

PEST MANAGEMENT PLAN

Brunel Road Industrial Estate, Newton Abbot TQ12 4PJ

Teignbridge District Council

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CONTENTS

DOCUMENT HISTORY:	I
CONTENTS	II
LIST OF TABLES:	III
LIST OF APPENDICES:	IV
1 INTRODUCTION	1
1.1 GENERAL	1
1.2 SITE LOCATION	1
1.3 RELEVANT GUIDANCE	2
1.4 PEST MANAGEMENT PLANNING	2
1.5 WASTE FACILITY OVERVIEW	2
1.6 SITE MANAGEMENT	3
1.7 TARGET PESTS	3
1.8 TARGET TYPES OF PESTS	4
1.9 TYPES OF RECEPTORS	6
2 RISK ASSESSMENT	7
2.1 METHODOLOGY	7
2.2 RECEPTOR SENSITIVITY	7
2.3 SENSITIVE RECEPTOR LOCATIONS	7
3 POTENTIAL SOURCES OF ON-SITE PEST GENERATION	9
3.1 WASTE STORAGE AREAS	9
3.2 FOUL SURFACE WATER	9
3.3 BACKGROUND SOURCES OF PEST GENERATION	9
4 PEST CONTROL	11
4.1 SITE OPERATIONS	11
4.2 OVERVIEW	11
4.3 RECEIVING WASTES	11
4.4 STORAGE OF WASTES	13
4.5 QUARANTINE AREA	16
4.6 STOCK ROTATION	17
4.7 LOADING AND TRANSPORT OF GENERAL WASTES	17
4.8 HOUSEKEEPING	17
4.9 LIAISON WITH NEIGHBOURS	18
4.10 TRAINING	18
5 MONITORING	20
5.1 MONITORING PESTS	20
5.2 MONITORING – FLIES	20
5.3 MONITORING – RODENT	21
5.4 MONITORING – BIRDS	22
5.5 PRELIMINARY PROCEDURES	22
6 PEST CONTROL	23
6.1 CONTROL MEASURES - GENERAL	23
6.2 CONTROL MEASURES - FLIES	24
6.3 CONTROL MEASURES (RODENTS)	26

6.4	PREVENTION MEASURES (SCAVENGING BIRDS)	27
7	COMPLAINTS	28
7.1	GENERAL	28
7.2	COMPLAINTS MONITORING	28
7.3	SITE DIARY REPORTING	28
8	CONTINGENCY PLANS	29
8.1	CONTINGENCIES AND EMERGENCY PLANS	29
8.2	OPERATIONAL FAILURE	30
8.3	SEASONAL FLUCTUATIONS / ALTERNATIVE OUTLETS	30
8.4	PMP MANAGEMENT	31

List of Tables

Table 1 - Receptor Sensitivity Criteria for pests	7
Table 2 -Potential Sensitive Receptors within 1000m of the site.....	7
Table 3 - Waste storage table	14

List of Appendices:

Appendix I - Drawings

Appendix II - Record Keeping Forms (to be used if presented with pest problems)

Complaints Report Form

Example pest control monitoring form

Near-Miss / Non-Conformance Sheet

1 Introduction

1.1 General

1.1.1 Oaktree Environmental Ltd has been instructed by Teignbridge District Council to prepare a Pest Management Plan (“PMP”) for their waste transfer station at Brunel Road Industrial Estate, Newton Abbot TQ12 4PJ.

1.1.2 The registered address and contact details for Teignbridge District Council (i.e. the ‘site operator’) is:

Teignbridge District Council	Contact:	Elizabeth Turner
Brunel Road Industrial Estate, Newton Abbot TQ12 4PJ	Position:	Recycling Officer

1.1.3 This PMP has been produced to accompany a new bespoke permit application.

1.1.4 This PMP will provide procedures minimise the risk of pests and allow Teignbridge District Council to implement an action plan should the site operatives detect the presence of pests, receive complaints from local businesses or residents or if the Environment Agency (EA), as the regulator, receives third party complaints or suspects the presence of pests during the site inspection. If pests are discovered appropriate control measures will be employed to mitigate.

1.2 Site location

1.2.1 The site is located at Brunel Road Industrial Estate, Newton Abbot TQ12 4PJ. The national grid reference for the site is SX 87063 71069.

1.2.2 The site is located within an industrial area between the Newton Abbot Railway line and the A381 which is located to the east of the site. The nearest residential property is located on Forde Close approximately 180m southwest of the site. Other adjacent business and receptors are shown on the Receptor Plan held in Appendix I.

1.3 Relevant Guidance

1.3.1 This PMP has been written in accordance with the following guidance:

- Risk assessment for your environmental permit, last updated 31 August 2022, Environment Agency, gov.uk
- Control and monitor emissions for your environmental permit, last updated 24 November 2022, Environment Agency, gov.uk and
- Fly management: how to comply with your environmental permit, Version 1, April 2013.

1.4 Pest management planning

1.4.1 A PMP decision at the site will consists of the following steps:

- a) Identify pest type/species
- b) Estimate pest populations and compare to established action thresholds
- c) Select the appropriate management/mitigation tactics based on the current site status and information
- d) Assess the effectiveness of the pest management/mitigation
- e) Retain appropriate records

1.5 Waste facility overview

1.5.1 The site is a waste transfer station for household waste and currently operates under waste exemptions S1, S2 and T4. The purpose of this PMP and subsequent documents is for the operator (Teignbridge District Council) to apply for a bespoke permit application which will replace the current exemptions.

1.5.2 The storage, tipping, separation and baling of waste will all be done within the onsite buildings. The location of plant and operational areas/ storage areas are shown on the Site Layout & Fire Plan presented in Appendix I.

1.6 Site management

- 1.6.1 The Technically Competent Manager (TCM) at the site is responsible for the general management of the site including the acceptance and handling of any wastes which could give rise to the presence of pests or vermin.
- 1.6.2 The company, through the TCM, will ensure that any nominated deputy staff are sufficiently trained and familiar with all site management documentation (which includes this PMP) in addition to all relevant company procedures who, in the absence of the TCM, will carry out their duties.

1.7 Target pests

- 1.7.1 Given that the site accepts food waste and other recyclable wastes which may contain residues of food, the following target pests are identified for particular control within this PMP:
- Flies
 - Rodents
 - Birds
- 1.7.2 These pest types are primarily attracted by the wastes being deposited and can cause nuisance for the local people. These pests in particular can cause significant problems for those affected, of which in all cases there is a risk of disease transmission.
- 1.7.3 Examples of diseases include:
- Flies – can carry diseases such as E. coli, Anthrax, Conjunctivitis, Tularaemia, Typhoid and food poisoning.
 - Rodents – are responsible for infecting humans with Weil's disease and some respiratory illnesses such as Leptospirosis.

- Birds – can transmit disease to humans due to their droppings landing on properties and people. They can also impact on aircraft operations and have the potential to cause a noise nuisance for nearby premises and increase local scavenging.

1.8 Target types of pests

- 1.8.1 **Flies** - The table below illustrates the species of fly which can sometimes be associated with waste sites of this type and potentially become a nuisance:

	Common housefly <i>Musca domestica</i> Medium		Lesser housefly <i>Fannia</i> sp. Medium
	Scuttle fly <i>Phoridae</i> 'Black-eyed'		Scuttle fly <i>Phoridae</i> 'Black-bodied'
	Drain fly <i>Psychodidae</i> small		Fruit fly <i>Drosophilidae</i> small
	Blue bottle fly <i>Calliphora vomitoria</i>		Common green bottle fly <i>Lucilia sericata</i>

- 1.8.2 Common house flies are readily distinguished from the other smaller fly species that are likely to be captured on traps at Teignbridge District Council. Larger flying insects such as wasps and bees are unlikely to be present in significant numbers since, they are generally not attracted to materials on site.
- 1.8.3 The life cycle of the common house fly is summarised below to give an approximate indication of the timescales involved from egg laying to growth into mature flies that can reproduce. Timescales vary according to temperature etc. for example:

- a) **Egg:** A female common house fly can lay up to 150 eggs per batch and can produce up to 6 batches of eggs, which typically hatch within a day or so of being laid.
- b) **Larva:** Also known as maggots. They are legless and white in appearance. They pass through three instars and can complete their development in as little as 3 days at optimum temperatures (30 - 35°C), after which they pupate.
- c) **Pupae:** The pupa is contained within the last larval skin, which tans and hardens. The adult emerges after a minimum of 3 days depending on temperature.
- d) **Adult:** Female common house flies are able to reproduce within two or three days of hatching. In captivity they can live for up to a month but a more typical lifespan for an adult in the wild is approximately a week. The life cycle of a housefly takes a minimum of 10 days at optimum temperature (35°C), but this can extend to several weeks or even months in cold conditions. The short life cycle that is typical of the summer months is the reason why this species is mainly a problem at that time of year. Control measures may be necessary to disrupt the lifecycle and reduce fly populations to ensure that receptors on site and those near the site are not adversely impacted.

1.8.4 **Rodents** – The other type of pests that can sometimes be associated with waste sites of this type is rodents.

1.8.5 Information of a common rodent is summarised below to give an approximate timescale for rats to populate and evolve in an area:

- On average rats produce above 7 offspring per litter. The typical gestation period of a rat is a few weeks allowing each female to produce 5 litters per year.
- From birth to adults, rats take roughly 3 weeks to mature and begin fending for themselves. They reach maturity around 5 weeks into life. The natural life expectancy of a rat is 2-3 years, however several die prematurely from predation and interspecies conflict.

1.8.6 **Birds** – Given the possibility of potentially putrescible wastes at the site, scavenging birds are also considered to be a risk.

- 1.8.7 There are a variety of species of scavenging birds for example, sea gulls, crows, vultures, hawks, eagles etc. are some of the bird species that are attracted to waste sites.

1.9 Types of receptors

- 1.9.1 Receptors are those who are likely to suffer from the nuisance of pests near the site.

- Local residents
- Operational personnel (employees, contractors, third-party vehicle drivers, visitors).
- Local industries
- Local agricultural users/properties.
- Local retail and commercial users/properties.

2 Risk assessment

2.1 Methodology

- 2.1.1 This PMP has been completed to identify where the likely risks are in relation to surrounding land uses. This assessment has been used to inform Section 5.0 of this PMP with regard to specific monitoring procedures.

2.2 Receptor sensitivity

- 2.2.1 Table 1 below outlines the receptor sensitivity to pests which will be used when determining nearby sensitive receptors:

Table 1 - Receptor Sensitivity Criteria for pests

Sensitivity of Receptor	Criteria
Low	Industrial workplaces
Medium	Industrial workplaces / Residential >250 m
High	Residential areas <200m

2.3 Sensitive receptor locations

- 2.3.1 The main potential sensitive receptors are listed in Table 2 below:

Table 2 -Potential Sensitive Receptors within 1000m of the site

Boundary	Receptor	Approximate distance from centre of site (m)
South east	Priority Habitat- Deciduous woodland	150
East	Aller Brook	60
South	Teignbridge District Council	75
East	Residential Properties- Queensway	270
North	River Teign	635
East	Haytor View Community Primary School and Nursery	386
North/east/south/west	Surrounding industrial and commercial premises	0-200

- 2.3.2 Total distances are from the boundary of the waste facility closest to the nearest receptor point. In reality distances to the waste storage/treatment areas may be greater. Other receptors maybe not included in this list are shown on the Receptor Plan in Appendix I.

3 Potential sources of on-site pest generation

3.1 Waste storage areas

- 3.1.1 The principal source of risk associated with pests at the site are the 3 food waste containers located in Area 14. These containers are kept securely closed at all times, apart from when they are being loaded.
- 3.1.2 Whilst the majority of other wastes stored on site are not commonly associated with pest generation, they could contain some materials (particularly traces of foods from food cartons/packaging and residual wastes) which have the potential to give rise to pests. This can be exacerbated following the ingress of rainwater which occurs predominantly whilst the wastes are resident in bins/containers at the sites of production and prior to receipt at the site. The wastes stored on site are covered by the on site buildings and therefore the ingress of rainwater is unlikely.
- 3.1.3 Given that the bespoke permit application includes the accepting of food wastes there is a risk of pest generation.

3.2 Foul surface water

- 3.2.1 The drainage system is clearly shown on the Site Layout & Fire Plan held in Appendix I, which includes the use of U channel surface drain/slot drains and man holes which will be monitored regularly to ensure they are functioning correctly.

3.3 Background sources of pest generation

- 3.3.1 Potential local off-site sources of pests would be associated with the surrounding commercial/industrial activities which are prevalent in the immediate area and the wider areas surrounding the site.

- 3.3.2 In order to determine whether complaints are the result of activities from the site or from other nearby sites a complaints form will need to be completed in line with the company's complaints procedure which is attached in Appendix II.

4 Pest control

4.1 Site operations

- 4.1.1 Measures for minimising and controlling pests from the waste are outlined in this section and have been based upon the outcome of the risk assessment and the processes and equipment utilised on site.
- 4.1.2 Limiting the generation of pests from the waste transfer facility can best be achieved through employing effective site management and good general practice. It is much easier to minimise the risk of pests in the first instance and have mitigation measures in place rather than dealing with problems when they occur.

4.2 Overview

- 4.2.1 The key method of controlling pest emissions is through good site design, management practices and good housekeeping, i.e. avoidance is the key to controlling pests.
- 4.2.2 The control measures have been based on
- Good operating and management practices to avoid pest infestations arising from site activities;
 - Good process design or revision to minimise pests;
 - Abatement or control to reduce pests, and
 - Shielding receptors through the use of operating and management practices (e.g. locating food waste within and/or within sealed containers).

4.3 Receiving wastes

- 4.3.1 Rigorous control of wastes delivered to the site is required, with wastes discovered within a consignment with the potential to attract pests removed and quarantined in a sealed container or dedicated bay/area. Trained competent staff are in place to recognize materials

which may result in pests and to inspect incoming wastes as they are deposited at the site. Any wastes permitted for acceptance at the site which may increase the risk of pests will either be sorted immediately, returned to the producer or sent to another authorised facility for treatment.

- 4.3.2 If the waste storage areas as set out in Table 3 below reach capacity and/or operational difficulties occur (such as the critical breakdown of loading plant, drainage issues, etc.) incoming wastes will be diverted to another authorised treatment facility as the cessation of waste acceptance at the site would occur.
- 4.3.3 Incoming waste will be processed as soon as practicably possible to ensure that any food related or odorous wastes contained within the incoming mixed waste (which were not identified during deposit) can be identified, isolated, and rejected immediately in accordance with Section 4.3.5 below and transferred to a suitably permitted facility.
- 4.3.4 **Age of wastes** - Teignbridge District Council (The operator) will advise waste producers to only order collections when they are ready to produce the waste which will be going in them to minimise on the time a container is standing at a customer's premises (this is not always logistically possible to fill a container in as short a time as possible but should be borne in mind). The operator will also inform customers that they should not put any food wastes or putrescible wastes into the same container (particularly during the summer months) to prevent the potential for an infestation at their premises which could be transferred to the operator's site.
- 4.3.5 **Rejection procedure** – All wastes are subject to quality control and waste acceptance procedures. The following specific procedures apply specifically for the rejection of waste which may pose a risk of, or already be subject to, the presence of a significant infestation:
- a) Drivers are trained to identify the potential for the threat of, or a present infestation by pests/vermin. Where this is identified, the driver will contact the site manager to agree a strategy.
 - b) Upon delivery to the site, all loads will be visually inspected for the presence of pests/vermin. Should there be evidence of such, this will be recorded as a 'Near-

Miss' and be subject to the Non-Conformance Procedure (see Appendix II for recording these incidents).

- c) If the same waste premises was the subject of a second discovery of a similar nature (i.e. a further infestation), the site manager or appropriate representative would be required to discuss what improvements they could make to their own waste storage procedures as the problem is clearly not resolved.
- d) A third occurrence would require potential civil action.

4.4 Storage of wastes

- 4.4.1 Low storage times and strict turnaround of biodegradable wastes on site in accordance with Table 3 below will be observed. Stock rotation procedures will be observed to ensure the maximum duration of storage times are not exceeded.
- 4.4.2 Table 3 below summarises the type, volume and duration of storage for each waste stream on site and the references for each storage location is provided on the Layout Plan & Fire Plan in Appendix I. The rows highlighted in red are those which have the highest potential to cause the generation of pests and will be removed as necessary to the quarantine area. Rows highlighted in orange have a medium risk of pest generation. The wastes highlighted in green are considered to have a low risk of pest generation.

Table 3 - Waste storage table

Storage Area Details (PILE BASED ON AREA X H NOT L X W X H)													
Plan Ref	Description	Storage type	Containment / type	Height / width of firewall (m)	Max width (m)	Max length (m)	Max height (m)	Max area (m)	Conversion factor used	Max volume (m3)	Approx. tonnage	Max storage time	Comments
Bay 1 (Glass)	Holding and bulking bay for pre-segregated and sorted glass	Sorted, not mechanically processed	Free-standing / three-sided solid a-block concrete fire wall	3.5 / 0.2	5	13	3	65	0.75	122	41	<72 hours	Bay emptied sooner if full.
Bay 2 (Glass or Mixed Recyclables)	Holding and bulking bay for pre-segregated and sorted glass	Sorted, not mechanically processed	Same as above	3.5 / 0.2	5	15.9	3	70	0.75	191	58	<72 hours	Bay emptied sooner if full.
Bay 3 (Baled Recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Same as above	4 / 0.2	4	15.9	3	56	1	191	191	<72 hours	Bale stacks are stored four high in bunker. Bay emptied sooner if full.
Bay 4 (Cardboard)	Baler infeed bay comprising sorted cardboard	Unprocessed	Free-standing / mixture of three-sided concrete panel and galvanised steel fire wall	4 / 0.3	5	4	3	20	0.75	45	15	<12 hours	Stockpile cleared 30 minutes before site shutdown.
Bay 5 (Cardboard outfeed)	Baler outfeed (baled cardboard)	Processed (baled)	Free-standing bale stack / mixture of three-sided concrete panel and galvanised steel fire wall	4 / 0.3	1.2	14	1.2	16.8	1	20	20	<12 hours	Bale stacks cleared 30 minutes before site shutdown.
Bay 6 (Baled Recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Free-standing bale stack / three-sided solid a-block concrete fire wall	4 / 0.2	4	12	3	48	1	144	144	<72 hours	Bale stacks are stored two high in blocks of three. Bay emptied sooner if full.
Bay 7 (Loose plastic)	Holding and bulking bay for pre-segregated and sorted plastic	Unprocessed	Same as above	4	5	10.2	3	51	0.75	153	50	<72 hours	Bay emptied sooner if full.
Bay 8 (Mixed plastic & cans)	Holding and bulking bay for a mixture of plastic and cans	Sorted, not mechanically processed	Same as above	4 / 0.2	5	14	3	70	0.75	158	53	<72 hours	Bay emptied sooner if full.
Bay 9 (Mixed plastic & cans)	Holding and bulking bay for a mixture of plastic and cans	Sorted, not mechanically processed	Free-standing / two-sided solid concrete fire wall	4 / 0.2	5	14	3	70	0.75	158	53	<72 hours	Bay emptied sooner if full.
Bay 10 (Loose paper and cardboard)	Holding and bulking bay for pre-segregated and sorted paper and cardboard	Sorted, not mechanically processed	Free-standing / three-sided solid a-block concrete fire wall	4 / 0.2	15	7.5	3	72.5	0.75	163	54	<72 hours	Bay emptied sooner if full.
Area 11 (Baled recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Free-standing bale stack / partly contained with concrete a-block fire wall to the west	4 / 0.2	3	8	3	24	1	72	72	<1 week	Bale stacks are stored four high. Bay emptied sooner if full.
Area 12 (Baled Recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Free-standing bale stack / partly contained with concrete a-block fire wall to the west	4 / 0.2	3	8	3	24	1	72	72	<1 week	Bale stacks are stored four high. Bay emptied sooner if full.
Area 13 (Baled Recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Free-standing bale stack / partly contained with concrete a-block fire wall to the west and south	4 / 0.2	3	8	3	24	1	72	72	<1 week	Bale stacks are stored four high. Bay emptied sooner if full.

Storage Area Details (PILE BASED ON AREA X H NOT L X W X H)													
Plan Ref	Description	Storage type	Containment / type	Height / width of firewall (m)	Max width (m)	Max length (m)	Max height (m)	Max area (m)	Conversion factor used	Max volume (m3)	Approx. tonnage	Max storage time	Comments
Area 14 (Food waste skips)	Sealed containers/skips of food waste	Unprocessed	Fully sealed 40-cubic yard skip	N/A	2.5	6.1	2.62	15.25	1	40	13	<1 week	Volume based on each skip. Skip removed sooner if full. The skip is fully sealed unless being filled from the top. Empty container placed in same location once removed.
AREA 15 (Battery store)	Non-hazardous batteries	Unprocessed	Containers with weatherproof covering	N/A	1.2	1	0.65	1.2	1	1	1	<1 week	Containers removed and replenished once full. Volume based on each container (approx. 5 - 10)

4.4.3 Waste packaging such as cans plastic or glass that have previously been containers of food may not have been washed out properly hence, they have the potential to give rise to a risk of pests.

4.4.4 The wastes highlighted in red i.e. those considered to be at the greatest risk of pests will undergo continuous visual inspections throughout the day and those highlighted in orange would be monitored as necessary. The residence times for wastes is generally low (i.e. <12 hours) which ensures that stockpile's are constantly being rotated and inspected, thus preventing the opportunity for pests to arise.

4.5 Quarantine area

4.5.1 The site procedures outlined within this PMP, and other site management documentation rely on the provision of a dedicated quarantine area on site for the temporary placement of waste(s) likely to give rise to pests.

4.5.2 **External Waste Quarantine Area-** The external waste quarantine bay for storage of rejected waste that does not conform to the waste acceptance checks is clearly labelled to ensure the segregation of rejected waste. Timeframes for the storage of these wastes are very low, and under normal operating conditions rejected waste is transported offsite within 36 hours of receipt. Wastes that are potentially malodorous or likely to attract pests are typically removed from the site within 24 hours.

4.5.3 However, on rare occasions it may be necessary to utilise a sealed skip of a larger volume to contain a larger amount of waste. Should a whole load be rejected after tipping due to either an infestation or a significant amount of putrescible material within, it will be necessary to provide a dedicated area on the site for the quarantining of that whole load. As this is an extremely rare occurrence, this area may vary and, as such, it has not been deemed feasible to include such an area as the site plan would need to be regularly updated.

4.6 Stock rotation

- 4.6.1 For all wastes, the maximum storage timescales identified in Table 3 above will be adhered to at all times.
- 4.6.2 ‘Dynamic’ stockpiles in bays (i.e. stockpiles which are constantly added to – and removed from) will be deep cleaned regularly in accordance with the procedures outlined in Section 4.8 below.

4.7 Loading and transport of general wastes

- 4.7.1 All waste vehicles leaving the site containing putrescible and/or other potential malodorous wastes that may attract pests will be securely enclosed at all times.

4.8 Housekeeping

- 4.8.1 All storage areas highlighted in Table 3 as having the potential to give rise to pests/vermin, will be deep cleaned routinely on a weekly basis between April and September and twice weekly at other times (or following a specific pest/vermin incident) by pressure washing and use of disinfectant if necessary (i.e. after an incident). This will entail a full removal of all wastes and clearing of residual material to ensure there is no build-up of waste material which could give rise to pests/vermin.
- 4.8.2 Daily cleaning of operational areas such as roads, drainage channels and areas surrounding waste storage will be carried out to discourage pest generation because of old degrading materials.
- 4.8.3 Litter pickups should be conducted as part of the daily routine checks to reduce the accumulation of litter around the site and its boundary that could be a cause of odour.
- 4.8.4 Equipment that has been in contact with materials likely to give rise to pests would be cleaned daily using a brush and power hose where material could stagnate i.e. in the bottom of storage areas, containers or mobile plant loading parts.

- 4.8.5 The yard area is checked daily for the presence of any damage which may lead to the build-up or accumulation of putrescible or malodorous wastes/water which could attract pests/vermin.

4.9 Liaison with neighbours

- 4.9.1 If any complaints are received, the complaint will be assigned to an operative familiar with the site operations who will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the EA. Details of information to be completed are dates, nature of the complaint, weather conditions at the time of complaint, investigation details, action taken and a signature (as a minimum). Complaints will be investigated and responded to within 24 hours and reviewed by the site manager who is ultimately responsible.
- 4.9.2 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are any issues with pests outside of normal operations, the operator will cease operation, investigate and resolve the issue before continuing.

4.10 Training

- 4.10.1 All employees and sub-contractors of Teignbridge District Council involved with waste materials and their handling will receive training in basic pest control, identification of infestations (or signs of an infestation) and complaint reporting (management and operations staff).
- 4.10.2 Training will be given to all relevant persons to make sure they are competent in completing complaint report forms to ensure sufficient monitoring can be carried out.

4.10.3 Specific training in respect of fly control will include the following and will be carried out by internal managers, entomologists and suppliers of the products before staff can use any of the control chemicals:

- a) Identification of fly species and fly biology
- b) Monitoring techniques
- c) Identification of problematic loads
- d) Use of fly baits
- e) Use/ handling of insecticide Use
- f) Use of spray & fogging systems
- g) Personal protective equipment

4.10.4 Training for site staff will be conducted using training modules used at induction stage and during the annual re-assessment stage for consolidation. Toolbox talks are also used for specific additional training which may be required as a result of incidents. Subcontractors are trained during their site induction.

5 Monitoring

5.1 Monitoring pests

5.1.1 Teignbridge District Council will use the following techniques to monitor pests:

- a) Visual Monitoring
- b) Complaints Monitoring
- c) Site Diary
- d) Specific monitoring techniques outlined in the subsequent sections

5.2 Monitoring – Flies

5.2.1 Fly populations will be visually monitored at the site and if on-site monitoring shows high levels of fly numbers (i.e. a clear and noticeable elevation in the baseline fly occurrences by a member of staff who has been present on site for a number of years) or complaints are received by third parties, the operator will install fly boards in conjunction with advice from a dedicated entomologist. A fly board will be deployed originally to determine the baseline fly population during normal conditions.

5.2.2 Visual monitoring of outdoor wastes will be carried out daily and any wastes which are observed with a fly density of significant numbers will be moved inside the workshop buildings, which is subject to routine treatment suggested by the site's pest control contractor.

- Adult flies will be monitored using a scudder grid and the flies attached to it will be counted and recorded. (Scudder grid - typically 60cm square wooden slatted grid which is dropped on the surface of material, after a period of time the flies resting on the grid are quickly counted and recorded).
- Larval monitoring will take place on surface wastes and surrounding floor areas and the larvae will be counted, to determine if there is a fly problem and appropriate measures can be implemented. It is difficult to target specific waste types as being more

problematic as it is more likely that individual suppliers' waste quality will be the root cause of any larval infestation.

5.3 Monitoring – Rodent

- 5.3.1 The most important methods of rodent control is sanitation, housekeeping and structural maintenance. These measures will ensure food supplies for rodents will be kept a minimum.
- 5.3.2 The presence of rodents will be visually monitored daily by trained personnel and the results recorded in the site diary.
- 5.3.3 Teignbridge District Council employ a specialist pest control contractor to both lay and undertake regular monitoring of traps (i.e. weekly) to quantify the presence of rodents at the site. Should the traps be identified as containing a rat, more frequent (daily) monitoring will take place and should the need arise, more traps be deployed and the steps outlined in Section 5.3.4 below will be employed in order to quantify and eradicate any infestation.
- 5.3.4 Following either a sighting of or the presence of a rat(s) in a trap, the following daily checks will be implemented by the appointed pest control contractor to identify the scale of the rodent problem. Rodent population indicators will be used to characterise if the populations are low, medium or high:
- Step 1: Low risk – Characterised as being low-infestation conditions, no signs of an infestation are seen. The area either has no rats or was invaded recently by a small number which have been dealt with.
 - Step 2: Medium – With a medium infestation, old droppings and gnawing's can be seen. One or more rodents are seen at night with none being seen in the daytime.
 - Step 3: High – In a high infestation circumstance, fresh droppings, tracks and gnawing's will be identified. Three or more rodents will be seen at night, and they may also be seen in the daytime. In the event of a high infestation, the pest control contractor may deem it necessary to install a temporary night-vision camera(s) at a suitable location(s) trained on the area(s) which appears to indicate an infestation in order to further quantify the potential rat population.

5.4 Monitoring – Birds

5.4.1 Conducting an accurate bird survey will inform the site to what birds are attracted to the site. The most common scavenging bird species in the UK which is widely present at landfill and waste sites is the Herring Gull and the Black-Headed Gull.

5.4.2 Bird population surveys should consider:

- Type and number of birds
- What do they appear to eat or drink/ what's attracting them to the site?
- Are they residents/migrants or adults/juveniles?
- Are they causing damage or health risks?

5.4.3 Daily monitoring by Teignbridge District Council will be carried out and recorded on scavenging bird population rates and spotting trends in bird numbers. Wherever it is deemed that scavenging birds are increasing in numbers, appropriate mitigation measures will be implemented to remove this pest.

5.5 Preliminary procedures

5.5.1 The purpose of monitoring is to ensure that the measures identified below are working. Where monitoring results demonstrate that control measures are not having the desired effect then additional remedial actions will be undertaken as specified in this document and as agreed with the EA. The daily site checks include pest monitoring.

5.5.2 Visual monitoring of all storage and processing areas will be carried out with daily, with special attention being made to those area highlighted in Table 3.

6 Pest control

6.1 Control measures - General

- 6.1.1 The site's strict preliminary acceptance procedures will also minimise the risk of receipt of non-conforming wastes. Wastes are visually inspected upon arrival including for the presence of flying insects or larvae/vermin on the face of the wastes. If there is presence of significant infestation the load requires rejection. Once materials are accepted, they are transferred to the designated storage and processing area and care is taken to ensure that cross-contamination does not occur in order to prevent any potentially contaminated waste affecting other stock.
- 6.1.2 For the proposed development there are no external bays, bales or stockpiles stored on site. All activities will take place within the sealed containers or within the Waste Transfer Buildings on site.
- 6.1.3 All staff inspecting materials being delivered to site will be informed of the need to notify a senior manager or supervisor of any possible infestations and make a record of their findings.
- 6.1.4 Any materials rejected under the company's acceptance and rejection policy will be isolated and returned to the producer within 24 hours.
- 6.1.5 The site operator complies with strict environmental controls for the site, including the clearance of litter and debris from site surfaces and around machinery. Adherence to these procedures also reduces the potential for the build-up of organic debris to occur and thereby reduces the potential for fly-breeding within the debris. Site cleaning procedures will be adhered to at all times to maintain site cleanliness and remove debris, thereby preventing the creation of breeding areas for flies, with corrective action taken as required and logged. These procedures are standard with the potential to increase the frequency following site checks by the site manager or appointed deputy.

- 6.1.6 Those wastes which could potentially result in pests (See Section 4) will be stored within bays or stockpiles. The stockpiles will be rotated quickly and in accordance with Table 3 to prevent wastes from degrading and attracting pests.
- 6.1.7 Any issues relating to pests will result in the stockpile being quarantined whilst specialist pest control contractors are brought in to eradicate the problem.
- 6.1.8 If advised by the specialist pest control contractor, the following locations will be the main subject of treatment using the methods and pesticides listed below:
- a) Waste reception and storage areas – comprising unprocessed general wastes, out feed piles and recyclables will be sprayed after receipt to the storage area or after it is discharged from the treatment plant.
 - b) Remaining Storage and processing areas – Internal and External Baits will be positioned throughout the site to deal with any potential presence of vermin i.e. rodents.

6.2 Control measures - Flies

- 6.2.1 Flies are managed using various methods, including the use of regulated chemicals to control the various stages of the fly life cycle. The use of all chemicals by staff on site is controlled by the company's health and safety policy. Any fly control products that are used will be used strictly in accordance with the product label.
- 6.2.2 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. All staff using non-agricultural pesticides on site will be trained and competent as required by the Control of Pesticides Regulations 1986 (a copy of which will be retained in the site office).
- 6.2.3 Depending on the severity of the infestation, techniques could be deployed in-situ to a large-scale fly problem or targeted to small proportions of material if it can be removed from the wider pile or container and isolated within the quarantine area.

6.2.4 The site Manager will make contact with an external pest control contractor who will determine the most appropriate course of action. Likely control techniques will include the following (list not exhaustive):

- 'Paint on' insecticide formula;
- Insecticide space treatment (fogging spray); and
- Ultra-Low Volume System (ULV)

6.2.5 Any use of insecticides will be undertaken by the trained external pest control contractor. Insecticide use will be agreed with the EA, prior to being carried out and all suitable controls will be in place. All relevant Health and Safety Executive (HSE) approvals and assessments will be undertaken.

6.2.6 As checks and monitoring of pests is undertaken daily, any control measures required will be implemented within the same day. This is achieved through responsible management practices, with the Site Manager responsible for ensuring that any fly control measures are implemented within the same day.

6.2.7 Should waste stockpiles be identified as having a potential or actual fly infestation, the pest control contractor may deploy pesticide solution using knapsack spraying to treat any affected areas of the waste. The use of this method of treatment will be kept under review to ensure that all products in use are approved and are rotated to avoid the potential for resistance. The addition of new pesticides and removal of those currently in use will be documented in the site diary and added to this plan on the next review. Pesticides are set out below, for reference.

INSECTICIDE
FICAM
QUICKBAYT
CYPERMAX
AQUAPY
DEADLINE

VULCAN C (contract)

6.3 Control measures (rodents)

- 6.3.1 In addition to the general acceptance and housekeeping measures, routine monitoring will be undertaken by site management. Should any visual signs of a rodent infestation be encountered (dropping, sightings etc.), these will be recorded on the daily Site Inspection Form and baiting and trapping will be installed via consultation with an external pest control specialist. Bait boxes will be moved around the site as the site develops.
- 6.3.2 If any activity of ingress by rats is found, then bait boxes will be adjusted or increased.
- 6.3.3 All use of rodenticides will be undertaken in line with the following guidance:
- Campaign for Responsible Rodenticide Use (CRRU) UK Code of Practice: Best Practice and Guidance for Rodent Control and the Safe Use of Rodenticides – March 2015; and
 - CRRU Guidance: Permanent Baiting – July 2019.
- 6.3.4 Permanent baiting site locations will be identified however these will not contain active rodenticides unless it can be demonstrated that there is an ongoing rodent problem. Pest control firm will re-bait the boxes monthly and monitor signs of activity. This enables an insight to whether there is an ongoing rodent related problem to be identified. If this occurs then active rodenticide will be used until the issue is resolved. Checks of the bait boxes by the site manager will be undertaken bi-monthly.
- 6.3.5 Pesticides are set out below, for reference.

RATIMOOR BROMODIOLONE

DIFENACOU - BRIGAND

6.4 Prevention measures (scavenging birds)

6.4.1 Techniques for bird abatement that could be considered by a suitably qualified individual are:

- Pre-recorded bird distress calls;
- Bird kites which mimic birds of prey;
- Helium balloons;
- Birds of prey; and
- Scarecrows

6.4.2 Selection of the most appropriate technique(s) is dependent upon a number of factors. Preference will be given to passive techniques to minimise disturbance to neighbours.

6.4.3 Consideration will be given to the presence of protected bird species in the vicinity of the facility, prior to utilising falconry/birds of prey. Techniques can also be rendered ineffective due to habituation and therefore a combination of different techniques may be used to ensure their individual effectiveness.

7 Complaints

7.1 General

- 7.1.1 Pest infestations and the presence of birds may be identified from a complaint or by detection of pests as a result of monitoring procedures outlined in this PMP. This enables contingency measures to be implemented to identify the source of pests, minimise their impact and eradicate them from the site.

7.2 Complaints monitoring

- 7.2.1 All complaints will be investigated promptly, and appropriate remedial action will be taken if the complaint is validated e.g. remove offending materials off site as soon as reasonably possible. Complaints will be recorded on the form found in Appendix II.
- 7.2.2 Complaints to the Local Authority / EA will also be recorded and taken into account. An assessment will be carried out from where the complaint was made and from any convenient locations between the complainant/receptor and the site so that the complaint can be validated or rejected.

7.3 Site diary reporting

- 7.3.1 If members of the local community are frequently reporting issues in the vicinity, then they will be asked (if agreeable) to keep a diary. This will help to build up an account of when the pests occur and their approximate prevalence, their location and the site operations that were being carried out at the time, as well as the duration of the activities taking place. Any obvious problems can then be addressed.

8 Contingency plans

8.1 Contingencies and emergency plans

8.1.1 In accordance with the EA guidance on PMPs contingency plans have been prepared to react to situations 'where monitoring indicates that a potential source of pests is not completely under control, meteorological conditions are unfavourable or that adverse impact has occurred'.

8.1.2 If the presence of pests is detected at the site boundary, monitoring points or a complaint is received, the following remedial procedures will be taken and the control measures shown in sections 6.1 – 6.4 will be implemented:

- Firstly, identify the source; is it from:
 - a) Site operations; or,
 - b) An off-site source
- If on site:
 - c) Report incidence to the site manager or technically competent manager;
 - d) If validated, the TCM will contact the appointed specialist pest control contractor and/or entomologist;
 - e) Identify the cause of the pests i.e. leakage, waste storage, etc;
 - f) Identify a solution in consultation with the specialist pest control contractor and/or entomologist;
 - g) Implement a solution, managed by the specialist pest control contractor and/or entomologist;
 - h) Where relevant carry out olfactory tests to check if fix is working, given that the presence of vermin can usually be linked to odour;
 - i) Record actions taken on relevant forms and site diary as required by this plan;
 - j) Monitoring in conjunction with the specialist pest control contractor and/or entomologist.

8.2 Operational failure

- 8.2.1 The site manager or TCM will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will, in turn, contact the contract engineer immediately who will assess major breakdown consequences and identify appropriate contingency measures. This may lead to a build-up of waste or result in waste being on site for longer periods of time. In this scenario, the following steps would be taken:
- Diversion/removal of wastes to a suitable alternative facility who will be identified through collaboration with the Recycling Association.
- 8.2.2 Serious operational failures, which result in the closure of the site, will be recorded in the site diary.
- 8.2.3 Any major defects found during the daily site inspection which have the potential to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, EA will be contacted to agree a suitable timescale for repair.
- 8.2.4 All defects and problems likely to give rise to pests will be recorded on the site inspection form or the operator's own recording procedures/documentation with repairs/solutions being carried out immediately; neighbours will be alerted if the problem cannot be rectified immediately and provided with a timescale of when the problem is likely to cease.

8.3 Seasonal fluctuations / alternative outlets

- 8.3.1 It is considered that the site will not be subject to significant seasonal fluctuations. Teignbridge District Council will be primarily accepting waste from kerbside recycling collections. Under normal operating conditions, there will always be an outlet for the waste material to ensure it is not stored in a manner which may give rise to pests. However, outlet sites may experience routine or unplanned shutdowns due to maintenance or breakdown

which may, in turn, lead to a build-up of wastes at the site. In this case, the operator will engage in liaison with the Recycling Association to identify alternative outlets, should this be required.

8.4 PMP management

8.4.1 The PMP sets out the appropriate measures Teignbridge District Council will undertake in order to maintain good housekeeping practices with the aim of minimising the risk of pests from the operations. A review will be carried out to ensure the plan remains suitable and sufficient to meet the needs of the facility.

8.4.2 The review will be carried out on an annual basis or should any of the following occur (list not exhaustive):

- The issue of an EP variation by the EA,
- Material changes to the operational process
- A substantiated complaint,
- Any changes in legislation or guidance documents applicable to pest management at the facility.

8.4.3 Following a review should the document be updated, a revised draft of the plan will be submitted to the EA for discussion, consideration or approval.

Appendix I

Drawings

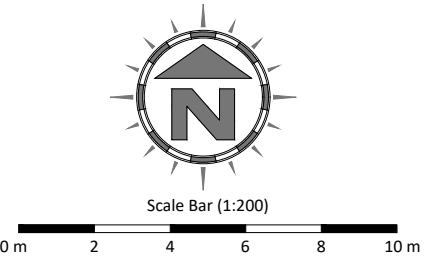
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Drawing for indication only. Reproduced with the permission of the controller of H.M.S.O. Crown copyright licence No. 100022432. This drawing is copyright and property of Oaktree Environmental Ltd.

REVISION HISTORY

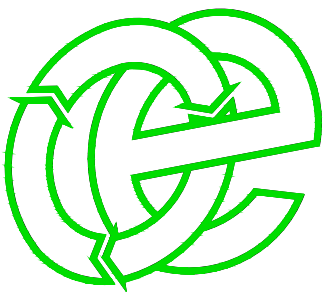
Rev:	Date:	Init:	Description:
-	15.04.24	JH/RS	Initial drawing
A	10.05.24	RS	Application submission
B	20.06.24	RS	Toilet block relocated
C	10.12.24	RS	Sandbag storage area added
D	30.01.25	JH	Buildings amendment

KEY:

- Permit boundary
- Waste storage areas
- General non-waste storage area
- Hazardous waste storage areas
- Transient storage areas (cleared before shutdown)
- Waste recycling building / covered area (with sealed concrete floor)
- Other buildings (office, workshop, welfare, etc.)
- Impermeable concrete surface (external)
- External yard area draining to foul
- Firewall with waste stored no higher than 1 metre below the heights of the wall
- U-channel surface drain/gully
- Slot drain
- Surface water drainage fall direction
- Gully
- Manhole
- Manhole to be shut-off in the event of a fire (x3)
- Surface water drainage pipe
- Foul drainage pipe
- Firewater containment area (calculated using landform modelling) water height set at 5.00 mAOD
- Sand bag barrier required in the event of a fire - to be constructed to height of 650mm minimum to achieve required containment for firewater
- Quarantine area
- Mains water point (hose reel)
- Fire extinguishers
- Fire blanket
- Plant shutoff location (indicative)
- Call points (break glass / horns)
- Spill kit
- Access route for emergency services
- Heat sensor (indicative)
- Smoke detector
- CCTV cameras
- Fire hydrant



Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
SITE LAYOUT & FIRE PLAN

CLIENT
Teignbridge Council

PROJECT/SITE
Brunel Road Industrial Estate, Newton Abbot TQ12 4PJ

SCALE @ A1
1:200

CLIENT NO
3312

JOB NO
001

DRAWING NUMBER
3312-001-03

REV
D

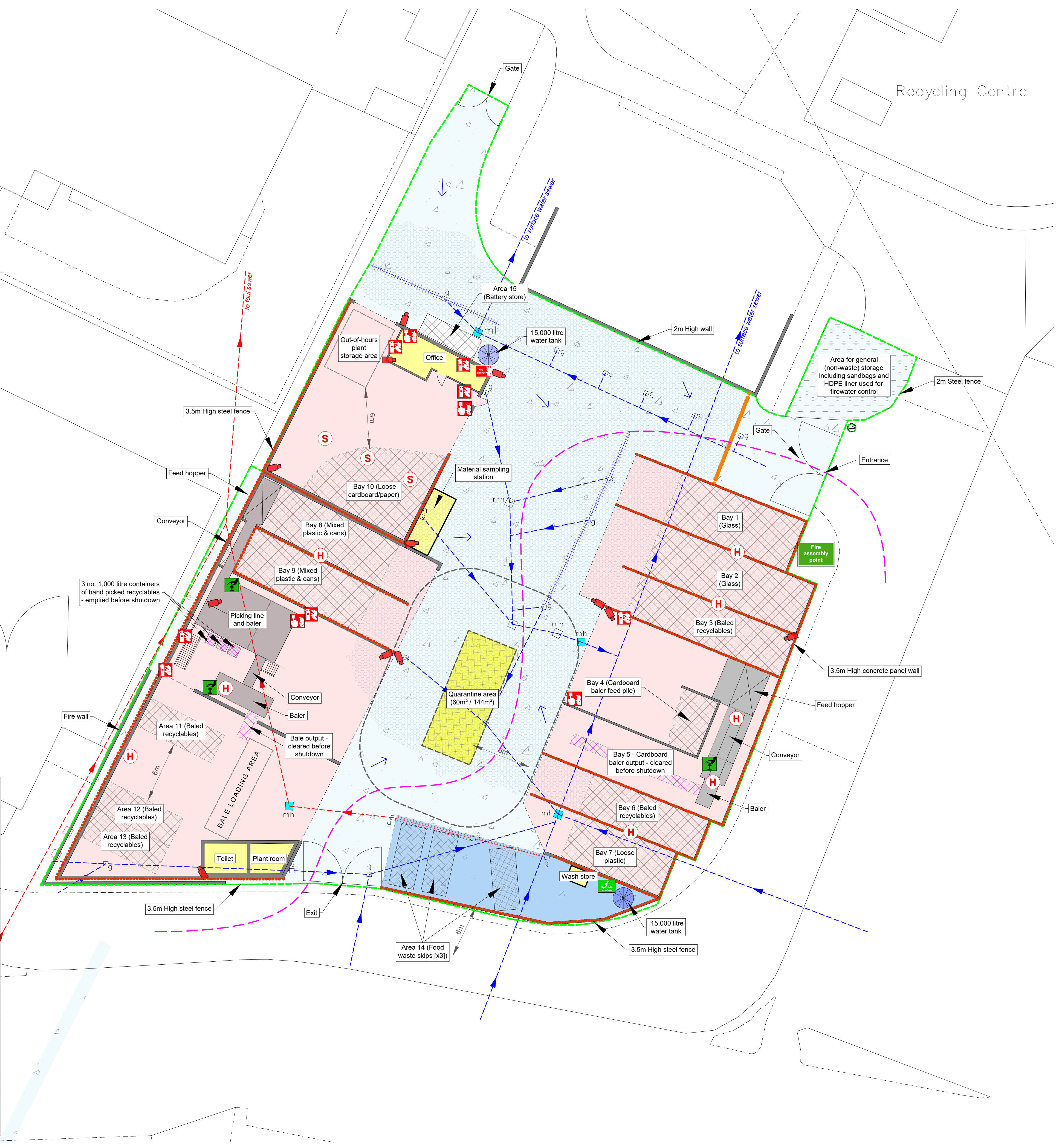
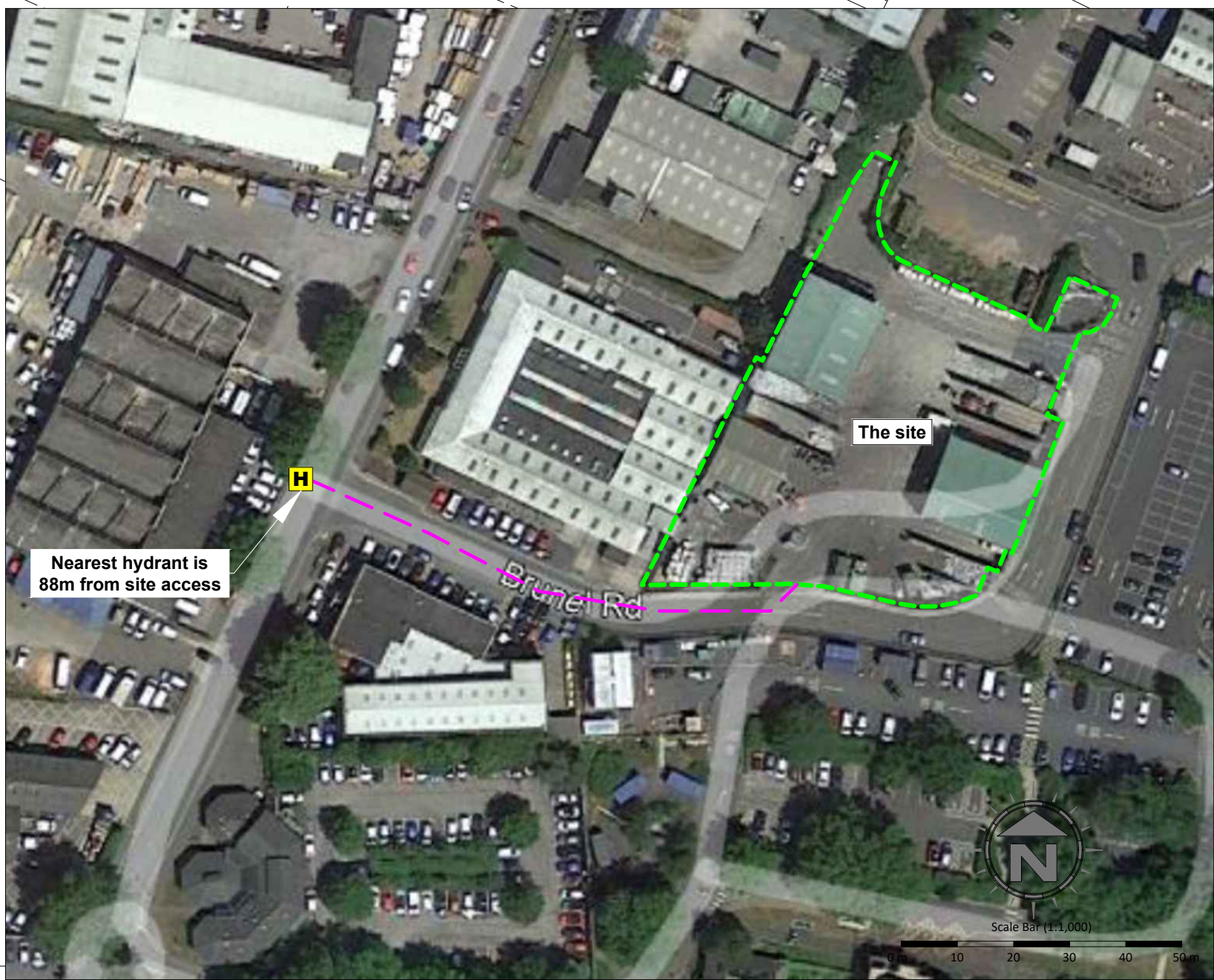
STATUS
Issued

DRAWN BY
JH/RS

CHECKED
RS

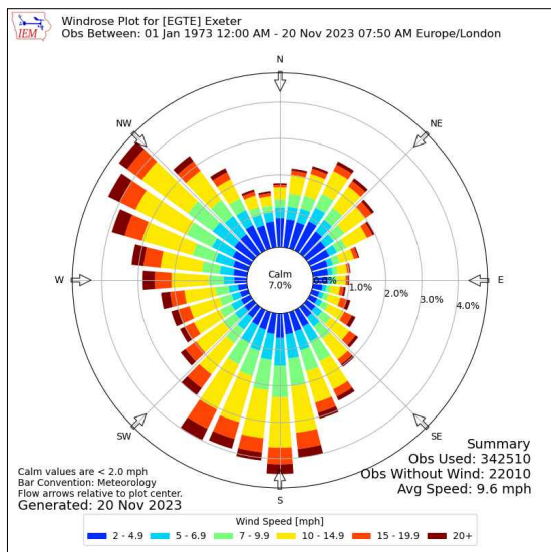
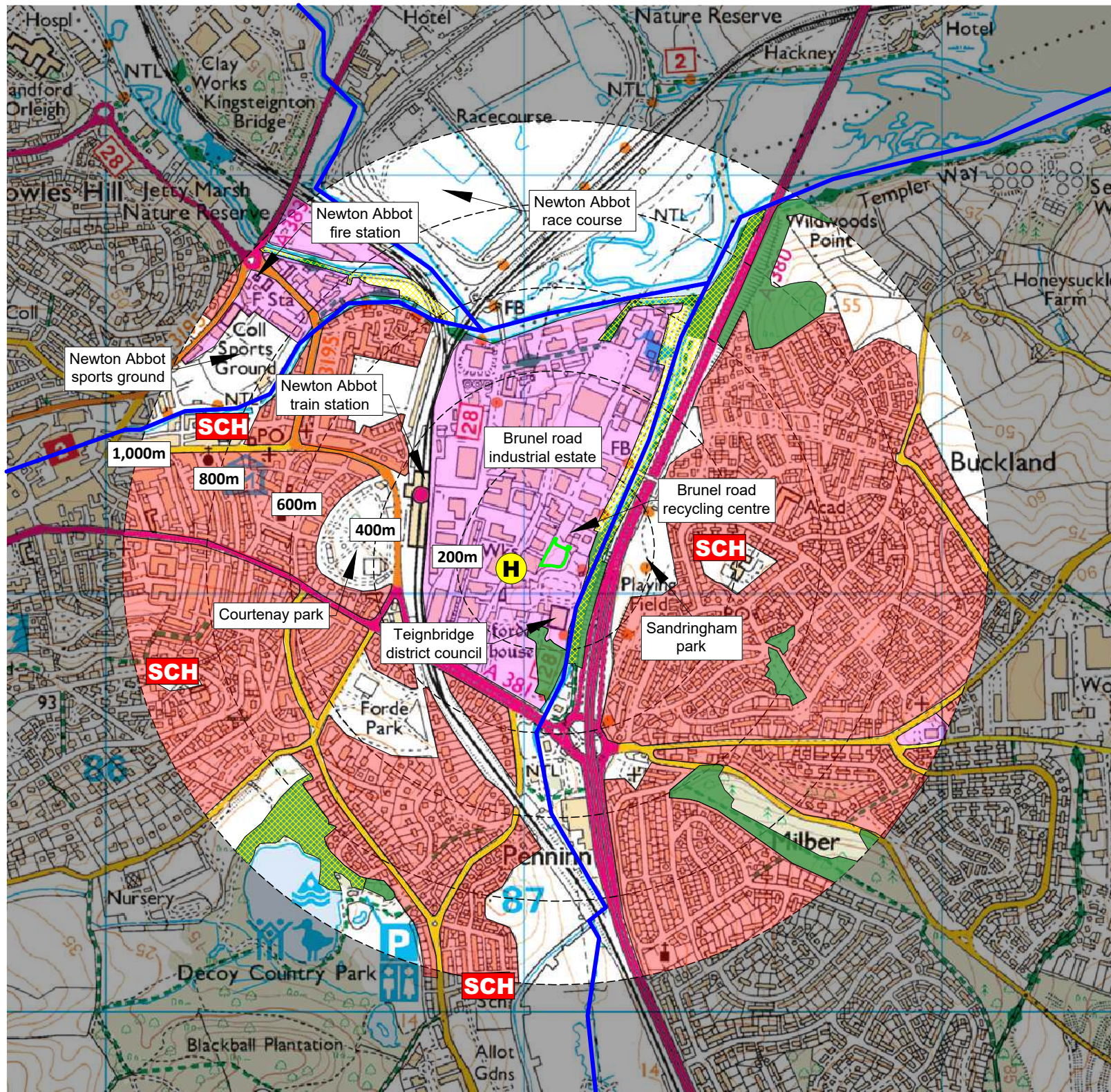
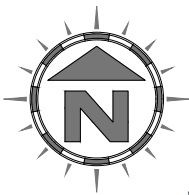
DATE
30.01.25

Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk



KEY:

- Permit boundary
- Main River
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A, B, C roads
- Nearest fire hydrant
- Railway line
- School
- Woodland areas
- Priority habitat inventory (deciduous woodland)
- Nature reserves



Compass Wind Rose for (EGTE) Exeter Period
1973-2023
- source: Iowa State University

NOTES

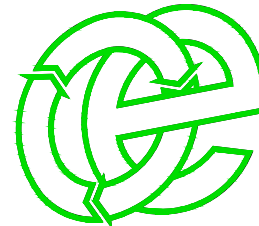
- Boundaries are shown indicatively.
- Wind rose data shows the prevailing wind direction to be Southerly.

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	01.12.23	JH	Initial drawing

Oaktree Environmental Ltd
Waste, Planning and Environmental Consultants



DRAWING TITLE
RECEPTOR PLAN

CLIENT
Teignbridge Council

PROJECT/SITE
Brunel Road Industrial Estate, Newton Abbot
TQ12 4PJ

SCALE @ A3 1:12,500	CLIENT NO 3312	JOB NO 001
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DRAWING NUMBER 3312-001-04	REV -	STATUS Issued
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DRAWN BY JH	CHECKED RS	DATE 01.12.23
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Lime House, Road Two, Winsford, Cheshire, CW7 3QZ
t: 01606 558833 | e: sales@oaktree-environmental.co.uk

Appendix II

Record Forms

TEIGNBRIDGE DISTRICT COUNCIL
COMPLAINTS REPORT FORM (3312/RF/7)

Date Recorded:	Reference Number:
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to environmental control procedures	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form 3312/RF/7. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

- 1) The name, address and telephone number of the caller will be requested.
- 2) Each complaint will be given a reference number.
- 3) The caller will be asked to give details of:
 - a) the nature of the complaint;
 - b) the time;
 - c) how long it lasted;
 - d) how often it occurs;
 - e) Is this the first time the problem has been noticed; and
 - f) what prompted them to complain.
- 4) The person completing the form will then, if possible, make a note of:
 - a) the weather conditions at the time of the problem (rain, snow, fog etc.);
 - b) strength and direction of the wind; and
 - c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.
- 5) The reason for the complaint will be investigated and a note of the findings added to the report.
- 6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the EA and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.