



Saxon Pit Southern Buttress Environmental Permit Application

Non-Technical Summary

East Midlands Waste Management Ltd

Saxon Pit, Peterborough Road, Whittlesey, PE7 1PJ

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Basis of Report

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1.0 Introduction

SLR Consulting Ltd (SLR) has been instructed by East Midlands Waste Management Limited (EMWM) to prepare an application for a deposit for recovery Environmental Permit (EP) for the construction of a buttress to stabilise the southern face of Saxon Pit, located at Peterborough Road, Whittlesey, PE7 1PJ (the Site).

Environment Agency (EA) application forms require the submission of a Non-Technical Summary (NTS) which includes an explanation of what is being applied for, a summary of the regulated facility and a summary of the key technical standards and control measures to be implemented. This report comprises the NTS for the application.

In addition to this NTS, the application includes the following sections:

- **Section 2:** Application Forms Part A, Part B2, Part B4 and Part F1;
- **Section 3:** Drawings;
 - Site Location Plan, Drawing No. 001
 - Construction and Cross-sections, Drawing No. 002
 - Environmental Permit Boundary and Site Layout Plan, Drawing No. 002
 - Site Setting Plan, Drawing No. 003
- **Section 4:** Waste Recovery Plan (WRP) and EA Approval Letter;
- **Section 5:** Environmental Setting and Site Design (ESSD);
- **Section 6:** Operating Techniques (OT);
- **Section 7:** Environmental Risk Assessment (ERA);
- **Section 8:** Hydrogeological Risk Assessment (HRA);
- **Section 9:** Stability Risk Assessment (SRA);
- **Section 10:** Dust Management Plan (DMP);
- **Section 11:** Noise Assessment and Noise Monitoring Plan; and
- **Section 12:** Site Condition Report (SCR).

1.1 Site Location and Setting

The Site is located within the inactive Saxon Pit quarry. Saxon Pit is located immediately to the west of the town of Whittlesey in Cambridgeshire at National Grid Reference TL 25759 96862. Saxon Pit comprises an excavation in the Oxford Clay which is between 18 and 27 metres deep and lies between the A605 Peterborough Road to the north and the Peterborough to March railway line to the south.

The eastern boundary of the wider Saxon Pit is adjacent to a housing estate. To the southeast the canalised Kings Dyke flows beneath the Peterborough to March railway line. The original Saxon Brickworks and associated infrastructure which were located in the pit have now been demolished and/or repurposed/de-commissioned and the general site is now operated as a waste management and plant hire facility by EMWM.

The location of the proposed Site within Saxon Pit is shown in Drawing 001 and the environmental site setting is shown in Drawing 003.

A summary of the immediate surrounding land use of the Site is provided in Table 1-1 below.



Table 1-1 Immediate Surrounding Land Uses

Boundary	Description
North	Open land within the wider Saxon Pit site. Commercial and industrial premises including waste operations undertaken by Johnsons Aggregates and Recycling and plant hire facilities among others. The A605/Peterborough Road lies approximately 465m to the north of the proposed EP boundary.
East	Open land including the existing deposit for recovery EP operated by EMWM for the stabilisation the eastern face of Saxon Pit, beyond which lies a large residential area within the town of Whittlesey, the centre of which is located circa 1km from the Site.
South	Peterborough to March railway line runs parallel to the southern boundary of the Site, beyond which lies King’s Dyke. Open / agricultural land is located further to the south.
West	Commercial and industrial land and open land within the wider Saxon Pit site.

1.2 Planning Status

A planning application for the Site was prepared by SB Rice Limited on behalf of EMWM. Planning permission (Ref No. CCC/24/078/FUL) for the *“Importation of controlled inert construction and demolition wastes for the buttressing and stabilisation of the southern face of a former mineral excavation face with associated screening, stockpile and storage areas”* was granted by Cambridgeshire County Council on 10 March 2025. The Site will be required to be operated and completed in accordance with the gained planning permission.

1.3 Approved Waste Recovery Plan

A Waste Recovery Plan (WRP) was submitted to the EA and approved on 17 December 2024 under EA reference EPR/CP3723V/P001. The approved WRP and EA assessment letter is provided in **Section 4** of this application.



2.0 Proposed Development

The exhausted clay pit has historically suffered from several minor failures of the quarry face along its eastern and southern boundaries. The eastern slope of the wider site has been stabilised by regrading works under a separate deposit for recovery EP (EPR/FB3406KC) which involved cutting back the slope crest combined with limited buttressing installed to the lower parts, using imported waste materials. The EP EPR/FB3406KC is operated by EMWM and was originally issued on 30 January 2012.

Multiple shallow failures have been subsequently observed in the south/south-western slope adjacent to the Peterborough to March railway line. As a consequence, essential works are required to stabilise the unrestored southern face of the quarry. The stabilisation will involve the placement of suitable imported waste material to construct an engineered buttress against the southern face of the quarry.

The buttress has been designed with a 1V:3H gradient for the main and south-western section to achieve an acceptable factor of safety for the slope gradient. The design also takes into account the constraints posed by presence of existing buildings at the toe of the buttress, which are under third party ownership. To address this, it is proposed to install a retaining structure, such as a gabion wall at the toe of the slope.

Based on an isopachyte of the existing topography and the proposed buttress design, approximately 216,700m³ of material will be required for the construction (between 325,500 and 390,600 tonnes assuming a density between 1.5 and 1.8 tonnes/m³).

All material will need to be imported for the construction of the buttress as a cut-and-fill approach is not an option for the stabilisation works. This is due to the proximity of the crest of the former quarry slope to the adjacent railway and surface water feature behind the crest of the slope meaning that it is not possible to cut the existing slope back to a suitably stable profile. In addition, all excess material which remained following closure of the quarry has been incorporated into the previous stabilisation phase on the eastern quarry face.

It is proposed for incoming waste material to undergo physical treatment via screening where required. The proposed EP boundary will comprise the buttress and an area for waste processing and storage, as shown on Drawing 002. A maximum of 50,000 tonnes of waste will be accepted to the Site per year. The maximum amount of waste to be stored on the Site at any one time will be 20,000 tonnes, in stockpiles no greater than 6m in height as defined by planning.

The buttress-forming material will be placed to an earthworks specification and will follow placement methods similar to those in the existing recovery EP on the eastern boundary (EPR/FB3406KC). In general terms this comprises:

- The former quarry floor and faces will be cleared and trimmed to remove any loose debris
- The imported material will be placed in layers and be notionally compacted by the bulldozer.
- The profile of the buttress will be controlled through topographic surveying and the use of survey boards where required.

Following completion of the engineered buttress, the slope will be finished with a comprehensive landscaping and ecological enhancement scheme designed to integrate with the existing restoration/planting scheme to the east of the site.

Surface water run-off will be managed via a swale at the base of the buttress which will direct flow to the existing on-site drainage scheme and attenuation lagoon.



It is estimated that buttress engineering work and restoration would take seven years to complete.

3.0 Regulated Activities

3.1 Activities

The application is for deposit of waste for recovery and physical treatment. Waste will be physically treated through a screener before being deposited into the buttress.

The waste management activities that will be carried out at the Site, as specified in Annex I of the Waste Framework Directive, are:

- **R3:** Recycling or reclamation of organic substances which are not used as solvents.
- **R5:** Recycling / reclamation of inorganic compounds – use of waste for the purpose of restoration of land.
- **R13:** Storage of wastes pending any of the operations number R3 or R5.

3.2 Application Fees

The application fees for the proposed activities total **£12,473**, consisting of the following elements:

- 1.17.9 - Deposit of waste for recovery - £9,207;
- 1.19.2 - Habitats assessment - £779;
- 1.19.5 - Emissions management plan (dust) - £1,241; and
- 1.19.7 - Noise management plan - £1,246.



4.0 Key Technical Standards & Control Measures

4.1 Technical Standards

Key technical standards laid out in the following documents will govern the operation of the Site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- “Waste recovery plans and deposit for recovery permits”; gov.uk, updated 29 June 2023;
- “Risk assessments for your environmental permit”; gov.uk, updated 3 January 2025;
- “Risk Assessments for specific activities: environmental permits”; gov.uk, updated 21 November 2023; and
- “Develop a management system: environmental permits”; gov.uk, updated 3 April 2023.

The key technical standards and control measures that are necessary to ensure that the Site does not give rise to significant environmental impact have been determined through the risk assessment process and are summarised below:

- strict waste acceptance procedures will be implemented to prevent the acceptance of unauthorised waste;
- noise impacts will be minimised by speed limits and traffic calming, maintenance of road surfaces, selection and maintenance of plant to minimise noise and daily auditory inspections;
- operations will only be undertaken during the hours authorised by any approved planning consent;
- measures will be implemented to control fugitive emissions of dust through the implementation of the site-specific Dust Management Plan;
- speed limits of 10mph or less will be implemented;
- wet cleaning methods or mechanical road sweepers will be used on all roads during periods when blown dust arisings are visible;
- a comprehensive programme of operational monitoring will be implemented to include noise, fugitive emissions, mud and litter;
- monitoring of surface water will be undertaken throughout the operation of the Site until the EP is surrendered.

4.2 Management System & Operating Techniques

The Site will be managed and operated in accordance with EMWM’s Environmental Management System (EMS). A summary of the EMS is provided as Appendix B2.2 of the EP application.

EMWM’s EMS will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system;
- performance against the management system is audited at regular intervals; and



- the EP is complied with.

The Operating Techniques (OT) is enclosed as **Section 6** of this EP application.

4.3 Waste Acceptance

The Site will only accept inert waste. A full list of the proposed waste types to be accepted under the EP, including the European Waste Catalogue (EWC) codes and descriptions, can be found in the ESSD in **Section 5** of this application and the Operating Techniques document included in **Section 6** of this application.

Strict waste acceptance procedures will be in place to ensure that only EWC codes listed on the EP are accepted at the Site. These procedures include the following:

- Pre-acceptance checks prior to accepting waste, including source checking of the waste characterisation data provided by the waste producer;
- Waste acceptance checks upon delivery to ensure that the wastes are as described, and as permitted within the EP; and
- Actions to be taken if waste not authorised for acceptance is delivered to the Site.

4.4 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) has been undertaken to assess the potential impacts from the proposed operations and is enclosed in **Section 7** of the EP application. The ERA:

- lists the potential receptors that may be affected by the operations;
- details the source – pathway – receptor linkages; and
- summarises the measures in place to mitigate risks.

The ERA concludes that with the implementation of risk management measures, potential impacts from the proposed operations are not likely to be significant.

A Dust Management Plan has been prepared for the proposed Site and is enclosed as **Section 10** of the application. A Noise Assessment and Noise Monitoring Plan has also been prepared and is enclosed in **Section 11** of the application.

4.5 Environmental Setting and Site Design

An ESSD report has been prepared in support of the EP application and is enclosed in **Section 5** of the application. The ESSD defines the Site's conceptual model including the potential source, pathway and receptor linkages. It provides details on the Site's environmental setting, and the proposed design of the Site.

The Site is located on natural clay which will form a low permeability basal attenuation layer.

4.6 Hydrogeological Risk Assessment

A Hydrogeological Risk Assessment (HRA) has been prepared in support of the EP application and is enclosed in **Section 8** of the application. The HRA consists of a qualitative assessment only.

The HRA concludes that:

- the proposed buttress will only accept inert waste streams which will meet inert WAC limits, therefore there is no significant contaminant source and leachate management is not required;



- the conceptual site model confirms that the buttress material will be tipped into an historic clay pit with no viable aquifer pathway across the sidewalls. Assessment of historic borehole logs confirms that there is a minimum of 1.5m of in-situ Oxford Clay within the base of the pit, likely to be in excess of 4m thickness, which will protect the underlying Kellaways Formation aquifer.
- no groundwater receptors associated with the underlying Kellaways Formation have been identified, the Kellaways are overlain by a significant thickness for a distance of >4.5km from the Site indicating the deposits will not provide baseflow to watercourses or ecological sites and no abstractions have been recorded within a 2km radius.
- requisite surveillance, which includes the monitoring of the surface water discharge from the Site, is detailed to ensure the installation remains in compliance with the Environmental Permitting Regulations 2016 (as amended); and
- the Site should comply with the relevant requirements of the Schedule 10 and Schedule 22 of the Environmental Permit Regulations 2016 (as amended).

4.7 Stability Risk Assessment

A Stability Risk Assessment (SRA) has been prepared in support of the EP application and is enclosed as **Section 9** of this application.

The SRA concludes that an acceptable factor of safety (FOS) has been determined for the 1V:3H gradient proposed for the majority of the buttress. The SRA demonstrates that an acceptable gradient for the slope adjacent to existing buildings in the wider Saxon Pit site is 1V:2.5H. The geometries determined from the modelling has estimated that approximately 217,000m³ of imported material will be required to buttress and stabilise the southern slope in the long term, hence the need for a deposit for recovery EP.

4.8 Site Condition Report

A Site Condition Report (SCR) has been completed for the area of the Site which is not subject to the permanent deposit of waste for recovery i.e. where screening and temporary storage of waste is proposed to take place. The report has considered the existing status of the proposed permitted area and describes the measures that will be used to ensure that there is no deterioration of the land throughout the life of the EP. The SCR is enclosed as **Section 12** of the application.

4.9 Site Closure

A Closure Plan has not been provided as part of the application due to the activity not comprising landfill.

EMWM's EMS will continue to apply to the management of the Site following completion of the buttress works until the EP is surrendered.

The objective of the EMS procedures during the post-construction period will be to ensure that when operations at the Site cease, the approved restoration scheme will be implemented and that maintenance will be continued until the EP is surrendered.



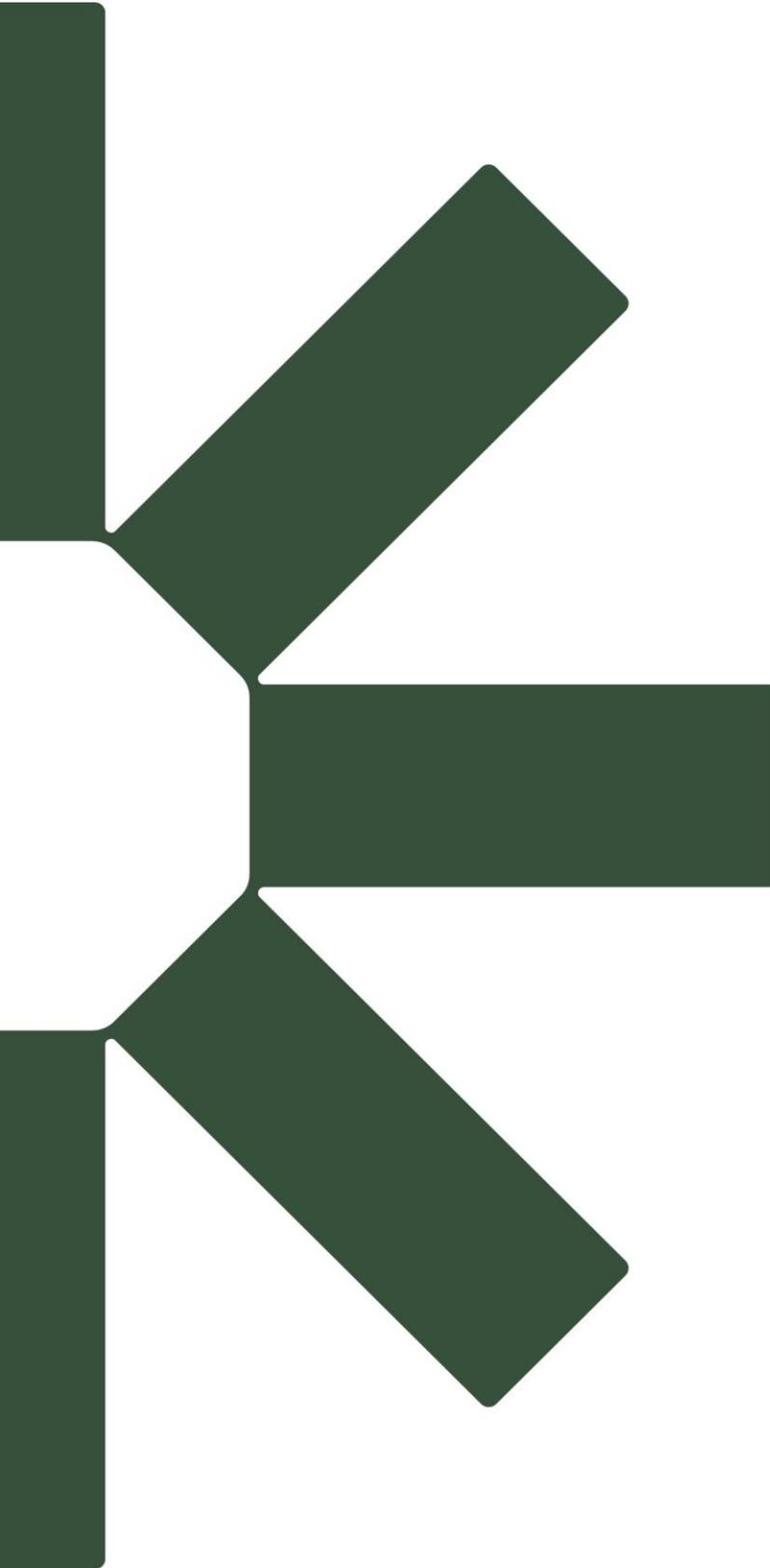
5.0 Conclusion

The overall conclusion from the supporting risk assessments undertaken as part of the application is that there is unlikely to be a significant environmental impact as a result of the proposed waste recovery operations to construct the stabilisation buttress at Saxon Pit.

EMWM is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the company's environmental policy and management system.

It is therefore considered that the EP should be issued as detailed in the application.





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