

Purpose of the waste recovery operation

1. This Waste Recovery Plan has been produced to support a Bespoke Permit application for Recovery of inert wastes to be used in the improvement of the golf driving range at High Post Golf Club. The Club is close to the High Post junction of the main road between Salisbury and Amesbury (A345).
2. This document presents a Waste Recovery Plan (WRP) which provides confirmation that the use of waste for the proposed works constitutes a recovery operation with '*waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function*' (EC Guidance on Directive 2008/98/ED on Waste).
3. Approval of this WRP is being sought at an early stage to provide certainty and assist with the permitting process in terms of the nature of the works that have secured planning consent (ref 20/06775).
4. The development site extends in total to around 4.9ha, which is largely used as the driving range, but has a number of undulations and is open to adjoining farmland, the car park and the road to the Winterbournes. As well as creating a level surface for the driving range the design approved at planning includes the creation of earth banks to reduce the number of balls for the driving range leaving the range, damaging parked cars, or endangering road users.
5. Across the range there are a number of small undulations, which can make collecting the balls with a motorised machine challenging without damaging the range surface. To eliminate the low spots, the main area of the driving range will be re-graded with a slight upward slope, which will help to reduce the run off of the balls. The end of the range will comprise an earth bank to act as a cut off and prevent the loss of balls.
6. High Post Golf Club has implemented a number of environmental initiatives over the past decade and with the benefit of creating earth banks, the Club plans to undertake significant native tree planting, creating corridors for wildlife and noise deflection from the adjacent roads. The external slopes will be planted with wildflowers that in turn will help to enhance the biodiversity of the area.
7. The need and justification for the type of development is addressed through the planning process which has consider that this is a suitable land use at this location.

8. The drawings accompanying this WRP include the existing topographical plan, cross sections showing current and final levels and the approved plan for the improved driving range. The design was developed by those responsible for management of the golf club with their knowledge of the how the driving range has performed in recent years, their members comments and their aims for the future.

Environmental Permitting

9. The Waste Recovery Plan has been written with reference to the current guidance on recovery¹ and also the definition provided in the Waste Framework Directive ²(WFD): The WFD defines 'recovery' as *"any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy."*
10. Article 11 (2) of Directive 2008/98/EC (the WFD) also notes a recovery operation is where suitable waste is used for engineering purposes in landscaping and where the waste is a substitute for non-waste materials, which describes this proposal at the golf club.
11. The importation of material will require a Bespoke Permit due to the quantity of material needed. This WRP doesn't seek to address issues which will be covered in the Permit application such as risk assessment, management plans or waste acceptance procedures.

How the work will be carried out

12. The placement of the materials will be in layers across the area to be levelled, each layer will be no more than 2m in depth. Profile boards or similar indicators will be used to direct the finished level. The earth banks will be constructed using advice from a surveyor to achieve the approved shape.
13. It has been estimated that the works will take 24 months.

The quantity of material needed

14. An estimated 110,000 cubic metres of material will be needed to complete the approve improvements to the driving range. This has been arrived at by calculation using CAD modelling of the required levels against a topographical survey of the driving range. Drawings provided

¹ <https://www.gov.uk/guidance/waste-recovery-plans-and-permits#waste-recovery-plan-information>

² <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32008L0098&from=FN>

respectively show the existing levels, the improved surface and the approved levels on cross section that have all informed the volume estimate.

15. The amount of waste that has been assessed as required is the minimum necessary to achieve the improvements that the golf club need. The depth of material across the driving range is as low as can be accommodated without compromise to the development.
16. Alternative proposals have been considered such as extensive netting to retain the balls, but that is deemed out of character in the locality, costly to maintain and offers no ecological improvements at the Golf Club.

Types of Waste to be Used

17. The risk assessment work which will be carried out to support the Permit application will determine precisely the waste types that can be permitted at this location, in particular the hydrogeological considerations around the groundwater sensitivities in the area. The intention at this stage is that the wastes will be broadly the same as those listed in SR2015 No 39: *“Use of waste in a deposit for recovery operations”*.
18. A range of wastes are suitable to provide the function of a basic engineered fill with the main qualification being that no liquids or powders will be used. Essentially the materials that are required are those which can be modelled to a suitable landform.
19. Strict waste acceptance procedures (WAP) will be adhered to and will be provided in an environmental management system which control how operations will take place in a manner designed to protect the environment. The WAP will ensure no waste from sites which have any indication of being contaminated or that contain dangerous substances will be accepted.

Substitution

20. In terms of suitable non-waste material that could be used in substitute for waste materials the works could be achieved using a material similar in nature i.e., a low-grade fill material suitable to be engineered. This could be either a primary aggregate, recycled aggregate or soils/clay. The use of waste for the works performs the same function as primary resource materials whilst serving a useful purpose by avoiding the need to use those primary or recycled materials that would be more sustainably used elsewhere, where a waste could not be accommodated.

Operation to Appropriate Standard

21. The works will comply with planning condition requirements and also the environmental permit conditions, including the operation of an environmental management system that will include the waste acceptance procedures, and monitoring measures that the various risk and impact assessments determine are necessary.
22. The material brought to site will be checked in accordance with waste acceptance procedures and then be placed on the driving range, or the levels raised by previous imported materials as appropriate to the timings. Suitable earthmoving equipment, primarily bulldozers, will be used to shape it into the appropriate profile as shown on the plans approved by the Planning Authority.
23. The proposed scheme is a small and straightforward operation which does not require complicated structural works and a suitably experienced groundworks contractor and surveyor will be sufficiently competent to undertake the works.

Financial gain by using non-waste materials

24. The improvement to the golf facilities would be undertaken even if it were not possible to beneficially use inert waste for the work. The financial benefits to the Golf Club of improved facilities confirms that the financial gain from the project is sufficient to utilise non waste materials in the work if the EA cannot agree this is a recovery operation.
25. The non-waste materials would likely be sourced and purchased from the closest supplier, as the haulage costs and carbon emissions would be lower than seeking other materials from a greater distance. Haulage cost is, in terms of this type of material, a significant element of the overall costs.
26. In order to assess the financial difference of substituting primary materials for wastes, it has been considered that there are a number of fixed costs which would be the same for either material. Costs which would occur in either scenario include the management of the operation, installation of drainage and the final topdressing that will be driving range and soils for the planting. These costs have not been monetarised as they don't impact the assessment of feasibility between a waste and purchased primary or recycled materials.
27. In considering the materials to be brought to site, of the 110,000 cubic metres, there will be a range of soils and more free draining materials expected in the incoming wastes and these are

also an important part of the works to ensure the driving range not only is free draining, but also that there are sufficient soils imported to supplement those on site and create a good stable surface supporting adequate grass cover as well as covering the earth bunds. Soil quality for the bunds is less critical as species will colonise well in subsoil materials.

28. The Golf Club has provided further information that is appended to this WRP; however, this information must be considered commercially confidential and is provided for the Environment Agency solely to confirm that the operations proposed are recovery. The further information must not be disclosed to any other entity or published in any way.
29. The spreadsheet appended to this WRP sets out the likely balance of soils and fill materials that would have to be purchased in considering a scenario where non waste was used. It goes on to include the costs of hiring in dozers and other equipment over the two years needed to complete the work. The costs of purchasing the material have been evidenced by appended quotations from two different companies. The total is approximately £1.3 million.
30. The appended spreadsheet and associated notes on the Golf Club's forward plan for the improved facilities confirms that if a loan were taken out to cover the costs of these works using non waste materials, the benefits to the Club of the improved facilities in terms of return on the investment being made, would see that the loan and its interest would be fully paid back in ten years. Evidence has also been provided that Commercial Recycling (Southern) Ltd Limited has the sufficient funds to be able to offer this financing option for the development using non-waste materials is appended.
31. It is considered that the improvements will result in a more profitable business and an increase in the overall value of the golf club, beyond the ten years taken to pay back associated costs in the event of not being able to utilise waste. It is considered that the proposed improvements would result in a substantial benefit to the Club and would be completed even if waste materials were not available.
32. The guidance on waste recovery plans notes that it should be commercially worthwhile to use non waste. The guidance provides the example that using non waste should be affordable, or there is a meaningful financial gain. The benefits illustrated on the accompanying information confirms both, that the proposals can be afforded, and that the commercial benefits to the Club mean they will have a financial gain from the work if carried out using non waste material.

Conclusion

33. The WRP confirms that the proposed recovery operation has been designed using the minimum amount of material and will utilise suitable waste types with the works will be conducted to an appropriate standard.

34. It has been demonstrated that it would be commercially worthwhile to use non waste, the development would go ahead regardless of whether waste or non-waste was used, and that the use of non-waste in the improvement of the golf course would still result in a meaningful financial gain in the overall scheme of which it is a part. The proposed works are in accordance with the legislative definitions of a recovery operation and this WRP can therefore be agreed.