Clark Contracting Limited Aston Le Walls Equestrian Centre Operational Plan

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1.0 INTRODUCTION

Overview

- 1.1 This Operational Plan (OP) describes how the operation of the site will occur in accordance with Environment Agency (EA) standards and outlines how the activities will meet with risk assessment guidance from the Environment Agency website¹ and relevant sector guidance. The Operator is Clark Contracting Limited (CCL).
- 1.2 The site operates under a bespoke deposit for recovery permit (EPR/LB3508LB). The location plan is presented in drawing 193224/D/001. The site receptors are presented in drawing 193224/D/002.
- 1.3 The import and placement will occur over an 18-24 month period and will involve the importation of circa 207,000 m³ of suitable waste material to be used as engineering fill to construct the noise and visual attenuation bund and the revised site formation. The proposed contours and attenuation regime are presented in drawing 296WFAW.
- This Operational Plan outlines the waste activities and the necessary controls required. This plan should be read in conjunction with the Environmental Site Setting and Design (193224/ESSD), the H1 Environmental Risk Assessment (193224/H1ERA), Waste Recovery Plan (193224/WRP) and Importation Protocol (193224/IP).

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¹ Environment Agency website, Control and monitor emissions for your environmental permit page, (accessed February 2023): https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit

2.0 MANAGEMENT

Management

- 2.1 The site will be operated in accordance with the Operator's site-specific Environmental Management System (EMS).
- 2.2 The site will have specific management plans including, but not limited to, the following:
 - Operational Plan (this document);
 - Accident Management Plan;
 - Waste Recovery Plan;
 - Importation Protocol;
 - Dust and Emissions Management Plan;
 - Spill Response Plan;
 - Site and Equipment Maintenance Plan; and
 - Complaints procedure.
- 2.3 These plans and other site procedures set out the following:
 - Control of operations on the environment;
 - Register of Environmental Effects;
 - Monitoring of emissions;
 - Management of Staff Competence & Training (Roles and Responsibilities);
 - Training of all staff on EMS;
 - Record Keeping:
 - Inspections (Daily Record and includes TCP presence);
 - Policies;
 - Review process of the EMS; and
 - Site Closure arrangements.
- 2.4 The site will clearly establish and monitor performance for key objectives, this includes but is not limited to:
 - Proportion of imported materials from wastes by each stream;
 - Incidents and complaints by category; and
 - Non-conformances.

Staffing

- 2.5 All staff and operatives have clearly defined roles and responsibilities with specified skills for each post required. At all times there will be sufficient staff to manage and operate activities on the site without causing a risk to the environment. Staff employed at the site on a typical shift may include:
 - Materials Engineer and Technically Competent Person (TCP) or delegate;
 - Plant operative; and
 - Site Manager.
- 2.6 In accordance with Environment Agency guidance⁽¹⁾ the site will be supervised by the TCP, in addition to at least one member of staff who is fully conversant with the requirements of the Permit and Operational Plan regarding, in particular, the following:
 - Waste acceptance and control procedures;
 - Operational controls and environmental monitoring;
 - Maintenance;
 - Record-keeping;
 - Accident/incident action plans; and
 - Notifications to the EA.
- 2.7 The TCP will be on site for greater than 20 % of the operation of the facility. The TCP attendance should be recorded in the Site Diary and include dates and times (duration) of attendance.

- 2.8 Technical staff will demonstrate continuing competence by passing periodic assessment. Personal training records will be kept, to provide evidence.
- 2.9 All contractors will be trained about the relevant working controls and legal responsibilities relating to their areas of works.
- 2.10 The Site Manager will only authorise for works to be undertaken once relevant legal requirements and a site-specific risk assessment has been completed.

Hours of Operation

2.11 The site will operate within the operating hours specified in the Planning Permission that are presented in Table 1.

Table 1. Operating Hours

Days	Hours
Monday to Friday	0730-1700
Saturday	0730-1230
Sunday and Bank and Public Holidays	No vehicle movements or operation

3.0 WASTE MANAGMENT OPERATIONS

Overview

- 3.1 This section of the Operational Plan outlines the waste management processes for the attenuation bund and revised site formation. Schedule 1 details the processes operating at the site. Schedule 2 presents the permitted waste types.
- 3.2 Only waste from pre-selected contracts will be permitted at the site. There will be no-adhoc acceptance of material at the gate. No hazardous waste is to be accepted. The permitted waste operations and permitted waste types are detailed in Schedule 1 and 2.
- 3.3 Prior to acceptance the waste will be reviewed to determine its characteristics and assess treatability. The following will be assessed:
 - the nature of the process that produced the waste, including variability of the process;
 - the composition of the waste; and
 - each new enquiry will complete a Waste Information Form (WIF) or equivalent information collection proforma, setting out its EWC Code and characteristics, including potential for odour, state (form), quantity and any non-hazardous categorisation.

Waste Acceptance

- 3.4 The Importation Protocol (193224/IP) will be implemented at the site to ensure that all material conforms to the required standard. The waste acceptance procedures, including permitted wastes and testing, can be found in the Importation Protocol.
- 3.5 Prior to permitting the delivery of the waste, the waste producer will be required to provide the operator with sufficient information for a basic characterisation of the waste. All wastes transported to the site will be weighed by estimated density to its container size or by weighbridge. Only permitted waste that conforms to the type and description in the documentation supplied by the producer and/or holder will be accepted. The waste must conform to the pre-importation data on the WIF sheet.

Storage over shutdown periods and security

3.6 Loaded vehicles are turned away when the area is not operational. In the event that a vehicle cannot be turned away, it will be placed adjacent to the quarantined section.

Housekeeping

- 3.7 As determined necessary through the inspection regime, excessive accumulation of soil, mud and dust on areas of hardstanding and haulage roads will be scrapped by machine or manually cleared.
- 3.8 The site will be inspected daily for evidence of litter, with litter picking undertaken as necessary.

Quarantine

- 3.9 Pre-acceptance procedures are implemented to avoid unacceptable waste being received at the site. Despite these controls, waste streams can contain unexpected waste that is not suitable for deposition.
- 3.10 Upon identification these wastes will typically be rejected and returned with the carrier to the producer. The rejection will be notified to the producer and no further import of the suspect material will be permitted until the matter is fully resolved. Details on the rejected material will be recorded in the Site Diary.
- 3.11 The site will operate a quarantine area. The quarantine area location is shown on the Site Layout Plan (see drawing 193224/D/004). The quarantine area is flexible in size. It can accommodate small isolated non-compliant waste in sealed, lockable containers; or larger stockpiles of material underlain and covered by HDPE geomembrane plastic sheeting to prevent pathways to local receptors.

- 3.12 When plastic sheeting is to be used, the basal sheeting rolls be overlapped to ensure sufficient seal between rolls. Once the cover plastic has been placed, the quarantined material will be left until final classification has been determined. The area will not be disturbed and will be appropriately sign posted to ensure no risk of disturbance or damage to the plastic liner.
- 3.13 An inventory of wastes within the Quarantine Area will be maintained at all times, detailing the date, waste characteristics and the date for removal.
- 3.14 All quarantined wastes will typically be removed within 1 working day of discovery. If not, the EA will be notified.

Waste Recovery

3.15 Operations will involve the transfer, temporary storage and placement of suitable imported inert waste using a bulldozer and excavators. HGV's will be the method of delivery. The wastes will comply with the Importation Protocol.

4.0 SITE INFRASTRUCTURE

Provision of site identification board •

- 4.1 A site notice board will be located at the entrance to the facility. The site identification board is inspected weekly by the manager to ensure it is clearly legible from the site boundary and free from damage or vandalism. The manager will record all inspections in the site diary. The site identification board provides the following information:
 - Site name and address;
 - Permit holder's name;
 - Operator name;
 - Environmental Permit reference number;
 - Emergency contact name and telephone number;
 - Confirmation that the site is permitted by the EA;
 - The Agency's telephone number (03708 506 506); and
 - The days and hours of operation.
- 4.2 The site identification board will be constructed from durable materials and maintained in a clearly legible condition throughout the entire duration of operations at the site.

Vehicle guidance

- 4.3 The site will implement a radio communication system between the operatives, key site staff, and weighbridge operatives to ensure effective on site traffic management and ensure that all waste is deposited in the correct area.
- 4.4 In the event the site is experiencing a high number of deliveries, traffic will be directed to the truck waiting area (within the site's working area) and the site will notify all incoming lorries to hold back until the site traffic has been alleviated to allow safe operations.

Site security, fencing and gates

- The wider equestrian site has secure perimeter fencing, lockable gates and CCTV installed. The site employs remote surveillance during periods out of operational working hours. The access gate will be locked when site is not in operation. The integrity of the perimeter wall, fencing and gates will be inspected on a daily basis by the Manager. Any damage or defects that reduce security at the site will be temporarily repaired as soon as practicably possible and permanently repaired within seven days. Damage to the site fencing and gates will be recorded in the Site Diary, along with any required repairs.
- 4.6 The site staff will be instructed that, in the event of finding evidence of unauthorised access and/or vandalism, the matter must be reported to the Police and the Manager who will then take the appropriate action.
- 4.7 All process machinery and plant will be turned off and system panels locked to ensure no tampering with equipment. All site visitors and site operatives must report to the site office to sign in.

5.0 ENVIRONMENTAL OPERATING CONTROL

Management of dust and particular matter

There will be no point source emissions of air pollutants. Any release will be fugitive. Operations at the site will be undertaken in accordance with the Dust & Emissions Management Plan (193224/DEMP).

Management of Mud

- 5.2 The dispersal of dirt and mud originating at the site onto public roads and the surrounding land will be controlled. The following operational procedures will be implemented to ensure that dirt and mud do not reach the public highways and surrounding land:
 - Where possible, internal site roads will comprise hard surfacing; and
 - A high pressure hose and bowser will be available in the event that roads or vehicles require washing;
 - Plant and machinery will be thoroughly cleaned before leaving the site
 - Mechanical sweeper to be deployed to remediate any mud and debris that has been deposited on to the public highway or metalled access road.
- 5.3 The Manager or nominated deputy will regularly inspect the entrance area for evidence of mud and debris that has been trafficked.

Management of surface water

5.4 Surface water management will be in accordance with the Hydrogeological Risk Assessment.

Management of groundwater and gas

5.5 Groundwater management will be in accordance with the Hydrogeological Risk Assessment. There is no in-waste gas management required as per the H1 Risk Assessment.

Management of noise and vibration

- The site is expected to have a very low residual risk of noise impact on the nearest receptors. This is based on the relatively short-term duration of the infilling (typical of a standard construction site) and the low level of plant in operation. There are restricted hours of operation as presented in Table 1 (Section 2).
- 5.7 Noise levels will be monitored by the Manager or appointed deputy to ensure that operations are not resulting in significant level of noise beyond the site boundary and effective noise reduction measures shall be introduced and noted in the Site diary. Plant machinery will be operated in a proper manner with respect to minimising noise emissions which typically include:
 - Controlled use of reversing bleepers;
 - Turning off idling plant engines;
 - Minimising drop heights; and
 - No unnecessary revving of engines.
- 5.8 All plant and vehicles will meet current guidance and will be maintained in line with manufacturer's requirements.
- 5.9 Vibration is not considered an issue at the site as the plant have no primary vibrating elements.

Management of odour

- 5.10 The assessment of odour can be found in the H1 Environmental Risk Assessment.
- 5.11 Due to the inert properties of the waste accepted, the odour generation potential is considered negligible. Odour management will therefore be limited to the assurance that only specific waste is accepted and deposited at the facility in line with the requirements of the Importation Protocol.
- 5.12 Any complaints regarding odours will be recorded in the Site Diary and be further investigated on site.

Management of fire

5.13 Management controls can be found in the Accident Prevention and Management plan, and in the H1 Environmental Risk Assessment.

Management for control and remediation of leaks and spillages

5.14 This can be found in the Accident Prevention and Management Plan, and the H1 Environmental Risk Assessment.

Management of litter and debris

5.15 The waste types received at the site will have no litter. All loads will be inspected upon delivery and/or discharge at the site to ensure contaminated wastes are not accepted. The site will be inspected daily and any litter identified will be bagged and removed from the site.

Management of pests

5.16 The waste recovery activity is considered to have a low risk of attracting pests. The site inspection regime will identify the presence of any pest and implement necessary controls to remove pests from the site.

Management of birds

5.17 Due to the properties of inert, the potential for scavenging and roosting birds is negligible. Bird management will therefore be limited to the assurance that only specific waste is accepted and deposited at the facility, through visual inspection of waste as they are delivery to and discharged at the site.

6.0 WASTE

- 6.1 The operation is designed to recover imported material for deposition as recovery, to enable construction of the noise and visual attenuation bund, and the revised site formation. No significant waste is anticipated to be generated by the activity.
- 6.2 The Operator recognises the Duty of Care requirements of the Permit. The Operator will adhere to Section 34 of the Environmental Protection Act 1990 'Waste Management: The Duty of Care A Code of Practice'.
- 6.3 Details of the waste arriving at the site will be recorded at the office. Relevant Duty of Care information will be recorded into the database. Quarterly waste returns will be completed and submitted to the Environment Agency in accordance with the Permit requirements.

7.0 INFORMATION MANAGEMENT

Records

- 7.1 All records required by the Permit will be held by the Operator. The operator will keep all records relating to the site at the main office.
- 7.2 The site diary/environmental log will be maintained by the site management. All records relating to the site will be kept for a minimum of 2 years. The following significant events will be recorded in the site diary:
 - Maintenance of plant in accordance with manufacturer's recommendations;
 - Breakdowns;
 - Emergencies;
 - Problems with material quality and action taken;
 - Site inspections and consequent actions carried out by the operator. These include those undertaken by specialists;
 - Technically competent management attendance at site;
 - Any monitoring undertaken;
 - Importation volumes and Duty of Care paperwork;
 - Severe weather conditions which adversely affected site activities;
 - Complaints (See complaints form and procedure in Appendix J); and
 - Environmental problems and remedial actions (including spills and leaks).

Inspection Regime

- 7.3 Site inspections will be undertaken of the operations and associated boundary on operational days to check for unforeseen emissions and compliance with the Permit requirements. Inspections and corrective actions (including any required notifications to the EA) will be recorded in the Site Diary. The main points for inspection will include the following:
 - Cleanliness:
 - Site emissions;
 - Leakages/spillages;
 - Monitoring data;
 - Plant condition; and
 - Integrity of wider associated buildings, surfaces, drainage and security provisions (where applicable).
- 7.4 In the event that a problem is identified, the Manager will organise immediate repair or other appropriate remedial action.

Duty of Care

7.5 In accordance with Duty of Care requirements, the Operator will maintain a schedule of all waste transfers from the site. The schedule and Duty of Care paperwork will be made available for inspection, as required. Records will be maintained at the Operator's main office.

Availability of Permit and Management Plan

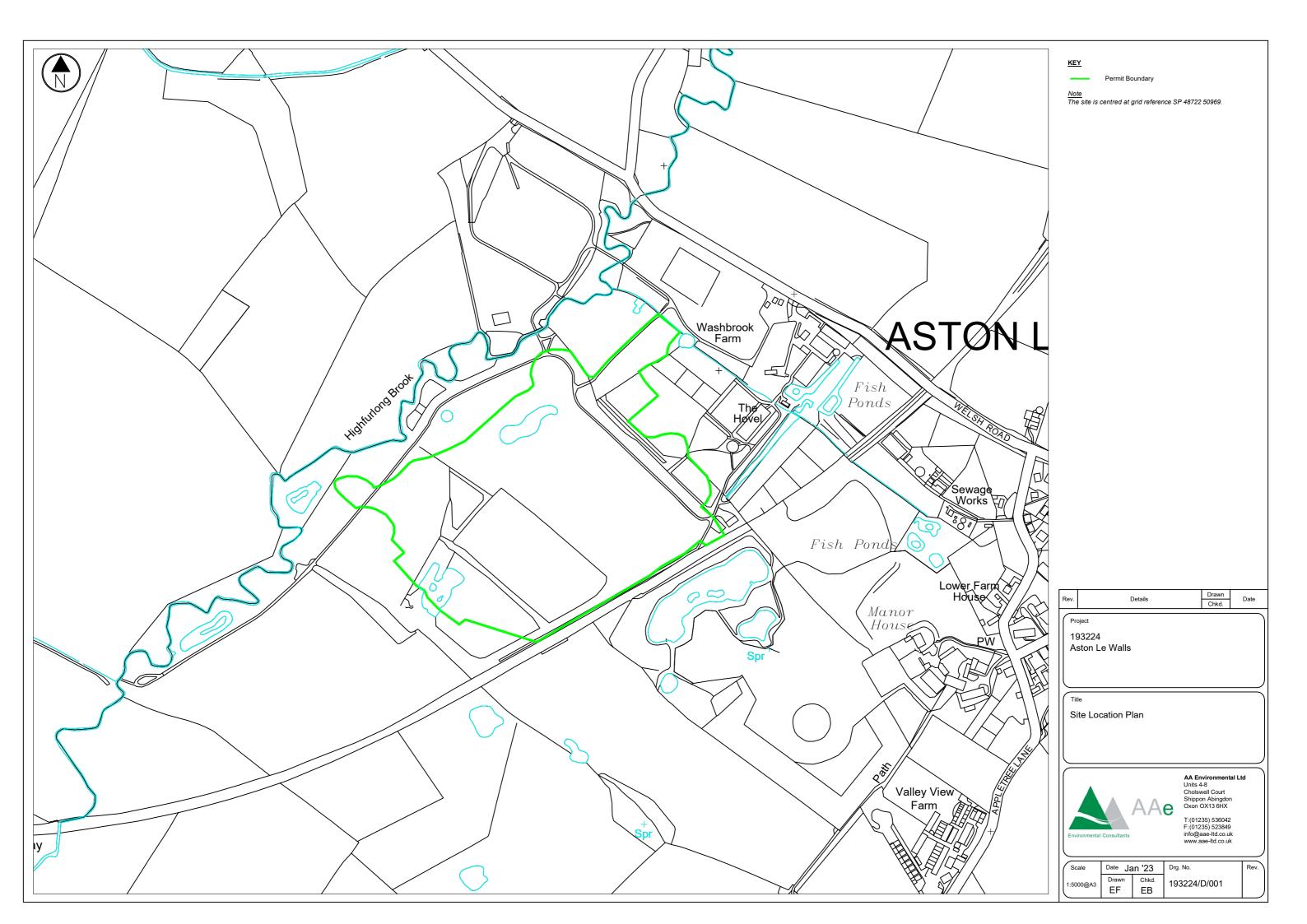
7.6 A copy of the Permit, all management plans and the supporting documents, will be kept available on site. It must be available for reference when required by all site staff carrying out work under the requirements of the Permit.

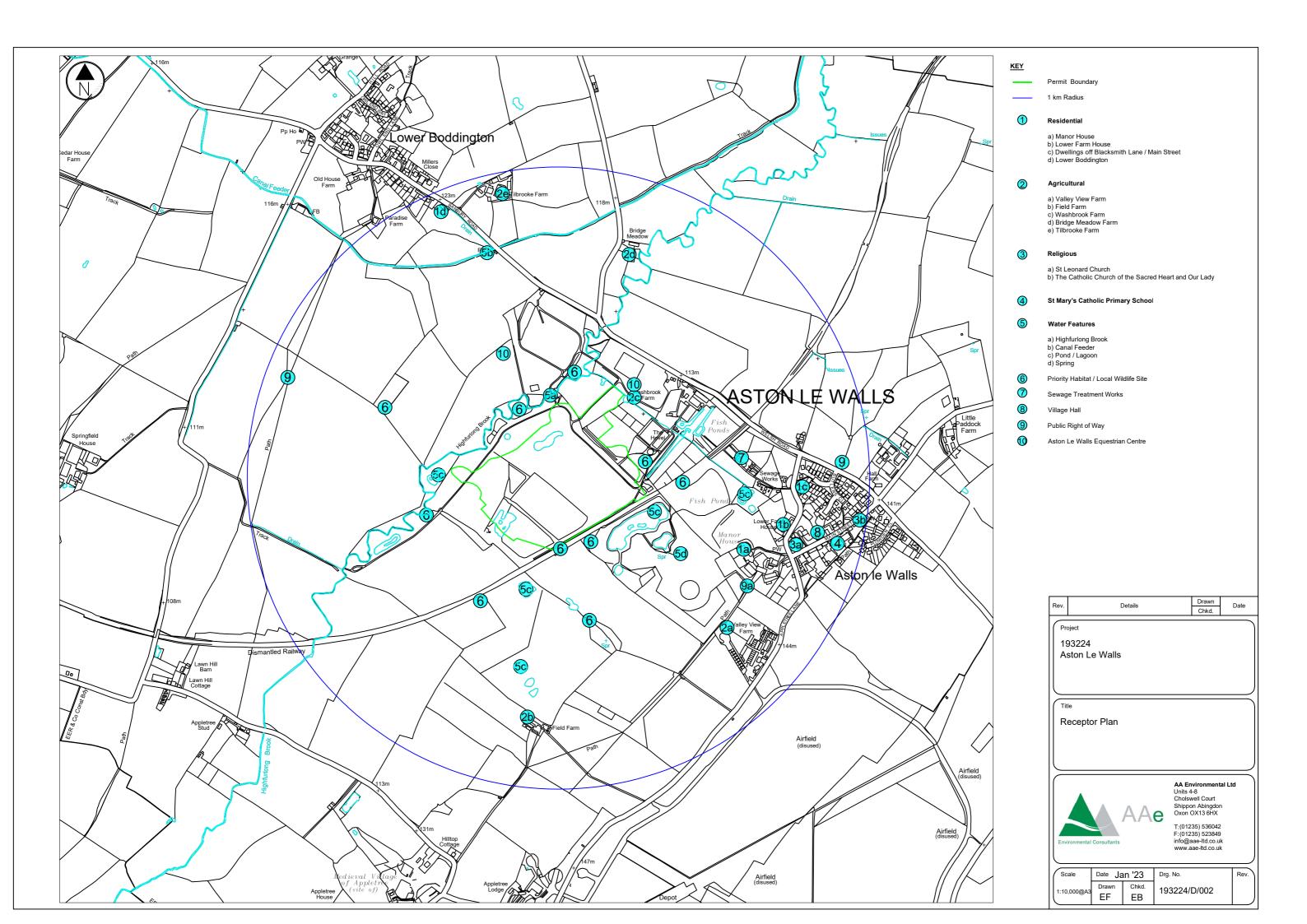
Review of Management Systems

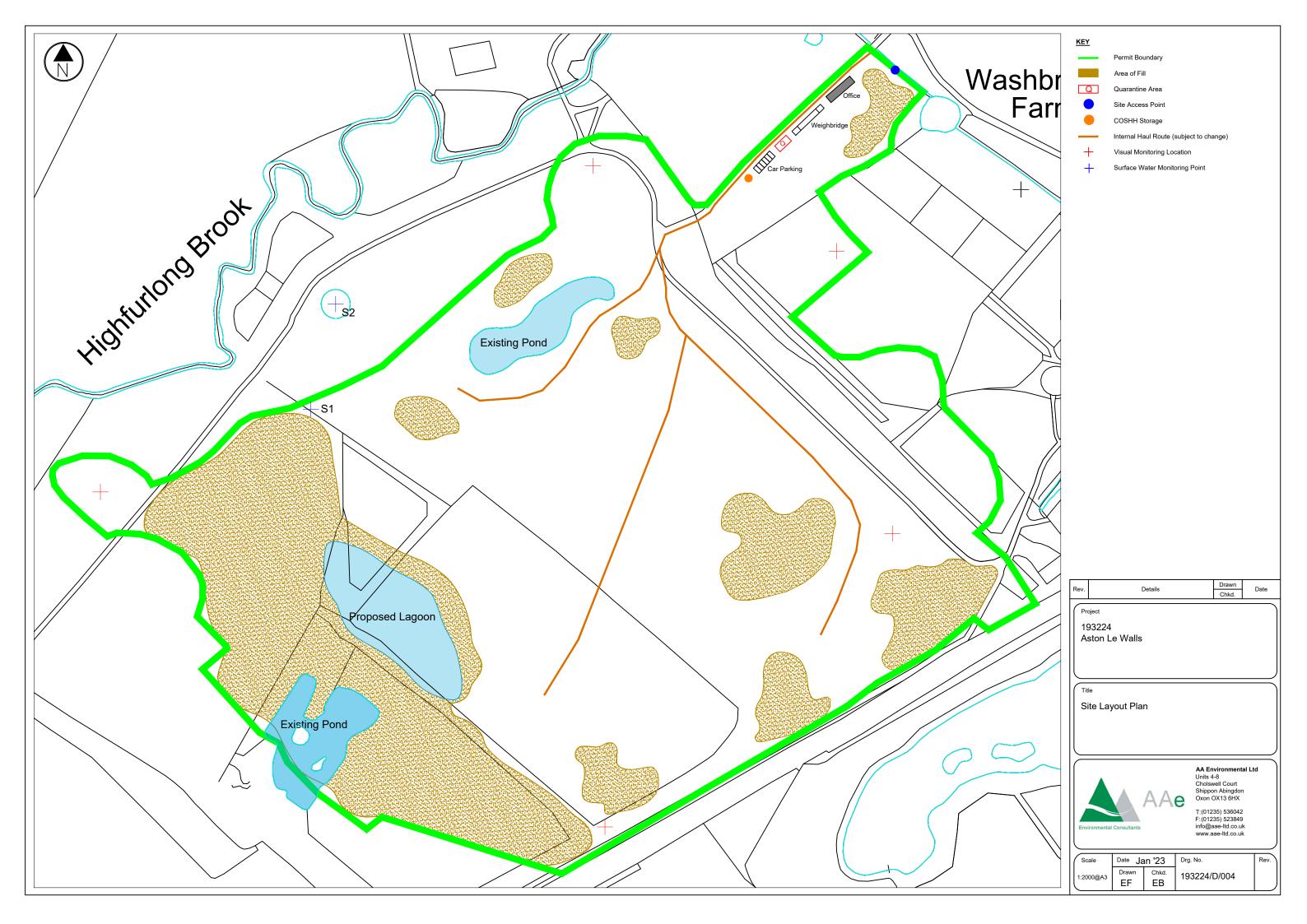
- 7.7 The management systems will be reviewed and updated following any of the following:
 - If any changes to the site, operations or equipment which affect the activities covered by the permit;
 - If the permit is varied;
 - Following any accident, complaint or breach of permit;
 - If a new environmental problem or issue is identified and new control measures are required.
- 7.8 All records of changes to the management system will be recorde

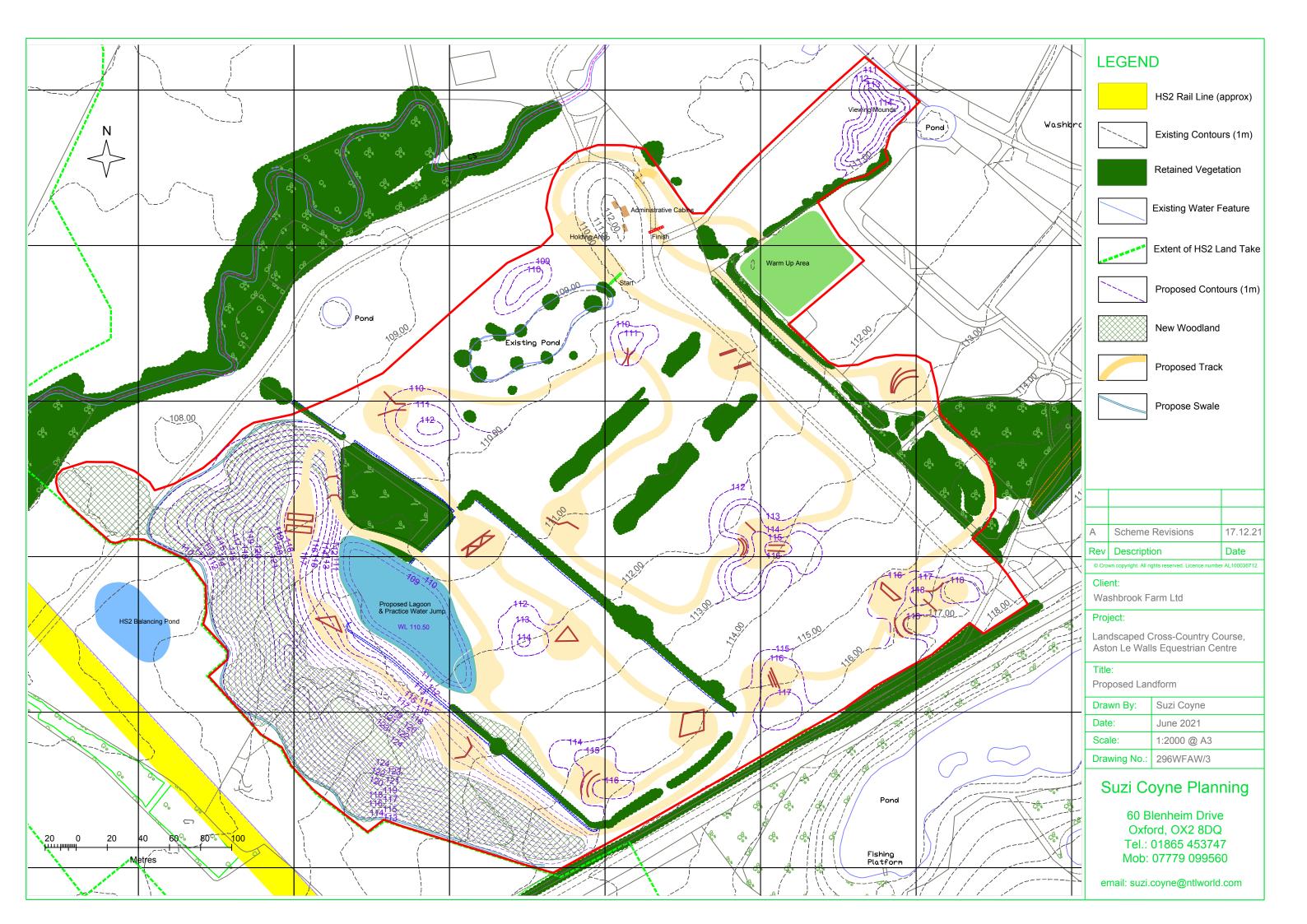
DRAWINGS

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Schedules

Schedule 1 Process Operations			
Activity	Description	Limits of waste	
Recovery of waste by deposit	R5 – reclamation of inorganic waste.	Up to 25,000 cu m of waste may be stored at any time.	
	R13 - Storage pending onward recovery.	Permitted waste types set out in Schedule 2.	

Schedule 2 Permitted Wastes		
Waste code	Description	
01 01 02	Wastes from mineral and non-metalliferous excavation	
01 04 08	Waste gravel and crushed rocks	
01 04 09	Waste sand and clays	
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)	
19 02 06	Silts and clays from soil washing facilities	
19 12 09	Minerals from waste facilities	
17 01 02	Bricks	
17 01 03	Tiles and ceramics	
17 01 07	Mixtures of concrete, bricks, tiles and ceramics	
17 05 04	Soil and stones	
19 12 09	Minerals from waste facilities / minerals (sand and stone)	
19 13 02	Solids from soil remediation (limited o soil washing silts and clays)	
20 02 02	Soil and stones	