

Westcombe Waste Limited

Permit Variation Application

Westcombe West limited

Whiscombe Hill Landfill
Somertonfield Road,
Westcombe,
Somerton,
Somerset
TA11 6HY



PROVIDING SOLUTIONS, ENSURING COMPLIANCE

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1. Introduction

- 1.1. Westbury Environmental Limited have been instructed to prepare this Environmental Permit Variation Application on behalf of Westcombe Waste Limited (Operator) for Whiscombe Hill Landfill, Somertonfield Road, Westcombe, Somerton, Somerset, TA11 6HY (Site).
- 1.2. The Environmental Permit Ref. EPR/QP3230LE (Permit) for Whiscombe Hill Landfill contains conditions allowing the landfilling of waste. The bespoke landfilling activities included in the permit are listed below.

Table 1.1 Activities

Activity reference	WFD Annex I and II operations (where applicable)	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
A1	D5 –Specially engineered landfill; R5 - the recycling or reclamation of inorganic material and R10 – Land treatment resulting in benefit to agriculture or ecology	Section 5.2 Part A(1) (a) , The disposal of waste in a landfill.	Landfill for non-hazardous waste and landfill restoration	Receipt, handling, storage and disposal of wastes, consisting of the types and quantities specified in conditions 2.7, as an integral part of landfilling.
A2	D8 – Biological treatment of waste	Section 5.4, Part A(1)(a)(i), Biological treatment of non-hazardous waste	Treatment of leachate in a facility with a capacity of >50 tonnes/ day	Treatment of leachate shall only take place from Whiscombe Hill Landfill Site. Leachate shall only be discharged to the sewer at point shown on drawing reference EM1196/WM172/NMP01 dated March 2010.
A3	D9 – Physico- chemical treatment of waste	Section 5.4, Part A(1)(a)(ii) Physico-chemical treatment of non - hazardous waste	Treatment of leachate in a facility with a capacity of >50 tonnes/ day	No more than 65m3/day of treated leachate shall be discharged.

Table 1.2 Directly Associated Activities

Activity reference	WFD Annex I and II operations (where applicable)	Description of specified activity	Limits of specified activity
A4	R1 – use principally as a fuel to generate energy	Pre-treatment and utilisation of landfill gas for energy recovery in an appliance with a rated thermal input < 50MW	Treatment and utilisation of landfill gas arising from the landfill.
A5	Leachate management	Extraction and storage of leachate prior to removal off- site	Leachate arising from the landfill.
A6	N/A	Temporary storage of waste (leachate)	Leachate arising from the landfill.
A7	N/A	Flaring of landfill gas for disposal in an appliance.	Landfill gas arising from the landfill.
A8	D6 – release to water body except seas/ oceans	Discharges of site drainage from the landfill.	From surface water management system to point of entry to controlled waters.
A9	Leachate discharge to foul sewer	Discharge of leachate from the landfill	From leachate management system to point of entry to sewer (including tankering off-site).



- 1.3. The permit also includes annual input limits for the permitted activities, see Table 1.3 Annual Waste Input Limits.

Table 1.3 Existing Annual Waste Input Limits

Category	Limit Tonnes/Year
Non-hazardous waste	14,500
Inert waste	5,500
Waste for restoration	To be agreed in accordance with IC1 in table S1.3

- 1.4. The application seeks to vary the Annual Waste Input Limits for Non-hazardous and Inert waste to the proposed limits shown in the table below.

Table 1.4 Proposed Annual Waste Input Limits

Category	Limit Tonnes/Year
Non-hazardous waste	94,250
Inert waste	35,750
Waste for restoration	To be agreed in accordance with IC1 in table S1.3

- 1.5. This application also includes a request to review the Financial Provision expenditure model, see attached Appendix 1 Proposed Financial Provision Model.
- 1.6. The relevant Environment Agency forms (Part A, Part C2, Part C4, and Part F1) and supporting information are included within this Environmental Permit application report.

Background

- 1.7. The landfill was originally licensed under Waste Management Licence (WML) reference EAWML26022, which was issued to Westcombe Waste Limited in March 2001.
- 1.8. The original WML contained conditions for both landfill and waste transfer station activities. In December 2006, the landfill conditions were replaced by a Pollution Prevention and Control (PPC) permit. The landfill conditions are now permitted under Environmental Permit ref. EPR/QP3230LE.
- 1.9. The WML conditions relating to operation of the transfer station remained under the WML (now EPR/GB3201CE).



2. Non-Technical Summary

- 2.1. This Environmental Permit variation application seeks to vary Permit Ref. EPR/QP3230LE to increase the annual input limits for non-hazardous and inert waste to the following:
 - Non-hazardous waste – 94,250
 - Inert waste – 35,750
- 2.2. This increase in the annual tonnage limits enable the completion of the remaining void at Whiscombe Hill Landfill within 12 months of determination of this variation application.
- 2.3. The landfill was originally reported to have a total void of 314,000 m³. It is reported that approximately 60% of this void has been filled, equating to 188,400 m³, leaving 125,600 m³ of void space remaining.
- 2.4. Based on an assumed density of mixed household waste of 0.83 tonnes per cubic metre, the remaining void represents an approximate capacity of 151,325 tonnes.
- 2.5. On the assumption that determination of this application will take around 12 months, a further 20,000 tonnes is expected to be deposited under the current permit conditions during that period.
- 2.6. To achieve completion of the landfill within 12 months following determination, the operator proposes to increase the overall annual input limit to 130,000 tonnes, which represents a 6.5-fold increase compared to the current annual limit of 20,000 tonnes. This increase has been applied proportionally across the permitted waste types (non-hazardous and inert), totalling 130,000 tonnes per annum.
- 2.7. There are no proposed changes to the permitted activities being carried out on Site.
- 2.8. The increase of the annual tonnage limits for incoming non-hazardous and inert waste will enable efficient and prompt completion of the Site.
- 2.9. A comprehensive Environmental Risk Assessment has been prepared to identify risks associated with the proposed changes and provide information on the proposed mitigation for those risks, see Appendix 2 Environmental Risk Assessment.
- 2.10. The following certificates for the Technically Competent Manager (TCM) for this Site are provided in Appendix 3, Technically Competent Management.
 - Original Certificate of Technical Competency (COTC)
 - Continued Compliance Certification



3. Review of Financial Provision

- 3.1. The existing financial provision model is nearly 20 years old. The Financial Provision agreement between Westcombe Waste Limited and the Environment Agency has not been reviewed since 2006, when it was first put in place.
- 3.2. It is noted that there were inconsistencies between the financial provision calculation data from 2006 and the figures contained within the deed.
- 3.3. In light of the proposed changes to the annual waste inputs the Financial Provision has been reviewed to bring this up to date and ensure it accords with the landfill situation today, see Appendix 1 Proposed Financial Provision Model.
- 3.4. The increase in annual waste input limits significantly reduces the operational timeline from that which was previously expected. In addition, the previous site Financial Provision (FP), arrangement did not allow for a reduction in the financial provision, following the completion of certain works e.g. capping of the Landfill Site. It is proposed in the Proposed Financial Provision Model attached in Appendix 1, that waste filling will be completed within 12 months of issue of the permit that allows the increase in annual waste tonnage input.
- 3.5. In addition, capping of the Landfill Site and installation of environmental controls will be brought forward significantly from the previous expected timescales for completing the operations at the site. This means that the date of closure of the landfill to waste inputs will be significantly sooner. Overall, this reduction in timescales and ability to reduce the financial provision fund as works are complete completed means that the expenditure profile has considerably changed since the original agreement back in 2006. The attached Financial Provision Model is considered to be a true reflection of the expected costs of ensuring that the Site complies with its environmental permit.
- 3.6. The Proposed Financial Provision Model shows that £456,730 is the total required provision at present.
- 3.7. The reviewed financial provision calculations are based on the assumption that landfilling activities will be completed in 2026, with capping works scheduled for completion in 2026/2027. Depending on the issues date of the varied permit these dates may vary.
- 3.8. The main differences between the approved 2006 financial provision and the reviewed proposed financial provision calculations are as follows:
 - A significant increase in the cost of capping, rising from £100,000 to £180,000.
 - A decrease in cap maintenance costs, from £77,000 to £63,000.
 - A slight increase in site security costs.
 - A substantial decrease in post-closure monitoring costs, from £198,000 to £95,000.
 - A decrease in leachate disposal costs, from £66,000 to £50,000.
- 3.9. At present, two accounts are maintained for the financial provision associated with the site. The first is an escrow account, which held a balance of £173,505.41 as of June 2025. The second is a NatWest account, with a balance of £290,054.36 as of October 2025.
- 3.10. The combined total of both accounts is £463,559.77, which exceeds the proposed financial provision requirement.



4. Environmental Risk

Environmental Risk Assessment

- 4.1. This permit variation application seeks to increase the annual waste input limits for non-hazardous and inert wastes. A Site-specific Environmental Risk Assessment (ERA) has been prepared to assess the potential impact to environmental risk associated with these changes, see Appendix 2 Environmental Risk Assessment.
- 4.2. The key environmental risk factors that have been considered in the ERA include:
 - Dust
 - Noise
 - Odour
 - Landfill Gas
 - Leachate
 - Litter
 - Mud on local roads
- 4.3. While no new sources of environmental risk have been identified, the increased annual throughput is expected to impact existing environmental risk factors due to the impact that the changes are expected to have on Site operations, such as:
 - An increase in vehicle movements due to higher volumes of waste being delivered to and handled on site.
 - More frequent waste handling and tipping activities.
 - Accelerated cell competition and infrastructure installation, such as landfill gas extraction systems and capping works.
- 4.4. These operational changes have been considered when assessing the impact of the proposed changes on environmental risk.
- 4.5. The ERA considers the potential impact of the proposed changes on sensitive receptors, including nearby residential areas, local roads, surface waters and protected habitats.
- 4.6. Mitigation measures currently in place, such as odour control, dust suppression and litter management, are expected to remain effective, however may require more frequent application as a result of the proposed changes.

Management Plans and Procedures

- 4.7. An Odour Management Plan (OMP) has been produced, see Appendix 4 Odour Management Plan. This OMP considers the impact of odour emissions on nearby receptors as a result of the proposed changes, and details how odour emissions will be managed.
- 4.8. The site will operate in accordance with a Waste Acceptance Procedure to ensure that only permitted waste types are accepted at the site, and that tonnage limits are not exceeded, see Appendix 5 Waste Acceptance Procedure.
- 4.9. A Dust Management Plan (DMP) has been produced, see Appendix 6 Dust Management Plan. This DMP considers the impact of dust emissions on nearby receptors as a result of the proposed changes, and details how dust emissions will be managed.

Assessments and Management Plans Not Impacted

- 4.10. The proposed increase in annual tonnage limits impacts the rate of waste disposal rather than the total volume of waste deposited in the landfill. As such, there are no proposed changes to restoration contours, settlement levels, engineering infrastructure, or environmental control systems for gas, leachate, and surface water.
- 4.11. The following assessments and management plans have not been revised or included within this application for the proposed increase in annual tonnage limits:
 - **Environmental Setting and Installation Design (ESID)**



- There are no proposed changes to restoration contours, engineering design, or monitoring infrastructure.
 - The increase in annual tonnage limits will only impact the rate of waste disposal, not the total volume of waste disposed of in the landfill.
- **Hydrogeological Risk Assessment (HRA), Stability Risk Assessment (SRA), and Gas Risk Assessment (GRA)**
 - There is no additional waste proposed as the total volume of waste remains unchanged.
 - It is therefore not considered that there will be impacts on restoration contours, waste density, settlement levels, stability, or gas management systems.
- **Leachate Management Plan (LMP)**
 - There is no additional waste proposed as the total volume of waste remains unchanged.
 - Since there is no additional waste proposed, there are no proposed changes to leachate management infrastructure.
- **Surface Water Management Plan (SWMP)**
 - Since there are no proposed changes to restoration contours, it is not considered that there will be any changes to surface water runoff management measures already in place.



5. Operating Techniques

Environmental Management System

- 5.1. The Site will be operated in accordance with a written Environmental Management System (EMS).
- 5.2. A hard copy of the EMS will be kept on Site at all times. Each member of staff at the Site will have access to the EMS.
- 5.3. The EMS folder shall include a copy of the Environmental Permit and will contain the following sections:

EMS Report

This report contains a description of the purpose and scope of the EMS, all Site details including the location of the Site, receptors located in close proximity to the Site boundary, waste storage, any plant and equipment that is used on the Site, the different types of waste activities carried out on Site, the Site security measures, information on the competence of the staff working on Site, roles and responsibilities for each member of staff and details for Site closure, where appropriate.

Site Condition Report

This records the condition of land covered by the Environmental Permit at various stages during the life of the permit.

Climate Change Risk Assessment and Adaptation Plan

This report identifies how climate change will impact the Site and what will be done to mitigate the impacts of climate change.

Odour Management Plan

This report considers the potential impact of Site operations on local receptors and details relevant mitigation measures.

Technical Competence

This section of the EMS includes details of the competence status of the Technical Competent Manager(s) (TCM), the operational hours for the Site, the minimum attendance requirements for the TCM and copies of relevant certificates.

Authorisations

A copy of the permit and any EA Registrations for the Site will be located in the EMS.

Technical Competence

This section of the EMS includes details of the competence status of the Technical Competent Manager(s) (TCM), the operational hours for the Site, the minimum attendance requirements for the TCM and copies of relevant certificates.

Procedures and Forms

The EMS contains a number of procedures, covering; implementation, operational control, waste acceptance and rejection, environmental protection, emergency provisions and reporting. Records to be produced in accordance with these procedures are provided in the EMS as forms. The associated completed forms provide records that evidence the implementation of the EMS. The following list details procedures that are included in the EMS:

Implementation

- Environmental Training, Awareness and Competence
- Compliance with Legal requirements
- Staff Organogram



- Reviewing and Auditing Documentation that outlines how reviewing of the EMS and associated documentation is undertaken. This procedure contains a list of how frequently documents within the EMS should be reviewed / audited.

Operational Control

- Housekeeping, litter, pests and vermin
- Noise Control
- Waste storage and Handling
- Site Security
- Reporting and Investigation of Accidents, Incidents and Complaints
- Dust, Fibres and Particulates
- Maintenance
- Waste Storage procedure including information on the following:
 - Identification of wastes stored on site.
 - Storage times of waste on site.
 - Quantity of Waste Stored on site.

Waste Acceptance and Rejection

- Waste Acceptance
- Waste Rejection and Non-compliance
- Waste Reporting
- Duty of Care

Environmental Protection

- Dust Fibres and Particulate
- Mud and Debris
- Noise Control
- Odour
- Surface Water Management

Environmental Monitoring

- Landfill gas
- Leachate
- Groundwater
- Restored Surface

Emergency Provisions

- Environmental Accidents /Incidents / Complaints and associated forms
- Fire
- Flood
- Spillages
- Utility Failure

Reporting

- Waste Returns
- Notifications to the Environment Agency
This list is not exhaustive.



6. Technically Competent Manager

- 6.1. Ian Greaves will be the Technically Competent Manager for this Site, See Table 5.1 TCM Details.
- 6.2. The following certificates for the Technically Competent Manager (TCM) for this Site have been provided, see Appendix 2 Technically Competent Management.
- Original Certificate of Technical Competency (COTC)
 - Continued Compliance Certification

Table 5.1 TCM Details

First Name	Ian
Last Name	Greaves
Date of Birth	██████
Phone	07411667271
Email	igreaves4@aol.com



Application form

Part A

Application for an environmental permit

Part A – About you



When to complete the Part A form

Complete this part of the application form if you are:

- applying for a new permit (apart from exclusion 1 below)
- applying to vary (change) an existing permit (apart from exclusion 2 below)
- notifying or applying for a permit surrender (apart from exclusion 3 below)
- notifying or applying to transfer an existing permit to yourself

Exclusions – when you do not need to complete this form

You do not need to complete this form if you are:

1. applying for a new permit for:
 - intensive farming – see [Part B3.5 form](#)
 - discharge of treated domestic sewage up to 20 cubic metres a day to surface water – see [Part B6.5 form](#)
 - discharge of treated domestic sewage up to 15 cubic metres a day into ground – see [Part B6.5 form](#)
 - existing small discharges of sewage to ground in a source protection zone 1 – see [Part B6.6 form](#)
 - a medium combustion plant standard rule permit – see [MCP guidance](#)
 - a specified generators standard rule permit – see [SG guidance](#)
2. applying for a variation to:
 - make an administrative change – see [Part C0.5 form](#). Note: you will still need to complete this Part A form if you're changing a name or address on the permit.
 - make a non-administrative change to an intensive farming permit – see [Part C3.5 form](#).
3. notifying us of a water discharge or groundwater activity permit surrender – see [Part E1 form](#). Note: this exclusion does not apply to surrender applications for standalone groundwater activities at onshore oil and gas facilities. You will need to complete this Part A form for those surrender applications.

Do not use this form for radioactive substance regulation permitting. See [RSR: environmental permit application forms](#)

Completing the form

Visit our website to check this is the latest version of the form. See [Application for an environmental permit: part A about you](#).

Please read through the form before completing it. We expect it will take less than 1 hour to complete if you have all the necessary information available.

The form can be:

saved onto a computer and then filled in. We recommend using Adobe Acrobat software to avoid any compatibility issues.

- printed off and filled in by hand. Please write clearly in the answer spaces. If you need to use the links in this form, you can access the electronic version here: <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you>

Other forms you will need to complete

You will also need to complete other parts of the application form. This depends on your facility type and what you are applying for:

- for a new bespoke permit, see: [New bespoke environmental permit: application forms](#)
- for a new standard rules permit, see: [Application for an environmental permit: part B1 standard facilities permit](#)
- If you already have a permit, see [Change, transfer or cancel your environmental permit](#)

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1 About you

Tick the box that describes you as the applicant.

- ☐ An individual. Now go to **section 2**.
- ☐ More than one individual. Now go to **section 3**.
- ☐ A public body. Now go to **section 4**.
- ☐ A ministerial government department. Now go to **section 5**.
- ☒ A registered company, limited liability partnerships, or other incorporated body. Now go to **section 6**.

To apply, you must be the legal operator of the activity or facility. See: **Legal operator and competence requirements: environmental permits**

2 Applications from an individual

2.1 Name of applicant

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

2.2 Address of applicant

Address

Postcode

2.3 Contact details for applicant

Email

Telephone number

Use a business address and contact details where possible. Otherwise use personal details. Individuals based overseas must provide an address for service in the UK.

Now go to [question 7.2](#)

3 Applications from more than one individual

3.1 Names and addresses of individuals

This could be, for example:

- individuals acting jointly
- individuals that are partners in a general or limited partnership (but not a limited liability partnership)
- unincorporated charities, trusts and associations, (unless we have agreed the charity, trust or association is a legal entity)

For unincorporated trusts, charities and societies provide the names and addresses of all governing individuals. For example:

- trustees
- chairperson
- treasurer
- secretary
- or a person with a similar position

For applications from other individuals provide the names and addresses of all individuals.

However, for applications involving large numbers of individuals, a smaller number of individuals can be nominated. These individuals will be named on the permit and responsible for controlling activities. For example, where a group of 20 individuals are involved, you may decide to identify four individuals as being the operator. This is only applicable to permit and transfer applications. For variation and surrender applications, provide up to date details of the permit holders.

Use a continuation sheet as necessary.

3.1a Name of first individual

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

3.1b Address of first individual

Use a business address where possible. Otherwise use a personal address. Individuals based overseas must provide an address for service in the UK.

3 Applications from more than one individual, continued

Address

Postcode

3.1c Name of second individual

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

3.1d Address of second individual

Use a business address where possible. Otherwise use a personal address. Individuals based overseas must provide an address for service in the UK.

Address

Postcode

3.1e Name of third individual (where applicable)

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

3 Applications from more than one individual, continued

3.1f Address of third individual (where applicable)

Use a business address where possible. Otherwise use a personal address. Individuals based overseas must provide an address for service in the UK.

Address

Postcode

3.1g Continuation sheet for additional individuals (where applicable)

Document reference of continuation sheet

3.2 Organisation type (if any)

For example, individuals acting jointly (e.g. a club), general partnership, unincorporated charity

3.3 Charity Commission registration number (if any)

Recognised charities may qualify for reduced permitting fees for certain water discharge activities. We'll need a Charity Commission registration number to check if this applies to this application.

3.4 Companies House registration number (Limited Partnerships only)

Now go to [section 7: Contact details](#)

4 Applications from public bodies

4.1 Name of public body

4 Applications from public bodies, continued

4.2 Address of public body

Address

Postcode

4.3 Type of public body

For example, local government body, executive agency, non-departmental public body

4.4 Charity Commission number (if any)

Now go to [section 7: Contact details](#)

5 Applications from ministerial government departments

5.1 Title of Secretary of State for relevant government department

Title

For example, Secretary of State for Environment, Food and Rural Affairs

5.2 Address of the government department

Address

Postcode

Now go to **section 7: Contact details**

6 Applications from registered companies, limited liability partnerships and other corporate bodies

6.1 Name of company, limited liability partnership, or other incorporated body

Westcombe Waste Limited

6.2 Principal address or Registered Office of registered company, limited liability partnership, or other incorporated body

Address

Somerton Commercial Recycling Centre,
Somertonfield Road,
Somerton,
England,

Postcode

TA11 6HY

For registered companies and limited liability partnerships this is the office address registered with Companies House. For other incorporated bodies use your principal business address or the address registered with The Charity Commission.

6.3 Main UK business address for overseas corporate bodies (if applicable)

Your main UK business address is required only if your principal or registered office address is overseas.

Address

Postcode

6 Applications from registered companies, limited liability partnerships and other corporate bodies, continued

6.4 Type of incorporated body

Private Limited Company

For example, private limited company, public limited company, limited liability partnership, incorporated society, charitable incorporated organisation or community interest company

6.5 Companies House registration number (if any)

02205997

6.6 Charity Commission number (if any)

6.7 Additional information if not registered with Companies House or The Charity Commission (if applicable)

This question does not apply to variation or surrender applications.

If you are not registered with Companies House or The Charity Commission, supply:

- evidence that your company or corporate body is a legal entity
- a description of how you will be the legal operator if you are an overseas company without a UK presence.

Document reference for evidence/description:

Evidence of legal entity could, for example, include:

- a copy of your Certificate of Incorporation for companies.
- a copy of your Memorandum and Articles of Association for incorporated charities and trusts

Now go to section 7: Contact details

7 Contact details

7.1 Contact for receipt of official documents

This question does not apply to applications from an individual. We'll send documents to the individual named in [section 2](#) of this form. Go to [question 7.2](#) instead.

Provide the details of someone we can send official documents to, such as notices and copies of permits.

7 Contact details, continued

Important: this must be the permit holder and cannot be an agent or consultant acting on their behalf.

For companies this person must be a company secretary, clerk or a director.

For partnerships this must be a person with control or management of the partnership.

For applications from more than one individual, provide details of everyone who is to receive official documents. You can include all individuals or nominate one or more people. Add a continuation sheet where necessary.

If relevant, we'll also send a copy of official documents to the application contact.

Title (Mr, Mrs, Miss and so on) (optional)

Mr

First name

Ian

Last name

Greaves

Position

Director

'Position' could, for example, be a director, secretary, trustee, or managing partner

Address

Somertonfield Commercial Recycling Centre,
Somertonfield Road,
Somerton,
England

Postcode

TA11 6HY

Email

igreaves@aol.com

Document reference of continuation sheet for additional people (if any). For applications from more than one individual only.

7 Contact details, continued

7.2 Application contact

Provide the details of someone we can contact about the application. The person must have the authority to act on behalf of the applicant.

- ☐ Contact details are the same as **section 2** (application from an individual). You do not need to fill in their details again.
- ☐ Contact details are the same as **question 7.1** (contact for receipt of official documents). You do not need to fill in their details again.
- ☒ New contact. Add their details below

Title (Mr, Mrs, Miss and so on) (optional)

Ms

First name

Tracey

Last name

Westbury

Address

Westbury Environmental,
Agriculture House,
Southwater Way,
Telford

Postcode

TF3 4NR

Phone number

01952879705

Email

info@westburyenv.co.uk

Position

Consultant

'Position' could, for example, be the applicant, their employee, or an agent or consultant acting on their behalf.

- ☒ Tick if you would like all general communication about this application sent to the above email address.

7 Contact details, continued

7.3 Operational contact

We use this information to help us know who to contact about operations at the site, returns and reporting. The operational contact is ordinarily the permit holder. Anyone else must have the authority to act on behalf of the permit holder.

- ☐ Contact details are the same as **section 2** (application from an individual). You do not need to fill in their details again.
- ☒ Contact details are the same as **question 7.1** (contact for receipt of official documents). You do not need to fill in their details again.
- ☐ Contact details are the same as **question 7.2** (application contact). You do not need to fill in their details again.
- ☐ New contact. Add their details below

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Address

Postcode

Phone number

Email

Position

'Position' could, for example, be the applicant, an employee, or an agent or consultant acting on their behalf.

7 Contact details, continued

7.4 Billing contact

Provide a billing contact where we can send requests for payment, such as invoices for the annual subsistence charge.

- ☐ Contact details are the same as **section 2** (application from an individual). You do not need to fill in their details again.
- ☒ Contact details are the same as **question 7.1** (contact for receipt of official documents). You do not need to fill in their details again.
- ☐ Contact details are the same as **question 7.2** (application contact). You do not need to fill in their details again.
- ☐ Contact details are the same as **question 7.3** (operational contact). You do not need to fill in their details again.
- ☐ New contact. Add their details below

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Address

Postcode

Phone number

Email

For applications from public bodies and ministerial government departments, go to **section 9**.

For all other applications, go to **section 8**.

8 Environmental record check

Question 8.1 applies if you are:

- applying for a new installation or waste permit
 - applying to transfer an existing installation or waste permit
 - applying to add a relevant waste operation to a permit that has not previously had one
- ‘Relevant waste operations’ are one or both of the following:
- a waste operation (not carried on at an installation or by means of a Part B mobile plant).
 - a specified waste management activity (certain installations carrying out waste management activities).

For further details of relevant waste operations, see: **The Environmental Protection (Miscellaneous Amendments) (England and Wales) Regulations 2018**

We use the date of birth information to check your environmental record.

If this question does not apply, go to **section 9**

8.1 Complete the date of birth information in **Appendix 1** for the applications set out above.

☐ Tick the box to confirm that Appendix 1 has been completed where required.

Then go to **section 9**

9 How to contact us

If you have difficulty using this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: **enquiries@environment-agency.gov.uk**

Website: **www.gov.uk/government/organisations/environment-agency**

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

You don't have to answer this part of the form, but it will help us improve our forms if you do.

We want to make our forms easy to fill in and easy to understand. Please use the space below to give us any comments that you may have about this form.

9 How to contact us, continued

How long did it take you to fill in this form?

We will use your feedback to improve our form.

Would you like a reply to your feedback?

☐ Yes please

☐ No thank you

Go to **section 10**

10 Where to send your application

Send one electronic copy of your completed application via email to:

- **PSC-WaterQuality@environment-agency.gov.uk** for water discharge activities
- **PSC@environment-agency.gov.uk** for waste or installation activities
- **flood.permitting@environment-agency.gov.uk** for flood risk activities

Alternatively send one paper copy of your application to:

Integrated Permitting Services
Environment Agency
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Appendix 1: Date of birth information for installation and waste activities

Dates of birth information in this appendix will not be put onto our Public Register.

Only complete this Appendix if required by [question 8.1](#).

A1.1 Are you applying as an individual; group of individuals; or a registered company, limited liability partnership or other incorporated body?

- ☐ An individual. Now go to [A1.2](#)
- ☐ More than one individual. Now go to [A1.3](#).
- ☒ A registered company, limited liability partnership or other incorporated body. Now go to [A1.4](#).
- ☐ Public body or ministerial government department. Do not complete this appendix. Go to [section 9](#) instead.

A1.2 Applications from an individual

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Date of birth (DD/MM/YYYY)

Now go to [section 9](#)

A1.3 Applications from more than one individual

For unincorporated trusts, charities and associations provide the name and date of birth of all individuals that are part of the group's controlling or guiding mind. For example:

- trustees
- chairperson
- treasurer
- secretary
- or a person with a similar position

In all other instances, provide the names and address of all individuals listed in [section 3](#) of this form.

Use a continuation sheet where necessary.

Appendix 1: Date of birth information for installation and waste activities, continued

First individual

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Date of birth (DD/MM/YYYY)

Second individual

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Date of birth (DD/MM/YYYY)

Third individual

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Date of birth (DD/MM/YYYY)

Fourth individual

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Date of birth (DD/MM/YYYY)

Continuation sheet for additional individuals

Document reference of continuation sheet (if any):

Now go to **section 9**

Appendix 1: Date of birth information for installation and waste activities, continued

A1.4 Applications from registered companies, limited liability partnership or other incorporated bodies

For registered companies provide the names and dates of birth of all directors and any company secretary.

For limited liability partnerships provide the names and dates of birth of all partners.

For other incorporated bodies provide the name and date of birth of all individuals that are part of the body's controlling or guiding mind. For example:

- trustees
- chairperson
- treasurer
- secretary
- or a person with a similar position

Use a continuation sheet where necessary.

Provide the company name and registration number on a continuation sheet for any corporate:

- directors
- company secretaries
- partners

First person

Title (Mr, Mrs, Miss and so on) (optional)

Mr

First name

Ian

Last name

Greaves

Position

Director

Date of birth (DD/MM/YYYY)

Appendix 1: Date of birth information for installation and waste activities, continued

Second person

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Position

Date of birth (DD/MM/YYYY)

Third person

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Position

Date of birth (DD/MM/YYYY)

Fourth person

Title (Mr, Mrs, Miss and so on) (optional)

First name

Last name

Position

Date of birth (DD/MM/YYYY)

Document reference of continuation sheet for additional people or corporate officers (if any):

Now go to **section 9**



Application form

Part C2

Application & Guidance for an environmental permit

Part C2 – General – varying a bespoke permit



Environment
Agency

Use this form if you are applying to make a non-administrative variation (change) to the conditions or any other part of your permit.

In addition to this form, you will also need to complete:

- **Part A: about you** <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you>
- **Part F1: charges and declarations** <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f1-opra-charges-declarations>

You will also need to complete one or more additional part C forms, depending on your proposed change:

- **Part C3: vary a bespoke installation permit** <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c3-varying-a-bespoke-installation-permit>
- **Part C4: varying a bespoke waste operation permit** <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c4-varying-a-bespoke-waste-operation-permit>
- **Part C5: vary a permit to a mining waste permit, or vary a bespoke mining waste permit** https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582774/LIT_6785.pdf
- **Part C6: vary a water discharge activity, groundwater activity, or point source emission to water from an installation** https://assets.publishing.service.gov.uk/media/66743838d427ab249955cef2/Part_C6_vary_a_bespoke_water_discharge_activity_and_groundwater_point_source_environmental_permit.pdf
- **Part C7: vary a bespoke groundwater permit to discharge used sheep dip, waste pesticide washing or other waste substances** <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c7-varying-a-bespoke-groundwater-permit>

If you are not changing to or adding a different facility type, the additional Part C form will depend on your permitted facility type. For example, if you are proposing to change the conditions of an installation permit, the additional form you need to complete is Part C3.

If you are changing to or adding a different facility type, the additional form you complete will depend on the facility you are changing to or adding.

Some examples are given below:

- Waste operation changing to an installation – if your changes mean that your existing waste operation becomes an installation you will need to fill in **Part C3: vary a bespoke installation permit** <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c3-varying-a-bespoke-installation-permit>
- Installation changing to a waste operation – if your changes mean that your existing installation becomes a waste operation you will need to fill in **Part C4: varying a bespoke waste operation permit** https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928388/Application-for-environmental-permit-Part-C4-varying-a-bespoke-waste-operation-permit.pdf

- Change to add a waste operation to an installation – if you are applying to add a waste operation to your existing installation you will need to complete application form **Part C4: varying a bespoke waste operation permit** https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928388/Application-for-environmental-permit-Part-C4-varying-a-bespoke-waste-operation-permit.pdf
- Change to add an installation to a waste operation – if you are applying to add an installation to your existing waste operation you will need to complete application for **Part C3: vary a bespoke installation permit** <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c3-varying-a-bespoke-installation-permit>
- Change to add an inert mining waste operation – if you have an existing permit for a water discharge activity that is integral to the mining waste operation and you wish to vary this permit by adding the requirements for an inert mining waste operation, complete forms Part A, C1 and F1. Please note that we will issue a bespoke permit, but it will resemble the standard rules for mining waste as closely as possible but will not technically be standard rules permit.
- Changing from a standard rule to a bespoke permit – the additional Part C form will depend on the bespoke facility type you are changing to. For example, if you are changing to a bespoke waste operation permit, you will need to complete the **Part C4 form** https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928388/Application-for-environmental-permit-Part-C4-varying-a-bespoke-waste-operation-permit.pdf
- Change to convert to or add a standard facility – to convert your existing permit to a standard permit or add a standard facility, do not complete this part of the form, but see: **Part C1: vary a standard facilities permit** https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928394/Application-Part-C1-varying-a-permit-to-change-to-or-add-a-standard-facility.pdf

To make an administrative change to your permit, do not complete this form. Instead see: **Part C0.5 administrative change to a standard or bespoke permit** <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c05-administrative-variation-of-a-standard-or-bespoke-permit>

To vary (change) your intensive farming permit, do not complete this form. Instead use: <https://www.gov.uk/government/publications/application-to-vary-an-environmental-permit-part-c3.5>

To vary (change) your medium combustion plant/specified generator permit, do not complete this form. Instead see: <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c2.5-vary-to-add-a-new-mcpsg-or-change-an-existing-mcp-or-sg-permit>

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or changing an existing one).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please check that this is the latest version of **Part C2 form**: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928047/Application-for-a-permit-Part-C2-general-varying-a-bespoke-permit.pdf

This form can be:

- Saved onto a computer then filled in. We recommend you use an Adobe Acrobat product to complete the form. You may not be able to complete the form using different software, such as a PDF reader built into your internet browser.
- Printed off and filled in by hand. Please write clearly in the answer spaces.

Contents

- 1 About the permit**
- 2 About your proposed changes**
- 3 Your ability as an operator**
- 4 Environmental risk assessment**
- 5 Site condition report**
- 6 Other supporting information**
- 7 Consultation**
- 8 How to contact us**

Appendix 1 – Low impact installation checklist

Appendix 2 – Date of birth information for Relevant offences and/or Technical competence questions only

Appendix 3 – Example site plan

1 About the permit

1a Have you spoken to the Environment Agency already about this application?

☐ No

☒ Yes Provide your pre-application reference number. For further information on pre-application advice see **Get advice before you apply for an environmental permit** <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

Pre-application reference number

EPR/QP3230LE/P001

Reference for the extra documents

1b If we have agreed you can send application information in stages

Provide your proposed timetable giving the dates of when you will submit each piece of information. For further information please see the guidance on **Send environmental permit application information in stages** <https://www.gov.uk/guidance/send-environmental-permit-application-information-in-stages>

Timetable document reference

1c Permit number

What is the permit number that this application relates to?

EPR/QP3230LE

This is the permit number starting with 'EPR' and can be found on your subsistence invoice, for example 'EPR/AB1234CD'

1d Site details (excludes mobile plant)

What is the site name, address and postcode?

Site name

Whiscombe Hill Landfill

Address

Somertonfield Road
Westcombe
Somerton
Somerset

Postcode

TA11 6HY

1 About the permit, continued

National grid reference for the centre of the site

ST 46525 29413

Provide the 12-digit Ordnance Survey national grid reference for the centre of the site: for example, ST12345 67890.

There are several online resources available that can help find the grid reference. For example go to the Ordnance Survey website at <https://explore.osmaps.com/?lat=51.776100&lon=-1.894300&zoom=7.0000&style=Standard&type=2d>, locate and right click on the centre of the site.

2 About your proposed changes

2a Type of variation

What type of variation are you applying for? For examples of the different variation types, see our 'Charging Scheme Guidance' <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance#varying-a-permit-charge>.

- ☐ Minor variation
- ☒ Normal variation
- ☐ Substantial variation

2b Changes or additions to existing activities

2b.1 Provide a summary of the changes or additions you want to make to each activity, include details of any changes to discharge points or site boundaries.

2b.2 Provide further details of your proposed changes or additions in a separate document

The application seeks to vary the Annual Waste Input Limits for Non – hazardous and Inert waste to the proposed limits shown below:

Non – hazardous waste – 94,250 tonnes per annum.

Inert waste 35,750 – tonnes per annum.

This application also includes a request to review the Financial Provision expenditure model.

Document reference of the detailed changes or additions

Application Report V1

2 About your proposed changes, continued

2b3 Do you want to remove an activity from your permit?

☒ No

☐ Yes Enter the activity that you are applying to remove in the text box below.

2c Consolidate (combine) two or more permits into one

If you have more than one permit on the same site you can apply to combine them into a single permit.

We will combine the existing permits into a single replacement permit. Where we agree to combine the permits, old style permit conditions will be replaced with modern ones that deliver an equivalent standard. An existing condition may be used if it does not have a modern equivalent.

We may require additional information from you, for example, about your management system.

It is advisable to obtain pre-application advice before you apply to combine your permits. See <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

Note: You will need to pay a variation charge for each permit being consolidated. See the 'Consolidate permits through variations' section of our Charging Scheme Guidance <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance#consolidate-2-or-more-permits-into-1>.

Do you want to combine two or more permits into one?

☐ Yes – list all the permit numbers you want to combine in Table 1 below.

Table 1 – Permit numbers

☒ No – **go to question 2d**

2 About your proposed changes, continued

2d Consolidate (update) a single permit

We will usually issue a new, updated permit whenever variations are made. If your permit has old style conditions we will usually replace them with modern ones that deliver an equivalent standard. An existing condition may be used if it does not have a modern equivalent.

We do this updating as a regulator initiated variation, so it is not something you need to apply for. If you do not want us to do this, tick the box in 2d.1 below and tell us why.

2d.1

☐ I do not want my permit updated with modern conditions.

Explain your reasons below:

Sometimes we will be unable to update old style conditions as a regulator initiated variation. For example, where the work is disproportionate to the type of variation applied for.

You can still apply to consolidate and update your old-style conditions, but this may incur an additional charge. See the 'Consolidate permits through variations' section of our Charging Scheme Guidance <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance#consolidate-a-single-permit>. You will need to include this as part of your overall application charge.

It is advisable to obtain pre-application advice before you apply to update and modernise your permit. See <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

2d.2

☐ I am applying to update and modernise my permit.

2e Low impact installations (installations only)

This applies to low-risk installation activities only. If this is not applicable, answer 'No' go straight to **section 3** on the application form.

Read the low impact installation guidance in **appendix 1** to check whether your installations fit the criteria. You must tell us how you meet the criteria in a separate document, giving the document reference in this section.

You must complete the low installation checklist in **appendix 1**. Tick the box to confirm you have filled it in.

2 About your proposed changes, continued

2e.1 Will the changes mean the facility qualifies as a low impact installation?

- ☒ No Now go to section 3
- ☐ Yes If yes, tell us how you meet the low impact installation criteria (see the guidance notes in **Appendix 1**)

Document reference

- ☐ Tick the box to confirm you have filled in the low impact installation checklist in Appendix 1 for each regulated facility

3 Your ability as an operator

If you are applying to add waste installations or waste operations (relevant waste operations) to a permit that has not previously had them, you need to fill in all of section 3. Otherwise, complete the relevant questions as indicated by the accompanying guidance.

Relevant waste operations are one or both of the following:

- A waste operation (not carried on at an installation or by means of a Part B mobile plant).
- A specified waste management activity (certain installations carrying out waste management activities).

For further details refer to <https://www.legislation.gov.uk/ukxi/2018/1227/regulation/4/made>

When deciding such applications we consider whether you will be competent operator. We look at any unspent relevant convictions; your technical ability; financial competence; and check that you have a management system.

3a Convictions for any relevant offences

This question applies to relevant waste operations only. Complete the question if you are applying to add a relevant waste operation to a permit that has not had one before.

It does not apply to applications from public bodies or government departments.

Relevant convictions are explained at: <https://www.gov.uk/government/publications/relevant-conviction-guidance-for-permit-applications-for-waste-activities-and-installations-only>

Do you, or any other relevant person, have any unspent convictions for any relevant offence?

- ☒ No Now go to **question 3b**
- ☐ Yes Please give details below

3 Your ability as an operator, continued

Name of the relevant person

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position held at the time of the offence

Name of the court where the case was dealt with

Date of the conviction (DD/MM/YYYY)

Offence and penalty set

Date any appeal against the conviction will be heard (DD/MM/YYYY)

If necessary, use a separate sheet to give us details of other relevant offences and tell us below the reference number you have given the extra sheet.

Document reference

☐ Tick this box to confirm you have provided dates of birth for each relevant person in **Appendix 2**.

Relevant person

For individuals or groups of individuals

A 'relevant person' is:

- the individual where the permit holder is a sole individual
- all individuals where the permit holder is a group of individuals, (such as individuals in a general or limited partnership)

For registered companies

A 'relevant person' is the company itself and any:

- director
- company secretary
- manager
- similar corporate officer

3 Your ability as an operator, continued

For limited liability partnerships

A 'relevant person' is:

- the partnership itself
- all partners

For other organisations or bodies

A relevant person is any person who is part of the controlling or guiding mind of the organisation or body. This could be, for example any:

- trustee
- chairperson
- treasurer
- secretary
- person with a similar position

Relevant unspent convictions must be declared whether the relevant person has been:

- convicted of a relevant offence themselves
- held one of the positions above at a time when the organisation or body was convicted of a relevant offence

3b Technical ability

Section 3b applies to relevant waste operations only.

Complete the questions if:

- you are adding a relevant waste operation to a permit that has not had one before; or
- your proposed variation will change your current technical competence requirements

'Relevant waste operations' are one or both of the following:

- a waste operation (not carried on at an installation or by means of a Part B mobile plant).
- a specified waste management activity (certain installations carrying out waste management activities). For further details about specified waste management activities refer to 2(4) and 2(5) of <https://www.legislation.gov.uk/uksi/2018/1227/regulation/4/made>

3b.1 Which technical competence scheme are you using?

We need to be satisfied that you will have sufficient technical ability to operate your facility.

To demonstrate your technical ability, you must comply with one of the government approved technical competence schemes. The two schemes currently approved are:

- Chartered Institute of Wastes Management/Waste Management Industry Training and Advisory Board (CIWM/WAMITAB) scheme: <https://ciwmquals.co.uk/competence/>.
- Energy and Utility Skills/Environmental Services Association/ (EU skills/ESA) scheme: <https://www.euskills.co.uk/about/our-industries/waste-management/competence-management-system/>.

3 Your ability as an operator, continued

Tick the scheme(s) you are using to demonstrate your technical competence.

☒ CIWM/WAMITAB. Go to question 3b.2

☐ EU skills/ESA. Go to question 3b.3

3b.2 CIWM/WAMITAB scheme

The information you provide in this section must be for the person(s) providing technical competence once the new or changed waste operation starts.

Note: grace periods do not apply to variation applications.

Provide the following information for each technically competent manager (TCM).

Use a separate sheet to provide the information for each TCM where more than one is being provided.

Document reference for continuation sheet, (if applicable):

a. Details of the technically competent manager

Title (Mr, Mrs, Miss and so on)

Mr _____

First name

Ian _____

Last name

Greaves _____

Phone

07411667271 _____

Email

igreaves4@aol.com _____

☒ Tick this box to confirm you have provided the date of birth for the TCM in **Appendix 2**.

Complete table 2 for any other sites where the manager provides technical competence. This includes permits held by other operators and any other sites where they are intending to provide technically competent management.

3 Your ability as an operator, continued

Continue on a separate sheet as required.

Table 2		
Permit number	Site address	Postcode
EPR/GB3201CE	Whiscombe Hill Transfer Station, Somertonfield Road	
	Somerton, Somerset	TA11 6HY

Document reference of the extra sheet (if applicable)

For information on how much time the TCM must be on site, see: <https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits#how-much-time-your-technically-competent-manager-must-be-on-site>.

b. Provide evidence of relevant technical competence

Tick the document(s) you are submitting to show evidence of technical competence. The original and continuing competence must be relevant to the activity you are applying for.

Primary competence qualification

- ☒ a copy of the primary competence qualification certificate(s)
- ☒ copy of current continuing competence certificate(s). This is required when the original qualification is over 2 years old.

Deemed competence

- ☐ evidence of deemed competence and current continuing competence certificate(s)

Environment Agency assessed competence

- ☐ evidence of passing an Environment Agency assessment and current continuing competence certificate(s)

Transitional provisions (for previously exempt activities)

- ☐ generic knowledge test certificate and current continuing competence certificate(s).

The generic knowledge test option only applies to managers nominated under the 2010 exemption transitional arrangements.

3 Your ability as an operator, continued

3b.3 EU skills/ESA scheme

Provide evidence of technical competence.

- ☐ Tick this box to confirm you have included a copy of your Competence Management System (CMS) certificate and any appendices

Now go to question 3c

3c Finances

Section 3c applies to installations, waste operations and mining waste operations only.

Complete question 3c.1 if you are applying to add a relevant waste operation to a permit that has not had one before.

Otherwise start at question 3c.2 for variations to all landfills, Category A and hazardous waste mining waste facilities.

If you want to change your permit to extend the area of a landfill or mining waste facility as described above, you will need to discuss when is necessary to review the expenditure plan/cost profile for variation.

3c.1 Financial competence – adding a relevant waste operation to a permit that has not had one before.

Do you or any relevant person or a company in which you (or they) (or any relevant person) were a relevant person, have current or past bankruptcy or insolvency proceedings against you?

- ☒ No
- ☐ Yes Please give details below, including the required set-up costs (including infrastructure), maintenance and clean-up costs for the proposed facility against which a credit check may be assessed.

We may contact a credit reference agency for a report about your business's finances.

See **Environmental permits privacy notice** – <https://www.gov.uk/guidance/environmental-permits-privacy-notice> for how we use your personal information to support environmental permitting.

3 Your ability as an operator, continued

Financial provision – variations to a landfill, Category A or hazardous waste mining waste facilities.

When you apply to change your permit, you must also review your financial provision. This is to make sure it covers any changes in liability.

For further guidance for landfills see: <https://www.gov.uk/guidance/landfill-operators-environmental-permits/calculate-your-financial-provision#review-and-change-your-financial-provision>

For further guidance for mining waste facilities see: the 'Financial guarantees' section of 'Environmental Permitting Guidance – The Mining Waste Directive' <https://www.gov.uk/government/publications/environmental-permitting-guidance-the-mining-waste-directive>

3c.2 Do you need to change the amount of financial provision?

You need to provide an expenditure plan. Tell us the document reference here and send the documents with the application form when you've completed it.

☒ Yes Go to question 3c.3

☐ No Provide an explanation in the box below and then go to **question 3d**

3c.3 How do you plan to make financial provision?

You need to satisfy us that you are financially capable of meeting the obligations of the permit, including during aftercare.

Tick the type of financial provision you intend to use:

☒ Renewable bonds

☐ Cash deposits with the Environment Agency

3c.4 Submit your revised expenditure plan

For landfills, include any updated monitoring point plan or monitoring and extraction point plan. For guidance see: (<https://www.gov.uk/guidance/landfill-operators-environmental-permits/calculate-your-financial-provision>).

Document reference for revised expenditure plan

Appendix 1 Proposed Financial Provision Model

3 Your ability as an operator, continued

3d Management systems

You must complete section 3d for all variation applications

You must have an effective, written management system in place that identifies and reduces the risk of pollution. You can show this by using a certified scheme or your own system. For guidance on developing a management system see: <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

If you operate more than one site, you need to be able to explain what happens at each site and which parts of the overall management system apply. For example, at some sites you may need to show you are carrying out additional measures to prevent pollution because they are nearer to sensitive locations than others.

For waste and installation activities only: your management system must also explain your resilience to climate change. Explained at: <https://www.gov.uk/guidance/climate-change-risk-assessment-and-adaptation-planning-in-your-management-system>.

For small sewage treatment activities only: your management system must ensure that your sewage treatment system is maintained and run effectively. <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

You can find guidance on management systems here: <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

- ☒ Tick this box to confirm that you have read the guidance and that your management system will meet our requirements

What management system are you providing for your regulated facility?

- ☐ ISO 14001
- ☐ BS 8555 (Phases 1–5)
- ☐ BS EN ISO 14005:2019
- ☐ Green dragon
- ☐ EMAS Global
- ☐ Other
- ☒ Own management system

Please send us a summary of your updated management system and a copy of your accreditation (if applicable) with your application.

Document reference/s

Application Report V1

4 Environmental risk assessment

Your environmental risk assessment will need updating to consider any additional or other changes in risk. The risk assessment must show the measures in place to reduce and control risks.

The risk assessment must follow the methodology set out in 'Risk assessments for your environmental permit' (see <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>), or an equivalent method.

Include modelling reports and files where you have carried out detailed modelling.

If a habitat site is within screening distance, then an additional fee will be required. See <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

You must provide an updated environmental risk assessment. Your risk assessment should clearly identify any additional or other changes in risk. This does not apply when we can do the risk assessment for you. We can do the risk assessment for you where you are:

- a farmer discharging certain substances to ground
- discharging domestic treated sewage, (depending on volume and site sensitivities)

See 'Risk assessments for your environmental permit' at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#when-the-environment-agency-can-do-your-risk-assessment> for further details on when we can do your risk assessment for you.

Document reference(s) for the updated risk assessment, including modelling reports and files where applicable

Appendix 2 Environmental Risk Assessment

5 Site condition report

This section is applicable to Part A installations, waste and mining waste operations only. Do not complete for mining waste facilities.

This section does not apply to areas of land where waste is permanently deposited, for example areas of landfill, mining waste operations and deposit for recovery. It does apply to any parts of the site where waste will not be permanently deposited, for example a weighbridge area that will not be backfilled with waste.

You can contact us for pre-application advice on site condition reports, see: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

If you want to make any of the changes listed in question 5a, you will need to submit an updated site condition report (SCR). This must include an updated site plan. For details of what to include on the site plan, see the H5 template linked below.

If you do not currently have an SCR, you should use the **H5 Site Condition Report word template** <https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report> to prepare one.

You should keep your SCR up to date throughout the life of your permit. It will help you show how you have protected land and groundwater when you come to surrender your permit.

For SCR guidance and a template see:

<https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report>.

5 Site condition report, continued

5a Are you proposing to make any of the following changes:

- extend your site boundary
- add an installation
- use, produce or release any new hazardous substances
- relocate hazardous substances to a new area within your site?

☒ No **Go to section 6**

☐ Yes Provide a site condition report, or an updated site condition report together with a summary of the changes.

Document reference(s) of your site condition report

Document reference(s) of your change summary document

For installations, go to question 5b

For waste and mining waste operations, go to **section 6**.

5b Stage 1 to 3 assessment for hazardous substances (installations only)

Question 5b only applies to installations.

If you want to make any of the changes listed in question 5b, you will need to update your stage 1 to 3 assessment. If you do not already have a stage 1 to 3 assessment, you will need to carry one out.

For guidance on producing a stage 1 to 3 assessment, see 'EC Commission Guidance concerning baseline reporting (2014/C 136/03)' ([https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52014XC0506\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52014XC0506(01)&from=EN))

We have also produced a stage 1 to 3 assessment guidance document with worked examples. To request a copy, contact our pre-application service and ask for 'EPR advice note: Stage 1 to 3 assessment'. See: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

Are you proposing to make any of the following changes:

- use, produce or release any new hazardous substances
- relocate any hazardous substances you currently use, produce or release to a new area within your site boundary?

☐ No **Go to section 6**

☐ Yes Tick to confirm you have included a stage 1 to 3 assessment as part of your updated site condition report

Go to question 5c

5 Site condition report, continued

5c Baseline reference data (installations only)

Section 5c only applies to installations.

If your stage 1 to 3 assessment identifies a risk to soil and groundwater from relevant hazardous substances, you must provide baseline reference data for those substances. You may be unable to provide this information as part of your application. In this situation, it is likely that we will include an improvement condition in your permit. This will require you to submit baseline reference data within a given timeframe.

You will also be required to do periodic monitoring of soil and groundwater if your stage 1 to 3 assessment identified there is a risk to soil and groundwater from relevant hazardous substances.

It is recommended that you plan for this and include details of your proposed monitoring plan in your updated site condition report. The monitoring period in your permit will depend on the severity of the risk.

If your stage 1 to 3 assessment identifies a risk to soil and groundwater from any other potentially polluting substances, we recommend you establish baseline reference data.

5c.1 Has your stage 1 to 3 assessment identified a risk to soil and groundwater from relevant hazardous substances?

☐ No

☐ Yes Go to question 5c.2

5c.2 Have you have provided baseline reference data in your site condition report?

☐ No

☐ Yes

5c.3 Has your stage 1 to 3 assessment identified a risk to soil and groundwater from any other potentially polluting substances?

☐ No Go to section 6

☐ Yes Go to question 5c.4

5c.4 Have you have provided baseline reference data in your site condition report?

☐ No

☐ Yes

6 Other supporting information

6a Provide a non-technical summary of your application

Write a summary that explains your application. Summarise the key technical standards and control measures for your proposed changes. Use non-technical language wherever possible and avoid detailed data and scientific discussion. Other parts of the application form will ask for these details when necessary.

For mobile plant, tell us how the proposed changes could impact land quality. Describe the mobility of your plant and how you intend to operate.

6 Other supporting information, continued

Document reference of the non-technical summary

Application Report V1

6b Updated site plans (not for mobile plant)

If you are extending your site boundary or adding a discharge point you must send us a revised site plan or plans.

For an example of a suitable plan please see **Appendix 3**.

If you are sending us a paper copy of your plan it must be either A3 or A4 size. Alternatively, you can send us an electronic copy. For both formats, the plan must be legible at A4 size, drawn to scale, and include a scale bar. The plan should also include a date, a reference and local features.

For installations, waste and mining waste operations your site plan must also:

- identify all the land on which your activities will take place
- clearly show the outline of the site (preferably in a green colour)

It may be possible to incorporate your site plan into your site condition report plan.

For water discharge or groundwater activity permits your site plan must also show:

- any treatment plant
- the sample point
- the point where the effluent is discharged to the receiving environment

Are you extending your site boundary or adding a discharge point?

☒ No

☐ Yes

Document reference/s of the plans

6c Fire prevention plan (not for mobile plant)

You may need to submit a fire prevention plan (FPP) if you want to start storing combustible waste.

You may need to submit a revised FPP if your changes will increase the fire risk in other ways. This could be an increase in the risk of a fire occurring or an increase in the environmental risk if a fire occurs.

You will not need an FPP if both of the following apply:

- you only store waste with low combustibility
- we are satisfied that you can meet the 3 fire prevention objectives without using any of the measures in our FPP guidance (or alternative measures)

See our FPP guidance at: <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits>

6 Other supporting information, continued

Complete this question if you accept or propose to accept combustible waste.

6c.1 Does our Fire Prevention Plan guidance apply to any of your activities?

- ☐ No Go to section 7
- ☐ Yes Go to question 6c.2

6c.2 Do you want to start storing combustible waste or will the fire risk increase in other ways?

- ☐ No
- ☐ Yes Provide a fire prevention plan or revised fire prevention plan that meets our guidance.

Document reference of the fire prevention plan

7 Consultation

Complete questions 7a to 7c for installations and waste operations and 7d for installations only. You will only need to answer the following questions if your proposed changes will result in the release of any substances to sewer or certain waters.

Does the change or addition to the waste operation or installation involve releasing any substance into any of the following?

7a A sewer managed by a sewerage undertaker?

- ☒ No
- ☐ Yes Please name the sewerage undertaker

7b A harbour managed by a harbour authority?

- ☒ No
- ☐ Yes Please name the harbour authority

7c Directly into inshore waters?

- ☒ No
- ☐ Yes Please name the relevant Inshore Fisheries and Conservation Authority (<https://association-ifca.org.uk/>)

7 Consultation, continued

7d Is the installation on a site for which:

7d.1 a nuclear site licence is needed under section 1 of the Nuclear Installations Act 1965?

☒ No

☐ Yes

7d.2 a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards Regulations 2015, or a safety report is needed under regulation 7 of those Regulations?

☒ No

☐ Yes

8 How to contact us

If you have difficulty using this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes

Would you like a reply to your feedback?

☐ Yes please

☐ No thank you

Appendix 1 – Low impact installation checklist (if you completed question 2f, low impact installations, you must also complete this checklist below).

Guidance for applicants on low impact installations

The Industrial Emissions Directive (IED) requires us to permit all installations regardless of their potential for environmental harm.

Consequently, we have developed the Low Impact Installation (LII) permit. If the criteria for LII are met, then a simpler permitting approach is adopted but all other aspects of the Environmental Permitting Regulations (EPR) still apply. LII sites are expected to require minimal regulatory effort by our staff.

Such reduction in regulatory effort can be reflected in lower subsistence charges for operators. The low impact qualifying criteria are demanding, as they are not designed to circumvent the purposes of the IED Directive or the Environment Permitting Regulations that implement them.

We do not consider the following waste activities under Schedule 1 of the Environmental Permitting Regulations to be eligible for the low impact approach:

- Section 5.1 – Incineration and co-incineration of waste
- Section 5.2 – Disposal of waste by landfill
- Section 5.3 – Disposal or recovery of hazardous waste, (except for standard rules SR2012 No13 for the treatment of incinerator bottom ash)
- Section 5.4 – Disposal, recovery or a mix of disposal and recovery of non-hazardous waste
- Section 5.6 – Temporary or underground storage of hazardous waste Requirements on the operator

Requirements on the operator

If you can comply with this guidance, you may pay the lower subsistence charge, as set out in our charges scheme. You must first demonstrate to us that your installation can have only a low impact on the environment through your variation application. We will check that the application is duly made and meets the criteria set out in this guidance. If we do not agree that the installation meets these criteria, we will not proceed to determine the application.

An application for a permit variation must address all the matters set out in the guidance on environmental permitting applications in sufficient detail to allow us to determine it, even if you believe that you are likely to satisfy the LII criteria. You must show through your application that your installation meets each of the conditions set out below. The application might not have to be as detailed as that required for installations that do not meet these criteria. However, it will still need to be made in the proper manner, advertised and entered on the Public Register in the usual way. In coming to our view, we will consider any comments that we receive about the application as part of the consultation process.

The permit conditions for a LII will meet the requirements of the Environmental Permitting Regulations. The permit conditions will also aim to ensure that an installation is operated in such a way that all appropriate measures are taken to avoid pollution, in particular through the application of best available techniques (BAT) and achieving a high level of protection of the environment as a whole. The operator will be required to report each year that the installation is still running as set out in the application and certify that actual releases remain below the levels set out in this guidance.

Appendix 1 – Low impact installation checklist, continued

Installation reference

Low impact installation criterion	Section of supporting document that shows how your proposed activity meets the LII criterion	Do you meet LII criterion?
A – Management techniques		☐ Yes ☐ No
B – Aqueous waste		☐ Yes ☐ No
C – Abatement systems/ releases to air		☐ Yes ☐ No
D – Emissions to groundwater		☐ Yes ☐ No
E – Waste production		☐ Yes ☐ No
F – Energy consumption		☐ Yes ☐ No
G – Accident prevention		☐ Yes ☐ No
H – Noise		☐ Yes ☐ No
I – Emissions of polluting substances		☐ Yes ☐ No
J – Odours		☐ Yes ☐ No
K – Compliance history		☐ Yes ☐ No

If you answered 'No' to any of the questions above, your installation cannot be considered as a low impact installation.

Appendix 1 – Low impact installation checklist, continued

Determination of low impact installations

We will determine what constitutes a low impact installation according to the principles set out below. You must demonstrate to our satisfaction that such is the nature of the installation, there is no reasonable likelihood that you will fail to meet any of these criteria.

- A. **Management techniques:** All the criteria described below must be met without having to rely on significant management effort. In other words, the installation intrinsically must have only a low environmental impact, including under start up, shut down, or abnormal operating conditions.
- B. **Wastewater:** The installation must not release more than 50 m³ per day of water from process activities conducted at the installation giving rise to effluent. No account need be taken of the volume of water exported from the installation as product. Characterise and quantify any aqueous effluents released from the installation on a daily basis and provide justification that the installation releases no more than 50 m³ per day of water from process activities.
- C. **Abatement systems/releases to air:** The installation must comply with the criteria in this guidance without having to rely on active abatement for releases to the environment outside of any buildings. Releases must not be dependent on continuing or correct operation of equipment, where failure of active pollution prevention systems could result in an unacceptable external release. For example, if the installation depends on active abatement in the form of scrubbers, filters or electrostatic precipitators to achieve the releases to the environment set out in this guidance, it is unlikely that it can be treated as having only a low potential for impact. However, abatement systems installed solely for the protection of workers (where abatement is not to attenuate external environmental releases) need not be included in this assessment.
- D. **Emissions to groundwater:** There must be no planned or fugitive emission from the permitted installation into the ground, or any soak away. This does not preclude the discharge of clean rainwater run-off into soak ways.
- E. **Waste production:** The installation must not produce more than one tonne of waste or 10 kg of hazardous waste per day, averaged over a year, with no more than 20 tonnes of Directive waste or 200 kg of hazardous waste being produced in any one day.
- F. **Energy consumption:** The installation must not consume energy at a rate greater than 3 MW or, if the installation uses a combined heat and power installation to supply any internal process heat, 10 MW. These limits apply to the sum of energy imported as electricity and produced on site through the combustion of fuels.
- G. **Accident prevention:** You must have in place satisfactory containment measures to prevent fugitive emissions to surface water, sewer or land and ensure that these are adequately maintained at all times. This requirement applies to all substances present on site and in any quantity.
- H. **Noise:** There must be only a low potential for causing offence due to noise. An installation will not be considered as a low impact installation if it may give rise to noise noticeable outside the installation boundary. This requires the exercise of judgement, taking account of any history of noise complaint arising from the installation and consideration of the likely offsite noise levels and proximity of sensitive receptors. Describe the main sources of noise from the installation, the nearest noise sensitive locations and any relevant noise measurement surveys which have been undertaken, and the proposed techniques and measures for the control of noise. Provide justification that there is only a low potential for offence due to noise.

Appendix 1 – Low impact installation checklist, continued

- I. **Emissions of polluting substances:** Justify that there will be no likelihood of a release to the environment of any particular substance from the whole installation at a rate greater than that determined as insignificant as set out in our guidance note (search for ‘Control and monitor emissions for your environmental permit’ at: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit>). Describe the nature, quantities and sources of foreseeable emissions from the installation.
- J. **Odour:** There must be only a low potential for giving offence due to odour. An installation will not be considered as a low impact installation if it may give rise to an offensive smell noticeable outside the installation boundary. This requires the exercise of judgement, taking account of any history of odour complaint from the installation and whether this class of activity is known by experience to give rise to smells. A significant possibility or actual history of excursions or fugitive emissions, for example from stored materials, would suggest that the installation could not be treated as having a low impact. Provide details of potential sources of odour from the installation, for example from stored materials, and justify that there is only a low potential for offence due to odour.
- K. **Compliance history:** If any of the following enforcement actions have taken place at the same installation under the same management (and where appropriate, have not been overturned on appeal), then it will not normally be considered further as a low impact installation:
- prosecution*
 - formal caution*
 - suspension notice*
 - enforcement notice relating to an actual or potential environment incident*
- * (All under EPR or the equivalent under previous environmental regimes)

Appendix 2 – Date of birth information for Relevant offences and/or Technical competence questions only

Date of birth information in this appendix will not be put onto our Public Register

1 Relevant Offences – date of birth information for each relevant person

Please give us the following details if you have answered ‘Yes’ to question 3a1

Name of relevant person 1

Date of birth (DD/MM/YY)

Name of relevant person 2

Date of birth (DD/MM/YY)

Name of relevant person 3

Date of birth (DD/MM/YY)

Name of relevant person 4

Date of birth (DD/MM/YY)

Continue on a separate sheet as required

Document reference of continuation sheet

Appendix 2 – Date of birth information for Relevant offences and/or Technical competence questions only, continued

2 Technical competence – date of birth information for each technically competent manager

Please give us the following details (relevant waste operations only)

Name of technically competent manager 1

Ian Greaves

Date of birth (DD/MM/YY)



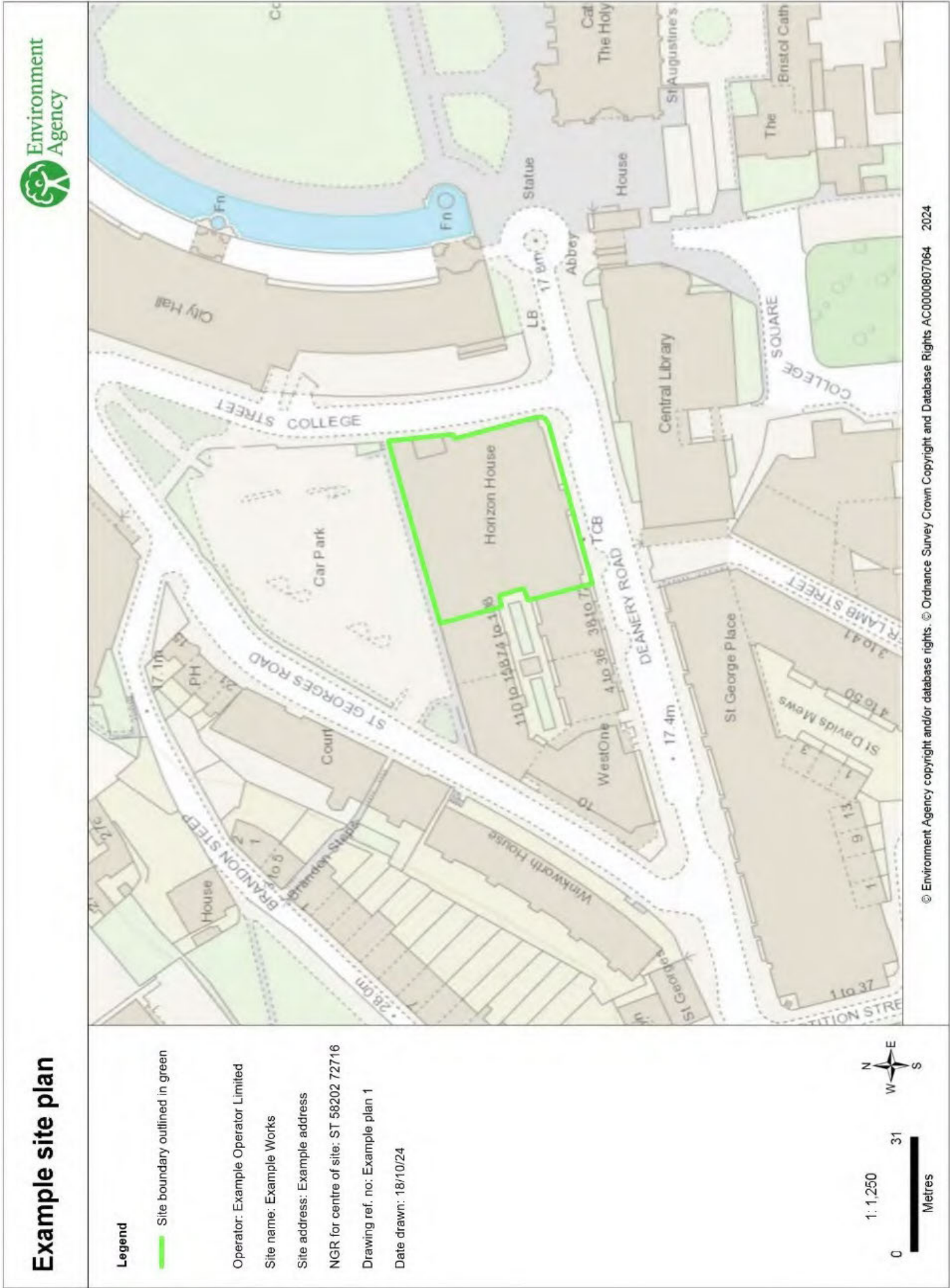
Name of technically competent manager 2

Date of birth (DD/MM/YY)

Continue on a separate sheet as required

Document reference of continuation sheet

Appendix 3 – Example site plan



Copyright issue

Please note that some plans and maps will be copyright. Unless you are using your own maps or plans or have paid for the copyright (for example with Ordnance Survey) you may not have the right to reproduce the map or plan.



Application form

Part C4

Application for an environmental permit

Part C4 – Varying a bespoke waste operation permit



Fill in this part of the form, together with parts A, C2 and F1, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or making changes to existing ones).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

Contents

- 1 What waste operations are you applying to vary?
 - 2 Point source emissions to air, water and land
 - 3 Operating techniques
 - 4 Monitoring
 - 5 How to contact us
- Appendix 1 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes
- Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations

1 What waste operations are you applying to vary?

Fill in Table 1a with details of what you are applying to vary.

Fill in a separate table for each waste operation you are applying to vary. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given this document.

Document reference

Application Report V1

Types of waste accepted

For each line in Table 1a, fill in a separate document to list those wastes you will accept on the site for that operation, giving the List of Wastes catalogue code (search for 'Technical guidance on how to assess and classify waste' at www.gov.uk/government/organisations/environment-agency). If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

1 What waste operations are you applying to vary?, continued**Table 1a – Waste operations which do not form part of an installation**

Name of the waste operation	Description of the waste operation	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 1)	Non-hazardous waste treatment capacity (if this applies) (See note 1)
Add extra rows if you need them. If you do not have enough room, go to the line below or send a separate document and give us the document reference here	Use the description from the guidance. Include any extra detail that you think would help to accurately describe what you want to do			
Landfill for non-hazardous waste and landfill restoration	Increase annual waste input limits for non-hazardous and inert waste.	D5 - Specially engineered landfill; R5 - the recycling or reclamation of inorganic material R10 - Land treatment resulting in benefit to		
		agriculture or ecology		
For all waste operations	Total storage capacity (see note 2)			
	New total if varying to increase			
	Annual throughput (tonnes each year)			20,000.00
	New total if varying to increase			130,000.00

1 What waste operations are you applying to vary?, continued**Notes**

1 By 'capacity', we mean:

- the total landfill capacity (cubic metres) for landfills
- the total treatment capacity (tonnes each day) for waste treatment
- the total storage capacity (tonnes) for waste-storage operations

2 By 'total storage capacity', we mean the maximum amount of waste in tonnes you store on the site at any one time.

Please provide the document reference. You can use Table 1b as a template.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description of the waste in the document, (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste.

Document reference

Application Report V1

Table 1b – Template example – types of waste accepted and restrictions

Waste code	Description of the waste
Example	Example
02 01 08*	Agrochemical waste containing hazardous substances
18 01 03*	Infectious clinical waste, not contaminated with chemicals or medicines – human healthcare (may contain sharps) for alternative treatment
17 05 03*/17 06 05*	Non-hazardous soil from construction or demolition contaminated with fragments of asbestos cement sheet

1c Deposit for recovery purposes (see the guidance notes on part C4)

Are you applying for a waste recovery activity involving the permanent deposit on waste on land for construction or land reclamation (including landfill restoration)?

No ☒ Go to section 2

Yes ☐

Are you applying for an inert landfill permit that includes a restoration activity using waste?

No ☐ Go to section 2

Yes ☐ Please send us a copy of your restoration plan in accordance with our guidance at <https://www.gov.uk/guidance/landfill-operators-environmental-permits/restore-your-landfill-site>

Have we advised you during pre-application discussions that we believe the activity is waste recovery?

No ☐ Go to section 2

Yes ☐

Have there been any changes to your proposal since the discussions?

No ☐

Yes ☐

Please send us a copy of your waste recovery plan that complies with our guidance at <https://www.gov.uk/guidance/waste-recovery-plans-and-permits>. You need to highlight any changes you have made since your pre-application discussions. Also give us the reference number of the document with your justification.

Please note that there is an additional charge for the assessment of a waste recovery plan that must be submitted as part of this application. For the charge see <https://www.gov.uk/topic/environmental-management/environmental-permits>.

Document reference

2 Point source emissions to air, water and land

Fill in Table 2 below with details of the point source emissions that result from the operating techniques at each of your waste operations.

Fill in one table for each waste facility.

Table 2 – Emissions

Name of the waste operation		Landfill for non-hazardous waste and landfill restoration		
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity	Unit
Point source emissions to water (other than sewers)				
Emission point reference and location	Source	Parameter	Quantity	Unit
Point source emissions to sewers, effluent treatment plants or other transfers off site				
Emission point reference and location	Source	Parameter	Quantity	Unit
Point source emissions to land				
Emission point reference and location	Source	Parameter	Quantity	Unit

Supporting information

3 Operating techniques

3a Technical standards

Fill in Table 3a for each waste operation you refer to in Table 1a above and list the ‘appropriate measures’ you are planning to use. If you are using the standards set out in the relevant technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a.

You must justify your decisions in a separate document if:

- there is no technical standard
- the technical guidance provides a choice of standards, or
- you plan to use another standard

This justification could include a reference to the Environmental Risk Assessment provided in part C2 of the application form.

Table 3a should summarise:

- the operations undertaken
- the measures you will use to control the emissions from your process, as identified in your risk assessment or the relevant technical guidance
- how you will meet other standards set out in the relevant technical guidance

Table 3a – Technical standards

Fill in a separate table for each waste operation.

Waste operation		
Description of the waste operation Add extra rows if you need them	Appropriate measure (TGN reference)	Document reference (if appropriate)
Landfill for non-hazardous waste and landfill restoration	Landfill operators: environmental permits	https://www.gov.uk/guidance/landf

In all cases, describe the type of facility or operation you are applying for and provide site infrastructure plans, location plans and process flow diagrams or block diagrams to help describe the operations and processes undertaken. Give the document references you use for each plan, diagram and description.

Document reference

3b General requirements

Fill in a separate table for each waste operation.

Table 3b – General requirements

Name of the waste operation	
If the technical guidance or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references Application Report V1, Appendix 6 DMP
If the technical guidance or your risk assessment shows that odours are an important issue, send us your odour management plan. If your activity type is listed in the guidance document ‘Control and monitor emissions for your environmental permit’ as needing an odour management plan, or your risk assessment shows that odours are an important issue, you need to send us your odour management plan.	Document reference or references Application Report V1, Appendix 4 Odour Management Plan
If the technical guidance or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references

3 Operating techniques, continued

We may need to ask for management plans or risk assessments in other circumstances based on our regulatory experience. If you are unsure as to whether you need to submit a management plan with your application, please discuss this with the Environment Agency prior to submission.

Search for 'Risk assessment for your environmental permit' at www.gov.uk/government/organisations/environment-agency.

3c Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed in Table 3c, you must answer the questions in the related document.

Table 3c – Questions for specific sectors

Sector	Appendix
Recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes	See the questions in appendix 1
Inert landfill and deposit of waste on land for construction, land reclamation, restoration or improvement	See the questions in appendix 2

General information

4 Monitoring

4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures
- the methods you use
- the procedures you follow to assess the measures

Document reference

N/A

4b Point source emissions to air only

Provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must use M1 (search for 'M1 sampling requirements for stack emission monitoring' at www.gov.uk/government/organisations/environment-agency).

Document reference of the assessment

N/A

5 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

☐

No thank you

☐

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐

Amount received

£

Plain English Campaign's Crystal Mark does not apply to appendices 1 to 2.

Appendix 1 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes

1 Please provide an accurate and reliable characterisation of your compost like outputs (CLO). This should be based on sampling and analysis of the CLO produced by the treatment (MBT) process over a 12-month period and in accordance with section 2 of TGN 6.15

Document reference

2 Please provide an agricultural benefit assessment for the use of your CLO. This should be based on section 2 of TGN 6.15 and should be signed and dated by an appropriate technical expert

Document reference

3 Please provide a site-specific risk assessment of risks to soil and food chain receptors. This should be based on Schedule 2 of TGN 6.15 and include a map with a green outline showing the boundary of the area being treated and include:

- locations where the waste will be stored and spread
- any spring, well or borehole used to supply water for domestic or food production purposes that is within 250 metres of the area being treated
- any spring, well or borehole not being used for domestic or food production purposes that is within 50 metres of the area being treated
- any European designated sites (candidate or Special Area of Conservation, proposed or Special Protections Area in England and Wales or Ramsar Site) or Sites of Special Scientific Interest (SSSI) which are within 500 metres of the place where waste is to be stored or spread
- the location of public rights of way
- any Groundwater Source Protection Zones
- surface watercourses
- any buildings or houses within 250 metres of the area being treated
- land drains within the boundary

Document reference

4 Are the technical standards and measures fully in line with those set out in section 3 of TGN 6.15?

No ☐ Provide justification for departure from TGN 6.15 and a copy of the proposed technical standards, measures or procedures

Document reference

Yes ☐

Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations

1 Please provide your Environmental Setting and Site Design (ESSD) report

Document reference

Note: You should use the Environment Agency template to help you develop an environmental setting and site design (ESSD) report.

2 Please provide your Waste Acceptance Procedures (including Waste Acceptance Criteria)

Document reference

3 Have you provided a hydrogeological risk assessment (HRA) for the site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

4 Have you completed an outline engineering plan for the site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

5 Have you provided a stability risk assessment (SRA) for your site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

Appendix 2 – Specific questions for inert waste landfill and deposit for recovery operations, continued

6 Have you completed a monitoring plan for the site?

No ☐ Please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ Document reference

7 Have you completed a plan for closing the site and procedures for looking after the site once it has closed?

No ☐ If no for deposit for recovery activities please refer to the section of your ESSD that explains why this is unnecessary for your site

Yes ☐ For inert waste landfill you must provide a closure plan

Document reference

Spreading waste to support plant growth

8a Does the activity involve the deposit of waste to create or treat a growing medium (R10 for land treatment)?

No ☐

Yes ☐

8b If you answered 'yes' to question 8a, does the R10 activity include the spreading of waste to improve the quality of the growing medium (e.g. soil conditioner to improve existing soil profile)?

No ☐

Yes ☐ Go to question 8c

8c If you have answered 'Yes' to question 8b, have you completed a benefit statement?

No ☐ Please explain why

Document reference

Yes ☐

Note: Refer to our guidance when completing your statement (including EPR 8.01, section 6).



Application form

Part F1

Application for an environmental permit Part F1 – Charges and declarations



We recommend you use an Adobe Acrobat product to complete the form. You may not be able to complete the form using different software, such as the PDF reader built into your internet browser

Fill in this part for all applications for:

- installations (excluding new permit and variation applications for intensive farming. Use application form Part B3.5 or C3.5 instead)
- waste operations
- mining waste operations
- medium combustion plant
- specified generators
- water discharges (excluding treated domestic sewage effluent discharges of up to 15 cubic metres (15m³) a day into ground or up to 20 cubic metres (20m³) a day to surface water)
- groundwater activities (excluding small discharges of 15m³ per day or less if using Part B6.5 OR existing small discharges to Source Protection Zone1 if using Part B6.6)

Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1) saved onto a computer and then filled in.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

We anticipate it will take less than 3 hours to fill in this form if you have all the necessary information available.

Contents

- 1 Working out charges**
- 2 Payment**
- 3 Privacy notice**
- 4 Confidentiality and national security**
- 5 Declaration**
- 6 Application checklist**
- 7 How to contact us**
- 8 Where to send your application**

1 Working out charges

You must fill out this section for all applications except for waste mobile plant and Part B surrender notifications.

You have to submit an application fee with your application. For guidance on the fee and how to pay your charges, please see our charging guidance (<https://www.gov.uk/government/publications/environmental-permitting-charges-guidance>) and the current charging scheme <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>. You can also contact us for pre-application advice to help work out the charges.

Please note that there is an annual subsistence charge to cover the costs we incur in the ongoing regulation of the permit.

Table 1 – Type and number of facilities being applied for

For example, if you are submitting one installation application, enter the number one into the first column.

Installation	Waste	Mining waste	Medium Combustion Plant (MCP)/ Specified Generator (SG)	Water discharge	Groundwater activity
	1				

Table 2 – General application charge (A)

Charge activity reference from the charging scheme tables	Charge activity description from the charging scheme tables	What are you applying for? For example, a new permit, minor variation, normal variation, substantial variation, surrender, low risk surrender, transfer	Amount
e.g. 1.17.3	e.g. Section 5.2 – landfill for hazardous waste	e.g. transfer application	e.g. £5,561
1.17.2	Landfill for non - hazardous waste and lagoons / dredging sites subject to the landfill directive; including assessment of odour management plan.	Normal Variation	£11,388
Total A			£11,388

1 Working out charges, continued

Table 3 – Additional assessment charges (B)

Part 1.19 Charges for plans and assessments			Tick appropriate
Reference	Plan or assessment	Charge	
1.19.1	Waste recovery plan or variation or revision of a waste recovery plan.	£1,231	☐
1.19.2	Habitats assessment (except where the application activity is a flood risk activity, water discharge or groundwater activity).	£779	☐
1.19.3	Fire prevention plan (except where the application activity is a farming installation).	£1,241	☐
1.19.4	Pests management plan (except where the application activity is a farming installation).	£1,241	☐
1.19.5	Emissions management plan (except where the application activity is a farming installation).	£1,241	☒
1.19.6	Odour management plan (except where the application activity is a farming installation).	£1,246	☐
1.19.7	Noise and vibration management plan (except where the application activity is a farming installation).	£1,246	☐
1.19.8	Ammonia modelling assessment	£620	☐
1.19.9	Dust and bio-aerosol management plan.	£620	☐
1.19.10	Habitats assessment for discharges to water and groundwater activities.	£2,218	☐
1.19.11	Specific Substances Assessment for a water discharge activity to surface water.	£4,114	☐
1.19.12	Specific Substances Assessment for a groundwater activity.	£1,685	☐
	Advertising	£538	☐
Total B			£1,241

Total charges

Add the total charges from Table 1 to the total charges from Table 2 (total A plus total B)

£12,629

2 Payment

You must fill out this section for all applications except for waste mobile plant and Part B surrender notifications.

Tick below to show how you have paid.

- ☐ Cheque
- ☐ Credit or debit card
- ☒ Electronic transfer (for example, BACS)

Cheques

You should make cheques payable to 'Environment Agency' and make sure they have 'A/c Payee' written across them if it is not already printed on.

2 Payment, continued

Please write the name of your company and application reference number on the back of your cheque. We will not accept cheques with a future date on them.

Credit/debit cards

If you are paying by credit or with debit card we will call you. We can accept payments by Visa, MasterCard or Maestro card only.

☐ Call me to arrange payment by debit or credit card

Electronic transfer BACS

If you choose to pay by electronic transfer, you will need to use the following information to make your payment:

Company name	Environment Agency
Company address	SSCL (Environment Agency), PO Box 797, Newport Gwent, NP10 8FZ
Bank	RBS/NatWest
Address	London Corporate Service Centre, CPB Services, 2nd Floor, 280 Bishopsgate, London EC2M 4RB
Sort code	60-70-80
Account number	10014411
Account name	EA RECEIPTS
Payment reference number	PSCAPPXXXXYYY

You need to create your own reference number. It should begin with PSCAPPWASTE (Waste), PSCAPPINST (Installation), PSCAPPWQ (Water Quality) (to reflect the facility type) and it should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). The reference number that you supply will appear on our bank statements.

You should also email your payment details and reference number to ea_fsc_ar@gov.sscl.com.

If you are making your payment from outside the United Kingdom, it must be in sterling. Our IBAN number is GB23NWBK60708010014411 and our SWIFTBIC number is NWBKGB2L.

If you do not quote your reference number, there may be a delay in processing your payment and application.

Provide a unique reference number for the application, i.e. do not only use the company name only

PSCAPPWHISC002

State who is paying (full name and whether this is the agent/applicant/other)

Westcombe Waste Limited - Applicant

Fee paid

£12,629

Date payment sent (DD/MM/YYYY)

27/11/2025

3 Privacy notice

The Environment Agency runs the environmental permit application service.

See <https://www.gov.uk/guidance/environmental-permits-privacy-notice> for how we use your personal information in services to support environmental permitting.

4 Confidentiality and national security

Confidentiality

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential.

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application. You can find guidance on confidentiality in ‘Environmental permitting guidance: core guidance’, published by Defra and available at <https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>.

Only tick the box below if you wish to claim confidentiality for parts of your application

☐ Please treat the specified information in my application as confidential

National security

You can tell the Secretary of State that you believe including information on a public register would not be in the interests of national security. You must enclose a letter with your application telling us that you have told the Secretary of State and you must still include the information in your application. We will not include the information in the public register unless the Secretary of State decides that it should be included.

You can find guidance on national security in ‘Environmental permitting guidance: core guidance’, published by Defra and available at <https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>

You cannot apply for national security via this application.

Now fill in section 5

5 Declaration

If you knowingly or recklessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

Each individual (or individual trustee) who is applying for their name to appear on the permit must complete this declaration. You will have to print a separate copy of this page for each additional individual to complete.

If you are transferring all or part of your permit, both you and the person receiving the permit must make the declaration. You must fill in the declaration directly below; the person receiving the permit must fill in the declaration under the heading ‘For transfers only’.

5 Declaration, continued

Note: we will issue a letter to both current and new holders to confirm the transfer. If you are changing address we will need to send this letter to your new address; therefore please tell us your new address in a separate letter.

If you are unable to trace one or more of the current permit holders please see below under the transfers declaration.

I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

- ☒ Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)
- ☒ I confirm that my standard facility will fully meet the rules that I have applied for (this only applies if the application includes standard facilities)
- ☐ Tick this box if you do not want us to use information from any ecological survey that you have supplied with your application (for further information please see the guidance notes on part F1)

Name

Title

Mr

First name

Ian

Last name

Greaves

on behalf of (if relevant; for example, a company or organisation and so on)

Westcombe Waste Limited

Position (if relevant; for example, a company or organisation and so on)

Director

Today's date (DD/MM/YYYY)

27/11/2025

For transfers only – declaration for person receiving the permit

A relevant person should make the declaration (see the guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this application to transfer an environmental permit to me is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

Note: If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration as above. Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

5 Declaration, continued

- ☐ Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)

Name

Title

First name

Last name

on behalf of (if relevant; for example, a company or organisation and so on)

Position (if relevant; for example, a company or organisation and so on)

Today's date (DD/MM/YYYY)

Now go to section 6

6 Application checklist

You must fill in this section.

If your application is not complete, we will return it to you. If you aren't sure about what you need to send, contact us before you submit your application. For further information on pre-application advice, see <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>.

You must do the following:

- ☒ Complete legibly all parts of the application form that are relevant to you and your activities
- ☒ Identify relevant supporting information in the form and send it with the application
- ☒ List all the documents you are sending in the table below.
- ☐ For new permit applications or any changes to the site plan, provide a plan that meets the standards given in the guidance note on part F1
- ☐ Provide a supporting letter for any claim that information is confidential
- ☒ Get the declaration completed by a relevant person (not an agent)
- ☒ Send the correct fee

6 Application checklist, continued

Continue on an extra sheet if necessary.

Question reference	Document title	Document reference
Form C2, 2b	Application Report	Application Report V1
Form C2, 3c.4	Proposed Financial Provision Model	Application Report, Appendix 1
Form C2, 3d	Application Report	Application Report V1
Form C2, 4	Environmental Risk Assessment	Application Report, Appendix 2
Form C2, 6	Application Report	Application Report V1
Form C4, 1	Application Report	Application Report V1
Form C4, 3b	Dust Management Plan	Application Report, Appendix 6
Form C4, 3b	Odour Management Plan	Application Report, Appendix 4

Document reference

7 How to contact us

If you have difficulty filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422549 (Monday to Friday, 8am to 6pm)

Email: [**enquiries@environment-agency.gov.uk**](mailto:enquiries@environment-agency.gov.uk)

Website: [**www.gov.uk/government/organisations/environment-agency**](http://www.gov.uk/government/organisations/environment-agency)

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

8 Where to send your application

For how many copies to send see the guidance note on part F1.

Please send your filled in application form and supporting documents to:

For water discharges and groundwater activities by email to

[**PSC-WaterQuality@environment-agency.gov.uk**](mailto:PSC-WaterQuality@environment-agency.gov.uk)

For waste, installations, medium combustion plant and specified generators by email to

[**PSC@environment-agency.gov.uk**](mailto:PSC@environment-agency.gov.uk)

For large electronic documents (too large for email attachment) you can upload your applications to file sharing sites and send us a link to download the documents. Alternatively, you can send more than one email with documents attached.

Or by post to:

Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Do you want all information to be sent to you by email?

- ☐ Please tick this box if you wish to have all communication about this application sent via email (we will use the details provided in the Part A form).

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes.

Would you like a reply to your feedback?

☐ Yes please

☐ No thank you

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

☐ No

☐ Yes

Amount received (£)



Appendix 1

Proposed Financial Provision Model



Appendix 2

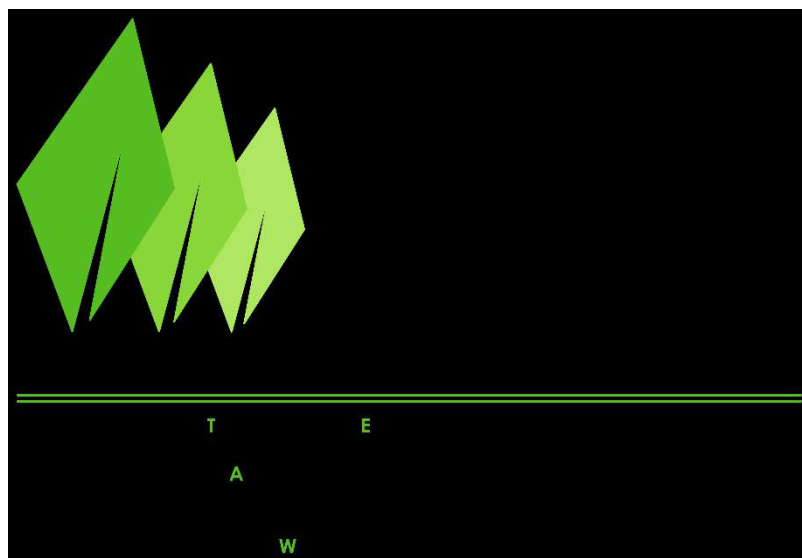
Environmental Risk Assessment

Westcombe Waste Limited

Environmental Risk Assessment

Westcombe Waste Limited

Whiscombe Hill Landfill
Somertonfield Road,
Westcombe,
Somerton,
Somerset
TA11 6HY



**Document Control Table**

Project Reference	25/014c
Project Title	Permit Variation Application
Document Title	Environmental Risk Assessment
Document Issue Date	27 November 2025
Client	Westcombe Waste Limited
Status	Issued

Change log

Version.	Changes	Produced by	Checked by	Date
1	Original Environmental Risk Assessment.	Sian Wilcox	Tracey Westbury	27 November 2025

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Drawings

25/014 001 Sensitive Receptor Plan



1. Introduction

- 1.1. Westbury Environmental Limited have been instructed to prepare this Environmental Permit Variation Application on behalf of Westcombe Waste Limited (Operator) for Whiscombe Hill Landfill, Somertonfield Road, Westcombe, Somerton, Somerset, TA11 6HY (Site).
- 1.2. For the purposes of this ERA, the Site is defined as the area and activities covered by Environmental Permit reference EPR/QP3230LE (Permit).
- 1.3. This ERA considers any potential increase in environmental risk associated with the following proposed changes:
 - Increase of the annual limit for non-hazardous waste to 94,250 tonnes per annum.
 - Increase of the annual limit for inert waste to 35,750 tonnes per annum.
- 1.4. This assessment has been undertaken in accordance with the requirements set out by the Environment Agency guidance document “Risk assessments for your environmental permit” (last updated 3 January 2025).

Content of the Environmental Risk Assessment

- 1.5. This report provides a detailed description of the Site and its environmental setting, identifies nearby sensitive receptors and evaluates the magnitude of risk to receptors as a result of the proposed changes.
- 1.6. The Environmental Risk Assessment is structured as follows:
 - Section 2 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors (Table 1).
 - Section 3 provides information on how environmental risk has been identified.
 - Section 4 identifies risk factors, sources of risk, mitigation measures and the impact of proposed changes (Table 2).
 - Section 5 provides a risk matrix for estimating the magnitude of environmental risk (Table 3).
 - Section 6 provides an assessment of environmental risk, risk management, and residual risk following risk mitigation measures (Table 4).
 - Section 7 provides a conclusion of the Environmental Risk Assessment and the impact of the proposed changes.



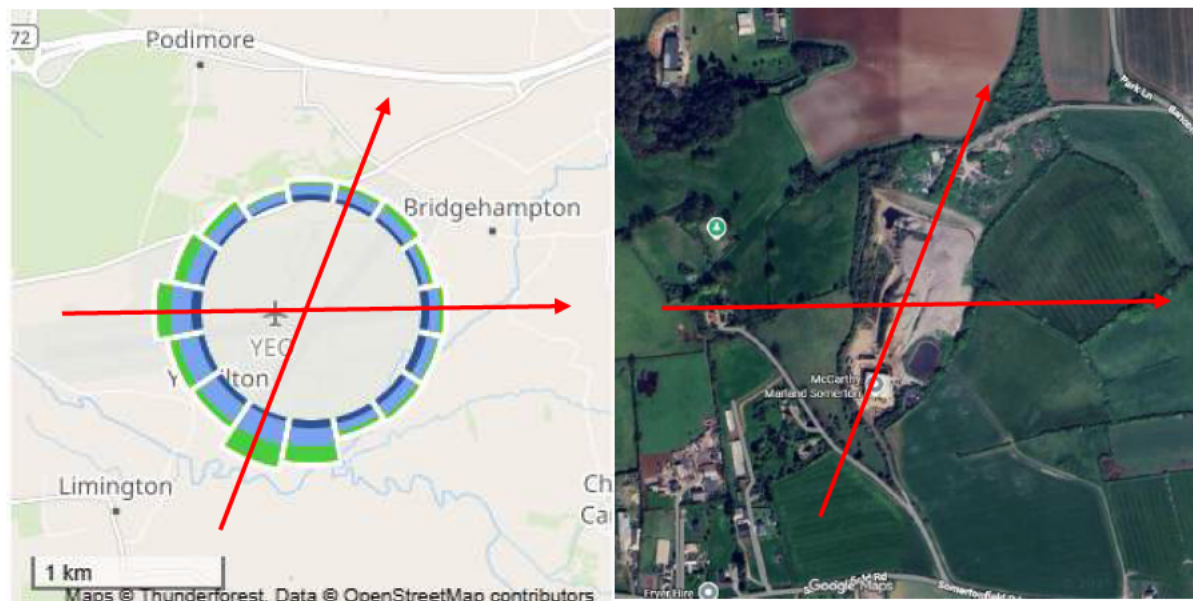
2. Site Location and Sensitive Receptors

Location

- 2.1. Whiscombe Hill Landfill Somertonfield Road, Westcombe, Somerton, Somerset, TA11 6HY.
- 2.2. The land surrounding the Site is largely agricultural, with the nearest town being Somerton which is located approximately 915m southeast from the site boundary at its closest point.
- 2.3. The Site is not located within a Groundwater Source Protection Zone.
- 2.4. The nearest surface water features are the River Dove located approximately 860m north. There are small ponds in the immediate area located northwest, north and northeast of the site boundary.
- 2.5. The Site is located within flood Zone 1 and therefore has a low risk of flooding.
- 2.6. The Site is located on a Secondary B bedrock aquifer. The bedrock geology is comprised of:
 - Mercia Mudstone Group - Mudstone and halite-stone, and;
 - Westbury Formation and Cotham Member - Mudstone and limestone, interbedded.
- 2.7. The Site is located on an Unproductive (Superficial Drift) Aquifer.
- 2.8. The predominant wind direction at Site blows towards the northeast and east, based on wind direction data obtained from Yeovil Airport weather station, located approximately 9.5km southeast of the Site, see Figure 2.1: Wind rose from Yeovil Airport weather station.

Figure 2.1: Wind rose from Brampton weather station

Red arrow indicates wind direction



Receptors

- 2.9. Sensitive receptors near the Site are identified on the Drawing No. TBC 25/014 001 Sensitive Receptor Plan.
- 2.10. Table 1 shows the approximate distance and orientation (from the Site boundary to the boundary of the nearest receptor) of nearby sensitive receptors.

**Table 1: Sensitive Receptors**

No.	Receptor	Type of receptor	Bearing from Site	Approx. distance from Site boundary to receptor boundary (m)
1	Pond	Surface Water Feature	Northwest	12
2	Somertonfield Road	Road	South	110
3	Deciduous Woodland	Protected Habitats & Species	West	180
4	Pond	Surface Water Feature	Northeast	204
5	Deciduous and Ancient Woodland	Protected Habitats & Species	Northwest	227
6	Little Park Farm	Agricultural	Northwest	255
7	Westcombe Farm	Agricultural	Southeast	315
8	Westcombe Stables	Residential	Southwest	390
9	Greenhill Farm	Agricultural	Southwest	480
10	Deciduous Woodland	Protected Habitats & Species	Northeast	484
11	Somerton Door Farm	Agricultural	Northeast	660
12	Harleys Court Cottages	Leisure	Southwest	698
13	River Cary	Surface Water Feature	North	725
14	Strangeways Farm	Agricultural	South	725
15	Somerton Hill B3153	Road	South	815
16	Cleers View Farm	Agricultural	South	826
17	Somerton Door Farm	Solar Farm	Northeast	840
18	Buttercross Meadow	Residential	Southeast	860
19	Somerton Business Park	Commercial	East	925



3. Identification Environmental Risk

- 3.1. This section identifies the environmental risk factors associated with current site operations and evaluates how these may be affected by the proposed changes.
- 3.2. The Environmental Risk Factors identified in this assessment are:
 - Dust
 - Noise
 - Odour
 - Landfill Gas
 - Leachate
 - Mud (on local roads)
 - Litter
- 3.3. Whether the proposed changes present any new risk factors has been considered. No new risk factors have been identified as a result of the proposed changes.
- 3.4. Table 2 presents the sources of environmental risk for each factor listed above.
- 3.5. Whether the proposed changes introduce any new sources of risk has been considered. No new sources of risk have been identified as a result of the proposed changes.
- 3.6. It has been identified that the magnitude of risk by each source may be impacted in some instances. The impact that the proposed changes have on each source of risk have been described in Table 2.
- 3.7. Table 2 also describes the mitigation measures currently in place on the Site. It assesses whether new mitigation measures will be required and how existing measures may be impacted by the proposed changes.
- 3.8. Current mitigation measures will continue to be implemented, with some requiring more frequent application to manage risk where an impact on risk has been identified.
- 3.9. Should an event occur on Site that prevents the Site from accepting waste deliveries, contingency measures will be implemented. Diverted vehicles will be directed suitable alternative sites.
- 3.10. The operator is committed to complete the landfill sooner. Cell capping and the installation of gas and leachate monitoring infrastructure will be completed at a faster rate. This may result in a significant increase in vehicle movement and works associated with landfill infrastructure requirements.
- 3.11. This has been considered when assessing the impact of the changes on risk factors and mitigation measures.



4. Risk Factors and Mitigation Measures

Table 2: Impact on Emission Sources and Mitigation Measures

Risk Factor	Current Sources of Risk	Impact of proposed changes on Sources of Risk	Current Mitigation Measures	Impact of proposed changes on Mitigation Measures
Dust	HGV Movements Handling and movement of waste Deposit of waste in the landfill. Waste storage (wind whipping of stockpiles)	There will be more HGV movements on Site each day. It is considered that this will result in an increased level of dust emissions as a result of vehicle movements. Movement of waste on the Site will take place more frequently each day, with waste being moved to and from storage areas and the landfill at a higher frequency. It is considered that this will increase the level of dust emissions from waste being handled. Waste will be deposited in the landfill at a faster rate. The tipping of waste loads can generate dust emissions. Dust emissions may increase as waste is tipped more frequently. It is not considered that the proposed changes will have a significant impact on waste storage. More waste will be delivered to Site daily however waste will be deposited in the landfill at a faster rate. It is not anticipated that there will be a significant impact to stockpile size or storage times as a result of the changes.	Dampening of stockpiles in dry warm weather to minimise dust generation. Dampening of internal road surfaces in dry, warm weather to minimise dust generated by vehicle movements. Temporary Cell Cover at the end of each day to prevent wind whipping of waste outside of operational hours. 5mph Speed Limit to minimise dust generated by vehicle movements. Minimising drop heights to minimise dust generated by the handling of waste. Minimising double handling of waste to minimise dust generated by the handling of waste. Sheeting of vehicles to minimise dust escaping from waste during transport.	Due to the increased frequency of waste being delivered to Site and deposited in the landfill, stockpiles of waste may require more frequent dampening during warm, dry weather. This is due to the fact that waste will be removed from stockpiles and deposited in the landfill at a faster rate. Newly delivered waste that has not been dampened will be added to the stockpiles at a faster rate. The dampening of road surfaces is carried out in periods of warm, dry weather. This mitigation measure is implemented based on weather conditions and the observation of dust being generated. Implementation of this mitigation measure not dependant on the volume of traffic on Site. It is considered that there will be no significant impact to the implementation of the temporary cell cover at the end of each day. The temporary cell cover is put in place at the end of each operational day. Implementation of this mitigation measure is not dependant on the volume of waste deposited in the landfill each day. Mitigations measures such as the Site speed limit, minimising drop heights, minimising double handling and the sheeting of vehicles are constantly enforced on Site. Implementation of these mitigation measures is not dependant on the number of vehicles on Site or the volume of waste being handled each day.
Noise	HGV Movements Handling and movement of waste Deposit of waste in the landfill.	There will be more HGV movements on Site each day. It is considered that this may result in an increased level of noise emissions as a result of vehicle movements. Movement of waste on the Site will take place more frequently each day, with waste being moved to and from storage areas and the landfill at a higher rate. It is considered that this may increase the level of noise generated by the handling of waste.	5mph seed limit to minimise noise generated by vehicle movements. No idling policy / no revving of engines to minimise noise generated by vehicles. Switching off plant when not in use to minimise noise generated by idle plant.	An increase in the frequency of vehicle movements may mean that vehicles and equipment require more frequent maintenance as a result of them being used more. More vehicle movements may mean that the internal road surfaces will degrade faster. More frequent maintenance may be required on internal surfaces to ensure that they are free from pot holes and ruts. Mitigations measures such as the Site speed limit, minimising drop heights, minimising double handling, no



Risk Factor	Current Sources of Risk	Impact of proposed changes on Sources of Risk	Current Mitigation Measures	Impact of proposed changes on Mitigation Measures
		Waste will be deposited in the landfill at a faster rate. The tipping of waste loads can generate noise. Noise emissions may increase as waste is tipped more frequently.	Vehicle/equipment maintenance to minimise noise associated with mechanical faults. Minimising double handling of waste to reduce the number of vehicle movements. Minimising drop heights to minimise the noise generated by the handling of waste. Maintenance of internal surface (free from potholes and ruts) to prevent the generation of noise as a result of vehicles driving on an uneven surface. Only completing waste activities during operational hours.	idling policy, and only completing waste activities during operational hours are constantly enforced on Site. Implementation of these mitigation measures is not dependant on the volume of waste being handled each day.
Odour	Reception, handling, storage and deposit of biodegradable wastes	More waste will be accepted per day and the total volume of waste will be deposited over a shorter period of time. As a result of this, more biodegradable wastes may be present on site at any one time, therefore increasing the risk of odour emissions.	Olfactory monitoring to detect putrescible odours. Odorous waste loads are deposited as soon as practically possible to minimise the storage times of odorous wastes. Temporary cell cover at the end of each day to minimise the risk of odour emissions escaping from the landfill cell.	Olfactory monitoring may need to be carried out more frequently as a result of there potentially being more odorous waste present at Site at any one time. The measure of always depositing odours wastes as soon as practically possible is applied to all odorous waste regardless of the volume of waste. This mitigation measure will therefore not be impacted by the change. It is considered that there will be no significant impact to the implementation of the temporary cell cover at the end of each day. The temporary cell cover is put in place at the end of each operational day. Implementation of this mitigation measure is not determined by the volume of odorous waste deposited in the landfill each day.
Landfill Gas	Decomposition of organic waste	The increased rate of waste deposition may result in a higher volume of biodegradable waste being landfilled over shorter timeframes. This could lead to a more rapid onset of gas generation in newly filled cells, although the overall gas production profile is expected to remain consistent with existing operations.	Flaring of landfill gas extracted from completed landfill cells.	Additional gas extraction infrastructure may be installed in newly filled cells at an earlier stage to manage accelerated gas generation.



Risk Factor	Current Sources of Risk	Impact of proposed changes on Sources of Risk	Current Mitigation Measures	Impact of proposed changes on Mitigation Measures
Leachate	Rainfall percolating through deposited waste. Flooding of the site. Decomposition of organic waste. Compromised cell liner allowing groundwater infiltration.	It is considered that there will be no significant impact to the sources of leachate as a result of the proposed changes. Cell liners are constructed in line with CQA's dependant on waste type and not the rate in which waste is deposited. Cells being completed quicker will likely reduce the amount of time that cell liners are exposed to the elements meaning that they could be less likely to become compromised while the cell is being filled. Cells being filled and capped quicker will likely reduce the time that waste is exposed to rain water. It is therefore considered that the proposed changes may reduce the quantity of leachate produced as a result of rain water percolating through the waste.	Temporary cell cover to shield waste from rainwater. A flood management plan to manage the potential escape of leachate as a result of a flood. Approved CQA's for cell liners. This ensures that cell liners are appropriately constructed based on waste type and are unlikely to become compromised.	It is considered that there will be no significant impact to the implementation of the temporary cell cover at the end of each day. The temporary cell cover is put in place at the end of each operational day. Implementation of this mitigation measure is not determined by the volume of odorous waste deposited in the landfill each day. CQA's for cell liners are always a requirement before works begin to fill a cell and this is not determined by the rate in which waste is deposited in the landfill.
Mud on Roads	HGV Movements	There will be more HGV movements on Site each day. An increase in Site traffic is considered likely to increase the risk of mud being tracked on to local roads.	Wheel wash to remove mud from vehicle wheels before they exit the Site. Road Sweeper to clear mud tracked on to local roads.	The wheel wash may need to be used more frequently due to the higher number of vehicles entering and exiting Site. The road sweeper may need to be deployed more frequently to clear local roads of any mud that has been tracked from Site on vehicle wheels.
Litter	Waste deliveries Waste storage (wind whipping of stockpiles) Waste handling Deposit of waste in the landfill	There will be more waste deliveries per day. This is considered likely to result in a higher risk of litter escaping from waste loads as they are delivered to the Site. There is not considered to be a significant impact on the amount of litter windblown from storage areas. As waste will be deposited in the landfill at a faster rate, the size of the stockpiles is not expected to be significantly impacted. Waste will be handled more frequently each day due to the accelerated pace of landfilling activities. This may result in a higher likelihood of litter escaping from waste loads.	Sheeting of vehicles Litter picking. Temporary cell cover	Vehicles delivering waste loads are required to be sheeted to minimise the potential for litter to escape during transit. This implementation of this measure is not determined by the number of waste deliveries each day. Litter picking is completed daily. Due to the increased risk of litter on the Site, litter picking may need to take place multiple times a day. The frequency will be determined by the amount of litter observed on Site and weather conditions (e.g., windy weather). It is considered that there will be no significant impact to the implementation of the temporary cell cover at the end of each day. This action is not determined by the volume of waste deposited each day.



Risk Factor	Current Sources of Risk	Impact of proposed changes on Sources of Risk	Current Mitigation Measures	Impact of proposed changes on Mitigation Measures
		Waste will be deposited into the landfill at an accelerated rate. This may result in a higher likelihood of litter from the waste within landfill cells.		



5. Environmental Risk Matrix

Risk Estimation

- 5.1. Table 3 below shows the matrix for estimating the magnitude of risk of a potential hazard from considering both the probability and consequence of a hazard occurring. The magnitude of risk determines what level of management is required to reduce the environmental impact and the probability of the risk occurring.

Table 3: Estimating the Magnitude of Risk

	Magnitude of Risk	Consequence			
		High	Medium	Low	Negligible
Probability	High	Very high	High	Medium/Low	Very low
	Medium	High	Medium	Low	Very low
	Low	High/Medium	Medium/Low	Low	Very low
	Negligible	High/Medium/Low	Medium/Low	Low	Negligible

- 5.2. Although Table 3 is a gross simplification that cannot represent the true complexity of risk assessment, it has been used as a guide in preparing this risk assessment report.
- 5.3. A risk assessment of the potential hazards associated with the proposed changes to the operation's that may cause harm to the environment has been completed using the method shown in Table 3, see Table 4 Environmental Risk Assessment.

Key Considerations

- 5.4. The following aspects have been considered when completing this Environmental Risk Assessment:

Data and Information

- Receptor
- Source / Hazard
- Harm
- Pathway

Judgement

- Probability of Exposure
- Consequences
- Magnitude of Risk

Action

- Justification for Magnitude
- Risk Management
- Residual Risk



6. Environmental Risk Assessment

Table 4: Environmental Risk Assessment

Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
Local human population – Residential dwellings located within the vicinity of the Site. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Releases of dusts and micro-organisms (bioaerosols)	Harm to human health - respiratory irritation and illness	Air transport then inhalation	Low	Medium	Medium/Low	Permitted waste types may comprise of dusts, powders, or loose fibres. Site activities that have the potential to generate dust include the tipping of waste into stockpiles, stored waste in the open being whipped by wind, deposit of waste in the landfill, and vehicle/plant movement. Movement of waste has the potential to emit dust. There is potential for increased dust generation from permitted activities during prolonged dry periods. It is considered that due to the size of the dust particles, the majority of dust is likely to be deposited within 250m of the source.	Only inert and non-hazardous waste types are accepted on Site. Any waste types delivered to Site that are not listed in the environmental permit are rejected. Any contravening waste discovered is stored in a secure container and promptly removed from Site. Water will be used to dampen the site surface to minimise dust emissions from the movement of the waste, and for dampening down stockpiles of waste to reduce the risk of wind whipping. The same dust management techniques are proposed. However, these are likely to be used	Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
							It is considered that the level of dust emissions may increase as a result of waste tonnage limits being increased due to the increase in the rate of waste movement. The predominant wind is from the west/ southwest.	more of the time as a result of the increase in tonnage being accepted per annum. In the event of a drought or limited water supply, activities causing dust emissions, will be temporarily ceased. Areas of the landfill will be covered at the end of the day to reduce the risk of wind whipping of waste.	
		Nuisance - dust on cars, clothing etc.	Air transport then deposition	Low	Low	Low	As above.	As above.	Low
	Smothering of plants and vegetation, reduced plant life	Harm to the health and habitats of protected wildlife.	Air transport then deposition and inhalation.	Low	High	Medium	Wildlife is often sensitive to dust. Dust can impact the health of wildlife and can alter habitats and food supply. As above.	As above.	Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
Local human population – Residential dwellings located within the vicinity of the Site. Nearest residential dwelling; Westcombe Stables 390m SW from the Site. Nearest road; Somertonfield Road 110m South of the Site.	Waste, litter and mud on local roads.	Nuisance, loss of amenity, road traffic incidents, potential for resuspension of dust.	Vehicles entering and leaving the site.	Medium	Medium	Medium	Local residents are often sensitive to waste, litter, mud on roads. Permitted waste types have a potential to produce litter. It is considered that there is potential for mud to be tracked on to local roads. It is considered that there is a risk of litter reaching the nearby road by way of the wind whipping of waste. It is considered that the risk of mud and litter may increase as a result of waste tonnage limits being increased due to an increased number of vehicles entering and exiting the Site and an increased volume of waste being delivered to the Site.	There will be wheel cleaning facilities to wash mud off vehicles exiting the Site. Site operatives will carry out regular visual inspection of local roads to identify where there is a build-up of mud on local roads. A road sweeper will be deployed to clear mud from local roads. Any litter found will be collected and disposed of regularly to prevent litter reaching local roads. The same mud and debris management techniques are proposed. However, these are likely to be used more of the time as a result of the increase in tonnage being accepted per annum.	Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
Local human population – Residential dwellings located within the vicinity of the Site. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Odour	Nuisance, loss of amenity	Air transport then inhalation	Medium	Low	Medium/low	Local residents often sensitive to odour. Permitted waste types have a potential to give rise to odour. The nearest residential receptors are not located within the predominant wind direction.	Only inert and non-hazardous waste types are accepted on Site. Any waste types delivered to Site that are not listed in the environmental permit are rejected. Any contravening waste discovered is stored in a secure container and promptly removed from Site. Incoming waste loads are unloaded and deposited in the landfill promptly to minimise potential odour emissions from the handling of waste. Vehicles carrying potentially malodorous waste will be enclosed or sheeted. Areas of the landfill will be covered at the end of the day to reduce the risk of odour emissions.	Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
								The same odour management techniques are proposed. However, these are likely to be used more of the time as a result of the increase in tonnage being accepted per annum.	
	Noise and vibration	Nuisance, loss of amenity, loss of sleep	Noise through the air and vibration through the ground	Low	Medium	Medium/low	Local residents are often sensitive to noise and vibration. Activities at site such as vehicle movements and deposit of waste in the landfill are a potential source of noise. The nearest residential receptors are not located within the predominant wind direction.	All plant and equipment will be maintained in accordance with the manufacturers' recommendations to minimise noise generation. Noise mitigation measures are carried out while the Site is in operation. All staff are required to report any unusual or abnormal noise to the Site Manager. The same noise management techniques are proposed. Due to the proximity of the motorway, it is not	Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
								anticipated that the noise emissions from the additional HGV movements would be significant.	
Local human population – Residential dwellings located within the vicinity of the Site.	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity Nuisance and harm to the health of local wildlife and habitats.	Air transport and over land	Low	High	Medium	Permitted waste types are likely to attract scavenging animals and birds but may become breeding / nesting sites.	Only inert and non-hazardous waste types are accepted on Site. Any waste types delivered to Site that are not listed in the environmental permit are rejected. Any contravening waste discovered is stored in a secure container and promptly removed from Site. Regular housekeeping will minimise the risk from scavenging animals. The same waste storage and handling management techniques are proposed. However, these are likely to be used more of the time as	Medium/Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
								a result of the increase in tonnage being accepted per annum. Areas of the landfill will be covered at the end of the day to reduce the risk of animals nesting in the landfill.	
	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity Nuisance and harm to the health of local wildlife.	Air transport and over land	Low	Medium	Medium/low	Permitted waste types likely to attract pests. As above.	As above.	Low
Nearest residential dwelling; Westcombe Stables 390m SW from the Site. Local roads.	Flooding of site	Harm to human health, nuisance, loss of amenity. Nuisance and harm to the health of local wildlife. Road closures and road traffic incidents.	Flood waters containing waste, contaminated run off from waste or leachate from the Site.	Low	High	Medium	The Site is located within Flood Zone 1. There is a very low risk of flooding from surface water, rivers, and the sea. Waste types are inert and non-hazardous, so harm is likely to be temporary and reversible. The proposed changes do not introduce any additional flood risk.	A Flood Management Plan is in place on Site. This plan outlines actions that should be taken in the event of a flood, such as moving plant to higher ground where possible, and containing free materials that could enter flood waters. Only inert and non-hazardous waste types are accepted on Site.	Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
							The proposed changes do not introduce any hazardous waste types that would potentially contaminate flood waters.	Any waste types delivered to Site that are not listed in the environmental permit are rejected. Any contravening waste discovered is stored in a secure container and promptly removed from Site.	
Local human population and / or livestock after gaining unauthorised access to the Site	All on-site hazards: wastes, machinery, and vehicles	Bodily injury	Direct physical contact	Low	Medium	Medium/low	The structures, equipment and machinery located on the Site are secured outside of operation / manned hours.	The Site will be constantly manned during operational hours. The same maintenance procedures are proposed. However, these are likely to be used more of the time as a result of the increase in tonnage being accepted per annum.	Low
Local human population – Residential dwellings located within the vicinity of the Site.	Major disruptive incidents – unforeseen events or emergencies that have the potential to temporarily	Temporary closure of the Site resulting in; Road closures and road traffic incidents.	Pathways include, but are not limited to; Direct physical contact /	Low	High	Medium	The presence of combustible waste on site means that, in the event of a major disruptive incident (such as fire, flood, or severe	In the event of a major disruptive incident, site operations will be suspended immediately to prevent further risk.	Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
Nearest residential dwelling; Westcombe Stables 390m SW from the Site. Local Roads.	suspend operations at the Site. These include but are not limited to; Flooding, Fire, Seismic Activity, Severe Road Accident, Pandemic and Industrial Action.	Harm to human health, nuisance, loss of amenity. Nuisance and harm to the health of local wildlife. Loss of containment of the waste, gas, and/or leachate. Loss of stability.	inhalation of smoke Contaminated Flood Waters Air transport and over land				accident), there is a risk of temporary loss of containment, environmental pollution, and harm to human health or local wildlife. While the probability of such incidents is low due to robust site management and security, the consequences could be significant, justifying a medium magnitude of risk. The site's proximity to sensitive receptors (residential dwellings, local roads, and surface waters) increases the potential impact of such events.	The site's Environmental Management System (EMS) includes contingency and emergency response procedures for fire, flooding, and other emergencies. These include: • Immediate closure of the site to all incoming waste and vehicles. • Notification of relevant authorities (Environment Agency, emergency services). • Deployment of fire suppression and containment measures. • Implementation of the Flood Management Plan and containment of any potentially	



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
								polluting materials. • Communication with alternative waste facilities (e.g., Flusco Landfill) for diversion of waste vehicles if required. • Post-incident review and update of procedures as necessary.	
Local human population – Residential dwellings located within the vicinity of the Site. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness, and nuisance to the local population and local habitats and species. Injury to staff, firefighters, or arsonists / vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches	Low	High	Medium	Permitted waste types include flammable materials, so a medium magnitude of risk is estimated. The Site is manned during operational hours and secured during operational hours to minimise the risk of arson/vandalism.	Procedures contained within the Environmental Management System (EMS) will identify and minimise the risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances (including fire and spillages). The EMS contains procedures with regards to the risks from arson /	Medium/Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
								vandalism i.e. site security measures.	
	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness, and nuisance to the local population and local habitats and species. Injury to staff or firefighters. Pollution of water or land.	As above.	Low	High	Medium	Permitted waste types include flammable materials, so a medium magnitude of risk is estimated. Contravening waste has the potential to be flammable.	The EMS will contain procedures and forms relating to accidents and incidents on the Site and what actions to take should one occur. Contravening waste will be stored separately and removed from site at the earliest opportunity. In the event of a fire, fire suppression equipment is available on-Site including fire extinguishers and water bowsers. The increase to the annual tonnage limit	Medium/low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
								will not increase the amount of waste stored at any one time. Therefore, there will be no increase in risk of fires on site as a result of the storage of combustible waste.	
All surface waters close to and downstream of Site. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Spillage of liquids, leachate from waste, contaminated run-off from waste e.g. containing suspended solids	Acute effects: oxygen depletion, fish kill and algal blooms. Chronic effects: deterioration of water quality.	Direct run-off from site across ground surface, via surface water drains, ditches etc. Indirect run-off via the soil layer.	Low	High	Medium	Waste types are inert and non-hazardous, so harm is likely to be temporary and reversible.	Strict waste acceptance procedures will ensure that only permitted waste types will enter the Site. The same waste acceptance procedures are proposed. However, these are likely to be used more of the time as a result of the increase in tonnage being accepted per annum.	Medium/Low
Groundwater – The Site is not located in a Groundwater Source Protection Zone.	As above.	Chronic effects: contamination of groundwater, requiring treatment of water.	Infiltration through the ground then transport through soil / groundwater then extraction.	Low	Medium	Medium/low	The Site is not located in a Groundwater Source Protection Zone and is reported to be in an area of low risk of flooding.	Waste acceptance procedures implemented on the Site will ensure that only permitted waste types are accepted onto the site.	Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
							Waste types are inert and non-hazardous, so harm is likely to be temporary and reversible. Landfill cells are lined to minimise the risk of contamination of groundwater. The proposed permit variation increases annual waste input and does not alter cell design. Therefore, the risk magnitude remains unchanged.	The same waste acceptance procedures are proposed. However, these are likely to be used more of the time as a result of the increase in tonnage being accepted per annum. Implementation of the EMS will ensure that no substances contaminate the groundwater at the Site.	
The landfill itself (containment, stability, and engineered design).	Landfilled waste	Loss of containment of the waste, gas, and/or leachate. Loss of stability.	Landfilled waste	Low	Medium	Medium/low	The landfill engineering / design / containment infrastructure will not change as a result of the increased rate of input of waste. Landfill is designed to be filled with waste, the risks from this are considered / managed by the conditions within	Compliance with the requirement of the Environmental Permit. Environmental Monitoring of the Site is undertaken. The same site management techniques are proposed. The increase in annual tonnage of waste entering the Site will not change this.	Low



Receptor	Source	Harm	Pathway	Probability of Exposure	Consequence	Magnitude of Risk	Justification for Magnitude	Risk Management	Residual Risk
							the permit. It is not considered that the risks are depended on the time taken to fill the landfill.		



7. Conclusion

7.1. The following conclusions have been considered as a result of this Environmental Risk Assessment:

- No additional risks have been identified as a result of the proposed changes to annual input limits.
- It is considered that existing risks from landfill activities will be impacted by the increased input rate.
- Risks can be adequately managed by existing mitigation measures.
- Where it is considered that a risk is greater as a result of the proposed changes, adjustments to the mitigation measures (e.g., rate of deployment) have been proposed.

7.2. Based on this Environmental Risk Assessment, it is concluded that the proposed changes do not present a significant increase in risk to environmental pollution or human health.



Drawings

25/014 001 Sensitive Receptor Plan



Appendix 3

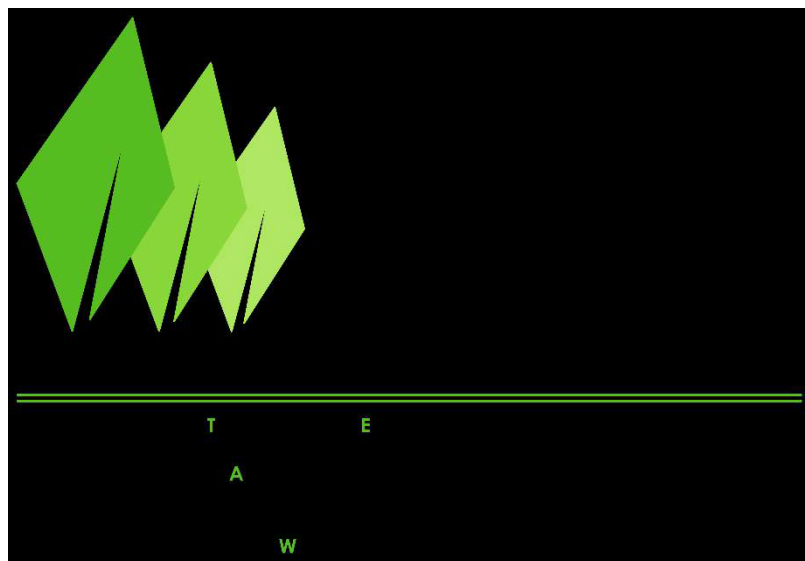
Odour Management Plan

Westcombe Waste Limited

Odour Management Plan

Westcombe Waste limited

Whiscombe Hill Landfill
Somertonfield Road,
Westcombe,
Somerton,
Somerset
TA11 6HY



**Document Control Table**

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1	Original Odour Management Plan.	Sian Wilcox	Tracey Westbury	27 November 2025



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Drawings

25/014 001 Sensitive Receptor Plan

Appendices

Appendix 1	Odour Control Procedure
Appendix 2	Odour Monitoring Form
Appendix 3	Odour Complaints Form



1. Introduction

- 1.1. Westbury Environmental Limited has prepared this Odour Management Plan (OMP) on behalf of Westcombe Waste Limited with regard to its landfilling activities.
- 1.2. The Site is located at Whiscombe Hill Landfill Somertonfield Road, Westcombe, Somerton, Somerset, TA11 6HY (Site).
- 1.3. Waste operations undertaken at this Site include:
 - Acceptance and storage of waste.
 - Disposal of non-hazardous waste in a landfill.
 - Biological treatment of landfill leachate.
- 1.4. Land surrounding the Site is largely agricultural.
- 1.5. This OMP has been produced in accordance with the Environment Agency Technical Guidance Note H4: Odour Management – how to comply with your environmental permit.

Using this OMP

- 1.6. A copy of this OMP must be kept in the Site office and be readily available to all members of staff.
- 1.7. This OMP forms part of the Environmental Management System (EMS) for the Site. Procedures and forms referenced within this OMP are included within the EMS. Completed forms (records) will be kept, as required by conditions included in the Permit.
- 1.8. The contents of this OMP will be implemented on the Site through procedures within the EMS. The EMS includes an Environmental Training Checklist that specifies all the required training for Site staff. This training checklist includes odour mitigation procedures. The training undertaken by each member of staff is recorded on their training record as part of the EMS.
- 1.9. Training on implementing odour mitigation procedures will be given to staff at least on an annual basis by the Site manager. New members of staff will be given training on the OMP during their induction.

Content of the Odour Management Plan

- 1.10. This Odour Management Plan is structured as follows:
 - Section 2 provides a summary of the relevant legislation and guidelines.
 - Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
 - Section 4 provides information on the operations carried out on the Site and the delivery of material to the Site.
 - Section 5 provides information on the site management and the mitigation measures employed at the Site.
 - Section 6 provides a description of how complaints can be made and how they are addressed by the site management.



2. Relevant Legislation

Environmental Protection Act 1995

- 2.1. The Environmental Protection Act 1990, Part III, Section 79 is the primary legislation for controlling odour from industrial, trade and business premises.
- 2.2. Local Authorities must review complaints about odours from industrial, trade and business premises that could be a 'statutory nuisance' covered by the Environmental Protection Act 1990.
- 2.3. Odour may be considered a 'statutory nuisance' if one of the following applies:
 - The odour unreasonably and substantially interferes with the use or enjoyment of a home or other premises.
 - The odour injures health or is likely to injure health.
- 2.4. An 'abatement notice' will be served by the Local Authority if it is agreed that a statutory nuisance is happening, has happened or will happen in the future. An abatement notice will require whoever's responsible to stop or restrict the odour being produced.
- 2.5. If an abatement notice is not complied with then the person responsible may be prosecuted and/or fined.
- 2.6. Local Authorities can also take action to stop or restrict the nuisance by:
 - Carrying out works and making the person given the abatement notice pay for them (this can include seizure and confiscation of equipment)
 - Applying to the High Court for an injunction (if a prosecution is not adequate)

Compliance with Environmental Permit

- 2.7. The Environment Agency ensures odour from permitted waste facilities is controlled by including conditions relating to odour emissions in the Environmental Permit.
- 2.8. If the Environment Agency consider that odour emissions are at an unreasonable level, then the operator will be required to take further abatement measures to reduce odour pollution or risk having to reduce or cease operations.
- 2.9. A final determination as to whether there has been a Permit breach will involve an assessment of the level and effect of the emissions and the appropriateness of the measures being employed.



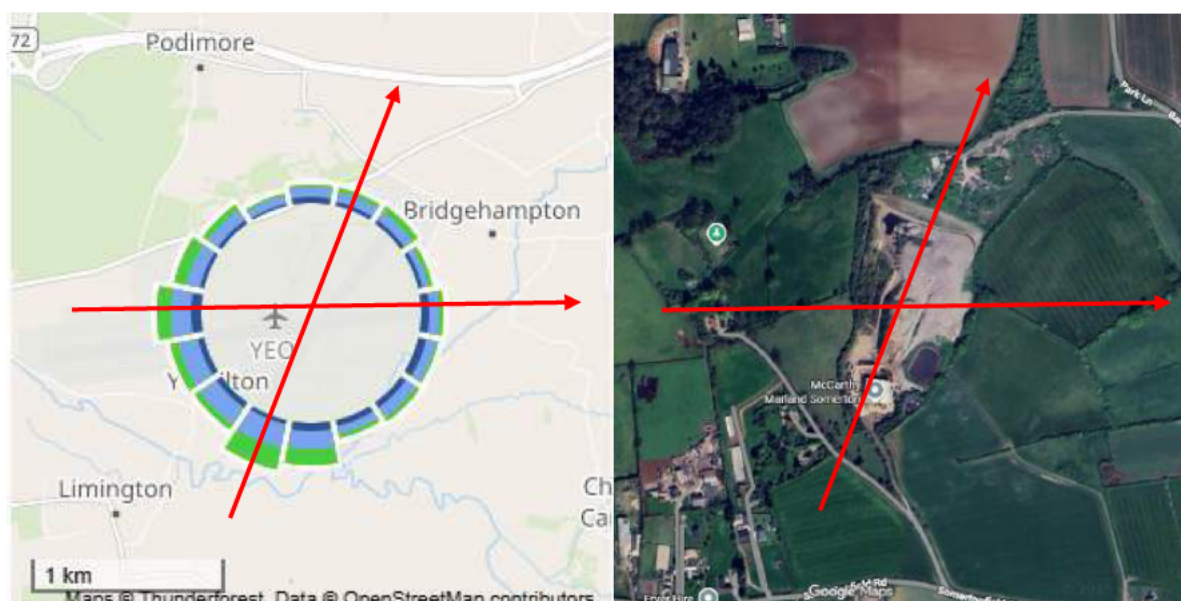
3. Site Location and Sensitive Receptors

- 3.1. The land surrounding the Site is largely agricultural, with the nearest residential area being Somerton which is located approximately 1km east from the Site boundary at its closest point.
- 3.2. The Site is not located within a Groundwater Source Protection Zone. The nearest surface water features are ponds located 12m northeast, 204m northeast, and the River Cary located 725m north.
- 3.3. The Site is located within flood Zone 1 and therefore has a low risk of flooding.

Sensitive Receptors

- 3.4. This OMP identifies receptors within 1km of the Site that may be sensitive to odour emissions as a result of the permit variation to remove annual waste input limits for landfill deposit.
- 3.5. Receptor sensitivity is a key factor in determining the significance of odour pollution as some receptors are more sensitive than others. Residential receptors tend to have considerably lower tolerance to odour pollution than commercial and industrial receptors.
- 3.6. Locations with a high sensitivity to odour near to the Site include protected areas of deciduous woodland to the west, northwest and northeast and the residential property Westcombe Stables located 390m southwest.
- 3.7. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from odour emissions. Odour intensity reduces significantly the further away from the source.
- 3.8. The predominant wind direction also plays an important role in the potential impacts experienced from odour emissions.
- 3.9. Wind direction data has been obtained from Yeovilton Airport weather station, see Figure 3.1. Yeovilton Airport weather station is located approximately 9.5km southeast of the Site.
- 3.10. The predominant wind blows towards the northeast and east of the, see Figure 3.1: Wind rose from Brampton weather station.

Figure 3.1: Wind rose from Yeovilton Airport Weather Station



- 3.11. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 3.1 Sensitive Receptors.

**Table 3.1 Sensitive Receptors**

Receptor	Type of receptor	Bearing from Site	Approx. distance from Site boundary to receptor boundary (m)
Deciduous Woodland	Protected Habitats & Species	West	180
Deciduous and Ancient Woodland	Protected Habitats & Species	Northwest	227
Westcombe Stables	Residential	Southwest	390
Deciduous Woodland	Protected Habitats & Species	Northeast	484
Harleys Court Cottages	Leisure	Southwest	698
Buttercross Meadow	Residential	Southeast	860
Somerton Business Park	Commercial	East	925

- 3.12. Sensitive receptors near the site are identified on Drawing No. 25/014 001 Sensitive Receptors Plan.
- 3.13. The closest residential area to the site is Westcombe Stables, located 390m southwest of the Site. These properties are not in the predominant wind direction. It is expected that the wind direction will reduce the potential impact of odour emissions at this receptor.
- 3.14. Protected habitats consisting of deciduous woodland are located 180m west, 227m northwest and 484m northeast of the Site. The area of woodland located to the northeast is situated in the predominant wind direction.

Meteorology

- 3.15. Adverse weather conditions such as heat waves may increase the potential for odour emissions from wastes deposited on Site. Prolonged spells of high temperatures will lead to biodegradable waste degrading quicker, thereby increasing the potential for odour emissions.

Other Sources of Odour

- 3.16. Operations undertaken at Westcombe Transfer Station, also operated by Westcombe Waste Limited, which is located within the permit boundary of the Site, may generate odour emissions.
- 3.17. It is also considered that agricultural activities carried out at particular times of the year on the surrounding agricultural land have the potential to cause odour emissions that may impact local sensitive receptors.



4. Operations at the Site

Waste storage, Handling and Deposit in the Landfill

- 4.1. The operations carried out at the Site include the receipt, handling, storage and disposal of waste in a landfill.
- 4.2. Waste is delivered to the Site in Heavy Goods Vehicles (HGVs) and is temporarily stored near to the active landfill cell prior to being deposited in the landfill for disposal.
- 4.3. Waste is deposited in the landfill throughout the day. Waste is not stored outside of operational hours where practicable.
- 4.4. The active landfill cell is covered with a daily cover material (typically soils or fines) at the end of each working day.

Waste Deliveries

- 4.5. All waste deliveries are accompanied by a Waste Transfer Note (WTN) which is obtained from the load driver. The WTN provides information on the driver, waste haulier name, permit number, description of waste etc. Loads not accompanied by a WTN or that do not match the description on the WTN are rejected.
- 4.6. A record is kept of all vehicles delivering waste to and from the Site, along with the type, quantity and source of waste delivered. WTN's are appropriately stored for a minimum of two years.
- 4.7. Waste acceptance procedures are applied to ensure that only suitable waste is accepted.

Leachate Treatment

- 4.8. Leachate generated by the landfill is treated on Site before being discharged to sewer.
- 4.9. Leachate is pumped from the landfill into a lagoon located in the southeastern corner of the site. The lagoon is fitted with aerators to mitigate odour emissions.



5. Risk Matrix for Measures to be Taken

- 5.1. The following section details the assessment process to be taken when determining if activities on Site should stop in order to prevent significant odour.
- 5.2. Weather conditions are monitored each working day as part of the Odour Control Procedure see Appendix 1 Odour Control Procedure.

Estimating Magnitude of Risk

- 5.3. Table 5.1 provides a matrix for estimating the magnitude of risk from a potential hazard, considering both the probability and consequences of the hazard occurring.
- 5.4. The magnitude of risk determines the level of management required to reduce the probability of the hazard occurring.
- 5.5. In this management plan, the hazard is considered to be the significant emission of odour from the Site such that it could cause nuisance to local sensitive receptors. Table 5.1 describes this Risk Matrix applied to this assessment of risk.

Table 5.1 Estimating the magnitude of risk.

	Magnitude of Risk	Consequence			
		High	Medium	Low	Negligible
Probability	High	Very high	High	Medium/Low	Very low
	Medium	High	Medium	Low	Very low
	Low	High/Medium	Medium/Low	Low	Very low
	Negligible	High/Medium/Low	Medium/Low	Low	Negligible

- 5.6. An assessment of the most common weather conditions and their potential to generate significant detectable odour emissions from the activities on Site has been undertaken and is presented in Table 5.2 to Table 5.4.
- 5.7. The risk assessment is separated into two sections. In Table 5.2 the operator must record the temperature and then proceed to the corresponding table. Tables 5.2 and 5.4 contain all common weather conditions and their risk magnitude. Actions required for each risk category are detailed in Table 5.5.

Table 5.2 Temperature

Temperature	Action
Warm (Above 18°C)	Go to table 5.3
Cool (Below 18°C)	Go to table 5.4

Table 5.3 Risk matrix for warm weather

Conditions	Probability of odour nuisance occurring	Consequence	Risk magnitude
low wind (<3 Beaufort)	Low	Medium	Medium/Low
medium wind (>4 Beaufort)	Medium	Medium	Medium
high wind (>8 Beaufort)	Low	Medium	Medium/Low

Table 5.4 Risk matrix for cool weather

Conditions	Probability	Consequence	Risk magnitude
low wind (<3 Beaufort)	Negligible	Medium	Medium / Low
medium wind (>4 Beaufort)	Low	Medium	Medium / Low



Conditions	Probability	Consequence	Risk magnitude
high wind (>8 Beaufort)	Negligible	Medium	Medium / Low

- 5.8. The above Risk Matrix details are based on the following assumptions:
- More anaerobic degradation / odour generation will occur in warmer weather.
 - High wind speeds will cause a greater dilution of the odour from the site thereby reducing the risk of nuisance to the sensitive receptors.
- 5.9. The action and odour monitoring frequency required for each level of risk is provided in Table 5.5: Action and odour monitoring frequency required for each level of risk.

Table 5.5: Action and odour monitoring frequency required for each level of risk

Risk Magnitude	Action	Odour Monitoring Frequency
Low	Continued implementation of preventive measures.	Once per day at around midday.
Low / Medium	Continued implementation of preventative measures.	Once per day at around midday.
Medium	Continued implementation of preventative measures. Odour emissions are likely, therefore movement / deposit of waste may temporarily cease if preventative measures are not proving effective in preventing the odour emission.	Twice per day, once in the morning, once in the afternoon.
High	Continued implementation of preventative measures. Odour emissions are likely therefore movement / deposit of waste with a potential to cause odour may not be undertaken or will be temporarily ceased.	At least every 3 hours.



6. Sources of Odour

- 6.1. There are three main potential sources of odour associated with landfill operations at the Site:
 - Odorous waste.
 - Landfill gas.
 - Landfill leachate.
- 6.2. The Permit allows for the acceptance and deposit of odorous wastes from the following waste categories:
 - 02 – Wastes from Agriculture, Horticulture, Aquaculture, Forestry, Hunting and Food Preparation.
 - 20 – Municipal Wastes
- 6.3. The Permit also allows for the acceptance and deposit of biodegradable wastes with the potential to become odorous.
- 6.4. Table 6.1 provides an inventory of the potentially odorous materials that may be handled, stored and deposited on Site.
- 6.5. The Permit also includes the following activities which are considered to have potential to generate odour emissions:
 - Landfill gas collection and utilisation.
 - Temporary storage and treatment of leachate.
- 6.6. These operations require ongoing engineering works, such as the installation of gas or leachate infrastructure, which can potentially impact the odour emissions.


Table 6.1: Inventory of Odorous Materials

Waste Type	List of Waste Codes	Description	Factors that influence odour emissions	Potential for variation
Wastes from Agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing	• 02 01 03 plant-tissue waste • 02 03 02 wastes from preserving agents • 02 03 04 – materials unsuitable for consumption or processing	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.
Municipal Wastes	• 20 02 01 – biodegradable waste • 20 02 03 – other non-biodegradable wastes • 20 03 01 – mixed municipal waste • 20 03 02 – waste from markets • 20 03 03 – street-cleaning residues • 20 03 04 – septic tank sludge	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.
Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use	• 19 05 01 – non-composted fraction of municipal and similar wastes • 19 05 02 – non-composted fraction of animal and vegetable waste • 19 05 03 – off-specification compost • 19 06 04 – digestate from anaerobic treatment of municipal waste • 19 06 06 – digestate from anaerobic treatment of animal and vegetable waste	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.



Paper and cardboard	• 15 01 01 – paper and cardboard packaging • 20 01 01 – paper and cardboard	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.
Wood wastes	• 03 03 01 – waste bark and wood • 15 01 03 – wooden packaging • 17 02 01 – wood • 19 12 07 – wood other than that mentioned in 19 1 06 • 20 01 38 – wood other than that mentioned in 20 01 37	Potential to be odorous as a result of decomposing organic material.	Quality of material – moisture content, organic content, age, degradation, ambient temperature). Quantity of waste on site and input of material.	Potentially less odorous in winter months due to lower ambient temperature. Potentially more nitrogenous and degraded from April to September.



7. Odour Management

- 7.1. The Site operates in accordance with an Environmental Management System (EMS) which includes procedures and forms which outline steps to be taken to manage odour emissions that are generated as a result of Site operations.
- 7.2. Measures to manage odour from the Site are employed to minimise the potential impact of odour on nearby receptors.
- 7.3. Table 7.1 provides details on Source, Pathway and Receptor routes for odour emissions, and the measures employed to manage these.

Waste Acceptance

- 7.4. The Site is operated in accordance with a strict Waste Acceptance Procedure to ensure that only permitted waste types are accepted at the Site.
- 7.5. Information about waste being delivered to the Site is obtained by completion of a waste information form, prior to waste acceptance. A judgement is made based on the information provided to determine if the waste is acceptable for deposit/transfer on the Site.
- 7.6. Waste loads are visually inspected on arrival at the Site to ensure that the waste matches the description provided on the waste transfer note (WTN). If the waste has not been accurately described on the WTN, then it is rejected in accordance with the Waste Rejection Procedure.
- 7.7. Strongly malodorous wastes will not be accepted on to the Site and will be rejected in accordance with the EMS procedure.

Plant and Equipment

- 7.8. Sufficient plant and equipment are made available at the Site to facilitate:
 - Prompt disposal of waste in the landfill.
 - Placement of adequate temporary cell cover.
 - Sorting and separation of wastes for transfer.

Deposit of waste in the landfill

- 7.9. Incoming waste loads will be unloaded into the reception area and sent to the landfill cell as soon as practically possible to ensure that the potential for odorous emissions is minimised.
- 7.10. The size of tipping areas in operational cells is minimised where practicable to minimise the size uncovered areas that may generate odour.
- 7.11. The slope gradients in operational cells are maintained at an appropriate gradient to prevent the escape of odorous waste from the cell.
- 7.12. The Environmental Permit allows for separate cells for gypsum and stable-non reactive hazardous waste. These cells have not been constructed and so these waste types are not accepted.

Use of Daily Cover and Cell Capping

- 7.13. The operational area of the landfill will be covered with daily cover (typically soils or fines) by the end of each working day. The daily cover is installed to prevent odour emissions escaping the operational landfill cell outside of operational hours.
- 7.14. The daily cover is considered to be effective in reducing the exposure of the waste to the elements (e.g. rain, wind), improve the stability of the waste, minimise the risk of windblown litter, and discourage vermin.
- 7.15. Where waste will not be deposited in a cell for a longer period of time, an intermediate cover will be applied to manage potential odour emissions.



- 7.16. Completed cells will be permanently capped with an engineered cap. The permanent cap will be placed in accordance with a Construction Quality Assurance (CQA) Report which has been approved by the Environment Agency.

Landfill Gas Management

- 7.17. Gas extraction infrastructure is installed progressively across the Site as landfill cells are filled and permanently capped.
- 7.18. Landfill gas extraction systems are installed during filling and on completion of a landfill cell, to reduce the risk of uncontrolled gas emissions.
- 7.19. Installation of gas management infrastructure requires for waste to be excavated from completed cells. Olfactory monitoring is carried out where gas infrastructure works are being carried out to monitor the level of odour released from drilling down into the completed cell.
- 7.20. Landfill gas is collected and used to produce energy. If the collected landfill gas cannot be used to produce energy, the landfill gas may be flared.
- 7.21. Landfill gas management infrastructure is regularly inspected and maintained in accordance with the maintenance procedure in the EMS.

Leachate Management

- 7.22. Leachate is temporarily stored in a leachate lagoon and treated in a leachate treatment facility on the Site, before being discharged to sewer.
- 7.23. The lagoon is fitted with aerators to mitigate odour emissions. The aerators are maintained in accordance with the maintenance procedures in the EMS.
- 7.24. Installation of leachate management infrastructure requires for waste to be excavated from completed cells. Olfactory monitoring is carried out where leachate infrastructure works are being carried out to monitor the level of odour released from drilling down into the completed cell.
- 7.25. Leachate management infrastructure is regularly inspected and maintained in line with the maintenance procedure in the EMS.

Housekeeping

- 7.26. The Site is operated in accordance with a Housekeeping Procedure to control litter, pests and vermin at the Site.
- 7.27. The Site is inspected regularly for litter. Any litter observed is collected as part of a daily litter picking activity.
- 7.28. Where weather conditions or site operations are observed to be producing a high level of litter, the litter picking activity will be undertaken on a more frequent basis throughout the day.
- 7.29. The Site is inspected regularly for evidence of pest and vermin infestations. If evidence of there is found, an appropriate specialist contractor will be called in to address the problem.

Employee Training

- 7.30. All Site operatives will be given the appropriate training in managing odour emissions and malodours material. Training will also be given to all personnel who are responsible for completing Odour Complaint Forms.



Table 7.1: Source Pathway Receptor Routes

Source	Pathway	Receptor	Impact	Odour Management Measures
Reception, handling and storage of odorous waste and leachate.	Atmospheric dispersion causing air transport then inhalation.	Surrounding sensitive receptors. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Nuisance. Potential for complaints if excessive odour is detected beyond the Site boundary. Loss of amenity.	Strict Waste Acceptance and Waste Rejection procedures are adhered to. All Site operatives will be given the appropriate training in implementing the requirements of this OMP and EMS procedures relating to odour and the management of malodourous material. Training will also be given to all personnel who are responsible for completing Odour Complaint Report Forms. If odour emissions being generated are not able to be minimised by implementing odour management measures, the acceptance and deposit of odorous waste in the landfill may temporarily cease. Waste storage duration will be limited to minimise the risk of wastes stored on site becoming odourous. The leachate lagoon is fitted with aerators which will minimise the production of odour.
Deposit of waste in the landfill.	Atmospheric dispersion causing air transport then inhalation.	Surrounding sensitive receptors. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Nuisance. Potential for complaints if excessive odour is detected beyond the Site boundary. Loss of amenity.	Incoming waste loads will be deposited as soon as practically possible to ensure that the odour potential of odorous materials is reduced. Odorous wastes will be tipped in the current operational area of the landfill and will be covered at the end of each working day. The size of the tipping areas in operational cells are kept to a minimum.



Excavation of waste and removal of cover/ temporary caps for engineering works (e.g., installation of gas wells)	Atmospheric dispersion causing air transport then inhalation.	Surrounding sensitive receptors. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Nuisance. Potential for complaints if excessive odour is detected beyond the Site boundary. Loss of amenity.	Olfactory monitoring will take place while installation of infrastructure such as wells or boreholes is being completed. A litter picking activity is undertaken to collect any escaped litter or waste. If odour emissions being generated are not able to be minimised by implementing odour management measures, activities may temporarily cease.
Escape of odorous wastes from operational cells.	Atmospheric dispersion causing air transport then inhalation.	Surrounding sensitive receptors. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Nuisance. Potential for complaints if excessive odour is detected beyond the Site boundary. Loss of amenity.	The gradient of slopes within operational cells are kept to an appropriate gradient to reduce the risk of waste escaping the cell. Landfilling may temporarily cease in periods of high wind where waste is being wind whipped. A litter picking activity is undertaken to collect any escaped litter or waste. If odour emission are detected from the operational area, then further cover material may be deposited to minimise the emission.



Management of landfill gas e.g., Collecting, monitoring and flaring landfill gas.	Atmospheric dispersion causing air transport then inhalation.	Surrounding sensitive receptors. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Nuisance. Potential for complaints if excessive odour is detected beyond the Site boundary. Loss of amenity.	Landfill gas infrastructure is maintained in accordance with the Maintenance procedure in the EMS. Temporary gas extraction systems may be installed to collect gas prior to the completion of a cell to minimise emissions. Landfill gas extraction systems are installed as soon as practically possible after the completion of a landfill cell.
Storage and treatment of leachate.	Atmospheric dispersion causing air transport then inhalation.	Surrounding sensitive receptors. Nearest residential dwelling; Westcombe Stables 390m SW from the Site.	Nuisance. Potential for complaints if excessive odour is detected beyond the Site boundary. Loss of amenity.	Leachate is pumped from the landfill into a lagoon located in the southeastern corner of the site. The lagoon is fitted with aerators to minimise the production of odour. The aerators are inspected and maintained in accordance with the maintenance procedure in the EMS.



8. Odour Monitoring

- 8.1. Odour monitoring will be completed in accordance with the Odour Control Procedure and Odour Monitoring Form, see Appendix 1 Odour Control Procedure and Appendix 2 Odour Monitoring Form.
- 8.2. Routine odour monitoring will be undertaken at least once daily by a suitably trained member of staff.
- 8.3. Staff responsible for completing odour surveys should:
 - Not smoke or eat/drink strongly flavoured items for thirty minutes before the odour survey.
 - Not eat/drink sweet items immediately before or after the odour survey.
 - Not complete odour surveys if they have an illness which can impact the odour survey e.g., cold, sore throat.
- 8.4. Weather conditions are recorded each working day as part of the Odour Monitoring Form, Appendix 2 Odour Monitoring Form.
- 8.5. Frequency of monitoring will be determined by weather conditions.
- 8.6. When the risk magnitude is low / medium, odour monitoring will be undertaken once per day at around midday, at all monitoring locations.
- 8.7. When the risk magnitude is medium, odour monitoring will be undertaken twice per day, once in the morning and once in the afternoon, at all monitoring locations.
- 8.8. When the risk magnitude is high, odour monitoring will be undertaken at least every 3 hours, at all monitoring locations.
- 8.9. To overcome issues regarding odour adaptation, a suitably trained member of the office staff will undertake monitoring, the frequency of which will be determined by the Risk Matrix, thus could be either at the beginning of the day immediately upon arriving at the Site, or after lunch break when the staff member has been off the Site for some time. This will prevent desensitisation or 'odour fatigue'.
- 8.10. The odour monitoring will be undertaken at the monitoring locations described below:
 - Site entrance.
 - Waste storage areas.
 - Area where landfilling operations are taking place.
- 8.11. The monitoring locations are listed on the Odour Monitoring Form. At each monitoring location, the suitably trained member of staff will complete the odour assessment and fill out the table.
- 8.12. If a complaint is received directly to the Site concerning an odour emission, an odour inspection is carried out as soon as practicably possible. The Operator will attend at the location of the reported odour and complete the Odour Monitoring Form.
- 8.13. All staff responsible for checking odour will have received specific training from Site management on odour inspection.



9. Reporting and complaints response

- 9.1. An Odour Complaint Form will be available on Site. An Odour Complaints Report Form must be filled in and kept on file whenever an odour complaint is received in accordance with the EMS Complaints Procedure.

Engagement with the Community

- 9.2. A Site Notice Board is located at the Site entrance and includes the following information:
- The Permit holder's name.
 - The operator's name.
 - An emergency contact name and telephone number.
 - A statement that the Site is permitted by the Environment Agency
 - The Environmental Permit Ref. EPR/QP3230LE.
 - The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).
- 9.3. The provision of the above information ensures that members of the public can contact the Operator should they be concerned by odour or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

Reporting of Complaints

- 9.4. Should a complaint regarding odour be received by the Site, the complaint is recorded on the Odour Complaints Report Form in the EMS and investigated in accordance with the Complaints Procedure within the EMS implemented on the Site. The Odour Complaints Report Form records who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again.
- 9.5. The Site Manager must identify what caused the odour emission to be generated. This generation may have been caused by failure of odour control measures or abnormal weather conditions. If the excessive odour emission has been caused by a procedure not being carried out properly, then staff will receive repeat EMS training on the odour control procedures and site management.
- 9.6. In all cases, and where information is available, all complaints will be acknowledged and investigated, with resultant actions reported to the complainant. Any complaints received by the Environment Agency or Local Authority relating to odour emissions from the Site are dealt with on the same day.

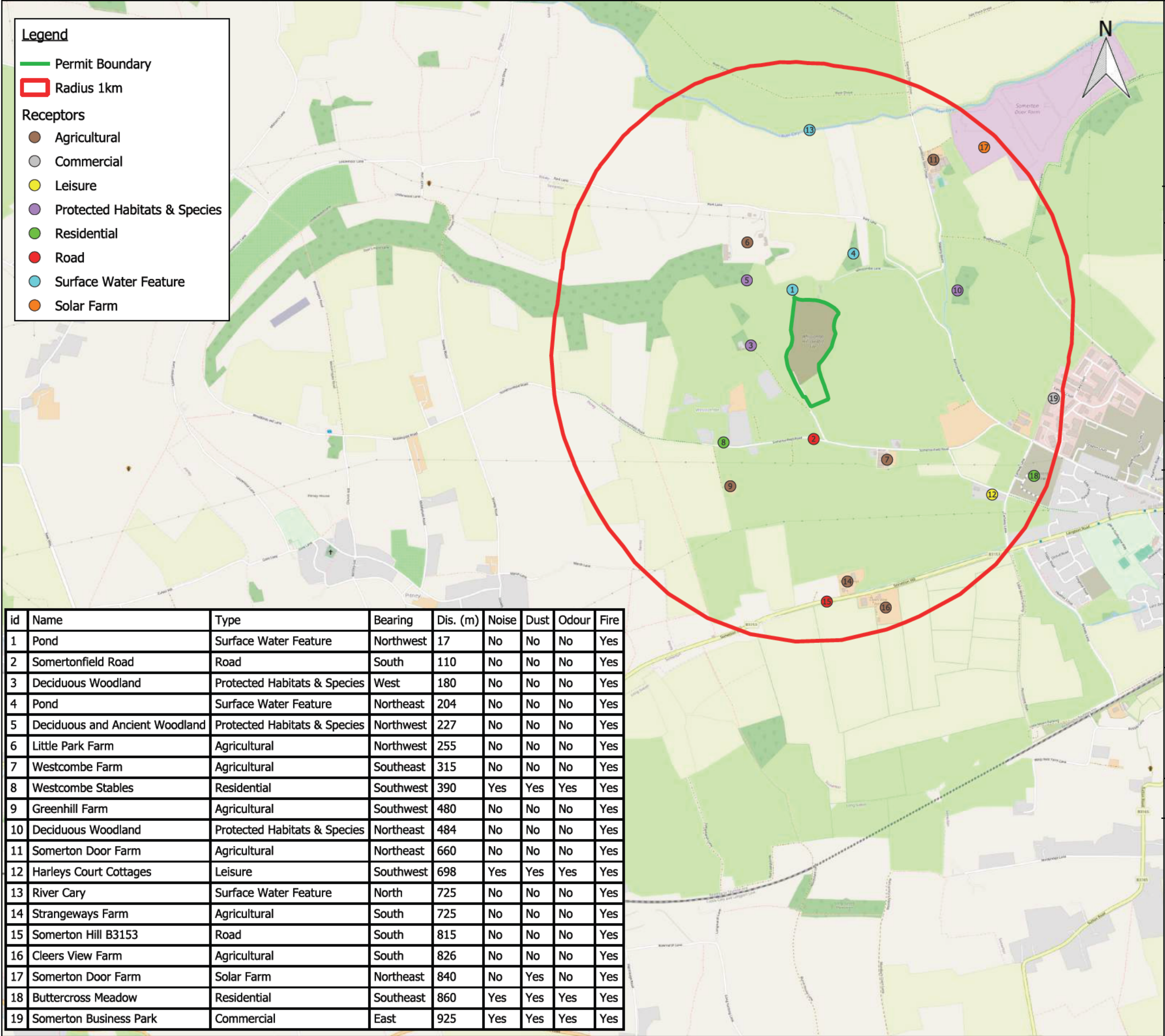
Management Responsibilities

- 9.7. Site staff are responsible for odour management issues and detecting/reporting odour emissions. All members of staff are given training on the EMS for the Site, which includes an Odour Control Procedure. All staff on the Site are trained on the Odour Control Procedure which includes details regarding mitigation measures and recording complaints.
- 9.8. On receipt of a complaint the Site Manager investigates and establishes the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant will be contacted with details on the actions to be implemented and the estimated timescales for completion. The maximum response time for contacting a complainant will be two working days.
- 9.9. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) will be investigated in accordance with the Accidents, Incidents & Complaints Procedure within the EMS. Operations on the Site will cease or be reduced should excessive odour emissions be identified following the implementation of other mitigation measures or when instruction from the Environment Agency to cease operations has been received.



Drawings

25/014 001 Sensitive Receptor Plan



id	Name	Type	Bearing	Dis. (m)	Noise	Dust	Odour	Fire
1	Pond	Surface Water Feature	Northwest	17	No	No	No	Yes
2	Somertonfield Road	Road	South	110	No	No	No	Yes
3	Deciduous Woodland	Protected Habitats & Species	West	180	No	No	No	Yes
4	Pond	Surface Water Feature	Northeast	204	No	No	No	Yes
5	Deciduous and Ancient Woodland	Protected Habitats & Species	Northwest	227	No	No	No	Yes
6	Little Park Farm	Agricultural	Northwest	255	No	No	No	Yes
7	Westcombe Farm	Agricultural	Southeast	315	No	No	No	Yes
8	Westcombe Stables	Residential	Southwest	390	Yes	Yes	Yes	Yes
9	Greenhill Farm	Agricultural	Southwest	480	No	No	No	Yes
10	Deciduous Woodland	Protected Habitats & Species	Northeast	484	No	No	No	Yes
11	Somerton Door Farm	Agricultural	Northeast	660	No	No	No	Yes
12	Harleys Court Cottages	Leisure	Southwest	698	Yes	Yes	Yes	Yes
13	River Cary	Surface Water Feature	North	725	No	No	No	Yes
14	Strangeways Farm	Agricultural	South	725	No	No	No	Yes
15	Somerton Hill B3153	Road	South	815	No	No	No	Yes
16	Cleers View Farm	Agricultural	South	826	No	No	No	Yes
17	Somerton Door Farm	Solar Farm	Northeast	840	No	Yes	No	Yes
18	Buttercross Meadow	Residential	Southeast	860	Yes	Yes	Yes	Yes
19	Somerton Business Park	Commercial	East	925	Yes	Yes	Yes	Yes

Westcombe Waste Limited

Westcombe Waste Limited

Whiscombe Hill Landfill

Somertonfield Road
Westcombe
Somerton
Somerset
TA11 6HY

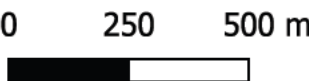
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Version Number: 1

20th November 2025

Created By: SW
Checked By: TW

Scale:
Map: 1:25,000



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Appendix 1

Odour Control Procedure

Procedure No. [x] Odour Control**V.1, November 2025***Purpose: To ensure that odours from the Site do not cause a nuisance to sensitive receptors.*

	RESPONSIBLE PERSON	RECORD
1. This Procedure implements the odour control measures included within the Odour Management Plan.	Site Operative	Odour Management Plan
2. Wastes accepted on to the Site have the potential to cause odour. Waste is deposited into the landfill and covered at the end of each operating day to reduce odour emissions.	Site Operative	
3. Incoming waste loads will be unloaded and then deposited in the landfill promptly to minimise potential odour emissions from handling odorous waste.	Site Operative	Odour Management Plan
4. Any vehicles arriving at the Site that may contain potentially malodorous waste will be enclosed or sheeted.	Site Operative	
5. General housekeeping and regular cleaning of waste storage areas and operational areas is carried out on Site to further reduce the potential for significant odour emissions.		

Monitoring

6. Olfactory monitoring (sniff testing) will be undertaken on the Site in accordance with Odour Management Plan, including: - Once per day, around midday, when the risk magnitude is Low or Medium/Low. - Twice per day when the risk, once in the morning and once in the afternoon, when the risk magnitude is Medium. - At least every 3 hours when the risk magnitude is High.		Odour Management Plan
7. Staff responsible for completing odour surveys should: - Not smoke or eat/drink strongly flavoured items for thirty minutes before the odour survey. - Not eat/drink sweet items immediately before or after the odour survey. - Not complete odour surveys if they have an illness which can impact the odour survey e.g., cold, sore throat.		
8. Once the above is completed, the Site Manager will determine the action to take using the Risk Matrix in the Odour Management Plan.	Site Manager	Odour Management Plan

Complaints

9. In the event of a complaint of odour being received, the Accidents, Incidents and Complaints Procedure should be followed.	Site Operative	
10. Should a complaint regarding odour be received by the Site, the complaint will be recorded on the Odour Complaints Report Form in the Odour Management Plan and investigated in accordance with the Complaints Procedure within the EMS implemented on the Site.	Site Operative	Odour Management Plan

	RESPONSIBLE PERSON	RECORD
11. The Odour Complaints Report Form records who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again.	Site Operative	Odour Management Plan
12. The Site Manager must identify what caused the odour emission to be generated. If the excessive odour emission has been caused by a procedure not being carried out properly, then staff will receive repeat EMS training on the odour control procedures and site management.	Site Manager	Training Record
13. In all cases, and where information is available, all complaints will be acknowledged and investigated, with resultant actions reported to the complaint. Any complaints received by the Environment Agency or Local Authority relating to odour emissions from the Site are dealt with on the same day.	Site Operative	Odour Management Plan



Appendix 2

Odour Monitoring Form

Form No. [X] Odour Monitoring Form**V.1, November 2025**

Date and time		Assessor	
Weather conditions and temperature			

Location	Time	Odour					Weather Conditions
	Start / Finish	Y/N	Intensity	Extent	Description	Source	Wind Direction and Strength
Site Entrance							
Waste Transfer Station Area							
Waste Storage Area							
Area of Active Landfilling							
Other (e.g. location closest to any complaint, if applicable)							
Action taken?							

Comments:	
Action required/ taken?	

Intensity Scale	0. No odour	1. Very faint odour	2. Faint odour	3. Distinct odour	4. Strong odour	5. Very strong odour	6. Extremely strong odour
Extent classification	I: Intermittent				P: Persistent		

Intensity of 3 or above, action must be taken to identify the cause and take preventative steps to prevent an odour emission.

Persistent intensity of 4 or above will require remedial action.

Intermittent intensity of 6 will require investigative action with potential for remedial action.



Appendix 3

Odour Complaints Form

Form No. [x] Odour Complaint Report Form

Site Manager			
Site Address	Whiscombe Hill Landfill, Somertonfield Road, Westcombe, Somerton, Somerset, TA11 6HY		
Contact No.			
Name of Complainant		Contact number of Complainant:	
Address of Complainant			
Date of complaint:		Time of complaint:	
Location of odour, if not at above address			
Weather conditions (i.e. dry, rain, fog, snow)			
Temperature (very warm, warm, mild, cold or degrees if known)			
Wind strength (none, light, steady, strong, gusting)			
Wind direction (e.g. from NE)			
Complainants' description of odour: • What does it smell like? • Intensity (see below) • Duration (time) • Constant or intermittent in this period • Does the complainant have any other comments about the odour?			
Do you accept that the odour was likely to be from the site's activities?			
What activities were being carried out on site when the odour occurred?			
Actions taken:			
Form completed by:	Date:	Signed:	



Appendix 4

Waste Acceptance Procedure

Procedure No. 2.1 Waste Acceptance**V.1, November 2025**

Purpose: To ensure that all waste imported on to the Site is acceptable under the conditions of the Environmental Permit.

	RESPONSIBLE PERSON	RECORD
<u>Environmental Permit and Waste Codes</u>		
1. The Environmental Permits contain the lists of waste types that are permitted to be accepted at the Site. Tables containing the codes and descriptions of waste types that are permitted on this site is included at the end of this procedure, see Table 1 Permitted Waste Types: Table 1 - Permitted Waste Types for Disposal at a Landfill for Non-Hazardous waste	All	Tables 1 Permitted Waste Types Appendix B.1 Environmental Permit
2. Waste types and quantities that can be accepted for restoration are outlined in the approved Restoration Plan.		Restoration Plan
3. The following annual waste inputs for Landfill should not be exceeded: 110,000 tonnes of non-hazardous waste 40,000 tonnes of inert waste - Waste for restoration as specified in the approved recovery plan.		
4. The following wastes should not be accepted for disposal in the Landfill: - Hazardous waste, - Liquid waste, including waste waters but excluding sludge. - Whole used tyres (other than bicycle tyres and tyres with an outside diameter of more than 1400mm) - Shredded used tyres. - Chemical substances from research and development or teaching activities (e.g., Laboratory residues) which are unidentified and/or which are new and whose effects on man/or environment are unknown.		
5. Waste must not be accepted for disposal in the landfill if they have been diluted or mixed solely to meet the waste acceptance criteria.		
6. Waste shall only be accepted for disposal in the landfill if it has been treated first, unless: - It's inert waste and treatment is not technically feasible. - It's non-hazardous waste and treating it wouldn't make it safer or reduce how much there is.		
7. Waste codes starting with 17 05 or 16 03 must only be accepted for disposal in the landfill if they do not include: - Medicinal products. - Pharmaceutically active waste materials from the manufacture of medicinal products.		
8. Wastes must only be accepted for restoration if: They are accepted in accordance with a restoration plan approved in writing by the Environment Agency.		
9. If unsure whether to accept a load onto the Site, consult Table 1, and then the Site Manager if necessary.		

	RESPONSIBLE PERSON	RECORD
10. Unsuitable wastes are rejected in accordance with the Waste Rejection Procedure.	Site Operative	Procedure No. 2.3 Waste Rejection
11. The Site does not typically experience seasonal variation in incoming waste material.		

Waste Pre-Acceptance

12. Following a customer enquiry, information about the waste is requested from the waste producer.	Site Manager	Form No. 2.1a Waste Information Forms
13. This information is recorded on the Waste Information Form and the information reviewed to assess if the waste is acceptable or not.		
14. Review of the information in the Waste Information Form will determine the need for sampling / testing / Hazardous Waste Assessment.	Site Manager	Procedure No. 2.2 Waste Classification Form No. 2.1a Waste Information Forms
15. A judgement should be made as to the necessity to obtain comprehensive information at this stage. If the source of the waste is not likely to be contaminated, then it may not be necessary to obtain further information or hazardous waste assessment on the waste. If the source of the waste is likely to be contaminated, then further information and/or a hazardous waste assessment should be requested.		
16. If required, a Hazardous Waste Assessment (based on WM3 Guidance) is completed in accordance with the Waste Classification Procedure.		Procedure No. 2.2 Waste Classification
17. The information requested from customers at the pre-acceptance stage is re-assessed on an annual basis to ensure it is preventing unsuitable wastes being sent to the Site.	Site Manager	
18. Pre-acceptance information requirements will be reviewed when: • There are changes in the waste. • There are changes in the process generating the waste. • Received waste does not conform to pre-acceptance information provided.		

All Vehicles on Site

19. Third-party hauliers used for transporting waste must be an Upper Tier Waste Carrier registered with the Environment Agency.	Site Operative	Waste Transfer Note
20. Copies of third-party haulier registrations certifications will be retained in the Site office.	Site Operative	
21. Periodic checks should be completed on registration certificates of third-party hauliers to ensure they remain valid. If the registration has expired, a copy of the renewed registration will be obtained.	Site Operative	

	RESPONSIBLE PERSON	RECORD
<u>Acceptance of Waste onto the Site</u>		
22. All incoming vehicles will provide the accompanying Waste Transfer Note to the Site Operative unless a Season Waste Transfer Note has been provided.	Site Operative	Waste Transfer Note
23. A season waste transfer note is a document that covers transfers for up to twelve months. Season waste transfer notes may be used for wastes from a given site if it is well characterised or a regularly generated waste.		
24. The Site Operative will complete the section relating to transfer of waste and will return the waste transfer note to the driver keeping a copy of the WTN for their own records.		
25. Unless a season WTN has been provided, a Waste Transfer Note for every load is obtained from the driver and the Waste Transfer Note is checked to ensure it contains the following: • Vehicle registration and driver's name and signature. • Waste haulier name and valid waste carrier's registration number. • Name, address (of source site) and signature of the transferor. • Name, address (of destination site) and signature of the person receiving the waste (transferee). • Permit number or exemption reference of the Site Description of waste including waste type, waste source and waste containment. • Amount of waste (tonnes). • List of Waste (LoW) code. • SIC Code of the waste holder using SIC Codes (2007). • Date and time of waste transfer. • Waste Transfer Note number. • Confirmation that the Waste Hierarchy has been considered.	Site Operative	Waste Transfer Note
26. Loads will be visually checked by Site Operatives prior to offloading to ensure that an accurate written description and List of Waste code has been provided on the Waste Transfer Note.	Site Operative	Waste Transfer Note
27. After initial checks by the Site Operative, loads are then directed for tipping, inspection, and stockpiling in the offloading area.	Site Operative	
28. Each load is visually inspected during tipping by Site Operatives. Inspections are made to check the accuracy of the waste description provided on the Waste Transfer Note again and to identify any contravening waste types.	Site Operative	
29. The Site Manager shall be immediately informed if there are discrepancies with the load or its paperwork.	Site Operative	
30. If the load is not acceptable under the Environmental Permit, then, it should be rejected from site in accordance with the Waste Rejection Procedure.	Site Operative	Procedure No. 2.3 Waste Rejection

Compliance Testing

	RESPONSIBLE PERSON	RECORD
31. Compliance testing will be carried out on waste accepted on to the Site.	Site Manager	Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling Pre- acceptance flow chart Waste Classification flow chart
32. The purpose of compliance testing is to ensure that the information provided during pre-acceptance was representative of the waste received and that the waste is acceptable.	Site Manager	
33. Samples taken from waste piles will be tested at a laboratory to determine the characteristics of the waste and to ensure that the waste is as described on the WTN.	Site Manager	
34. A Hazardous Waste Assessment, in accordance with WM3 Guidance, will be completed using the testing results received from the laboratory. This Hazardous Waste Assessment will classify the waste as non-hazardous or hazardous.	Site Operative	Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling
35. If a waste sample is found to be classified as hazardous waste, then the corresponding waste pile will be quarantined and removed from the Site in accordance with the Waste Rejection Procedure. The Hazardous Waste Classification Report will ensure that this waste is removed under the correct LoW code.	Site Operative	Pre- acceptance flow chart Waste Classification flow chart
36. Hazardous wastes will be sent to a suitably licensed facility and accompanied by a Hazardous Waste Consignment Note.	Site Operative	Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling

Records

37. Waste Transfer Notes will be stored for a minimum of two years.	Site Manager	Procedure No. 6.1 Waste Returns
38. Information from the waste transfer notes and any consignment notes will be used to provide the necessary data to complete the waste return as required by the Environment Agency.		

Consequences

39. The consequence of not following this procedure may result in unsuitable waste being accepted on to the Site. This may constitute a breach in the conditions of the Environmental Permit, in addition to causing potential contamination of the Site.

Table 1 – Permitted Waste Types

- For Disposal at a Landfill for Non-hazardous Waste

Waste code	Description
01	Wastes resulting from exploration, mining, quarrying, and physical and chemical treatment of minerals
01 01	wastes from mineral excavation
01 01 01	wastes from mineral metalliferous excavation
01 01 02	wastes from mineral non-metalliferous excavation
01 04	wastes from physical and chemical processing of non-metalliferous minerals
01 04 09	waste sand and clays
01 05	drilling muds and other drilling wastes
01 05 04	freshwater drilling muds and wastes
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 03	plant-tissue waste
02 01 07	wastes from forestry
02 01 10	waste metal
02 03	wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 02	wastes from preserving agents
02 03 03	wastes from solvent extraction
02 03 04	materials unsuitable for consumption or processing
03	Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard
03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
03 03 07	mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	wastes from sorting of paper and cardboard destined for recycling
03 03 09	lime mud waste
03 03 10	fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
04	Wastes from the leather, fur and textile industries
04 01	wastes from the leather and fur industry
04 01 08	waste tanned leather (blue sheetings, shavings, cuttings, buffing dust) containing chromium
04 02	wastes from the textile industry
04 02 09	wastes from composite materials (impregnated textile, elastomer, plastomer)

04 02 21	wastes from unprocessed textile fibres
04 02 22	wastes from processed textile fibres
09	Wastes from the photographic industry
09 01	wastes from the photographic industry
09 01 08	photographic film and paper free of silver or silver compounds
09 01 10	single-use cameras without batteries
10	Wastes from thermal processes
10 01	wastes from power stations and other combustion plants (except 19)
10 01 01	bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
10 01 02	coal fly ash
10 01 03	fly ash from peat and untreated wood
10 01 17	fly ash from co-incineration other than those mentioned in 10 01 16
10 01 24	sands from fluidised beds
10 01 25	wastes from fuel storage and preparation of coal-fired power plants
10 01 26	wastes from cooling-water treatment
10 02	wastes from the iron and steel industry
10 02 01	wastes from the processing of slag
10 02 02	unprocessed slag
10 11	wastes from manufacture of glass and glass products
10 11 03	waste glass-based fibrous materials
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 01	waste preparation mixture before thermal processing
10 12 06	discarded moulds
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 01	waste preparation mixture before thermal processing
10 13 04	wastes from calcination and hydration of lime
11	Wastes from chemical surface treatment and coating of metals and other materials; non-ferrous hydro-metallurgy
11 05	wastes from hot galvanising processes
11 05 01	hard zinc
11 05 02	zinc ash
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging

15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
15 02	absorbents, filter materials, wiping cloths and protective clothing
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16	Wastes not otherwise specified in the list
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 19	plastic
16 01 20	glass
16 02	wastes from electrical and electronic equipment
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 03	off-specification batches and unused products
16 03 04	inorganic wastes other than those mentioned in 16 03 03
16 03 06	organic wastes other than those mentioned in 16 03 05
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
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	wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals

17 04 11	cables other than those mentioned in 17 04 10
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 05 08	track ballast other than those mentioned in 17 05 07
17 06	insulation materials and asbestos-containing construction materials
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 01	wastes from incineration or pyrolysis of waste
19 01 02	ferrous materials removed from bottom ash
19 01 12	bottom ash and slag other than those mentioned in 19 01 11
19 01 14	fly ash other than those mentioned in 19 01 13
19 01 18	pyrolysis wastes other than those mentioned in 19 01 17
19 01 19	sands from fluidised beds
19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	premixed wastes composed only of non-hazardous wastes
19 03	stabilised/solidified wastes
19 03 05	stabilised wastes other than those mentioned in 19 03 04
19 03 07	solidified wastes other than those mentioned in 19 03 06
19 04	vitrified waste and wastes from vitrification
19 04 01	vitrified waste
19 05	wastes from aerobic treatment of solid wastes
19 05 01	non-composted fraction of municipal and similar wastes
19 05 02	non-composted fraction of animal and vegetable waste
19 05 03	off-specification compost
19 06	wastes from anaerobic treatment of waste
19 06 04	digestate from anaerobic treatment of municipal waste
19 06 06	digestate from anaerobic treatment of animal and vegetable waste
19 08	wastes from waste water treatment plants not otherwise specified
19 08 01	screenings
19 08 02	waste from desanding
19 09	wastes from the preparation of water intended for human consumption or water for industrial use
19 09 01	solid waste from primary filtration and screenings
19 09 04	spent activated carbon
19 10	wastes from shredding of metal-containing wastes

19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 10 04	fluff-light fraction and dust other than those mentioned in 19 10 03
19 10 06	other fractions other than those mentioned in 19 10 05
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 05	glass
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	textiles
19 12 09	minerals (for example sand, stones)
19 12 10	combustible waste (refuse derived fuel)
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
19 13	wastes from soil and groundwater remediation
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27
20 01 30	detergents other than those mentioned in 20 01 29
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 01 41	wastes from chimney sweeping
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	soil and stones
20 02 03	other non-biodegradable wastes
20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 02	waste from markets
20 03 03	street-cleaning residues

20 03 04	septic tank sludge
20 03 06	waste from sewage cleaning
20 03 07	bulky waste



Appendix 5

Dust Management Plan

Westcombe Waste Limited

Dust Management Plan

Westcombe Waste Limited

Whiscombe Hill Landfill
Somertonfield Road,
Westcombe,
Somerton,
Somerset
TA11 6HY



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Drawings

Drawing No. 25/014 001	Sensitive Receptor Plan
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Appendices

Appendix 1	Inspection Checklists
Appendix 2	Complaints Form



1. Introduction

- 1.1. Westbury Environmental Limited has prepared this Dust Management Plan (DMP) on behalf of Westcombe Waste Limited (Operator).
- 1.2. This Dust Management Plan has been prepared in relation to waste activities carried out under Environmental Permit EPR/QP3230LE (Permit) at Whiscombe Hill Landfill, Somertonfield Road, Westcombe, Somerton, Somerset, TA11 6HY (Site).
- 1.3. The environmental permit allows for the operation of a landfill for non-hazardous waste and landfill restoration at the Site, including the biological treatment of hazardous and non-hazardous waste (leachate).
- 1.4. The Site extends to an area of approximately 7 hectares.
- 1.5. This Dust Management Plan provides information on the sources, risks and mitigation measures related to the potential of dust from the waste operations carried out on the Site.

Definitions Used Within This Report

- 1.6. Dust is a generic term for particulate matter and covers airborne particles in the size range of 1 to 75µm (micrometres) in diameter:
 - Particles less than 10µm are '*small*'.
 - 10µm to 30µm are termed '*intermediate*'.
 - Particles above 30µm are termed '*large*'.
- 1.7. Large and intermediate dust particles are often referred to as nuisance dust, whilst small particles are associated with effects on human health.
- 1.8. Dust generated from the waste operations undertaken on this Site and the movement of plant and vehicles are commonly of *larger* particle size.
- 1.9. The larger particle fraction of dust can create a potential nuisance in the community or impact on the environment. It is normally perceived as an accumulated deposit on surfaces such as window ledges, paintwork, and other horizontal surfaces e.g., car roofs. When the rate of accumulation is sufficiently rapid to cause noticeable fouling, discolouration, or staining (and decreasing time between cleaning) then the dust is generally considered to be a nuisance. The visibility of dust clouds themselves may also give rise to such impacts.

Content of the Dust Management Plan

- 1.10. This Dust Management Plan will form part of the Environmental Management System (EMS) for the Site. Procedures and forms referenced within this Dust Management Plan are included within the EMS. Completed forms (records) are kept, as required by conditions included in an Environmental Permit.
- 1.11. This Dust Management Plan is structured as follows:
 - Section 2 provides a summary of the relevant legislation and guidelines.
 - Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
 - Section 4 provides a summary of the operations carried out on the Site and the delivery of material to the Site.
 - Section 5 provides information on the dust management and the mitigation measures employed at the Site.
 - Section 6 details other considerations.
 - Section 7 provides information on cessation of operations for dust mitigation.
 - Section 8 provides details of Site monitoring.
 - Section 9 provides a summary of what happens when an alarm is triggered.
 - Section 10 provides a description of how complaints can be made and how they are addressed by the Site management.



2. Relevant Legislation

- 2.1. The *Air Quality Strategy (AQS) for England, Scotland, Wales and Northern Ireland* fulfils the requirement under Part IV of the *Environment Act 1995* for a national air quality strategy which sets out policies for improving ambient air quality and keeping these under review. The first strategy, the *National Air Quality Strategy (NAQS)*, was published in March 1997. In January 1999, proposals to amend the strategy were put out for consultation and a consultation document was produced. Following consultation, a revised version of the strategy was published in January 2000. This was further revised in 2007 and has not been revised since this date.
- 2.2. The AQS provides a framework for air quality control through air quality management and air quality standards and objectives for different pollutants (including particulate matter). These air quality standards and objectives were transposed into English Law by the *Air Quality (Standards) Regulations 2010*.

Air Quality Management Area (AQMA)

- 2.3. The system of local air quality management (LAQM) was introduced under the *Environment Act 1995*. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within the relevant period, the authority must designate an AQMA.
- 2.4. The Site is located within the Yeovil AQMA which includes Nitrogen Dioxide (NO₂) as the declared pollutant.

Low Emission Zone (LEZ)

- 2.5. An LEZ is an area that has restrictions on the type and age of vehicles permitted in it, therefore, vehicles emitting high levels of pollution can be prevented from entering and operating within the zone.
- 2.6. The Site is not located within an LEZ.

3. Site Location and Sensitive Receptors

Site Location

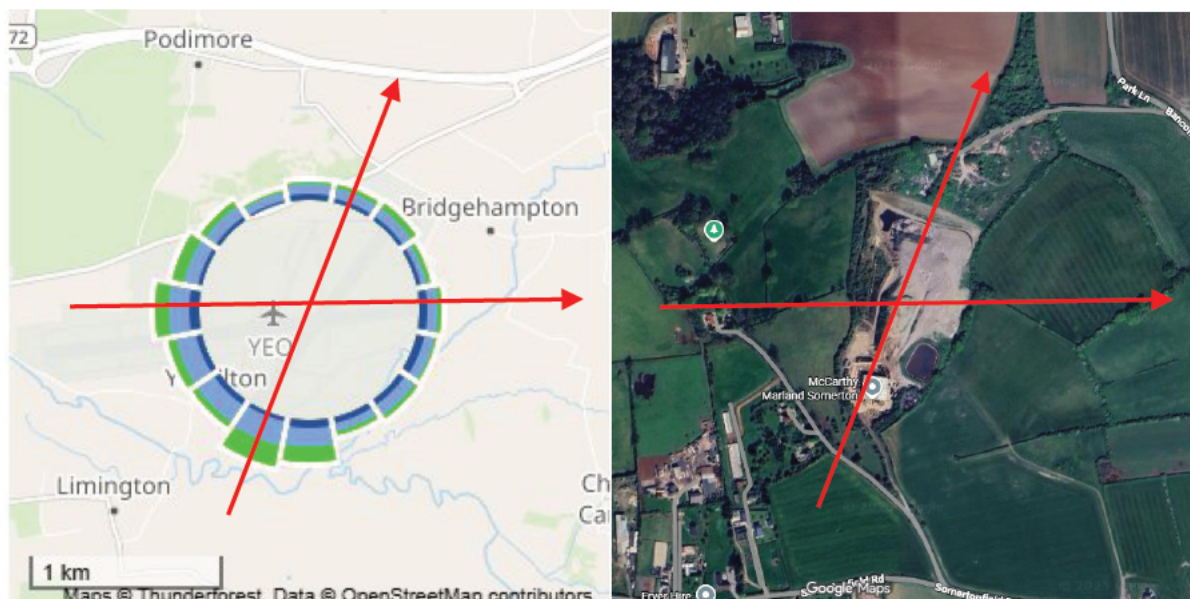
- 3.1. The Site is located at Whiscombe Hill Landfill, Somertonfield Road, Westcombe, Somerton, Somerset, TA11 6HY (Site).
- 3.2. The Site is located at National Grid Reference (ST 46525 29377).
- 3.3. The Site extends to an area of approximately 7 hectares.
- 3.4. The Site is mainly surrounded by agricultural fields to the north / northwest. There is the town of Somerton to the east / southeast, and residential and commercial areas to the south.
- 3.5. The Site is located off a surfaced road located to the south of the Site, accessed from Somerton Road.

Meteorology

- 3.6. Unlike many other atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.
- 3.7. The prevailing meteorological condition at any site is dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site specific, microclimatic conditions. The most significant meteorological factor is the predominant wind direction and wind speeds, and consequently data has been collected regarding the predominant wind speeds and directions appropriate to the Site.
- 3.8. Wind direction data has been obtained from Yeovilton Airport weather station, see Figure 3.1. Yeovilton Airport weather station is located approximately 9.5km southeast of the Site.
- 3.9. The predominant wind blows towards the northeast and east of the, see Figure 3.1: Wind rose from Brampton weather station.

Figure 3.1 Wind Rose Diagram from Yeovilton Airport Weather Station

Arrow indicates predominant wind direction





Sensitive Receptors

- 3.10. This Dust Management Plan identifies all types of receptors within 1km of the Site that may be sensitive to dust emissions.
- 3.11. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from airborne dust. Concentrations of airborne dust reduce significantly further away from the source.
- 3.12. Due to the nature of the materials being handled on this Site the particle size of the dust emitted is of intermediate to large particles. Therefore, it can be concluded that these particles are highly likely to be deposited within 250m of the source.
- 3.13. Sensitive receptors to the northeast and east of the Site are considered most at risk of being impacted by dust emissions from Site operations due to the predominant wind direction being from the southwest/west.
- 3.14. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 3.1.

Table 3.1: Sensitive Receptors Within 1km of the Site Boundary

No	Receptor	Type of Receptor	Bearing from Site	Approx Distance from Site boundary to receptor boundary (m)
3	Deciduous Woodland	Protected Habitats & Species	West	180
5	Deciduous and Ancient Woodland	Protected Habitats & Species	Northwest	227
8	Westcombe Stables	Residential	Southwest	390
10	Deciduous Woodland	Protected Habitats & Species	Northeast	484
12	Harleys Court Cottages	Leisure	Southwest	698
18	Buttercross Meadow	Residential	Southeast	860
19	Somerton Business Park	Commercial	East	925

**This table only contains receptors that are considered to be sensitive to dust emissions. As such, numbered receptors that are not considered sensitive to dust have been omitted.*

- 3.15. The locations of these receptors are shown in Drawing No. 25/014 001 Sensitive Receptor Plan.
- 3.16. The nearest residential property is Westcombe Stables. This receptor is not in the direction of the predominant wind direction and there is an area of woodland between the Site and the receptor. It is expected that the woodland and wind direction will reduce the impact of dust emissions produced by the Site.
- 3.17. Protected habitats consisting of deciduous woodland are located 180m west, 227m northwest and 484m northeast of the Site. The area of woodland located to the northeast is situated in the predominant wind direction.
- 3.18. The nearest leisure receptor is Harley's Court Cottages. This receptor is not in the predominant wind direction and there is approximately 600m of agricultural fields between the receptor and the Site. It



is expected that the wind direction and expanse of agricultural fields will reduce the impact of dust emissions produced by the Site.

Other Dust Sources

- 3.19. It is also considered that agricultural activities carried out at particular times of the year on the surrounding agricultural land will have the potential to cause dust emissions.



4. Operations at the Site

- 4.1. The permit (EPR/QP3230LE) allows for the operation of a landfill for non-hazardous waste and landfill restoration at the Site, including the biological treatment of hazardous and non-hazardous waste (leachate).
- 4.2. The operator also operates a waste transfer station within the permit boundary, EPR/GB3201CE/T001.
- 4.3. Waste is delivered onto the Site by Heavy Goods Vehicles (HGVs). The movement of vehicles visiting and moving around on the Site has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements are enforced on the Site to help minimise the amount of dust generated by vehicle wheels.
- 4.4. Vehicles enter the Site via the southern entrance to the Site.
- 4.5. All vehicles entering / exiting the Site will be sheeted to minimise the likelihood of dust emissions.
- 4.6. Wastes are stored in dedicated storage areas outside before being deposited into the landfill.

Overview of Waste Operations

- 4.7. Specific operations carried out on the Site are listed below with further information regarding the potential for these activities to cause dust emissions:
 - Vehicle Movements
 - The movement of vehicles within the Site has the potential to cause dust emissions, particularly in dry and windy conditions.
 - Mud could be tracked out of the Site by vehicles, potentially causing dust emissions from the road surface.
 - Waste Storage
 - Prior to landfilling waste is stored outside in stockpiles.
 - Waste stockpiles have the potential to cause dust emissions from wind whipping.
 - Deposit of Waste in the Landfill.
 - Movement and permanent deposit of waste within an engineered landfill cell.
 - Deposit of daily cover on to landfilled waste.
 - Landfill Engineering
 - Construction of landfill liner and other infrastructure.

Site Layout

- 4.8. Waste is deposited in the active landfill cell throughout the day.
- 4.9. Site offices are located towards the south of the Site, next to the access road.
- 4.10. Waste is stored for a short amount of time in a stockpile near to the active landfill cell, prior to being deposited in the landfill.

Plant and equipment

- 4.11. The following equipment is used on the Site for the waste operations:
 - Front-shovel Loaders
 - HGVs



- 4.12. All the equipment used on the Site are subject to maintenance checks in accordance with the procedures within the EMS.
- 4.13. All plant is operated in a proper manner with respect to minimising emissions, for example, switching off plant when not in use and no-revving of engines etc. The Operator implements a policy of replacing older machinery with new, lower emission machinery as it becomes available and as the business development allows.
- 4.14. All mobile and fixed plant on Site is subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts.
- 4.15. Site management undertake or delegate additional preventative maintenance checks on a frequent basis, see Appendix 1, Inspection Checklists, to ensure the following:
- Machinery is mechanically sound for use and no presence of black fumes or trailing liquids visible prior to use or following shutoff of plant/equipment.
- 4.16. A 'no-idling' policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

Waste - Dust Potential

- 4.17. The waste types accepted at the Site that have a significant potential to cause dust have been identified in the table below. These have been assigned a '*low*', '*medium*' or '*high*' risk level for the potential to generate dust emissions.

Table 4.1: Potential of Waste Types to Produce Dust Emissions

Waste Type	Processes Waste Type Subjected To	Dust Potential
Ashes, slag and dust.	Storage	<i>High</i>
	Handling	<i>High</i>
	Deposit for Disposal	<i>High</i>
Soils and Stones (including cover material)	Storage	<i>Medium</i>
	Handling	<i>High</i>
	Deposit for Disposal	<i>High</i>
Concrete, bricks, tiles, ceramics.	Storage	<i>Low</i>
	Handling	<i>Medium</i>
	Deposit for Disposal	<i>Medium</i>
Wood (including shredded wood)	Storage	<i>Low</i>
	Handling	<i>Low</i>
	Deposit for Disposal	<i>Low</i>
Mixed municipal wastes.	Storage	<i>Low</i>
	Handling	<i>Low</i>
	Deposit for Disposal	<i>Low</i>



5. Dust Management and Mitigation

Responsibility for Implementation of the Dust Management Plan

- 5.1. The Site Manager is responsible for the implementation of the Dust Management Plan and for ensuring that the mitigation strategies in place are adhered to. Where the Site Manager is unavailable to oversee the implementation of dust suppression measures, a suitably experienced Site Operative is delegated responsibility from the Site Manager.
- 5.2. This Dust Management Plan will be reviewed every four years, after a complaint, at the request of the Environment Agency, or when a change in operations is deemed to have a potential effect on dust emissions. The review process will amend any mitigation measures that have been identified as areas for improvement in reducing dust emissions from the Site.
- 5.3. All staff members have received the necessary training to deliver dust suppression measures detailed within this Dust Management Plan. All staff are given training on the EMS for the Site, which includes a Dust Procedure. All staff on the Site are trained on the Dust Procedure which includes details regarding mitigation measure and monitoring/recording visual inspections. Site procedures are communicated between staff via EMS training and regular toolbox talks. Where new dust suppression measures are implemented, training is provided to ensure staff remain competent. This training is delivered by the Site Manager.

Sources and Control of Fugitive Dust Emissions

- 5.4. Table 5.1 details the potential sources of dust on the Site and which mitigation measures are implemented in order to break the source-pathway-receptor routes for dust emissions.
- 5.5. Table 5.2 lists the mitigation measures to control dust emissions at the Site.
- 5.6. The following dust mitigation measure are always implemented on Site:
 - Minimising drop heights.
- 5.7. The following dust mitigation measures will always be enacted on Site if there is not significant rainfall:
 - Use of a water hose attached to water bowzers around waste storage and movement activities.
- 5.8. The following dust mitigation measures are implemented on an as-needs basis that is determined by the Site operative after consideration of the checks made on Site:
 - Bowzers and water sprays to spray water on stored materials.
 - Bowzers and water sprays to spray water on Site surfaces.

**Table 5.1: Source-Pathway-Receptor Routes**

Source	Pathway	Receptor	Type of Impact	Where relationship can be interrupted
Movement of vehicles and plant on site surfaces and local roads.	Atmospheric dispersion from the wheels on surfaces.	Surrounding sensitive receptors.	Airborne particulates causing nuisance.	Water bowsters and hoses are available on Site to dampen the Site surface in warm, dry, and windy conditions. A strict 5mph speed limit is enforced on Site. Lower vehicle speeds will minimise resuspension of mud and dust as airborne particulates. All vehicles are checked before they leave the Site to ensure that mud will not be tracked out beyond the Site access road. All incoming/outgoing vehicle loads are sheeted. Any mud, observed on the public highway in close proximity to the Site, is cleaned by way of road sweeper.
Handling and storage of wastes.	Atmospheric dispersion.	Surrounding sensitive receptors.	Airborne particulates and buildup of dust.	Drop heights from equipment and vehicles are kept to a minimum at all times to reduce the risk of dust emissions. During periods of dry or windy weather, or if the material is considered to be fine/dusty material, stockpiles will be dampened down prior to and during waste movement/handling. Operations may be temporarily ceased in accordance with the Risk Matrix presented in Section 6. Weather conditions are assessed at the end of the day to identify if stockpiles need to be further dampened down to minimise the risk of dust emissions occurring outside of operational hours.
Deposit of waste for disposal in the landfill.	Atmospheric dispersion.	Surrounding sensitive receptors.	Airborne particulates and buildup of dust.	Drop heights from equipment and vehicles are kept to a minimum at all times to reduce the risk of dust emissions. During periods of dry or windy weather, or if the material is considered to be fine/dusty material, stockpiles will be dampened down prior to and during waste movement/handling. Operations may be temporarily ceased in accordance with the Risk Matrix presented in Section 6.
Depositing of daily coverage material onto landfill.	Atmospheric dispersion.	Surrounding sensitive receptors.	Airborne particulates and buildup of dust.	During periods of dry or windy weather, or if the material is considered to be fine/dusty material, coverage material will be dampened down. Weather conditions are assessed at the end of the day to identify if the daily coverage material needs to be further dampened down to minimise the risk of dust emissions occurring outside of operational hours.

**Table 5.2: Mitigation Measures**

Mitigation Measure	Description / Effect	Use on Site	Trigger for implementation	How is it implemented?	Further mitigation if not effective
Preventative Measures					
Boundary trees / hedging.	The Site has dense woodland / hedging along the perimeter of the Site boundary.	All operations are contained within the site boundary.	No trigger – part of the infrastructure.	N/A	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) are triggered e.g. dampening down of Site surfaces.
Site speed limit, 'no idling' policy and minimisation of vehicle movements on Site.	Reducing vehicle movements reduces dust emissions from the Site. Enforcement of the speed limit and limiting movements will reduce the chance and amount of re-suspension of dust by vehicle wheels.	There is a no-idling policy in place on the Site for vehicles. Vehicle movements are minimised by ensuring that the double handling of materials is avoided where possible. A 5mph speed limit is enforced on the entire Site.	Speed limit signage. Enforcement of speed limit by Site Manager and constant observation and reminders by Site operatives.	These measures are implemented by staff training on the EMS and speed limit signs on the Site.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) are triggered e.g. dampening down of Site surfaces. If excessive dust emissions from vehicle movements continue after these measures, then operations shall temporarily cease.
Minimising drop heights for waste.	Minimising the height at which waste is dropped should reduce the distance over which dust could be blown and dispersed by winds.	The EMS will require that the handling of waste material on Site should be minimised at all times. Staff are trained on minimising drop heights.	This measure is implemented whenever the Site is operational i.e. whenever material is being moved.	By plant operators lowering the grabs, shovels etc. when moving potentially dusty materials.	Surfaces and stockpiles will be dampened to minimise dust generation. If excessive dust emissions continue after these measures, then operations shall temporarily cease.
Good housekeeping.	Having a consistent, regular housekeeping regime that is supported by management, will ensure the Site is regularly checked and issues remedied to prevent and remove dust	The EMS implemented on the Site will have a specific procedure for enforcing good housekeeping. On-Site litter is collected and disposed of daily by a Site	These measures are implemented whenever the Site is operational.	Good housekeeping is implemented by following the housekeeping procedure within	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered e.g., dampening down of



	build up.	Operative to keep the Site tidy.		the EMS and by carrying out Site inspections. Details of housekeeping checks are included in the Inspection Checklists, see Appendix 1, Inspection Checklists. Completed Checklists are reviewed by the Site Manager on the day that they are completed.	surfaces.
Wheel washing.	Vehicles exiting the have access to water bowsters and hoses to facilitate wheel washing where necessary to prevent the tracking of mud out onto local roads.	The Site is mainly untouched ground, with concrete pads. Therefore, it is considered that there is a high capacity for mud to occur across the Site / onto access roads. Site operatives have access to water bowsters and hoses to clean the wheels and bodies of vehicles leaving the Site if required.	All vehicles have access to the wheel washing equipment on the Site.	Vehicles are directed to the available hoses to wash mud/dust from wheels.	A road sweeper will be hired and deployed should the wheel wash be ineffective and mud is observed on the local highway.
Sheeting of vehicles.	All vehicles delivering or removing waste are sheeted/enclosed to minimise dust release in transit.	The EMS states that all vehicles entering / exiting the Site must be sheeted to minimise the likelihood of dust emissions.	Loading of potentially dusty materials on to a vehicle is followed by closing of the sheet covers on that vehicle. Visual observation of incoming vehicles will take place. All vehicles carrying waste to the Site are sheeted at all times unless being loaded or unloaded.	The sheeting on the vehicle is checked to ensure proper coverage before the vehicle is allowed to leave the site. Incoming vehicles that are not sheeted are rejected from the site or sheeted immediately.	If excessive dust emissions are continued to be observed leaving the Site boundary, then the further mitigation measure(s) will be triggered. e.g., dampening down of materials.



Ceasing operations during high winds and/or exceptionally dry conditions.	Mobilisation of dust and particulates is likely to be greater during periods of strong winds or exceptionally dry conditions and hence ceasing operation at these times may reduce peak pollution events.	During exceptionally dry and/or windy conditions, if any operations / Site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormal dust emissions are observed within the Site, Site waste operations may be suspended to avoid further dust emissions. The weather conditions at the Site are considered and recorded at the start of each working day so that the day's work may be planned to take in regard any potential dust emissions. If the wind speed and direction are likely to increase the risk of nuisance to nearby receptors, then operations may be temporarily stopped. Wind speeds and temperature are not electronically measured on Site. Weather conditions are recorded on the Daily Inspection Checklist from observations made. Wind speed is estimated from either: • Using local wind speed information from a weather monitoring website. • An estimation using the Beaufort scale. The Site Manager will decide whether to cease operations because of weather conditions.	If excessive dust is being generated by the operations, then the Site Manager will notify staff and operations may be temporarily ceased. Operations commence once the wind has subsided and/or the area is dampened down.	The Site Manager makes the decision to cease activities that are causing the dust emissions.	If excessive dust emissions from Site continue after these measures, then operations shall temporarily cease.
Suppression using water.	Using the water bowser and hoses. This measure can remove particles from the air	The hoses attached to water bowsers are in use at the Site to dampen surfaces and material	When materials are being moved and significant dust emissions are	Dust emissions will be suppressed by	If excessive dust emissions are observed leaving the Site boundary, then the



	and dampen down dry / dusty materials.	to prevent dust emissions. The condition and integrity of the hoses/sprays are checked as part of the Inspection Checklist in Appendix 1.	observed. Visual observation is carried out by all employees on the Site. Findings from the visual observations are recorded on Inspection Checklists.	the use of a water bowser and hoses to dampen waste when it is tipped off from vehicles and when this material is moved to the waste storage area. Water will also be used to dampen waste when being transported between the stockpile and the landfill.	further mitigation measure(s) is triggered. Cease operations causing the dust emission.
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6. Other Considerations:

Water Availability

- 6.1. There is a mains water supply at the Site. Water bowsters and hoses will be utilised to mitigate dust emissions in dry and dusty conditions. The condition of the bowster and hoses are checked as part of the daily inspections, see Appendix 1, Inspection Checklists.
- 6.2. Hoses and spray attachments attached to the water bowsters are used to dampen materials and surfaces and to control any dust emissions.
- 6.3. It is considered that the spray coverage of the hoses is sufficient to cover all areas of the Site.
- 6.4. Factors affecting spray coverage include:
 - Nozzle design
 - Flowrate
 - Pressure
 - Spray angle
- 6.5. The spray coverage therefore cannot be calculated due to the above variables.
- 6.6. The fact that the sprays are attached to hoses from bowsters that can reach / move around the Site will ensure full coverage.

In the Event of a Drought

- 6.7. During exceptionally dry and/or windy conditions, if any operations/Site movements cause or are likely to cause visible dust emissions beyond the Site boundary, or if abnormally high dust emissions are observed within the Site, operations may be suspended to avoid further dust emissions. This is decided by the Site Manager.
- 6.8. Depending on the severity of the drought conditions, restrictions may be in place on the amount of water available for use on Site from the water bowster. In this case, operations may be reduced or suspended to comply with any water usage restrictions.
- 6.9. Alternative sources of water will be sourced, and mobile bowsters will be used to import and supply water for dust suppression during the event of drought or other water shortage.



7. Cessation of Operations for Dust Mitigation

- 7.1. The following section details the assessment process to be taken when determining if activities on Site should stop to prevent significant dust emissions.
- 7.2. Weather conditions are monitored each working day as part of the daily inspection checklist, see Appendix 1, Inspection Checklists.

Estimating Magnitude of Risk

- 7.3. Table 7.1 provides a matrix for estimating the magnitude of risk from a potential hazard, considering both the probability and consequences of the hazard occurring.
- 7.4. The magnitude of risk determines the level of management required to reduce the probability of the hazard occurring.
- 7.5. In this management plan, the hazard is considered to be the significant emission of dust from the Site such that it could cause nuisance to local sensitive receptors. Table 7.1 describes this Risk Matrix applied to this assessment of risk.

Table 7.1 Estimating the Magnitude of Risk

	Magnitude of Risk	Consequence			
		High	Medium	Low	Negligible
Probability	High	Very high	High	Medium/Low	Very Low
	Medium	High	Medium	Low	Very Low
	Low	High/Medium	Medium/Low	Low	Very Low
	Negligible	High/Medium/Low	Medium/Low	Low	Negligible

- 7.6. An assessment of the most common weather conditions and their potential to generate significant nuisance dust emissions from the activities on Site has been undertaken and is presented in Table 7.2 to Table 7.4.
- 7.7. The risk assessment is separated into two sections. In Table 7.2 the operator must record the temperature and then proceed to the corresponding table. Tables 7.2 to 7.4 contain all common weather conditions and their risk magnitude. Actions required for each risk category are detailed in Table 7.5.

Table 7.2 Temperature

Temperature	Action
Warm (Above 18°C)	Go to Table 7.3
Cool (Below 18°C)	Go to Table 7.4

Table 7.3 Risk Matrix for Warm Weather

Conditions	Probability	Consequence	Risk Magnitude
Wet, low wind (<3 Beaufort)	Medium	Negligible	Very Low
Wet, medium wind (>4 Beaufort)	Medium	Low	Low
Wet, high wind (>8 Beaufort)	Low	Medium	Medium/Low
Dry, low wind (<3 Beaufort)	Medium	Low	Low
Dry, medium wind (>4 Beaufort)	Medium	Medium	Medium
Dry, high wind (>8 Beaufort)	Low	High	High/Medium

**Table 7.4 Risk Matrix for Cool Weather**

Conditions	Probability	Consequence	Risk Magnitude
Wet, low wind (<3 Beaufort)	Medium	Low	Low
Wet, medium wind (>4 Beaufort)	Medium	Low	Low
Wet, high wind (>8 Beaufort)	Low	Medium	Medium/Low
Dry, low wind (<3 Beaufort)	Medium	Low	Low
Dry, medium wind (>4 Beaufort)	Medium	Low	Low
Dry, high wind (>8 Beaufort)	Low	Medium	Medium/Low

- 7.8. The action required for each level of risk is provided in Table 7.5: Action Required for Each Level of Risk.

Table 7.5: Action Required for Each Level of Risk

Risk Magnitude	Action
Low	Continued implementation of preventative mitigation measures.
Medium	Continued implementation of preventative mitigation measures. Dust emissions are likely, therefore remedial measures to be employed. Relevant activities* temporarily cease if preventative and remedial measures are not proving effective in controlling the dust emission. Relevant waste activity can resume upon implementation of additional mitigation if measures are effective.
High	Continued implementation of preventative mitigation measures. Dust emissions are likely, therefore remedial measures to be employed. Relevant waste activity may not be undertaken or will be temporarily ceased. Relevant waste activity can resume when the conditions no longer apply / additional remedial mitigation is effectively implemented and there are no significant dust emissions.

**Relevant activities: Activities identified as generating significant dust emissions or having the potential to generate significant dust emissions in such conditions.*



8. Monitoring

Weather Monitoring

- 8.1. Wind speeds and temperature are not electronically measured on Site. Weather conditions are recorded on the Daily Inspection Checklist from observations made, see Appendix 1, Inspection Checklists.
- 8.2. Wind speed is estimated from either:
 - Using local wind speed information from a weather monitoring website.
 - An estimation using the Beaufort scale.
- 8.3. Adverse weather conditions are:
 - Windy conditions (>4 Beaufort scale).
 - Prolonged dry and hot (>20 degrees and dry surface conditions from lack of rainfall) conditions.
- 8.4. The weather is considered by the Site Manager when planning the activities for the day to ensure appropriate activities are carried out to minimise dust generation where possible.

Visual Dust Monitoring

- 8.5. Monitoring of dust emissions will take place across the Site as part of the daily inspections, see Appendix 1, Inspection Checklists.
- 8.6. Dust emissions at the Site are monitored by visual observation. This monitoring will take place at various locations within the Site boundary throughout the day.
- 8.7. The visual inspections are once-a-day minimum and more frequent during dry/windy/warm weather conditions (i.e. morning, afternoon and evening). The Site supervisor will also make a formal visual inspection of dust emissions and record the results of monitoring, see Appendix 1, Inspection Checklists.
- 8.8. It is the responsibility of every member of staff to monitor the dust emissions on the Site as they undertake their daily tasks.
- 8.9. Reports are made to the Site Manager regarding dust emissions when dust is observed leaving, or about to leave, the Site boundary.
- 8.10. If excessive dust emissions (dust clouds) are observed, then the Site Manager will establish what is causing the excessive dust emission to be generated and take remedial action. The results of the investigation and what action was taken are recorded and retained.
- 8.11. Feedback from the monitoring is recorded as part of the Inspection Checklist and feedback is given to the Site Manager.



9. Actions When an Alarm is Triggered

- 9.1. Monitoring is carried out by visual observation and assessing whether dust emissions are excessive i.e. leaving the Site boundary.
- 9.2. The staff member who identified the dust generation/emission will raise the alarm by notifying the Site Manager.
- 9.3. If the Site Manager confirms that dust is being generated and causing dust emissions from the Site, they will take remedial action.
- 9.4. Remedial measures to be taken are described in Table 5.2: Mitigation Measures.



10. Reporting and Complaints Response

- 10.1. The EMS on the Site will have a procedure for responding and dealing with complaints. A complaints form is available on Site and must be filled in and kept on file whenever a complaint is received in accordance with the EMS complaints procedure.

Engagement with the Community

- 10.2. The Site Notice Board is placed at the entrance of the Site with the following information:
- The Permit holder's name (Westcombe Waste Limited).
 - An emergency contact name and telephone number.
 - A statement that the Site is permitted by the Environment Agency
 - The Environmental Permit reference.
 - The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).
- 10.3. The provision of the above information will ensure that members of the community can contact the Operator should they be concerned by dust emissions or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

Reporting of Complaints

- 10.4. Should a complaint regarding dust be received by the Site, the complaint is recorded on the Complaints Form in the EMS and investigated in accordance with the Complaints Procedure within the EMS. The Complaints Form will record who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again, see Appendix 2, Complaints Form.
- 10.5. The Site Manager will identify what caused the excessive dust emission to be generated. This generation may have been caused by failure of Site machinery or dust procedures. If the excessive dust emission has been caused by a procedure not being carried out properly, then staff will receive further training on the dust procedures and Site management.
- 10.6. All complaints are acknowledged and investigated, with resultant actions reported to the complaint. Any complaints received by the Environment Agency relating to dust emissions from the site are dealt with on the same day.

Out of Hours Arrangements

- 10.7. In the event of an out-of-hours complaint or incident occurring at the Site related to dust emissions, then a Director can be contacted via phone call.
- 10.8. The Director can attend the Site or instruct a relevantly trained Site Operative to attend the Site in their absence. On arrival at the Site, the cause of the dust emission is identified, and the most suitable corrective measure is instigated.
- 10.9. Outside of operational hours the only potential source of nuisance dust is wind whipped from stockpiles, the daily coverage material and the Site surface. This risk of this causing a nuisance to local sensitive receptors is minimised through the majority of sensitive receptors not being within the predominant wind path and the Site having areas of woodland along the Site boundary.
- 10.10. At the end of each working day weather conditions are assessed to determine if additional spraying of stockpiles is required. These conditions include prolonged hot, dry weather (>20 degrees) and windy conditions (Beaufort scale >4). If these weather conditions present a significant risk, then waste stockpiles are dampened prior to the Site closing.



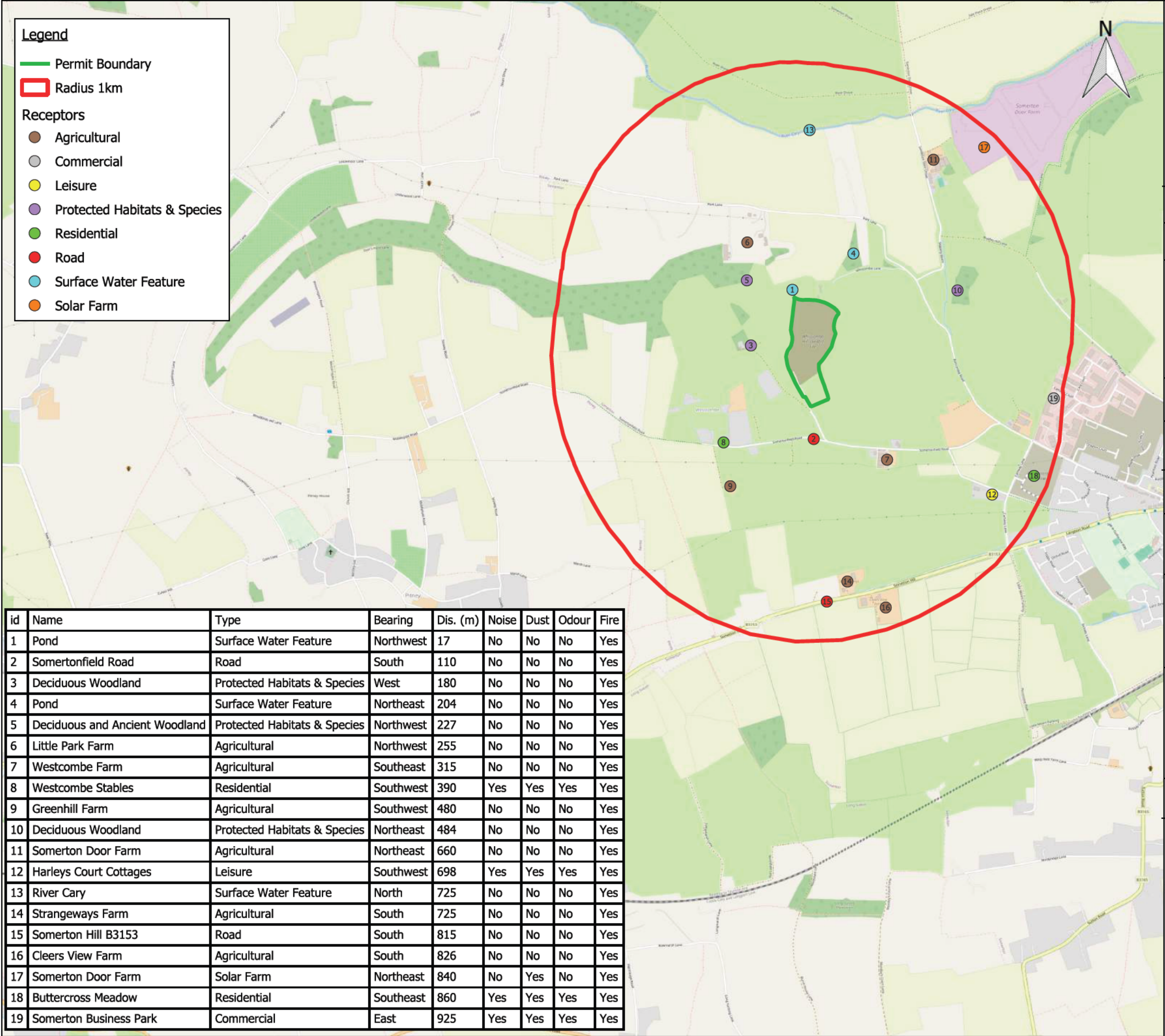
Management Responsibilities

- 10.11. Site staff are responsible for dust management issues and detecting/reporting dust emissions. All members of staff are given training on the EMS for the Site, which will include a Dust Procedure. All staff on the Site are trained on the Dust Procedure which will include details regarding mitigation measures and monitoring/recording visual inspections.
- 10.12. On receipt of a complaint the Site Manager will investigate and establish the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant is contacted with details of the actions to be implemented and the estimated timescales for completion. The maximum response time for investigating the cause of the complaint and contacting a complainant is two working days.
- 10.13. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) is investigated in accordance with the Accidents, Incidents & Complaints Procedure within the EMS. Operations on the Site will cease should excessive dust emissions be observed leaving the boundary following the implementation of additional mitigation measures or when instruction from the Environment Agency to cease operations has been received.



Drawings

Drawing No. 25/014 001 Sensitive Receptor Plan



Westcombe Waste Limited

Westcombe Waste Limited

Whiscombe Hill Landfill

Somertonfield Road
Westcombe
Somerton
Somerset
TA11 6HY

Drawing Ref: 25/014 001 Sensitive Receptors Plan

Version Number: 1

20th November 2025

Created By: SW
Checked By: TW

Scale:
Map: 1:25,000

0 250 500 m

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Appendix 1
Inspection Checklists

Form No. 3.3a Inspection Checklists

November 2025

Daily Inspection Checklists					
Item for Inspection	Visual	Aspects for Inspection	Checked?	Remedial Action Required?	Action Completed Form
Equipment		Pre-use checks.			
Fire Watches		Equipment.			
Litter		Within tipping area.			
		Within storage area.			
		Along Site boundaries.			
		Outside Site boundary.			
Fuel Storage		Mobile bowser is securely located			
		Mobile bowser checked for any sign of damage, corrosion, deterioration, incident, leakage, or spillage.			
		The bund that encloses the fuel container is free from damage, deterioration, leakage or spillage.			
		The bund that encloses the fuel container is emptied of any accumulated rain water.			
Fire		Fire extinguishers / hoses in place and no obvious damage.			
		Soil / sand available to aid in firefighting.			
		Spill kits available.			
Dust emissions		No excessive dust emissions should be escaping the Site boundary.			
		Spray bar in crusher operational and has water supply.			
Roads		Public highway clear of mud and debris.			
		Access road clear of mud and debris.			

Weather	Weather is recorded in Site Diary.			
Fugitive emissions to air	Check if waste on Site is causing an odour.			
Fugitive emissions to water	Check if there has been any contamination in runoff water, for example if there is oil sheen visible. Check for leaks from the quarantine area or containers that could cause contamination in runoff water. Check any nearby lagoons/sumps, tanks, collection points and drainage channels to prevent escape of contaminated water.			

Date: _____

Completed by: _____

Signature: _____

Form No. 3.3a Inspection Checklists

November 2025

Weekly Inspection Checklists				
Item for Visual Inspection	Aspects for Inspection	Checked?	Remedial Action Required?	Action Form Completed
Pests and vermin	Observations of pests and vermin or evidence of their presence e.g. faeces.			
Site Security	Security measures are functional and fit for purpose.			
Hoses and containers	Hoses should be in good condition and free from holes. Wheel washing hose functioning and not leaking. Containers free from cracks which may result in loss of containment.			

Date: _____

Completed by: _____

Signature: _____

Form No. 3.3a Inspection Checklists

V.1, June 2025

Monthly Checklist

Item	Aspects	Checked ✓ / ✗	Comment	Remedial Action (if required)	Action Form ✓ / ✗	
					Required	Completed
Access Road on Site	In good condition, no potholes/damage					
Leachate management system	In good condition, no leaks/damage					
Landfill gas management system	In good condition, no leaks/damage					
Spill Kits	Present on the Site, ready for use and fully stocked with contents.					
Welfare/Site Office	Integrity of the records stored within the Site Office.					

Date: _____

Completed by: _____

Signature: _____



Appendix 2
Complaints Form

Form No. 7.1c Complaints Form**V.1, November 2025**

Who made the complaint?	Name:	
	Address:	
	Phone No.:	
Date and time they made the complaint:		
What happened? What was it about?		
Was anyone else aware of this – other neighbours or your staff? If so, who?		
Did the complaint relate to your site? If so, what happened? What went wrong?		
What have you done to make sure that it does not happen again?		
Was there any significant pollution – for example: dust, odour or noise outside the Site or spillage of polluting liquids onto the ground, into a drain or a watercourse?		
If there was, then you must notify the Environment Agency on 0800 807060 and any other relevant regulators. Have you done so? Yes ☐ No ☐		At what time did you phone?
You must also write or send an email to confirm this to your local Environment Agency office. Have you done so? Yes ☐ No ☐		What date did you contact?
Please print and sign your name:		