



Whealdream Golf & Leisure

Recovery Operation

Environmental Management System

1st January 2026





Notice

This report was produced by Land & Mineral Management for A & J Land Management Ltd for the specific purpose of providing an outline Environmental Management System for Whealdream Recovery Permit.

This report may not be used by any person other than A & J Land Management Ltd without express permission. In any event, Land & Mineral Management accepts no liability for any costs, liabilities or losses arising as a result of the use of or reliance upon the contents of this report by any person other A & J Land Management Ltd.

Document Control

Version	Date	Author / Checked by	Change Description
V0.1	22 08 2025	LL	First draft
V0.2	09 09 2025	LL/SK	Client review
V0.3	30-09-2025	LL	Update.
V0.4	23-10-2025	LL/SK	Final Review
V0.5	01 01 2026	LL	EA requested update for effects of climate change on operations

Contact Details:

Author: Lesley Loane
tel: 07970 103196
email: ll@landandmineral.co.uk



Contents

1	Site Details including Infrastructure, Engineering & Mobile Plant	1
2	Waste Acceptance Procedures	2
3	Site Operations	8
	Staffing	8
	Daily Site Inspection	8
	Permitted Waste Types	8
	Waste Storage	8
	Weekly Inspection	8
4	Environmental Control Measures	9
	Dust	9
	Odour	10
	Mud and Debris	10
	Pests & Vermin	10
	Surface & Ground Water	10
5	Climate change impact on the operations	12
6	Environmental Accidents	13
	Emergency Procedures	13
	General Contingency Provisions	13
	Training	14
	Emergency Equipment	14
	Water & Land	14
	Fire	14
7	Communications & Record Keeping	15
	Waste Records	15
	Site Diary	15
	Other Record Keeping	15
	Complaints	15
8	Management, Site Staff and Training	16



Management16
Operational Staff16
Training16

Appendix A – Emergency Contact Details

Outline



Foreword

This outline EMS has been produced for the purpose of accompanying an Environmental Permit application at Whealdream Golf and Leisure. The work will be carried out using imported inert wastes and due to the scale a bespoke Permit is required.

This outline EMS will be subject to update and review as part of the Permitting process and during development of the site, and after the works have commenced it will be subject to regular review and updating as a “live” document, along with its appendices to reflect operational changes or any other reason required by A&J Services.

This document forms part of a wider network of documents relating to management of the works and protection of the environment, beyond the requirements of a Permit. This includes Construction Method Plan and a Construction Management Strategy. This Outline EMS has been drafted to reflect the Permit requirements.



1 Site Details including Infrastructure, Engineering & Mobile Plant

1.1 Pertinent details pertaining to the site are listed in the table below.

Site Details		
Site Location	Address:	Whealdream Holiday & Leisure , Wendron, Helston, TR13 0LR SW 66828 29950
Operator Details	Name:	A&J Land Management Ltd
	Head Office Telephone No.	01749 880051
	Competent Person:	S Knight
	Site staff:	TBC
Emergency Contacts		Located in Appendix A.
Equipment & Stores		Firefighting equipment, Oil Spillage Kit and First Aid Kit will be kept in the mobile plant or at the Site Office. A double banded fuel bowser will be used.
Site security		Site secured by lockable gates and hedge vegetation; Public access not permitted to working areas. Site access and boundaries to be inspected on a regular basis by Site staff. Repair requirements will be noted in the Site Diary and actioned within five working-days.
Site notice		Site notice board maintained at site entrance, with following details: <ul style="list-style-type: none"> • the permit holder's name; • an emergency contact name and telephone number; • a statement that the site is permitted by the Environment Agency; • the permit number; • Environment Agency telephone number 03708 506506 and incident hotline 0800 807060.

1.2 This outline EMS does not include a site infrastructure plan as one has not historically been required for Recovery Permits. The nature of the operations mean that the works are at a constantly changing location and no significant infrastructure is required.



2 Waste Acceptance Procedures

2.1 The wastes permitted at the site are determined by the Hydrological Risk Assessment (HRA) (which is undertaken after the WRP has been approved) and are conditioned by reference to the Permit where they are listed. The table below includes those wastes anticipated to be received at the time of drafting this outline EMS.

EWG Code	Description
01 01 02	Wastes from non-metalliferous excavation
01 04 08	Waste gravel and crushed rocks other than those containing dangerous substances
01 04 09	Waste sand and clays
10 12 08	Waste ceramics bricks tiles and construction products (after thermal processing)
10 13 14	Waste concrete and concrete sludge
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics
17 05 04	Soil and stones
19 02 05	Glass – granular form only
19 02 06	Silt arising from washing of inert wastes to form recycled aggregates
19 12 09	Minerals (such as sand and stones) from the treatment of waste aggregates that are otherwise naturally occurring minerals – excluding fines from treatment of non-haz wastes and plasterboard
19 12 12	Crushed bricks, tiles, concrete and ceramics, including mixture of materials excluding fines from treatment of non-haz wastes, metals and plasterboard
19 13 02	Solid wastes from soil remediation other than those containing dangerous substances
20 02 02	Soil and stones

2.2 As part of the EMS these procedures are a living document and will be updated as necessary to reflect any changing circumstances either at site, in legislation or to improve practices. These changes will be advised to the EA when the Permit is next reviewed.



- 2.3 This WAP has been prepared for the recovery operations at Whealdream so that there are robust procedures operated at site ensuring that only the material accepted is inert and non-biodegradable that as such no gas monitoring is required¹ for this recovery operation.
- 2.4 All permitted wastes accepted for deposit for recovery will be inert as classified under the Landfill Directive (1999/31/EC) and Council Decision (2003/33/EC) '*establishing criteria and procedures for the acceptance of waste landfills*'. This however does not mean that this facility is a landfill.
- 2.5 The Landfill Directive defines inert waste as "waste that does not undergo any significant physical, chemical or biological transformations. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm to human health. The total leachability and pollutant content and the ecotoxicity of its leachate are insignificant and, in particular, do not endanger the quality of any surface water and/or groundwater."

Waste Characterisation

- 2.6 The legal responsibility to describe any waste is with the person who produces the waste and this includes assigning the appropriate List of Waste (LoW) code. Where the waste code can have both hazardous and non-hazardous entries it is a "mirror code entry" e.g. 17 05 04, and a producer must characterise (see Environment Agency Technical Guidance WM3 (Guidance on the classification and assessment of waste) the waste to confirm whether it is not hazardous or that it is hazardous. The Waste Information Form (WIF) must be completed for all waste brought to site and it sets out the full range waste codes accepted at the site identifying mirror codes which require characterisation.
- 2.7 The WIF form is to confirm the correct characterisation of a waste is in relation to potential properties that the waste may have as a result of its source. The Operator accepts that waste characterisation to define a waste as either hazardous or non-hazardous need not always involve testing and analysis. The steps that the Operator takes include through this procedure, including the Producer's affirmation recorded on the WIF, make up a formal waste characterisation process for the purpose of waste acceptance of mirror waste codes.
- 2.8 Whilst it is the legal responsibility of the Producer to classify the waste, if there are concerns that the classification is incorrect in the completed WIF then the Operator undertake additional

¹ The guidance on WRPs on the gov.uk website does not require gas monitoring for all recovery operations.



checks which can include visiting the source site, checking address details and a planning search of the site. Where concerns remain the waste will either be subject to agreed testing or not accepted at the site. When testing is required and not provided the waste will not be accepted at the site.

Primary source of Inert Wastes

2.9 If the waste :

- comes from a single source
- is well characterised and described
- carries no risk of contamination, for example from a site that has not previously been developed
- is a List of Waste codes that falls within those outlined in red in Table 1 overleaf, It can be accepted without any accompanying testing information.

2.10 A fully complete WIF will be provided for all wastes before they are delivered to site.



Table 1

EWG code	Description	Restrictions
1011 03	Waste glass-based fibrous materials	Only without organic binders
1501 07	Glass packaging	
1701 01	Concrete	Selected C & D waste only (*)
1701 02	Bricks	Selected C & D waste only (*)
1701 03	Tiles and ceramics	Selected C & D waste only (*)
1701 07	Mixtures of concrete, bricks, tiles and ceramics	Selected C & D waste only (*)
1702 02	Glass	
1705 04	Soil and stones	Excluding topsoil, peat; excluding soil and stones from contaminated sites
1912 05	Glass	
2001 02	Glass	Separately collected glass only
2002 02	Soil and stones	Only from garden and parks waste; Excluding top soil, peat

(*) Selected construction and demolition waste (C & D waste): with low contents of other types of materials (like metals, plastic, soil, organics, wood, rubber, etc). The origin of the waste must be known.

- No C & D waste from constructions, polluted with inorganic or organic dangerous substances, e.g. because of production processes in the construction, soil pollution, storage and usage of pesticides or other dangerous substances, etc., unless it is made clear that the demolished construction was not significantly polluted.
- No C & D waste from constructions, treated, covered or painted with materials, containing dangerous substances in significant amounts.

Waste not appearing on this list must be subject to testing as laid down under section 1 to determine if it fulfils the criteria for waste acceptable at landfills for inert waste as set out in section 2.1.2.

- 2.11 If an Inquiry is received for waste that doesn't fall within point 2.9, which will be established by completion of the WIF at the time of inquiry by the Waste Producer, then WAC testing will be required prior to the material being accepted.
- 2.12 The precise details of frequency and nature of testing will be commensurate to the scale of the wastes and nature of the arisings taking into account the origins and available background information.



- 2.13 There may be circumstances where materials do not wholly conform to WAC because of a local but natural anomaly, for instance raised selenium levels (above WAC) being generated in an area where there is known to be high naturally occurring levels of selenium. If this occurs the details and the justification for acceptance will be recorded.
- 2.14 Loads that contain wastes from multiple streams, ie grab lorries, will be accepted without any testing, provided the waste producer has confirmed the LoW code, and that it complies with the waste types specified in the Permit. Each site which contributes to generating a full load will be recorded on an appropriately completed WAF.
- 2.15 All vehicles delivering waste will be licensed waste carriers and each delivery must be accompanied by a relevant Waste Transfer Note, unless an annual Transfer Note has been put in place. Introduction of obligatory digital recording of waste movements will potentially supersede this wording, but the intent remains the same.

All Waste Sources

- 2.16 If on review of the WAF, the Operator is not satisfied that the basic characterisation has been fully completed in accordance with the degree of risk associated with the material, they may then request WAC testing evidence from the Producer of the Waste.
- 2.17 No wastes will be accepted onto the site if there is uncertainty as to its source, conformance with Permit and/or its suitability for the intended use.

Specific Waste Type

- 2.18 The site accepts inert waste 19 02 06, defined in the Permit as "Silt arising from washing of inert wastes to form recycled aggregates". The imported 19 02 06 material only comes from inert sources and forms a minor component of the overall volume of material placed (the majority being 17-05-04).
- 2.19 Specific to acceptance of 19 02 06, 19, 12,12 or 19 12 09, every 1000 tonnes (from any single source) a WAC test will be required from the Waste Producer and at the start of a new source of these three specific waste codes a WAC test will be required. The waste will only come from inert sources so this level of testing is considered proportionate to the risk.
- 2.20 Additionally the Operator will take a minimum of 3 random samples per year from each of the list of waste codes received as incoming waste to the site. The results of that WAC testing and the WAC from 19 02 06 , and any other WAC test results will be held by the Operator until surrender of the Permit.



On Site Inspections

2.21 All vehicles must go via the site reception and be booked in before proceeding to unload.

Information on ticket will include:-

Producer	Carrier	Date	LoW Code
Volume	Waste Description	Tipping Location	Waste Carriers Licence Number
Vehicle Registration	Drivers Identity	Controlled Waste Transfer Number	Source of the Waste

2.22 If the information above is not available / provided the ticket cannot be produced, therefore the load cannot be accepted.

2.23 The site staff will visually check the waste description and LoW Code with what is actually seen in the load to ensure these match. The site staff will carry out a further inspection of the waste before and after discharge from the vehicle, before it is bladed in, to ensure that it complies with the information provided by the Waste Producer as part of the basic characterisation.

2.24 Waste that is not permitted will be rejected and returned to the producer with a non-compliant waste form. If the waste has already been tipped, before it is established that it may not be deposited on site, it will either be reloaded onto the vehicle or isolated from other tipping until it can be removed or if necessary, the Agency has been informed of the proposals to remove it and where it will be taken.

2.25 If the waste is determined to be dangerous in its existing state, the vehicle will be directed to an isolated area and the appropriate emergency services and the Environment Agency informed immediately. A record of all such incidents of refused or rejected waste will be kept in the Site Diary. Staff training (covered elsewhere in the EMS) addresses the refusal or rejection of wastes on site.

Records

2.26 All records including the WIF, random sampling results and any pre-acceptance testing information, as well as other records required by the Permit will be retained and can be produced on request.



3 Site Operations

Staffing

- 3.1 The site will be run by technically competent management, with a Certificate of Technical Competence (CoTC) to an appropriate level, or above.

Daily Site Inspection

- 3.2 At the start of each working day the operator will inspect the Site to ensure that there have been no incidents overnight. The inspection will ensure that the entire Site is as expected and free from any obstructions or damage and no disturbance to the site has taken place.
- 3.3 Any defects identified by inspection will be rectified. The operator will record details of the incident, detailing its cause(s) and any remedial measures employed, in the Site Diary. The Site Staff will report the matter, verbally, to the Site Operator before the end of the working day.

Permitted Waste Types

- 3.4 The permitted waste types are listed the Permit. The annual amount of waste to be accepted in the recovery operation will average 100,000 tonnes per annum.

Waste Storage

- 3.5 Waste storage will be limited with direct placement of waste materials where possible. Up to 50,000 cubic metres may be stored in areas identified for storage, to accommodate fluctuations in material availability or weather conditions.

Weekly Inspection

- 3.6 A Weekly Site Inspection will be carried out to assess:
- The correct nature of wastes that are being stored/deposited;
 - Any evidence of pests & vermin;
 - The satisfactory operation of the waste recording system; and
 - The general condition of the site.
- 3.7 At the end of each working day, the Operator will ensure any waste awaiting placement is appropriately stored, all mobile plant is safely and securely parked and the Site is left in a tidy condition.



4 Environmental Control Measures

Dust

- 4.1 Dust Management is addressed in the CEMP as agreed with the Planning Authority and in the DMP that forms part of this EMS

Noise

- 4.2 The EA have confirmed no assessment or noise management plan required under this Permit. The stand-off of waste activity to sensitive noise receptors exceeds 10m in all instances, with separation including margins to hedges and trees, soil bunds and the public highway.
- 4.3 Best practicable means will be employed to ensure that noise levels are minimised. No specific noise fencing is required due to the low sensitivity of the works. Prior to starting works on site indicative calculations will be carried out of how activities will be undertaken and a survey of the background noise levels undertaken.
- 4.4 The adoption of Best Practicable Means as defined in the Control of Pollution Act 1974 will be followed in line with current British Standards and Codes of Practice. The Operator will implement daily site inspections at site boundary locations during normal operations, to assess the noise emissions from the site to nearby sensitive receptors. The assessor will determine whether noise levels are considered excessive. In the event of either sustained excessive noise or a complaint, the Operator will employ a competent acoustic technician to monitor at the boundary. Construction noise levels will not be permitted to exceed 75 dB(A) (LAeq(15mins)) at the boundary.
- 4.5 In the event that the noise level is exceeded or the works are considered to be generating excessive noise, works will be suspended until corrective measures can be implemented. This includes, but not limited to, relocating an activity, undertaking maintenance on plant, replacement of non-performing equipment. The results of any quantitative monitoring and daily inspections will be recorded in the site diary. .
- 4.6 The following measures will be implemented throughout the project construction to ensure that noise levels are attenuated as far as is reasonably practicable:
- Working hours and delivery hours will be strictly adhered to.
 - Delivery vehicles will be prohibited from waiting within the site with their engines running;

Commented [LL1]: EA letter 14 12 2021
EPRKB3507KYA001

Commented [LL2R1]: And pre-app.



- Strict Controls on the sequencing of work will be developed on an area by area basis. Examples include the turning off of mobile plant when not in use, restricting times of work along the specific sensitive boundary;
- The quietest plant that can be reasonably and practicably obtained will be used for each construction task. Percussive and Pneumatic plant will not be required for any the construction activities on site.
- Use of radios, other sound systems or tannoy's will not be permitted anywhere on site.
- All mobile plant will be fitted with smart audible alarms adjusted to background noise levels at all times;
- Machines which are used intermittently will be shut down between periods of activity;
- All machinery will be well-maintained (abnormal increases of noise are often associated with wear and tear or are indicative of mechanical failure); and all
- construction work will be undertaken in accordance with codes of practice as outlined in BS 5228;

Odour

4.7 Due to the inert nature of the waste, odour nuisance is considered to be a very negligible risk.

Mud and Debris

4.8 To control mud being deposited on the public highway drivers will be instructed to ensure that before leaving the Site the wheels and chassis of their vehicle are clean and if necessary to remove all mud or detritus from the wheels and chassis before joining any public highway.

Litter

4.9 The accepted waste types should not give rise to litter problems.

Pests & Vermin

4.10 Problems arising from scavenging birds, pests and vermin are unlikely due to the waste type.

Surface & Ground Water

4.11 Although the hydrological risks are low due to the management of the Site and the inert nature of the incoming materials, the following actions will be adopted:

- Waste Acceptance Procedure to ensure that only inert materials are accepted;
- Fuelling and maintenance of plant and vehicles in accordance with best practice guidelines;



- No storage of polluting liquids such as oils and fuels on Site, except in appropriate bunded storage facilities; and,
- Spill kits will be made available.

Outline



5 Climate change impact on the operations

- 5.1 Whealdream recovery operation is intended to be completed in two years from commencement (estimated completed by 2028) but it is the intent that it will be, if not sooner. The expectation is that in the intervening period this site will not experience any climate change impacts could change the risk of an environmental incident or give rise to non-compliance.
- 5.2 Higher summer temperatures, less than average summer rainfall or high daily temperatures may lead to a longer period of each year when the maximum dust control measures may need to be applied but the site is prepared to adequately control dust across fluctuating temperatures and varying summer weather without giving rise to any issues, therefore it is expected the adopted measures will be adequate during the life of the site.
- 5.3 The site is not reliant, for control of emissions that could lead to environmental impact, on any temperature sensitive equipment.
- 5.4 Intense periods of rainfall (or even snowfall) may inconvenience the smooth operations of the site, but should this occur, the measures in the surface water management scheme will be in effect. . Alternative arrangements for the incoming materials can be made if necessary, although it is most likely the material would not be being generated in periods of extreme weather.
- 5.5 The existing site and its immediate surroundings are wholly located within EA Flood Zone 1, and therefore there is low risk from any flooding..



6 Environmental Accidents

Emergency Procedures

Immediate Response

6.1 Site Staff shall carry radios for safety purposes. Where appropriate to the accident, immediate actions shall include:

- Raising alarms if human / environmental safety is at risk;
- Ensuring all persons are evacuated from any danger area; and
- Contacting the relevant Emergency Services.

Secondary Actions

6.2 Potential events / failures that could lead to a human / environmental accident, their possible consequences and the actions to be taken to deal with the accident are outlined in this section.

Reporting

6.3 The company have a system that includes an Environmental Incident flowsheet.

Investigation of Accident

6.4 The company have a system that includes an Environmental Incident flowsheet.

General Contingency Provisions

Site Shut Down

6.5 When conditions arise on Site which prevent normal working methods and give rise to pollution risks or emergency situations, the Site will shut down until normal working conditions can be resumed.

6.6 When the site is shut down, where conditions permit, the Operator will ensure that all inert waste not yet used shall be appropriately stored.

Mobile Plant & Machinery Failure

6.7 In the event of a breakdown or malfunction the machinery shall be repaired and subject to a full inspection to ensure its normal operation prior to re-commencing operation again.

Investigation of Incident

6.8 The incident / shutdown will be investigated by the Operator to establish the reasons and, where possible, mitigation measures instigated in order to prevent a repeat occurrence.



Training

- 6.9 All Site Staff will be suitably trained in the operation of accident management provisions including firefighting procedures.

Emergency Equipment

- 6.10 Spill kits/firefighting equipment and first aid provision will be located near to hand as detailed in the operational RA. The Operator shall ensure protective clothing is available. A fresh water supply for firefighting is available from the leisure buildings onsite.

Water & Land

Potential accidents

- 6.11 Potential accidents that could lead to pollution of water or land interests include:
- Run-off from un-intentionally accepted hazardous wastes;
 - Failure of vehicles and plant e.g. fuel leak; or
 - Inappropriate repair, maintenance and fuelling of vehicles and plant.

- 6.12 Actions to avoid potential accidents include:
- Strict operation of waste acceptance procedures;
 - Maintenance and inspection regime for all site plant and vehicles;

Minimising Impact

- 6.13 In response to an accident as outlined above, the following actions will be instigated by the Site Staff as appropriate to the incident:
- Isolate and remove hazardous waste as per waste acceptance procedures;
 - Immediate use of spill kits and take measures to stop any leakage; and
 - Inform the Site Operator / Environment Agency.

Fire

- 6.14 The nature of an inert recovery operation does not lead to any significant risk of fire.



7 Communications & Record Keeping

7.1 The Operator will ensure that this Management System and any updates or reviews are communicated to all Site Staff involved in the operation of the site.

7.2 Any sub-contractor involved in the operations will be supplied with a copy of the Management System which they must comply with as relevant to their work.

Waste Records

7.3 Records will be kept of the full details of all waste brought to the site, as detailed in the waste acceptance procedure. All Transfer Notes of the waste accepted at the Site will be retained by the Operator as required by legislation and the Permit.

Site Diary

7.4 The Environmental site diary is kept in the site office, recording all daily weather and events onsite along with site inspection and waste testing details.

Other Record Keeping

7.5 All environmental records associated with the site shall be kept for a minimum of six years or in accordance with the requirements of the Environmental Permit. Records may be in either electronic or paper or a mix.

Complaints

7.6 Any complaint received at the site will be immediately investigated by the Operator. Where appropriate, remedial action will be taken.

7.7 Site Staff will report any complaint to the Operator within 24 hours. The original complainant will be informed of the outcome of the investigation of the complaint and any actions taken within 5 working days.

7.8 Details of each complaint, including the complainant's details, actions taken and outcomes will be recorded in the Site Diary.



8 Management, Site Staff and Training

Management

- 8.1 Direct responsibility for the Management System is held by the Operator, who is also responsible for managing the technically competent staff. Technically competent staff will report directly to the Operator. Site Staff will include, or report directly to, technically competent staff.
- 8.2 The Operator will undertake an annual audit of the Management System to ensure the site is operating effectively. Interim informal audits will also take place in response to changes to the site's operation, permit, company changes, incident/accidents, complaints, legislation and use of new plant or techniques.

Operational Staff

- 8.3 The Site Staff involved in the operations will be fully conversant with the contents of the Management System as relevant to their daily duties.

Training

- 8.4 The Operator will ensure that the Technical Competency is maintained in accordance with industry requirements. Suitably qualified staff will be brought in to manage the Site if this is not the case.
- 8.5 Site Staff will be suitably trained in their roles and responsibilities with on-Site training by technically competent management to ensure that they conduct their duties in compliance with the Management System.
- 8.6 Management will periodically review the Company's environmental policy and objectives.

Appendix A – Emergency Contact Details

(not in outline version)