



Our Ref: A101856/MJ/EA/02

18th October 2018

Permitting Support Centre
Environmental Permitting Team
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Dear Sirs

Normal Variation Application (Downend Chalkpit Landfill Site) EPR/CB3409UB/V003 - Response to Not Duly Made Information Request

Further to the issue of the Not Duly Made Information Request 2nd October 2018 for the above application, please find below our response on behalf of Downend Aggregates and Restoration Limited. The numbered responses below correspond with the individual questions within the Not Duly Made requested and therefore, should be directly referred to.

1). Form Part C4, Table 1a – Amend figures or units for infill (D1) and storage (D15)

There appear to be inconsistencies between the figures and or units/ volumes in this table compared with those in ESSD, HRA and Ops Tech document. Currently Table 1a suggests that 784,000 tonnes will be stored under the D15 activity (storage) at any one time, whereas other document advise this figure is the infill capacity (D1).

Please amend, or remove, and explain the figure of 50,000 tonnes throughput as this suggests that other activities will take place. If they will take place under this permit you must:

- add the appropriate R/ D code under the 'Annex I (D codes) and Annex II (R codes) and descriptions' column and add the tonnage in the adjacent column(s) for treatment.
- amend the Environmental Risk Assessment and Non-Technical Summary to include the extra activity/ activities.
- pay the additional bespoke application fee(s) for adding the extra activity/ activities.

Apologies if this was unclear. I have altered Form C4 as requested and it is attached. The total volume of the site is 784,000 cubic metres and the annual input rate of the landfill will be 50,000 tonnes.

2). Appendix 4

Please complete the document reference codes for questions 3-7 inclusive and ensure these documents are listed on the Form Part F question 6 'Application checklist'.

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Unfortunately if you tick yes to any of the questions listed above (3 to 7) in Appendix 4 of Form C4, you are not able to add in the document reference for some reason. Otherwise we would have filled these in. I can confirm these documents have been referenced within the checklist in Form F Question 6.

3). Hydrological Risk Assessment

Identify or include the groundwater risk assessment modelling files e.g. LandSim.

We have not undertaken any Landsim modelling for this application. However please find attached the excel spreadsheet of all the data within the permit application used to produce EALs for groundwater.

4). Form Part C2, Question 3 – Technical Competency

Submit WAMITAB certificates for an individual competent in managing an inert LFD compliant landfill, as those submitted are not appropriate. Where the original qualification is over 2 years old the current Continuing Competency certificate must also be presented and the appropriate tick-boxes on the form completed.

This is on its way from my client. My colleague Jess Allan will forward it to you as soon as it arrives along with the cheque for the additional fees.

5). Question 6 – Environmental Risk Assessment (ERA)

You must capture in your ERA the receptors, risks and their mitigation associated with extracting the waste from the non-LFD compliant landfill.

The excavation of the waste from the landfill is not an activity that we would permit; however, because it is to take place at a landfill that has a permit any environmental impact – such as dust, noise or odour – would need to be controlled by the permit.

Please find attached an updated version of the ERA which discusses the issues of excavating the old wastes.

6). Form Part F1 – Amend and resubmit, Table 2a

Please amend the monetary figure on the form to £13,203 and contact our Permitting and Support Centre to pay the £6,601 outstanding.

The application proposes to have a new LFD compliant landfill activity after the removal of the non-LFD compliant waste from the closed landfill; therefore, the fee associated with adding this new activity is as for a new bespoke £13,203 application, and not £6,602 that you have paid to date.

I am waiting for my client to provide me with the additional fees requested. As soon as this arrives my colleague Jess Allan will forward it on to Permitting and Support Centre.

7). List of documents table

Appendices G, L, plans and drawings have not been listed; as you require more room please reference the document containing the extended list on Form Part F1 and submit the extended list.

Please find attached a new version of Form F with the additional documents listed as requested.

We trust the above is satisfactory and allows you to determine the application. If you have any further questions, please don't hesitate to contact the undersigned.



Yours sincerely,

Michael Jones

Michael Jones

Associate

For and on behalf of WYG

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