

Worms Heath Restoration Limpsfield Road

NON-TECHNICAL SUMMARY

1. Introduction

This application is for the importation of waste to restore the former landfill at Worms Heath, Limpsfield Road, Warlingham, Surrey CR6 9QL.

A 'recovery' decision was received from the Environment Agency on 13th January 2023. A copy of their confirmation email is appended to this summary.

The proposed operation will closely resemble those permitted under SR2015No.39 "Use of waste in a deposit for recovery operation", however, the proposed importation will exceed 60,000m³ and this application is therefore for a bespoke permit.

2. The site

The site is located to the north of Limpsfield Road and is known as Worms Heath. It is part of a wider agricultural holding, however, the planning history for the site shows it has been used for gravel extraction since the 19th Century, before being infilled with inert waste during the 1970's. The land has since been returned to agriculture, but the poor quality of the land makes the site difficult to use and, in contrast to the surrounding agricultural land, it is now rough grassland inhabited by brambles, nettles and other weeds.

The site is approximately 9.5ha and includes 3.0ha of woodland, mainly along the southern boundary, but also along the other boundaries. The remainder of the site is an open field that gently slopes down towards the north-west. There is a public bridleway that runs east to west across the site.

There are no significant environmental or landscape designations nearby; some of the nearby woodland is classified as 'Ancient', but the woodland within the site is not. The nearest Ancient woodland is located adjacent to the northeast boundary of the site and will therefore be less than 50m from the permitted activities.

The proposed works will cap the existing unsuitable soils (and former landfill) to create an improved soil profile for productive agricultural use, in the future. The area of the proposed works is approximately 7.5ha and it is estimated that approximately 100,000m³ of material is required.

A Site Plan (Ref. WH/003) is provided with this application and shows the location of the site. The extent of the site is shown by the green site boundary line.

3. Waste Acceptance

The proposed works will be constructed from imported waste materials. The majority of these materials will be recovered excavation arisings from other construction sites including clays, subsoils, sands and stones. A description of how these waste materials will be utilised to construct the works, including a full list of the waste materials to be imported, is contained in the approved *Waste Recovery Plan (Ref. WH/001)*.

The waste materials will be delivered by a vetted group of hauliers from various source sites. Each source site will be reviewed and, where available, chemical test data will be checked prior to acceptance at the site. All waste materials delivered to the site will be accompanied by a Controlled Waste Transfer Note and materials will be visually checked upon arrival. Full details of the waste acceptance procedure are given in the *Environmental Management System (Ref. WH/007)*.

4. Management/Competence

This Bespoke Permit will be managed by a competent manager who holds the appropriate WAMITAB Competence Qualification, refer to Technical Ability (Ref. WH/005).

5. Risk Management

The construction of the proposed restoration works will be carried out using typical construction machinery. Fugitive emissions such as noise, vibration, odour, dust, Silt-laden runoff and mud (carried off site on vehicle wheels) may be generated. The potential risks that these present have been assessed in the Risk Assessment (Ref. WH/008) which accompanies this permit application. Mitigation measures to control and manage these fugitive emissions are identified in the *Environmental Management System (Ref. WH/007)*.

Potential risks from the former landfill material have also been assessed and are included in the Risk Assessment (Ref. WH/008). The nature of the former landfill material has been described, along with the environmental setting, in the ESSD Report that accompanies this permit application (Ref. WH/010).

6. Technical Guidance Notes

The importation and utilisation of the waste materials will be carried out in accordance with the relevant Technical Guidance Note (TGN). The following have been identified as relevant:

Online Guidance – Risk assessments for your environmental permit

Online Guidance – Waste recovery plans and permits

7. Supporting Documents

The following supporting documents are submitted with this Bespoke Permit Application:

Document Ref.	Title
WH/001	Waste Recovery Plan
WH/003	Site Plan
WH/004	Site Condition Report
WH/005	Technical Ability
WH/006	Non-technical Summary
WH/007	Environmental Management System
WH/008	Risk Assessment
WH/009	Table 1b
WH/010	Environmental Setting and Site Design (ESSD) Report

Appendix A

RvD Advice Email

Worms Heath Waste Recovery Plan - Recovery Decision

Tanner, Matt <Matthew.Tanner@environment-agency.gov.uk>

Fri 13/01/2023 13:07

To: TJS Projects <tjs_projects@outlook.com>

Cc: holeshot2011@hotmail.co.uk <holeshot2011@hotmail.co.uk>; paul@amv-uk.com <paul@amv-uk.com>

Dear Neil,

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

Pre-application reference: LB3608HQ/A001

Prospective applicant name: TJS Services Limited

Site name and address: Worms Heath, Limpsfield Road, Warlingham, Surrey, CR6 9QL

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	Date
Waste Recovery Plan	WH/001, Version B	January 2023

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>).

If you have any questions or feedback regarding our advice above please phone me or email Matthew.Tanner@environment-agency.gov.uk

Yours sincerely

Matt Tanner BSc (Hons) MSc

Senior Permitting Officer (Waste Deposit Team)

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Pronouns: he/him ([why is this here?](#))

Typical hours : Monday – Friday, 7am – 3pm



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