

Non-Technical Summary

Project Ref:	139521, Version 002	Date:	6-May-22
Author:	J. Parry-Welsh	Site Ref:	Farrington Golf Club
Applicant:	Towens of Weston Limited	EA Ref:	EPR KB3909XJ A001

Introduction

Ashfield Solutions Limited (“Ashfield” or the “Agent”) has been commissioned by Towens of Weston Limited (“the Operator”), on behalf of Farrington Golf and Country Club Limited (“the Applicant”), to prepare and submit to the Environment Agency (“EA”) an application for a bespoke Deposit for Recovery (“DfR”) Environmental Permit (“EP”) at Farrington Golf and Country Club, Marsh Lane, Farrington Gurney, Bristol, BS39 6TS (the “site”).

This EP application has been prepared by Ashfield, on behalf of the Operator, which is registered in England, Company No. 04319664, and the Applicant, which is registered in England, Company No. 03926812. This Non-Technical Summary (“NTS”) report has been produced to support the EP application and also to pre-application correspondence (EPR/KB3909XJ/A001) with the EA.

In support of the permit application the following documents have been submitted:
This report has been completed in accordance with the EPR and should be read alongside the following supporting information:

- Ashfield Solutions Limited (2023) – Environmental Site Setting & Design Report. Ref. 139521-S03.
- Towens of Weston Limited (2023) - Farrington Golf Club Environmental Risk Assessment - V002.
- Ashfield Solutions Limited (2022) – Waste Recovery Plan, Version 01. Ref. 139521-S01.
- Ashfield Solutions Limited (2022) – Site Condition Report, Ref. 139521-S02.
- Ashfield Solutions Limited (2022) - Dust & Particulate Management Plan, Ref. 139521-S02.
- Environment Agency (2022) - Environmental Permitting – Recovery vs Disposal Assessment of a Waste Recovery Plan, Ref. EPR/KB3909XJ/A001.
- Towens of Weston Limited (2021) - Environmental Management System Manual, Ref. SWP019, Revision 006.
- Towens of Weston Limited (2021) – Waste Rejection Information, Ref. STOF32, Version 003.
- Towens of Weston Limited (2021) – Waste Acceptance, Ref. SWP008, Version 003.
- Towens of Weston Limited (2021) – Waste Rejection and Tipping of Non Permitted Wastes, Ref. SWP012, Version 003.

- Towens of Weston Limited (2021) – General Dust Control, Ref. SWP072, Version 004.
- Mendip District Council, Planning Permission 2018/0577/FUL, and supporting information, including:
 - The Landmark Practice Limited (2019) – Construction and Environmental Management Plan (CEMP), No Ref., Version 03;
 - The Landmark Practice Limited (2019) – Landscape and Ecological Management Plan, No Ref., Version D01;
 - Western Ecology Limited (2018) – Addendum to Preliminary Ecological Appraisal Land at Farrington Golf Club, Farrington Gurney in Somerset June 2016. No Ref; and,
 - Clive Onions Consulting Civil Engineers Limited (2017) - Flood Risk Assessment and Drainage Strategy, Ref. 17209, Version 02.

Background Information

The site broadly comprises approximately 82ha of an irregular parcel of land. The site includes the existing Farrington Golf Club with club house, car parking, driving range and golf course. The site contains two open fields unused for golfing purposes in the north-west and one in the south. The golf course contains the expected features including sand bunkers, lakes/ponds, lawns and trees. The general site setting is summarised in Table 1 below.

Table 1 – Site Setting

Site Location & Grid Reference:	The site address is Farrington Golf and Country Club, Marsh Lane, Farrington Gurney, Bristol, BS39 6TS. The site is centred as National Grid Reference ST 63275 54727 (X: 363275, Y: 154727), approximately 3km to the west of Midsomer Norton, with access gained from a A37 to the north west.
Terrain & Topography	<p>The site is located on a ridge falling from west to east causing the majority of the land to slope, with some falling east and south, drained by boundary watercourses. The site is topographically undulating, rising from approximately 126m Above Ordnance Datum (“m AOD”) in the north, to 145m AOD in the south. The topography falls from approximately 160m AOD in the west, to 148m AOD in the east.</p> <p>The ground cover predominantly comprises open fields (use as a golf course), with areas of vegetation and limited areas of hardstanding (constrained to building cover and a car park in the east of the site).</p>

Proposed Development

Mendip District Council have granted the site, and proposals, planning permission (Ref. 2018/0577/FUL) for the “*proposed works to a golf club including new academy Course, new driving range, two new golf holes to North-West, Front 5 holes converted to 9 hole course, new Spa and Accommodation, new touring caravan park and amenities, conversion of existing driving range to accommodation and proposed car park extension. (Amended Plans and Description)*”. In accordance with the granted planning permission (Section 1.3), the proposed re-development and re-configuration of the site will:

- Create two new golf holes on land, south west of the seventh tee;
- Create a new driving range with 12 covered bays and 12 grass bays on the current practice ground;
- Create a new 5 five hole academy course;
- Convert the existing driving range structure in to 10 letting rooms;
- Extend the car park into the existing driving range, to serve the new letting rooms;
- Create a new Spa and 12 additional letting rooms on the former driving range;
- Construct a Caravan Park with 25 pitches, including toilets and showers

The above shall be undertaken in numerous phases, summarised below:

- Phase 1 - Creation of the two new holes, on land, south west of the seventh tee.
- Phase 2 – Creation of the new driving range.
- Phase 3 – Creation of the new Academy course.

Proposed Permit Application

Table 2 summarises the proposed site classification as part of the EP application.

Table 2 – Site Classification

Proposed Boundary:	The proposed Environmental Permit application boundary is shown by Drawing D- ESSD2 .
Type Code:	A25
Type Description:	Deposit of waste to land as a recovery operation
General Description:	Waste facilities that have a permit for a waste operation under the EP Regulations (former waste management licences). A waste recovery plan must be provided to support a DfR EP application (see below).

Supporting Waste Recovery Plan Reference for Proposed DfR:	Ashfield Solutions Limited – Waste Recovery Plan, Ref. 139521-S01. Environment Agency - Environmental Permitting – Recovery vs Disposal assessment of a waste recovery plan, Ref. EPR/KB3909XJ/A001.
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The proposed waste types including details relating to volumes, quantities and chemical characteristics are summarised in Table 6.

Table 6 – Summary of Proposed Waste Types & Quantities

EWC Code(s):	17 05 04.
Waste Description:	Soil and stones other than those mentioned in 17 05 03
Total volume (Combined Phase 1 & Phase 2):	109,795
Range of material densities for imported material	1.8t/m ³
Estimated mass of imported material	197,631 tonnes

Important note: Further detail on the above is provided in the agreed Waste Recovery Plan, Sections 3.3 and 3.4. In addition to the above, the proposed Phase 3 element of works (to be completed after Phase 1 and Phase 2) equates to 26,153m³ of material (or an additional 47,076 tonnes). It is anticipated that the WRP and permit shall be amended, upon completion of Phases 1 and 2, to allow for completing the proposals using imported waste soil materials (subject to agreement with the EA).

As outlined in Section 3.4 of the agreed Waste Recovery Plan, only inert and chemically suitable material excavated from local development sites will be used for the purpose of this proposed recovery activity. Due to the close proximity of already identified source sites to the proposed recovery activity, the type of material excavated is anticipated to be very similar to the natural geology at the site. Owing to the certainty of source of these materials, Towns proposes to further restrict the description of waste accepted under these codes to materials originating from greenfield excavations only.

The proposed operation will be permitted to only accept Landfill Directive inert wastes only. Inert waste is defined by the Landfill Directive, article 2(e) as:

“Waste that does not undergo any significant physical, chemical or biological transformations. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular not endanger the quality of surface water and/or groundwater”.

As outlined in appropriate guidance¹, WAC “are limits that have been derived by modelling the impacts of a typical landfill on groundwater and are thus aimed at avoiding groundwater pollution”. Therefore, materials meeting inert WAC criteria do not contain substances at concentrations that may present a risk to surface water or groundwater. To ensure long-term protection of the water environment, leachability tests shall also be undertaken to ensure results are lower than the applicable Environmental Quality Standard (“EQS”) and/or Drinking Water Standard (“DWS”). This, in combination to acceptance procedures (Section 5) and risk assessment (Section 4), shall ensure that there is to be **no contaminant loading** in imported materials at the site.

Site Operations

The following procedures will be undertaken:

- Source selection and processing of materials;
- Materials acceptance procedures;
- Transport and delivery;
- Rejection of rogue loads; and,
- Works to be managed under a Technically Competent Manager (“TCM”).

Also provided in supporting documentation are details of mitigation measures to be undertaken throughout the duration of the permit as well as a site specific monitoring plan.

Management of Activities

An existing Environmental Management System and Environmental Risk Assessment of the proposals has been provided to cover good environmental practice. Based on this and the requirements outlined herein, the following site management activities. The overarching aim of the management system is to ensure that the business fulfil its purpose, stay legally compliant, and maintain social responsibility by way of meeting the objectives set by the Environmental Policy.

All staff and external contractors will be made aware of the environmental policy before commencing work on site. The management system and supporting procedures will be available for inspection at the facility and will apply to all staff, contractors and visitors to the site.

¹ Section 4 Permitting Requirements, Paragraph 4.86, of DEFRA (2010, Version 3.1) Environmental Permitting Guidance The Landfill Directive For the Environmental Permitting (England and Wales) Regulations 2010.

A record-keeping system will be implemented on-site as part of the management system. The management system will include the programme for the monitoring and reporting of emissions from the operation, which will be required by condition on the environmental permit.