

# CONNINGBROOK BALLAST HOLE

**Environmental Permit Application**

**Non-Technical Summary**

Prepared for: Brett Aggregates Limited

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### APPENDICES

Appendix 01: Waste Recovery Assessment Letter, August 2019.

## 1.0 Introduction

Brett Aggregates Limited (Brett) has instructed SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) application under the Environmental Permitting (England and Wales) Regulations 2016 (as amended). The application seeks approval for the use of waste in the restoration of a 'ballast hole' (arising from historic removal of sand and gravel) near to the Conningbrook Recycling Facility (Ref: XP3394VP) owned and previously operated by Brett. Herein the facility will be referred to as 'the Site'.

This document provides a Non-Technical Summary (NTS) of application including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed changes.

To support this application for an EP, the following documentation is submitted in addition to this NTS:

- Application Forms (Parts A, B2, B4 and F1) and associated appendices, including a summary of the Integrated Management System (IMS), List of Directors and WAMITAB/Certificates of Continuing Competence;
- Associated Drawings;
- An Environmental Risk Assessment (ERA);
- An Environmental Setting and Site Design report (ESSD);
- Waste Acceptance Criteria and Waste Acceptance Procedure (WAC and WAP) document;
- An Operating Techniques document (OT);
- A Site Condition Report (SCR);
- A Dust Management Plan (DMP); and
- Approved Waste Recovery Plan (WRP).

### 1.1 Pre-Application Discussions

SLR requested the basic level of pre-application advice from the Environment Agency (EA) on 28<sup>th</sup> August 2019. The advice included an application reference (EPR/GB3703KZ/A001) and detailed the baseline application fee and documents required for the submission.

### 1.2 Approved Waste Recovery Plan

As part of pre-application discussions, a WRP was submitted for assessment by the EA. On 1<sup>st</sup> August 2019 it was confirmed that the EA agreed with the assessment that the activity is a recovery operation based on the information provided in relation to waste types, amounts and the nature of the proposal.

The approved WRP (reference 416.01009.00228 /WRP version 2) is enclosed as Section 10 of this EP Application. The waste recovery assessment letter is included as Appendix 01 to this NTS.

### 1.3 The Site

Conningbrook is located to the northeast of Ashford and northwest of Junction 10 of the M20 in the county of Kent. The Site is accessed via Willesborough Lane, approximately 200m to the southwest. The National Grid Reference for the Site is TR 02929 43897.

The Site is located within the existing Conningbrook Quarry complex, now being decommissioned, close to the former mineral processing area and areas of historic mineral extraction, at the location shown on Drawing 001. Directly to the north is a railway line and beyond is agricultural and open ground. To the east is the Conningbrook Recycling Facility (now being decommissioned) and beyond lies the Conningbrook Lakes Country Park which is currently undergoing development to construct residential properties and recreational facilities. Open ground is located directly to the south and beyond is the Julie Rose Stadium and the A2070. To the west of the site is the railway and A2070 with areas of open ground. Beyond to the west is residential properties within Ashford.

The surrounding land uses and local receptors within 500m are identified on Drawing 003, Environmental Site Setting, in addition to the cultural and natural heritage within 1km.

## 1.4 Planning Status

### 1.4.1 Current Planning Status

The site is subject to the following wider planning permission issued by Ashford Borough Council under reference number 12/01245/AS and approved on 24<sup>th</sup> October 2014:

*“Creation of a country park for recreational and water-sports purposes with a range of associated facilities including an activity centre, a public house/restaurant, change of use of Manor to offices, car parks and other ancillary works and structures including works to the Julie Rose Stadium; construction of 300 dwelling residential development with associated infrastructure and landscaping; and provision of an aggregates storage and distribution facility”.*

### 1.4.2 Future Planning Status

The draft allocation for housing contained within the Ashford Borough Council Local Plan 2030 includes the ballast hole and surrounding area as being suitable for future housing development. Planning permission is likely to be gained for a housing development in this area by mid-2020.

To summarise, the ballast hole currently holds planning permission for an aggregate facility. The area surrounding the ballast hole holds planning permission for residential properties (which are currently under construction) and a wide range of different uses. The ballast hole is also included in a wider plan for additional residential properties, for which planning permission will be applied for in the next 2 years.

## 2.0 Proposed Activities

This EP application seeks to authorise the use of suitable imported waste materials, as a replacement for non-waste construction material in the restoration of the ballast hole to create an area of useable land for the aggregate facility or for the future development of residential properties.

The ballast hole will be restored in line with surrounding contours and will incorporate imported waste materials in accordance with the following profile:

- Up to 4.5m depth imported waste materials; and
- 0.6m depth soil/soil-forming materials.

The proposed restoration of the land is illustrated on Drawing CON/187 (Proposed Restoration Contours – Ballast Hole).

Key points regarding the proposed restoration are as follows:

- Waste accepted to site may be screened or crushed on a campaign basis to create material suitable for placement into the ballast hole;
- A 0.6m capping or 'deter to dig' layer is required to be placed over the entire site. Rather than importing this material, Brett propose to strip 0.6m of material at the base of the ballast hole, before waste material is deposited. This site won material will be temporarily stockpiled in readiness for use as the capping layer once deposition is complete;
- The storage of the capping material will take place in mounds and placed around the area to be filled;
- Waste material stored at the adjacent Brett owned Conningbrook Recycling Facility is a potential source of material for the site and will be subject to the criteria detailed in the Waste Acceptance Criteria (WAC) and WAP included in Section 5 of this EP application; and
- Imported fill materials followed by site derived capping materials will be placed progressively within the ballast hole to levels that comply with the proposed restoration profile.

### 2.1 Quantity of Permitted Wastes

The volume of material estimated to restore the site in accordance with the proposed final landform is approximately 28,031m<sup>3</sup>. Assuming an average density of 1.75t/m<sup>3</sup>, the mass of imported material will be approximately 49,054 tonnes.

### 2.2 Specified Waste Management Activities

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **R3:** Recycling/reclamation of organic substances which are not used as solvents;
- **R5:** Recycling/reclamation of other inorganic materials; and
- **R13:** Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

### 2.3 Waste Types

The proposed waste types to be accepted on site are shown in Table 2-1 below.

**Table 2-1  
 Proposed Waste List**

Waste	Code Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
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 PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL WASTE
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11



## 3.0 Application Contents

### 3.1 Application Forms

Parts A, B2, B4 and F1 of the EA's EP application forms have been completed and are enclosed as Section 2 of this EP application. The application forms also require the following additional information, which has been included:

- Appendix A-1: List of Directors
- Appendix A-2: Date of Birth Directors
- Appendix B2\_1: WAMITAB and Certificates of Continuing Technical Competence
- Appendix B2\_2: Summary of Integrated Management System

#### 3.1.1 Application Fee

Under the EA's Environmental Permitting (England) Charging Scheme 2019, the fee for a waste recovery operation is as follows;

- Deposit of waste for recovery (Table 1.17.9 of the charging scheme): £9,207; and
- Dust Management Plan review: £1,241.

Therefore, the total application fee will be; £10,448.

### 3.2 Drawings

A suite of drawings has been produced to detail all characteristics of the Site relevant to the application and are enclosed as Section 3 of this EP application. The full list of drawings produced is as follows:

- Drawing 001 Site Location Plan
- Drawing 002 Environmental Permit Boundary
- Drawing 003 Environmental Site Setting
- Drawing CON/187 Proposed Restoration Contours

### 3.3 Environmental Setting and Site Design

An ESSD has been produced in support of this EP application. The ESSD defines the Site's potential source, pathway and receptor linkages. It provides details on the Site's environmental setting, and the proposed design of the site.

The ESSD (reference 416.01009.00228/ESSD) is enclosed as Section 4 of this EP application.

### 3.4 Waste Acceptance Criteria and Waste Acceptance Procedure

The WAP and WAC (reference 416.01009.00228/WAP) is enclosed as Section 5 of this EP application.

### 3.5 Environmental Risk Assessment

The ERA has been produced to assess the environmental risk posed by the proposed activities on Site.

Strict operational procedures will be implemented at the Site to monitor and manage amenity risks from the activities and include provision for the monitoring of scavenging birds, vermin, insects and litter, mud on road,

dust, odour and noise. The impact of the proposed activities is assessed in the ERA. Potential receptors are illustrated on Drawing 003.

Subject to the implementation of the stated management measures, the conclusion has been reached that the proposed activities are unlikely to result in a significant accident risk or risk to the amenity of the local environment.

The ERA (reference 416.01009.00228/ERA) is enclosed as Section 6 of this EP application.

### 3.6 Operating Techniques

The Site will be operated in accordance with Brett's Integrated Management System (IMS) known as QHEST (Quality, Health, Environment, Safety Together) which combines the requirements for quality, occupational health, environment and safety into one comprehensive set of procedures. The management system is certified to the following standards:

- BS EN ISO14001:2004, Environmental Management Systems;
- BS EN ISO9001:2000, Quality Management Systems;
- BS OHSAS18001, Occupational health and safety management systems – specification;
- QSRMC Quality and Product Conformity Regulations 2003 (EN 206-1); and
- BES 6001 Issue 2 Responsible Sourcing of Construction Products.

In addition to the IMS, the OT document details the management measures that will be implemented on Site to minimise the risk of accidents or emissions that could impact workers and local receptors.

The IMS and the OT will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system and the OT;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The OT (reference 416.01009.00228/OT) is enclosed as Section 7 of this EP application.

### 3.7 Site Condition Report

A SCR has been prepared as part of this application to establish the baseline environmental conditions for the area of land not subject to the permanent deposit of waste within the proposed permit boundary. The SCR has been prepared in accordance with EA guidance H5 (version 3), April 2013.

The Site will operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the Site does not pose a significant risk to the surrounding human and natural environment.

The SCR will be maintained throughout the lifetime of the Site. At the time of permit surrender, the SCR will be utilised to demonstrate that the Site is being returned in a satisfactory state with regards to its condition prior to the proposed operations taking place.

The SCR (reference 416.01009.00228 /SCR) is enclosed as Section 8 of this EP Application.

### 3.8 Dust Management Plan

The DMP will be implemented under the control of Site management.

The DMP includes a review of the Site's location, potentially sensitive receptors and local wind speed and direction data. The sources of dust associated with the proposed operations on Site have been considered and appropriate techniques for monitoring, management and mitigation will be in place.

Subject to the implementation of the stated management measures, the conclusion has been reached that the proposed activities are unlikely to result in a significant risk of dust emissions that would affect the amenity of the local environment.

The DMP (reference 416.01009.00228/DMP) is enclosed as Section 9 of this EP application.

## 4.0 Technical Standard and Control Measures

The key technical standards laid out in the following documents govern the design and operation of the Site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- Developing a management system: environmental permits;
- Controlling and monitor your emissions for an environmental permit;
- EA guidance – Waste Recovery Plans and Permits, October 2016; and
- Relevant EA Guidance e.g. ERA, ESSD, SCR.

The control measures relevant to the proposed activities are described in the OT submitted with this application.

The proposals have been assessed against these standards and are all considered to meet the relevant technical standards.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed activities on Site.

Brett is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the Company's IMS.

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