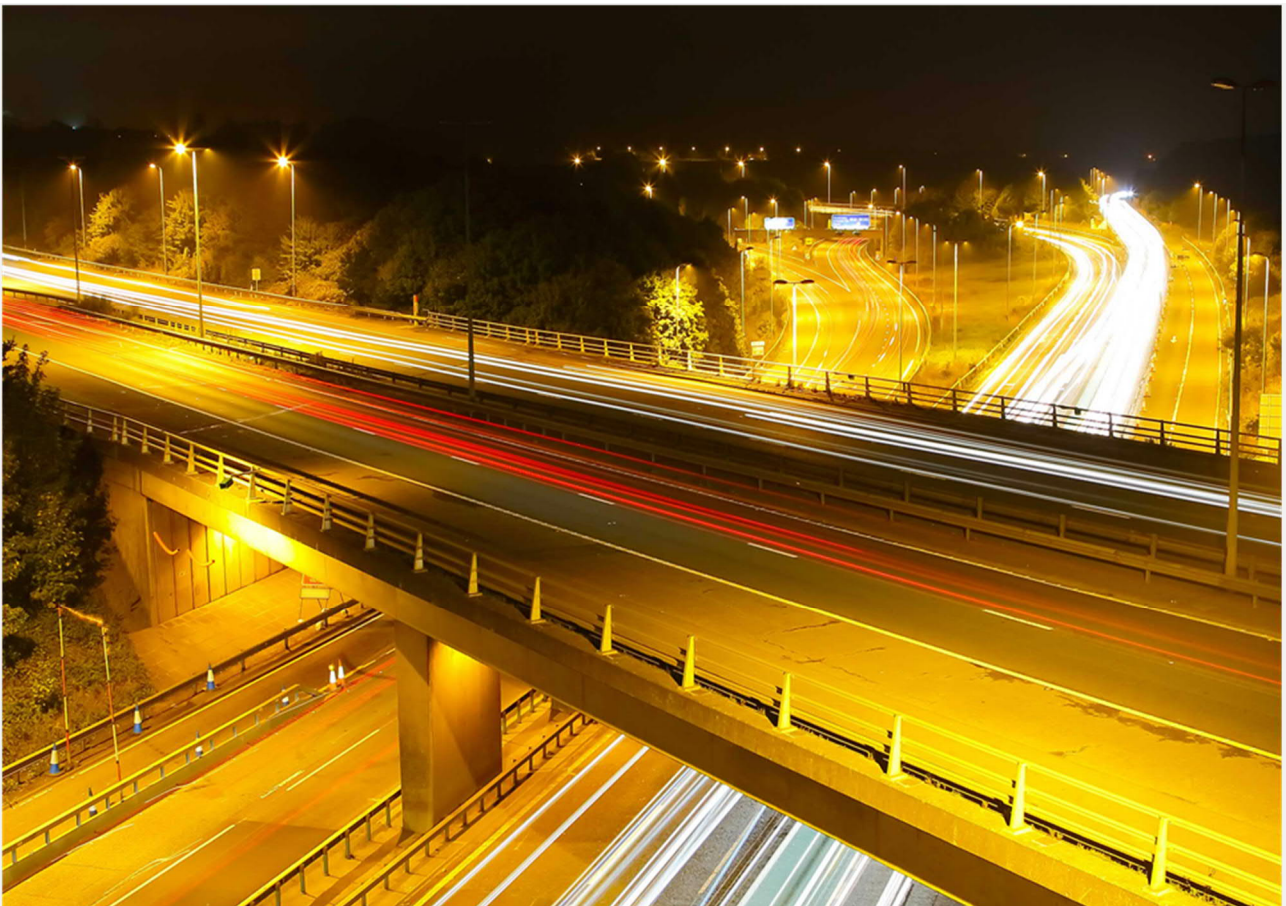


# M25 J28 Improvements DfR Permit

Non-technical Summary



# Change list

Ver:	Date:	Description of the change	Reviewed	Approved by
1	21-12-2021	Draft for discussion	MM	TV
2	13-01-2022	Final Draft – For Client comment	MM	TV
3	14-01-2022	Final	MM	TV

**Project Name:** M25 J28 Improvements  
**Project Number:** 65202055  
**Client:** Graham  
**Ver:** 3  
**Date:** 14/01/2022  
**Author:** Tony Vine  
**Document Reference:** Non technical Summary

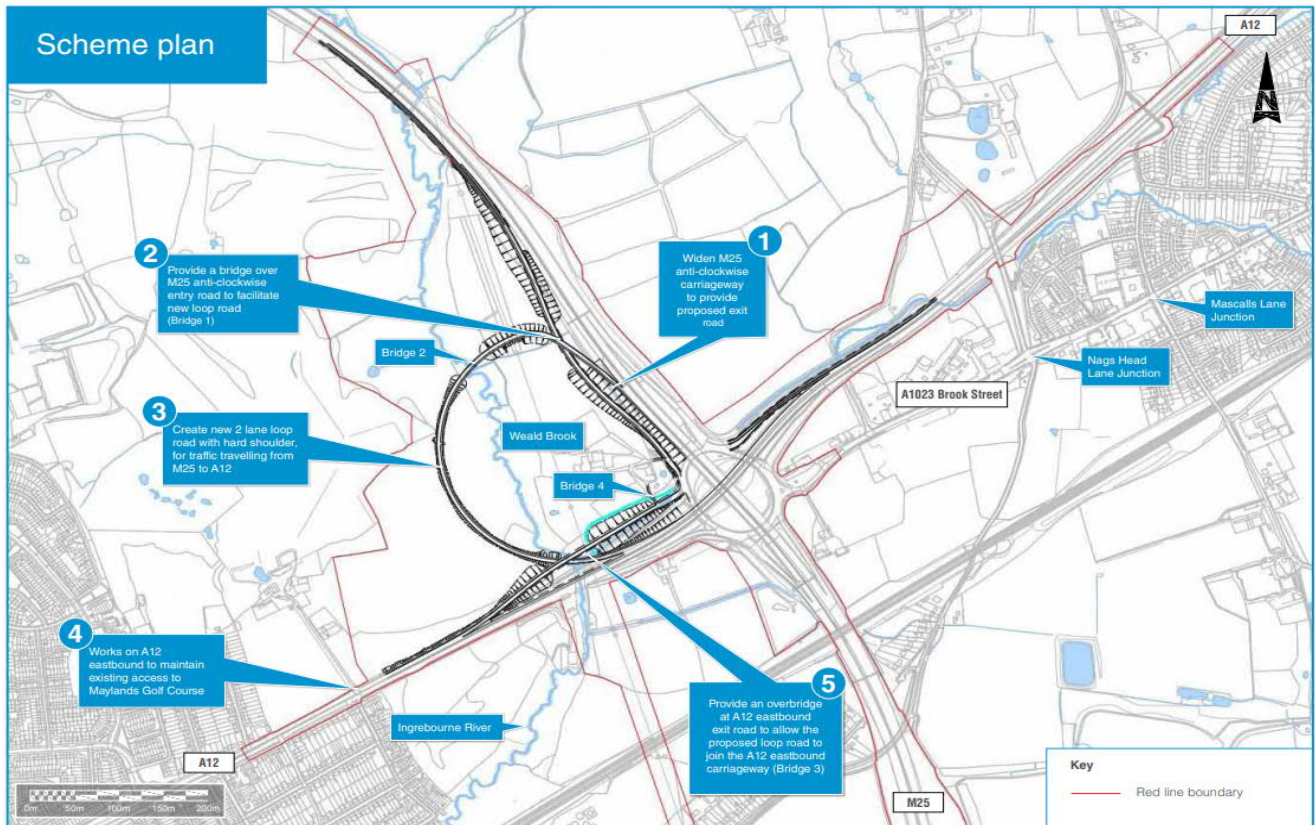
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# 1. Introduction

As part of National Highways regional delivery framework, improvements to Junction 28 of the M25 are proposed. The Scheme is to take place at and around the area of Grove Farm, Brentwood, CM14 5NG (see **Figure 1**).

**Figure 1.1: Scheme Plan**



This Scheme was announced by National Highways in July 2017 and comprises the following elements:

- The creation of a new two-lane loop road with hard shoulder, for traffic travelling from the M25 anti-clockwise onto the A12 eastbound
- The realignment of the A12 eastbound exit slip road and M25 anticlockwise entry slip road to accommodate the new loop road
- The provision of a bridge (Alder Wood bridge) over M25 anti-clockwise entry slip road to facilitate the new loop road
- The provision of an overbridge (Grove bridge) at the A12 eastbound exit slip road to allow the proposed loop road to join the A12 eastbound carriageway
- Diversion of a high-pressure gas main
- Diversion and undergrounding of a section of UKPN high voltage overhead line
- Other minor utilities diversions
- The creation of three new attenuation ponds and associated drainage facilities
- Realignment of the Ingrebourne River and sections of the Weald Brook and an area for ecological compensation to provide mitigation for the impacts of the Scheme on biodiversity resources

- An area for compensation to provide mitigation works for the impacts of the Scheme on Maylands Golf Club.

Some of the scheme elements require a programme of earthworks including the excavation of soil materials from a number of locations in order to provide fill materials that are to be used to create embankments, or to fill low points on the site, so that construction of the highways infrastructure can proceed.

Part of this work requires excavation of soils and wastes from the historical Brook Street Landfill, which is located beneath part of the scheme and extends approximately 350m north-west of Junction 28.

The landfill comprises waste associated with the construction of the M25 prior to 1983. During ground investigations completed for the Scheme, soil material encountered within the historical landfill was found to comprise mostly inert waste materials.

The proposed re-use of controlled waste materials falls within the classification of activities undertaking the disposal, recovery or a mix of disposal and recovery of non-hazardous waste, for which an Environmental Permit is required.

The documents which form this Environmental Permit application seek to provide sufficient information in order for the EA to determine and issue a Permit which allows the deposit of waste for recovery in order to implement the scheme improvements.

## 1.1 Purpose of this report

This Non-Technical Summary (NTS) has been prepared in support of question 5C to Environmental Permit application form Part B2 and seeks to provide a concise summary of the application in non-technical language.

The Environment Agency (EA) require a non-technical summary to be submitted in support of the permit application to include the following:

- An explanation of exactly what is being applied for;
- A summary of the regulated facility, and;
- A summary of the key technical standards and control measures arising from the risk assessment.

This Non-Technical Summary should be read in conjunction with the rest of this application which contains:

- Application Forms A, B2, B4, F1, and;
- Supporting Information

## 1.2 Deposit for Recovery Permit

As part of the planning process, on behalf of National Highways, Atkins submitted a pre-application consultation with EA (Pre-application Reference: EPR/KB3001MB/A001). As part of the pre-application discussions, a Waste Recovery Plan (WRP)<sup>1</sup>, was submitted to the Environment Agency's National Permitting Service (NPS) on 30 April 2021.

Correspondence dated 12 May 2021 confirms that the EA has assessed the proposed re-use of controlled wastes to meet the definition of a waste recovery operation. Based on the above, a relevant Permit will be required prior to operation.

## 1.3 Waste Acceptance and Permitted Activities

The permitted activities as listed in Annex II of the Waste Framework Directive (2018) are to cover the excavation of controlled waste arisings from Brook Street landfill, storage and backfill / reinstatement are set out below.

<sup>1</sup> Atkins, M25 Junction 28 Improvements, Waste Recovery Plan, Highways England, 30 April 2021

Where treatment of the excavated materials is carried out, this will be in accordance with a separate environmental permit for the mobile plant operator to carry out this activity. This treatment activity does not form part of the intended activities associated with this DfR activity.

- R13 Storage of wastes pending any of the operations numbered R3 and R5 (excluding temporary storage, pending collection, on site where the waste is produced).
- R3 Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).
- R5 Recycling or reclamation of other inorganic materials.

Note: R3 and R5 are both included to recognise that the controlled and uncontrolled wastes present comprise a range of inorganic and organic matter.

## 1.4 Site Access & Operating Hours

Details of the site access arrangements shall be provided followed completion of detailed design. Information held on site will include a drawing showing:

- Means of access to the site
- Location of site entrances
- Location of parking for all vehicles associated with the operational activities

The operation of the facility will be during the hours listed below and in line with planning permission

Monday to Friday 07:00 to 19:00 (06:00 to 07:00 non-noisy activities)

Saturday 07:00 to 17:00 (06:00 to 07:00 non-noisy activities). Any proposal to conduct site operations outside the hours listed above will be subject to prior notice to the Environment Agency and Local Planning Authority.

## 1.5 Staffing and General Maintenance

Staff will have clearly defined roles and responsibilities. Appropriate training will be undertaken and appropriate written instructions will be given, where necessary. Copies of any such written instructions will be retained and used to investigate any incidents. Any Contractors present on Site will be provided with necessary information and training before commencing work.

All Site-based machinery and equipment will be serviced and maintained in accordance with the manufacturers' recommended maintenance schedules.

The Site will be fully fenced with lockable gates and gates will be kept locked at all times when the Site is not operating. The Site will be fully manned during the operating hours given above.

All waste will be excavated in accordance with standard practice for earthworks operations from within the area subject to Permit and will be placed in accordance with the earthworks design in accordance with relevant standards and codes. Wastes will not be imported onto the site and no soil materials are expected to be exported from site. Mud is therefore unlikely to present an issue although wash facilities will be provided to clean site equipment and vehicles, if required. A roadsweeper will be available to deal with any mud or dust building up on hard surfaces / highway.

Due to the nature of the materials that will be excavated and deposited at the Site there will not be a significant odour, litter, pest, vermin or fire risk.

Fuels, oils, and similar chemicals will only be stored for the purpose of refuelling / servicing on-Site equipment and vehicles and will be provided with a second containment system in the event of failure of the main containment.

Appropriate firefighting equipment will be available at the Site.

A noticeboard will be displayed near the Site entrance and will include: the company name, emergency contact details, the Site Permit number and the EA's contact details.

Any complaints received, and subsequent action undertaken will be recorded in accordance with the Environmental Management System for the Site.

## 1.6 Operator Competence

GRAHAM Group will be the operator of the permitted activity and are a leading privately owned company with an impressive history of successfully completed civil engineering building and construction projects.

Relevant persons of Dunton Environmental have not been convicted of any relevant offences or subject to insolvency or bankruptcy.

The Site will be operated by a technically competent person for the waste management operations under an Industry Standard Operator Competence Scheme, under the Waste Management Industry Training and Advisory Board (WAMITAB). The Site will be operated under GRAHAM's Environmental Management System (EMS), which is accredited to ISO 14001.

## 1.7 Environmental Risk Assessment

In addition to the EMS, a series of documents have been developed in support of the deposit for recovery permit application. These include a Waste Recovery Plan, Waste Acceptance Procedures, Environmental Risk Assessment, Site Condition Report, and Environmental Site & Setting Design report. A series of site investigation reports establish an understanding of the local surface and groundwater regimes. A hydrogeological risk assessment (HRA) is in preparation for the Site with the objective of refining the technical ground model taking into account the final design of the scheme. When available it will set out more detailed information relating to the Site's surface and sub-surface setting and Conceptual Site Model (CSM) with regard to the proposed DfR activity.

Available information confirms risks to "controlled" (groundwater and surface water) waters have been assessed and concludes that the proposed waste operation will not create an unacceptable risk to groundwater or surface water (Weald Brook).

The risk from substances not subject to emission limits (odour, noise, vibration, ground gas, dust, mud, litter and pests) have been assessed in the Environmental Risk Assessment which concludes the risk from these substances to be low.

## 1.8 Environmental Monitoring

Details of environmental monitoring are set out in relevant sections of the supporting documentation and will include groundwater and surface water monitoring. Odour, dust, and gas emissions are deemed to be controlled by planning and the Operator's environmental management system and procedures and hence no additional monitoring is proposed.