appropriate environmental solutions arising from our procurement function
- Develops and promote environmental procurement across the company
- Compliments existing environmental policies and initiatives within the company

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## 7. PROCUREMENT POLICY (CONTINUED)

### 7.3 Objectives of The Procurement Policy

#### Training and Awareness

To raise awareness and skills of appropriate staff across the business in how to assess and select the most beneficial environmental procurement options.

#### Procurement Process

To ensure effective environmental assessments are integrated into everyday procurement functions and to provide all procurement staff with the relevant supporting tools and techniques that can be used without the need for any environmental expertise. Increasing direct spend through preferred suppliers, where environmental performance can be measured, reported and improved through framework agreements.

#### Communication

Promote awareness of this strategy within the business and to any appropriate external body. Promote achievements and developments relating to environmental procurement within the business.

#### Research and Collaboration

Continuous research on environmental products, services, initiatives and forthcoming legislation etc. to ensure the procurement process takes account of latest developments. Identify best practice and aim to introduce collaborative approaches with our clients.

#### Measurement, Reporting and Review

Based upon the information obtained from our own procurement activities and from our "Top" Suppliers, sustainability will be integrated into annual reports to the Managing Director, Head of Procurement, Health & Safety Director and the Head of Sustainability.

#### Business Ethics

VolkerFitzpatrick will:

- Behave legally, honourably and ethically at all times
- Remain opposed to bribery and the receipt of goods within the context of all aspects of its business
- Trade and compete fairly, within a framework of applicable competition law
- Source a series of company-wide term deal orders to attempt sourcing of goods where possible and practical from local sources
- Attempt to ensure free and open trade within the guidelines of the specification and its ethical conduct. The client generally specifies goods and services, however where value engineering can be undertaken it is encouraged
- Procure fairly traded goods in line with the requirements of its clients and its own procurement guidelines however, we do not typically procure from outside UK

#### Social Value

VolkerFitzpatrick has an obligation to measure and manage the contribution that we make to society and the communities we work in. We achieve this by using the Thrive Portal (unless there is a client specific requirement to use an alternative system) to report both non-financial AND financial data and rewards that we deliver to the communities in which we work. Social Value is recorded using the Impact Evaluation Standard (IES) that provide proxies and metrics to record and capture social value activities consistently across the business allowing for continuous improvement. We are working with our supply chain as we recognise they are a key enabler to achieving our corporate and contract Social Value targets, contributing to commitments during pre-construction and at contract award and supported by our in-house social value teams.

## 8. IMS AUTHORISATION

#### Document owner approval:

**James McMorro**, Head of Sustainability - 27.01.2023

#### Approval for IMS:

**Alex Boatwright**, IMS Manager - 27.01.2023

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**E. RvD Advice Letter**

Dated 18 September 2023 reference EPR/ZP3225SV/P001

Our ref: EPR/ZP3225SV/P001

Date: 18 September 2023

Dear Sarah,

**Environmental Permitting – Recovery vs Disposal assessment of a waste recovery plan**

**Pre-application reference: EPR/ZP3225SV/P001**

**Prospective applicant name: HELIOSLOUGH LIMITED**

**Site name and address: Area 2, North Orbital Road, Upper Colne Valley, Hertfordshire, AL2 2ET**

You have submitted information to us that includes your assessment that the activity you wish to undertake at your site amounts to a recovery operation.

We have now considered your submission and we would like to advise you that:

We agree with your assessment that your activity is a recovery operation. This advice is based on the information you have provided to support that the waste is being used as a substitute for non-waste material plus details in relation to waste types and quantity and the purpose and nature of the proposal. If you change any of this information between now and when you submit an application, this advice may no longer apply.

**Please note that the advice contained in this letter is not in itself a permitting decision or an indication that a permit will be granted or permit variation issued following submission of an application.** Further assessment will take place during the permit determination stage and pre-application advice should be sought as required before preparing an application. See appendix for more information.

The following documents are considered to form the approved waste recovery plan:

Title	Reference (where applicable)	Date
Waste Recovery Plan	Waste Recovery Plan RAD-WAT-A2EX-XX-RP-I-0026	24/08/2023
Earthworks Specification	RAD-WT-A2EX-XX-SP-C-0023	24/08/2023

If you have any questions regarding our advice above please phone me or email [Anthony.watts@environment-agency.gov.uk](mailto:Anthony.watts@environment-agency.gov.uk)

Yours sincerely  
Anthony Watts

## **Appendix**

### **Recovery vs Disposal advice**

The Recovery vs Disposal (RvD) assessment of a waste recovery plan enables us to advise an applicant regarding whether or not we agree in principle that a proposed waste activity is a recovery operation to inform what type of permit would be required (recovery or disposal).

This assessment is discrete from the pre-application advice that would be provided to support the preparation of a permit application (see below) attracting a separate charge.

Our decision to grant a recovery permit or to issue a variation is subject to further assessment carried out during the permit determination stage. In the case of bespoke permit applications, this includes site-specific risk assessment based on the location of the site and technical requirements of the scheme.

For example:

- RvD assessment considers what waste types *may* be suitable, not what waste types *will* be deemed suitable following technical assessment of a permit application which would take into account the sensitivity of the site location and the proposed appropriate measures to be carried out. This is particularly relevant where non-inert wastes are to be deposited.
- RvD assessment considers whether it has been demonstrated that the scheme will be designed and constructed to be fit for purpose. Further technical assessment of the design and the construction methods and/or quality standards to be met may be carried out during permit determination.

If the permit that you are intending to apply for includes the application of waste to improve / enhance or maintain soil quality (landspreading), you must make this clear in your permit application and provide a benefit statement with your application that shows that the specific use of the waste is suitable and will provide no more soils and/or nutrients than the plants need. This is separate to the RvD assessment of the waste recovery plan.

If you plan to mix or blend waste or manufacture a soil substitute under the permit this should be made clear in the permit application as it is a separate activity that will need to be assessed during permit determination.

### **Pre-application advice on a recovery permit application**

Prior to preparing and submitting an application for a recovery permit, you should review our deposit for recovery guidance (<https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits>) and consider seeking pre-application advice (<https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>).

You should use the paid for enhanced pre-application advice service to discuss your proposal if any of the following apply:

- your site is in a sensitive location (<https://www.gov.uk/guidance/landfill-operators-environmental-permits/plan-the-environmental-setting-of-your-site#sensitive-locations>)
- you are depositing waste on top of a landfill
- you are depositing waste into water
- hazardous waste is to be deposited as part of the scheme



- additional activities (such as landspreading or soil treatment) are intended to be included in the permit

### **Changes to your waste recovery plan**

Before making changes to your proposal you should review our waste recovery plan guidance (<https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits>).

## We are Waterman, where every project matters

We deliver progressive, sustainability-driven environmental and engineering consultancy services across every sector. We think differently, and we're harnessing our collective expertise to deliver greener, healthier and well-connected communities, networks and built environments.

Based in strategic locations throughout the UK and Ireland, our team of specialists is at the forefront of tackling the climate emergency and forging a path to a Net Zero built environment.

### UK & Ireland Office Locations

