Permit Variation Application Report

Folly Farm Waste Management Facility

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[1] Introduction

[1.1] Report Objectives

Shotley Holdings Limited (SHL, the Operator) have instructed Ayesa to prepare a variation application to Environmental Permit referenced EPR/SP3239BB for Folly Farm Waste Management Facility (the Site). The Operator is proposing to add a soils washing plant to the existing transfer station.

This document supports the permit variation application for the Site. It has been compiled to provide details and documentation to address the questions raised in the environmental permit application forms part A, C2, C3, C4 and F1, attached as Appendix A.

[1.2] Non-Technical Summary

[1.2.1] Site Location

The Site is situated at National Grid Reference (NGR) TM 12257 36341 roughly 730m to the south-east of Bentley village. The site is positioned in a predominately rural area comprising agricultural land and small settlements to the east of the Shotley peninsular.

[1.2.2] Planning History

The Site has a long history associated with mineral extraction and associated activities. Presently, the Site has a number of different operations which either can take place or are taking place in accordance with extant planning permission(s) including the extraction, processing, storage and sale of sand and gravel (predominately sand), landfilling of inert and hazardous wastes (asbestos), waste recycling activities, sale and onward distribution of recycled aggregates, and associated ancillary operations. These activities have been undertaken by the Operator over a substantial number of years.

In 2015, planning permission reference B/15/01403 enabled the construction and use of a soils washing plant for the recycling of inert waste.

On 18 July 2017, planning permission reference SCC\0091\17B, SCC\0092\17B, SCC\0093\17B was granted which enabled the variation of Condition 17 attached to the consolidated planning permission reference B/15/01395, B/15/01396, and B/15/01403 to allow vehicles to depart the site between 06:00 and 07:30 hours Monday to Saturday. This planning consent was subsequently subject to a non-material amendment reference SCC\0160\17BNMA which amended the description of the development.

On 11 April 2017, planning permission reference SCC/0024/17B enabled the construction of a fire protection lagoon and to allow the restoration of part of an existing bund. On the 28 February 2018, planning permission reference SCC/0209/17B was granted to allow for the erection of a multipurpose building.

Planning permission referenced SCC/0125/22B, removed Condition 19 attached to planning permission reference SCC\0091\17B, SCC\0092\17B and SCC\0093\17B. This permission allowed

the removal of a restriction previously imposed on the use of mobile plant within certain areas of the Site.

The latest planning permission issued on 15 June 2023 referenced SCC/0127/22B enables the erection and use of a general storage building, spray shop building, together with some additional impermeable surfacing. It also seeks to regularise the following at the Site, the use of a secondary weighbridge, use of a welfare unit, four lighting columns and the use of a haul road.

In 2023, three planning applications were submitted and are pending a decision.

- Application SCC/0024/23B to allow for an eastern extension to Folly Farm Quarry for the extraction, processing, sale and distribution of sand and gravel and subsequent restoration using inert materials on land adjacent to Folly Farm Quarry.
- Application SCC\0209\17B\VOC and SCC/0125/22B/VOC propose variation to Conditions 2, 3 and 33 to allow for the continuance of permitted developments in line with proposals for an eastern extension to Folly Farm Quarry. This will allow continuations of operations until 31 October 2045 and the completion of restoration by 31 March 2046, and allow the continued use of the permitted development until 31 March 2046. These planning applications are outside the scope of this permit application and have only been included for reference purposes.

[1.2.3] Permitting History

Quarry operations commenced in 1989 with quarried areas restored progressively by landfilling. Landfilling at the site has been developed within two main phases which include:

- Landfilling of Category A & B (i.e. inert and low activity) wastes under WML70687 (EPR/DB3103GA) (hereafter described as the “Closed Landfill”) operated as a sand and gravel quarry and then was landfilled between 1991 and 2003, which included discharge consent PRENF/10083 (now revoked);
- Landfilling of non-hazardous and stable non-reactive hazardous (SNRHW) waste under Permit EPR/SP3239BB (the operational “P42 landfill site”) within the void space remaining after sand and gravel quarrying.

Waste recycling and recovery operations were introduced at the Site in September 1998 and initially consisted of sorting, screening and crushing inert wastes into re-usable aggregate and clean soils under the Waste Management Licence EAWML71129 (EPR/WP3498NB).

The Site permits have been varied numerous times to allow additional waste streams to be accepted and additional treatment activities to be undertaken including open windrow composting and bioremediation. It is understood neither open windrow composting or bioremediation activities have commenced. Waste recovery operations are being undertaken above the footprint of the Closed Landfill.

The three separate permits were consolidated in November 2015 into one installation permit EPR/SP3239BB/V009. The latest permit variation was issued in November 2019 (as V011) and updated the operating techniques, removed carbon dioxide limits and amended methane limits.

[1.2.4] Proposed Permit Variation Application

This permit variation application proposes to extend the waste recycling and recovery operations across the P42 landfill site, Cells 4A and 5a. These cells have been filled using stable non-reactive hazardous wastes (asbestos) to the height of the adjacent waste transfer station in readiness for placing a sealed surface extension area.

The extension area will be approximately an 80m x 80m reinforced concrete pad with sealed drainage which will host a soil washing plant. The waste treatment and waste transfer station boundaries are shown on the Operational Areas Plan (K6157/ENV/001).

Soil Washing

Soil washing is classified by the Environment Agency as a physio-chemical treatment technique. The soil washing process is an additional processing step to the existing soil and aggregate management processes, whereby imported construction and demolition waste are screened to remove hardcore, gravel and sand. The proposed soil washing plant will be used to recover high quality sand and aggregate from incoming soils. The process will comprise of the separation and washing of excavation and demolition waste materials to produce various grades of recycled aggregates and sand.

There is no intention to increase the throughput at the site as part of this permit application.

This application is not intended to wash hazardous soils.

Both inert and non-hazardous construction and demolition waste soils will be processed through the soil washing plant.

General Process

Suitable imported material will be stored in the transfer station on an impermeable surface to avoid potentially contaminated run off. The material will be either directed directly to the soil wash plant or will be treated in the existing transfer station (*i.e*. trommel, picking stations, screener) before being directed to the soil wash plant.

Recoverable fractions (e.g. cobbles, gravel, and sand) will be washed clean of silts and clays. The silts and clays will pass in suspension through a filter press, which will allow the wash water to be returned to the process. Water from the soil washing process and pad area will be contained onsite and recirculated into the soil washing process.

Any recovered material will be stored on site in bays situated on impermeable surface, with the intention of these materials being sold as a product. The WRAP (Waste Resources and Action Programme) Quality Protocol[1] sets out end of waste criteria for the production and use of aggregates from inert waste. The Operator intends to use either the end of waste criteria set out within the aggregates protocol (for inert waste only) or a separate end of waste criteria (for non-hazardous wastes) to demonstrate that the recovered material is no longer a waste.

[1] Quality protocol: aggregates from inert waste - GOV.UK (www.gov.uk)

Surface water run-off from the impermeable surface used to house the soil washing plant and stockpiles will either be

- harvested and re-used within the soils washing plant process; or
- tankered off site for treatment at an appropriate facility.

Any excess water *e.g.* during heavy rainfall events will be captured by the sump which will be suitably sized to manage a 95th percentile rainfall event (54m^3) or within the impermeable surface prior to management via one of the above routes.

Tonnages

The soil wash plant proposes to process a maximum of 60,000 tonnes per annum of construction / demolition wastes.

Changes to Permit required

As noted, above no additional waste types are required. Table S1.1 of the Environmental Pemit will require updating to include the proposed soil washing activity. It is also proposed to add a new permitted waste types and quantities table for the soil washing activity into Schedule 2.

The proposed waste types are:

- 10 10 08 casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
- 15 01 07 glass packaging
- 17 01 01 concrete, excluding slurry
- 17 01 02 bricks
- 17 01 03 tiles and ceramics
- 17 01 07 mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
- 17 02 02 glass
- 17 03 02 bituminous mixtures other than those mentioned in 17 03 01
- 17 05 04 soils and stones other than those mentioned in 17 05 03
- 17 05 08 track ballast other than those mentioned in 17 05 07
- 19 12 05 glass
- 19 12 09 minerals (for example sand, stones)
- 19 12 12 other wastes from mechanical treatment of wastes other than those mentioned in 19 12 11, specifically construction and demolition waste already treated at the existing transfer station via a trommel / screener / crusher / picking station
- 20 01 02 glass
- 20 02 02 soils and stones

Besides EWC code 10 10 08 and 19 12 12, all of the above waste types are listed as inert within Appendix C of the WRAP Quality Protocol (*Wastes considered to be inert waste for the purpose of this Quality Protocol and to be acceptable for the production of recycled aggregates)*.

Company Address Update
This permit variation application also proposes to update the company address from Tattingstone, Ipswich, Suffolk, IP9 2NY to Collins Station Road, Bentley, Ipswich, IP9 2DB.

[2] Application Form Part C2

[2.1] Question 1a – Discussion before your application

Basic preapplication advice and a 'Conservation & Heritage Screen' (referenced: EPR/SP3239BB/V012) were provided by the Agency. The response is provided as Appendix E.

[2.2] Question 2b – Changes or additions to existing activities

The proposed changes to the permit are listed within Section 1.2.4 of the non-technical summary above.

[2.3] Question 3 – Your ability as an operator

[2.3.1] Relevant Offences & Finances

SHL or any of the relevant persons or Directors associated with that company have no bankruptcy or insolvency proceedings again them. They have no relevant environmental offence convictions.

[2.3.2] Technical Ability

The Technical Competent Managers for the Site are:

- Timothy Richmond, billy@collins-skiphire.co.uk, 01473 327596
- James Shelley, james@collins-skiphire.co.uk, 01473 327596

Copies of their WAMITAB certificates and continuing competence certificates are attached as Appendix B.

Both Technical Competent Managers also provide cover for the following other sites:

- EPR/MP3699NY, Martells Pit, Slough Lane, Ardleigh, Essex, CO7 7RU
- EPR/RP3495NN, Units 12c & 13d, Masterlord Industrial Estate, Leiston, Suffolk, IP16 4J
- EPR/QP3125SU, Lakenheath WTS, Undley Road, Lakenheath, Brandon, Suffolk, IP27 9BY

[2.3.3] Financial Provision

There are no changes to the Financial Provision for the landfill.

[2.3.4] Management System

The Site is operated in accordance with the site permit and the Operator's own Management System. The Site's Management System has been developed in accordance with Agency guidance[2] and covers the following items:

- Site infrastructure;
- Site operations;
- Site and equipment maintenance plan;
- Contingency plans;
- Accident prevention and management plan;
- Complaints procedures;
- Staff training;
- Record keeping; and
- Closure.

The updated EMS for the transfer station is provided in Appendix C. The Fire Prevention Plan for the site forms part of the EMS and is also included in Appendix C.

The Closed Landfill is managed in accordance with the Closure Plan (10004-R32, dated June 2018).

[2.4] Question 5 – Supporting information

The following drawings are provided in support of the variation application:

- Site Location Plan (K6157.1004)
- Permit Boundary Plan (K6157.1002)
- Operational Areas Plan (K6157.1001)
- Receptor Location Plan (K6157.1003)
- Lower Tier Drainage (K6157.1005)
- Site Layout (E2186-PD-003-02)
- Plant Layout (E2186-PD-003-01)

Section 1.2 of this report contains the non-technical summary.

[2] Develop a management system: environmental permits - GOV.UK (www.gov.uk)

The updated EMS for the transfer station is provided in Appendix C. The Fire Prevention Plan (FPP) for the site forms part of the EMS and is also included in Appendix C. However, the proposed activity is to treat soils and therefore an amendment to the FPP is not considered necessary.

[2.5] Question 6 – Environmental Risk Assessment

An Environmental Risk Assessment (ERA) (14-K6157-ENV-R003) has been submitted with this permit variation application.

A noise risk assessment was produced in support of the Planning Permission application and is provided in Appendix F. Noise will continue to be managed in accordance with the criteria agreed with the Planning Authority.

[3] Application Form Part C3 / C4

[3.1] Question 1a – What activities are you applying to vary?

[3.1.1] Table 1a – Types of Activities

No changes are proposed to the Recovery and Disposal codes, annual tonnages or throughput rates for the WTS.

This permit variation application proposes to add a soil wash plant activity to the existing permit. Materials from the existing transfer station will be treated via the soil wash plant to produce a saleable aggregate. The following Recovery and Disposal codes provided for in Annex I and Annex II of Directive 2008/98/EC are to be carried out at the soil washing plant:

- R3 – Recycling/reclamation of organic substances;
- R5 – Recycling/reclamation of other inorganic compounds; and,
- R13 – Storage of waste pending any of the operations numbered R1 to R12.

[3.1.2] Table 1b – Types of waste accepted

The total throughput for the soil wash plant will be 60,000 tonnes per annum. The quantity of waste will be within the aggregated permitted maximum quantity of waste accepted currently at the WTS.

It is proposed to add a new permitted waste types and quantities table for the soil washing activity into Schedule 2. The proposed waste types are set out within Section 1.2.4 above.

[3.2] Question 2 – Point source emissions to air, water and land

There are no changes to point source emissions to air, or land. The majority of additional water generated from the inclusion of the soil washing activity, will as far as practicable be returned to the

process, although there may be a small quantity of excess water which will require management via existing routes.

Management will continue in accordance with the existing permit.

[3.3] Question 3a – Technical Standards

A Technical Standards report has been submitted for the proposed activities. No other changes are proposed to the remaining technical standards already listed in the permit as set out within the EMS.

[3.4] Question 3b – General Requirements

An ERA (14-K6157-ENV-R003) has been submitted with this permit variation application report.

[3.5] Question 4 – Monitoring

Monitoring will continue to be carried out in accordance with the permit, although process monitoring of the soil wash water will be initiated for management purposes. Monitoring will be introduced to any sumps constructed to manage the soil treatment area run-off.

[3.6] Question 5 – Environmental Impact Assessment

The proposed variation is not subject to an Environmental Impact Assessment.

[3.7] Question 6 – Resource Efficiency and Climate Change

The wider Site is a landfill, and this permit variation is not seeking to make any amendments to the landfill operation in relation to the management of landfill gas. The site as such does not produce sufficient gas to require management, and neither is it expected to do so in future. There are no changes to the resource efficiency and no further detail has been provided in this application.

[4] Application Form Part F1

The permit application fee for the soil wash plant, physical treatment of non-hazardous waste (1.16.12), is anticipated to be £7,930.00. In addition to this, a fee of £779 has been submitted for a habitats assessment.

Therefore, the overall permit variation application fee of £8,709 has been paid via BACs transfer.

Appendix A – Application Forms

Appendix B – TCM Certificates

Appendix C – Environmental Management System including Fire Prevention Plan

Appendix D – Drawings

Appendix E – Pre-application Advice Response and Habitats Screening

Appendix F – Noise Risk Assessment

Appendix G – Environmental Risk Assessment

Appendix H – Technical Standards Report