

Company Reg: 03560476

VAT Reg: 708 2839 21

EA Reg: CB ZP 3598 LM

Telephone: 01274 814384

BLACK ROCK
ENVIRONMENTAL ASSOCIATES LTD

Fax: 01274 413906

Mobile: 07831 509131

16 Buckingham Crescent
Clayton
Bradford
West Yorkshire
BD14 6EJ

Email: hfwilcox@aol.com

HFW/jrw/GA/PUS/47b

11th Dec 2018 / 2nd Amdmt 14th Feb 2019

Wakefield MC Planning Consent Ref: 13/03500/FUL

An Application for a Bespoke EA Permit: EAWML 405998

The Use of Waste for the Reclamation, Restoration or Improvement of Land

JP Land Restoration Services Ltd

Warmfield Fishing Grounds Development

Warmfield Lane - Kirkthorpe - WF1 5TH – SE 370 210

A Waste Recovery Plan

PREAMBLE

The Application for a Bespoke Permit for the development was initially rejected by the Environment Agency. The EA considered that insufficient information had been provided to demonstrate that the exercise was viable if the infill element was completed using non-waste soils.

The EA offered commercial consultancy to inspect the facility and advise on how to progress a viable application. Following this service, it was agreed that a Waste Recovery Plan would be submitted for appraisal by the Environment Agency in preference to submitting a full application.

The EA has appraised the document and is satisfied that the project can be classed as land recovery for the purposes of a Permit Application for an EA permit.

The EA Permitting Unit has requested the applicant to re-issue the Waste Recovery Plan (this document):

- *Removing reference to being a ' document*
- *Designating that the site drawings comprise an integral part of the Waste Recovery Plan.*

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Waste Recovery Plan

Background

- (1) Messrs Pick Up Skips owns a section of disused railway cutting that traverses Warmfield Lane, Kirkthorpe. The cutting is steep-sided and poses environmental and physical risks: -
 - A risk of someone falling into the cutting
 - A pollution risk from fly-tipping.
 - Basal ponded water that water that can occasionally exhibit a surface film of oil. It has developed a coarse wildlife eco-system but does not support fish.

The company wishes to redevelop the site to create two Sports Fishing Lakes within the stretch of cutting.

- (2) A subsidiary of Pick Up Skips ... **JP Land Restoration Services Ltd**... is applying to the Environment Agency for a Bespoke Land Recovery Permit to authorise /regulate the land improvement operation. JPLRS is based at Pickup Yard, New Brunswick Street, Wakefield, WF1 5QR.

The company has retained Black Rock as its consultant / agent in securing the EA Permit

The Legal Status of the Site

- (3) Wakefield MC has granted planning consent (Ref: 13/03500/FUL) to re-profile the stretch by infill to create two fishing lakes. *[The consent was granted to the site's previous owner, Mr Gary Asprey.]*
- (4) Pickup Skips initially intended to apply for an *Environment Agency Standard Rules Permit SR 2010 No. 10* to cover the land improvement operation.
Documents to support the Planning Application may relate to the implementation of the 2010 No. 10 Permit.]
- (5) The EA has subsequently:
- replaced this SR 2010 No. 10 Permit with the revised *Standard Rules Permit SR 2015 No. 39* legislation
 - refused to accept an application for a revised Standard Rules Permit SR 2015 No. 39. The EA requires Pick Up Skips to apply for a ***Bespoke EA Permit for the Use of Waste for the Reclamation, Restoration or Improvement of Land.***

Pickup Skips (JP Land Restoration Services Ltd) is therefore seeking to register / authorise its proposed operation via an Application to the Environment Agency for a Bespoke Environmental Permit

- (6) The EA's reason for rejecting the SR 2015 No. 39 Permit Application package was the presence of a "protected habitat" within 50m of the site.
The protected habitat was/is the railway cutting itself, designated as a (Deciduous Woodland) Protected Habitat by the Natural England organisation.

Pick Up / Black Rock subsequently provided Natural England with full details of the land restoration project.

In response, Natural England has given written confirmation that it has no objection (*'no remit'*) to the proposed development.

- (7) The requested Bespoke Environmental Permit will define and restrict the types of material that will be accepted for the infill exercise.
The exercise is considered to fall within the EA / EU classification of ***R10: Land treatment resulting in benefit to agriculture or ecological improvement***

Pre-Application Liaison with the Environment Agency

- (8) The Application for a Bespoke Permit requires to be accompanied by a **Waste Recovery Plan**.

The Waste Recovery Plan included in the initial Bespoke Permit Application of March 2018 was reviewed by the Environment and considered unacceptable.

- (9) Following protracted exchanges with the Environment Agency, the EA offered to provide a commercial service to provide advice on whether a Bespoke Permit Application might be resubmitted.

Ms Anna Gribben and Mr John Murray of the EA Permitting Unit at Warrington visited the Warmfield site on the 29 August 2018 and have provided a report on their observations.

A copy of the EA Visit Report is included in the Annexe to this Waste Recovery Plan document.

- (10) The Environment Agency officers *inter alia* advised Pick Up / Black:
- To improve and expand on the financial information provided in the initial Waste Recovery Plan
 - To confirm the voidspace that would be incorporated in the proposal
 - To confirm that only the volume required for lake-construction would be imported.
 - To submit a revised Waste Recovery Plan for Pre-Submission Appraisal by the Environment Agency ... this would have benefits from both timescale and financial aspects.
- (11) This document comprises the revised Waste Recovery Plan for appraisal by the Environment Agency. It confirms the waste recovery regime that will be maintained at the operation.

The Volume of Imported Construction Soils and Aggregates

- (12) Pick Up has retained Mr Alan Powell of Ramsden / Den Architects as its engineering consultant for the exercise. The input volume has been calculated by Den at ~42,000m³, equivalent to ~84000 tonnes.

NB: Den's Site Drawings:

Proposed Site Plan and Sections ...Final Site Plans A & B are classed as integral parts of this Waste Recovery Plan.

Length of Relevant Stretch of Cutting =	560 metres	m
Average Width of Cutting =	23 metres	m
Average Depth of Fill =	4 metres	m
Volume of Overall Project =	51520 cubic metres	m ³

Volume of Each Lake

100m Length x 16m Average Width x 2.5m Depth =	4000m ³
For 2 x Lakes =	8000m ³

Volume of Wildlife Pond

45m Length x 14m Average Width x 2m Depth =	1260m ³
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Volume of Overall Project		51520 m ³
- Volume of 2 x Lakes	-	8000 m ³
<u>-Volume of Wildlife Pond</u>	-	<u>1260 m³</u>
Volume of Infill	=	42,260 m³

(13) The project will use the minimal volume of waste required to create the two fishing lakes:

- There is a requirement to install a 2m-deep basal layer on the disused railbed to cover the stumps of self-seeded willow trees that have been felled under the Planning Consent for the development. A stable base will be created for traversal by HGV vehicles
- The project will not extend the full length of the stretch of cutting that is owned by Pick Up. Neither will it fill that stretch to the level of the surrounding land. The great majority of the bankside trees are to be retained.
- The construction zone of the cutting is crossed by an elevated road bridge. There is no current facility to offer maintenance access to the underside of the bridge. For this reason, the project will create two fishing lakes rather than a single lake. The split-lake scheme is designed to provide an access area in the middle of the lakes that will offer a platform to enable road bridge maintenance. At this doesn't exist at the moment this is beneficial.

(14) The sub-volumes of construction soils and aggregates have been calculated at:

Fill Soils:	63,000 tonnes
Clay for Lakes	10,000 tonnes (provisional)*
MOT Type 1 Aggregate	400 tonnes (Fishing Stations)
MOT Type 1 Aggregate	1200 tonnes (800m of footpath)
Top Soil	8,000 tonnes for planting of Trees & Grass

*Pick Up has been in liaison with a company that supplies and lays heavy-duty polymeric pond liners. The quantity of clay might be reduced and the differential made up with fill soil. The quoted cost of installing the work is included in the "Financial Calculations" section of this document .

A copy of the Turtle Productions Ltd Quotation is included in the Appendix to this Waste Recovery Plan document.

Site Preparatory Works

The operation has *inter alia* incorporated: -

(15) The laying of a new access road across the land, displacing reworked natural soil with a suitable medium to act as a running-surface for delivery vehicles.

This was commenced under the provisions of:

- A Environment Agency U1 Exemption Certificate (Ref: EPR/VE5040/EN/A001) that authorised the acceptance of road building materials.
A renewed U1 Exemption has been issued by the EA in November 2018 (Ref: WEX 149507).
- Bespoke site access drawings produced by Ramsden / Den Architects & Co (Design & Access Statement inc drawings of December 2013; Drawing Ref: 1513701 of December 2015)

This work has commenced and preliminary access to the infill zone is complete.

(16) The clearance of undergrowth and scrub trees along the base of the cutting to facilitate the land improvement exercise.

In order to maintain / enhance the existing ecosystem before the fishing grounds are constructed:

- A new Wildlife Pond will be constructed to the north of the projected fishing lakes. The Wildlife Pond is to be drainable to ensure that the development of semi-aquatic fauna and flora can be promoted.
- Woodpiles will be constructed to encourage and protect the development of any hibernating species, e.g. snakes, lizards etc.

These provisions are incorporated in the Simply Ecology Ltd report of February 2016.

The operation has commenced and will progress in a manner that maintains nesting facilities in the bird-breeding season.

- (17) The partial infill of the cutting with to create a Wildlife Pond; a prerequisite of the Wakefield MC Planning Consent.

An initial 2m layer must be laid in a stretch to the north of the lake-construction zone to form a pond that marries in with the final construction profile, whilst acting as a barrier between the pond base and the residual rail bed.

- (18) The Wildlife Pond construction exercise has yet to commence, but will utilise:

- displaced soil from the access-road construction programme
- suitable natural and made ground soils that will be imported.

Infill will be conducted in accordance with:

- A Bespoke Environmental Permit
- Additional soils meeting Site Specific Remediation Criteria and Highways Agency standards as fill soils or construction aggregates.
- Soils meeting SSRC Control limits and classed as *bona fide* construction products following assessment by a CL:AIRE-registered consultant.
- Soils will be laid in ~500m - 1m deep layers that will be progressively inset with vertical drainage columns filled with free-draining rubble to allow surplus surface water to drain into the original trackbed drainage system.

- (19) Access / Construction will initially create the Wildlife Pond and, subsequently, the 2 x Fishing Lakes. The sequencing is a requisite attempt to maintain and enhance the existing ecosystem before work on the fishing lakes commences.

Progress will be dependent upon the suitability of source construction soils and contemporary ecological issues.

The environmental improvement works in the Wildlife Pond zone will be partially funded by savings earned from the reception of suitable Pick Up processed soils.

Site Acceptance Provisions

- (20) The site will only accept pre-authorized deliveries. Producers of "Regular" waste streams will be required to produce six-monthly analyses of representative samples of their waste soil or rubble.

All deliveries will be monitored on arrival and deposit by Pick Up / JP Land Restoration site personnel.

Pick Up Skips already operates a longstanding waste transfer and treatment station in Wakefield. The Pick Up workforce is familiar with:

- the requirement for wastes to be checked and handled in an appropriate manner
- the environmental and financial benefits of segregating and recovering recyclable components from mixed waste streams.

Pick Up Skips will implement a monitoring programme for a range of control limits for imported soils and rubble. The control limits will be stricter for growth soils than for fill soils. Verification testing will be commissioned from a UKAS / MCERTS-Registered Laboratory ... provisionally Concept Life Sciences Ltd of Manchester.

The site specific control limits will be drawn up using a combination of ATKINS ATRISK guidance limits, applicable CLEA and ADAS guidance limits and the UK Government's C4SL. No Hazardous Waste will be accepted.

(21) Pick Up Skips retains the services of:

- Mr Danny Addison. He will be the Site Manager and is to undertake a Wamitab COTC Level 4 for Transfer and Treatment operations. He will be in daily attendance at the site.
- Mr Christopher Pickup. He holds a Wamitab COTC Level 4 for Transfer and Treatment operations. He will be available for daily / contingency attendance at the site.
- Mr Hywel Wilcox of Black Rock. He holds COTC's (at Special / Hazardous Waste: Level 4) for Waste Landfill, Transfer and Treatment operations, and will be available for requisite attendance at the site.

(22) It is anticipated that any construction materials and "eligible wastes" accepted at the site will fall within the categories identified in the UK Govt guidance note: "*Waste Acceptance Procedures For Waste Recovery On Land*":

(23) In addition processed soils reclassified as "non-wastes" will be eligible for acceptance.

These will be:

- Construction / excavation soils that are sanctioned and certificated by a CL:AIRE-Registered external Consultant to be acceptable for reception at the site. Under the procedure, waste soils meeting site-specific criteria can be re-classified as bona-fide products for incorporation in construction bases.

A copy of the Black Rock CL:AIRE template for growth-zone soils is included in the Appendix to this Waste Recovery Plan document

- Processed aggregates produced at the Pick Up Skips waste treatment station in Wakefield.
A specimen recent sample has been physically tested to meet the Highways Agency specification as a Grade 2C Fill Soil, suitable for creating engineered construction bases.

A copy of the White Rose laboratory Test Certificate is included in the Appendix to this Waste Recovery Plan document.

NB: The overall project can be cost effective without the input of Pick Up's recovered aggregate and CL:AIRE-compliant process soils.

A full costing of development using wholly-sourced commercial soils and aggregates has been calculated and is confirmed in Section R of the Annexe to this Waste Recovery Plan document.

Payback time will / would be between 9 and 10 years on the basis of income from fishing rights.

The Principles of Waste Recovery

- (24) In its everyday operations, Pick Up Skips espouses and deploys the principle of the UK Waste Hierarchy
At the Fishing Lakes Construction site, the company will primarily source its infill materials from processed aggregates and soils that are otherwise initially classed as wastes

This is the optimum way that the fishing lake development is financially viable and minimises the need and quantity of wastes sent for landfill disposal.

However, the financial model for using non-waste materials has been calculated and is detailed in section R of the Annexe to this document.



The Environmental Benefits of Constructing the Fishing Lakes

- (25) The Fishing Lakes Construction programme will ameliorate longstanding pollution issues and create a valuable leisure facility.

Ancillary environmental benefits include the construction of a Wildlife Pond, the resurrection of an abandoned footpath, a promotion of herpetology habitat, the eradication of any proscribed plant species and a major tree planting programme.

The final construction contours will not fill the railway cutting. The majority of non-scrub mature trees on the bankside will be retained and protected.

The Environmental Monitoring Regime

Landfill Gas

- (26) The proposed feedstock wastes are not expected to generate significant quantities of landfill gas.
- The drainage system ... rubble in gabion ducts ... will facilitate a preferential escape route for transient subterranean gases from below the railbed.
 - Any gas would be dissipated into the open air at elevations well below the surrounding topography.
 - The nearest domestic properties are 180m away to the west.

The infill depth will exceed 2m and so four whole-depth monitoring boreholes will be installed in addition to background monitoring before infill commences. Ground gas will be monitored for Methane, Carbon Dioxide, Oxygen and Flow rate. In addition the ambient air temperature and pressure will be recorded on each monitoring visit.

The provisional Gas Monitoring contractor is WMA Ltd of Preston.

The Prevention of Mud on the Highway

- (27) Appropriate environmental control measures will be adopted to minimise the external escape of mud, dust, odour etc from beyond the site boundary.

The access point onto the highway has been upgraded by increasing the splay for sight-lines and surfacing the section crossing the layby with tarmac.

The remainder of the access road is to be constructed from concrete (gateway to layby stretch) then bulk aggregate overlain by compacted crushed aggregate.

- (28) The operator will husband stockpiles of rubble and tarmac planings to maintain the site access road.

A gridded wheel wash unit is set alongside the access road, to be deployed in wet weather to clean vehicle wheels of free mud prior to exit onto the highway

The Protection of Tree Species

- (29) Natural England has designated the railway cutting as a (Deciduous Woodland) Protected Habitat.

Black Rock has provided Natural England with full details of the land restoration project. In response, Natural England has given written confirmation that it has no objection (*'no remit'*) to the proposed development, which has incorporated an extensive tree-conservation programme.

- (30) A number of trees are to be discretely removed; these are the scrub self-seeded sycamore, willow, ash and elder saplings in or at the edge of the residual railbed. Their removal is necessary to facilitate the construction of the Wildlife Pond and Fishing Lakes. This is confirmed in reports prepared by Altofts Tree Services and Simply Ecology.

Some trees have been removed by Northern Powergrid. The foliage was intruding into airspace under and alongside the overhead power cables that cross the site.

The majority of the felled saplings has been / will be sent as a biomass fuel for a power station.

The remainder are being used to construct temporary over-winter herpetology habitats.

- (31) **Mature non-scrub trees disturbed by the partial infill of the railway cutting will be replaced on a one-for-one basis as construction commences. Sycamores are to be replaced by ash or oak.**

Protective fencing is to be erected around a mature oak that is immediately adjacent to the access road.

- (32) A large number of additional trees and bushes (>500) are to be planted during the lake-construction exercise.

These include:

Hawthorn hedge plants	Gorse bushes
Oak trees	Silver Birch trees
Goat Willow trees	Alder trees
Hazel trees	Holly trees

The planting scheme will both stabilise slopes and promote /enhance eco-diversity

- (33) The Simply Ecology report did not note any knotweed-infestation of the site surface. However, it is possible that, under the development exercise, contaminative soil might be inadvertently imported. Any such presence will be recorded and the suspect material will be quarantined for treatment.

The vegetation in a quarantined stockpile will not be disturbed until the colony is eradicated. When it is removed, the soil and vegetation will be sent for landfill disposal rather than risk a secondary contamination of reprocessed soil-blends

Appropriate control /eradication measures will also be adopted to address any noted presence of the alien plants Giant Hogweed (*Heracleum Mantegazzianum* and Himalayan balsam (*Impatiens Glandulifera*).

- (34) The recontoured access road banking is to be seeded / planted with a combination of grass and gorse that will both stabilise the slope and promote /enhance eco-diversity.

Site Security & Access Provisions

Site Security Provisions

- (35) The western boundary of the site is the only position where unauthorised vehicular access could be obtained.
- The site entrance is protected by lockable steel gates
 - The remainder of the western boundary offers protection in a combination of close-set form of trees and rustic fencing.
 - It is not proposed to erect permanent metal fencing that would detract from the surrounding rural aspect.

Site Access & Egress Provisions

- (36) Access to the site is gained via an existing lay-by that abuts Kirkthorpe Lane. Access has been upgraded by increasing the splay for sight-lines and surfacing the section crossing the layby with tarmac.

The remainder of the access road is constructed from concrete (gateway to layby stretch) then (on-site) bulk aggregate overlain by compacted crushed aggregate.

- (37) The inner access road travels through a section of grazing land, extending ~ 250m along a shallow gradient to the fill zone.

Sight lines have been improved by selective excavation and regrading of the shoulder of the plateau to the west of the cutting.

- (38) The road-recontouring exercise has also given added vertical clearance under overhead power lines.
The hazard posed by the power lines will be adverted to drivers by the erection of two "goalposts" marked with an elevated string of fluttering bunting set at 6m height to prevent any ready passage of an HGV vehicle with a raised cargo bay

- (39) The access road is to be set at one-HGV-vehicle width to minimise disturbance of the grazing land.
Two passing points have been constructed to facilitate a ready traffic flow and avoid any blockage of the point where the access road joins the highway.

- (40) A gridded wheel wash unit is set alongside the access road, to be deployed in wet weather to clean vehicle wheels of free mud prior to exit onto the highway.
- (41) Pedestrian access is maintained by an access gate next to the lockable steel gates.

The original footpath travelling along the steep flank of the cutting has long become overgrown and inaccessible. This footpath is to be re-opened under the fishing lakes development.

During the construction phase, temporary pedestrian access will be maintained alongside the route of the inner access road. However, the footpath route will be demarcated and separated by a combination of temporary fencing matched with fresh rustic fencing.

Car Parking Provisions

- (42) An area for car parking is set on hardstanding at a position halfway down the inner access road.

Drawing ref: 2618 – 201 confirms there will be parking for 12 x car spaces, 1 x disabled space and 2 x motorcycle spaces.

It is to also provide contingency space for the manoeuvring and overnight parking of site equipment (bulldozer / 360⁰ excavator) [*Footprint detailed on drawing 1513701*]

Post-construction, the carpark will be maintained for the use of people using the fishing lakes.

Copies of the Den /Ramsden Architects Drawings ref: 2618 – 200, 2618 – 201 and 1513701 are included in the Appendix to this Waste Recovery Plan document

Hours of Operation

- | | |
|------------------------|---|
| (43) Monday – Friday | 7.30am To 6pm
Waste Acceptance ceases at 5pm |
| Saturday | 7.30am To 2pm
Waste Acceptance ceases at 1pm |
| Sunday & Bank Holidays | Closed for Waste Acceptance |

Site Signage

- (44) In compliance with the Environmental Permitting Regulations, the gateway will be fitted with a site noticeboard confirming
- The Operator’s name address and contact numbers
 - The EA Permit Number & EA contact numbers
 - The hours of Operation.

The Site Noticeboard

JP LAND RESTORATION SERVICES Ltd			
Warmfield Fishing Grounds Development			
Warmfield Lane - Kirkthorpe - WF1 5TH – SE 370 210			
Tel: 0800 917 7192		Emergency Tel: 07927 975 286	
Environment Agency-Permitted Waste Management Site			
EA Permit: EAWML 405998			
Opening Hours	Monday - Friday	Saturday	Sunday Bank Holidays
	7.30am To 6pm	7.30 am To 2pm	Closed
Environment Agency Contact	EA Regional Office		
	Lateral - 8 City Walk - Leeds – LS11 9AT		
General Telephone Enquiries: 03708 506506			
Emergency Telephone Contact: 0800 80 70 60			
No Unauthorised Out-Of-Hours Entry			
SITE VISITORS & DELIVERY DRIVERS MUST REPORT TO THE SITE OFFICE			

Next to the site noticeboard, Pick Up Skips will affix warning signs:

- advising that visitors must beware of oncoming traffic
- instructing that site visitors must wear appropriate ppe.

- (45) Two additional noticeboards will be erected, one just inside the site entrance and one at the carpark. Both will display the *Site Rules ...* a code of practice to be enforced by the site management.
- (46) The inner access road will be fitted in both directions with warning signs for a 10mph speed limit. The access road will be fitted in the exit direction with warning signs to give way to oncoming traffic.

Goal posts will be fitted in advance of passage under the electric cables, together with additional signs saying "Danger! Overhead Cables" Each passing point will retain a site sign requesting exiting vehicles to give way to incoming vehicles.

The Management Team & System

- (47) The Pick Up Skips personnel with direct control of the facility are Mr Jim Pickup and Mr Daniel Addison.
Pick Up Skips operates a large waste treatment station and has many years' experience in the handling and transport of wastes.

Mr Addison is to undertake to obtain such a certificate within the two years of grace accorded to EA-sanctioned operators under the Environmental Permitting Regulations.

- (48) The operation of an EA-Permitted site requires oversight by the holder of a WAMITAB Certificate of Technical Competence, at a set rate of attendance. Pick Up Skips retains the services of:
- Mr Christopher Pickup. He holds a Wamitab COTC Level 4 for Transfer and Treatment operations. He will be available for daily / contingency attendance at the site.
 - Mr Hywel Wilcox of Black Rock. He holds COTC's (at Special / Hazardous Waste: Level 4) for Waste Landfill, Transfer and Treatment operations, and will be available for attendance.

The Site Rules for All Site Users

- (49) These will be posted on signs at the site entrance and carpark

SITE RULES

For

OPERATIVES - DRIVERS - VISITORS - CONTRACTORS

- 1. REPORT TO THE SITE OFFICE IMMEDIATELY ON ENTRY DURING STANDARD HOURS**
- 2. PRODUCE ALL RELEVANT DOCUMENTATION**
i.e. WASTE CARRIER Reg NUMBER, DELIVERY NOTE, WASTE TRANSFER NOTE, HAZARDOUS WASTE CONSIGNMENT NOTE etc AS APPROPRIATE.
- 3. OBEY ALL INSTRUCTIONS GIVEN BY SITE CONTROL PERSONNEL.**
- 4. OBEY THE 10 MPH SPEED LIMIT AND BE ALERT TO ALL OTHER SITE USERS.** GIVE WAY TO TRAFFIC / MACHINERY ALREADY MANOEUVRING IN THE OPERATIONAL AREA.
- 5. USE PERSONAL PROTECTIVE EQUIPMENT WHILST ON SITE.**
NB 1: THE PPE REQUIREMENTS FOR PICK UP SKIPS PERSONNEL ARE SPECIFIED IN THE RELEVANT COMPANY POLICY DOCUMENTS.
NB 2: EXTERNAL PERSONNEL ARE EXPECTED TO WEAR A MINIMUM OF, HIGH-VISIBILITY JACKET OR VEST, OVERALLS & SAFETY FOOTWEAR. A HARD HAT MUST BE WORN BY PEDESTRIANS AND BY DRIVERS OUTSIDE THEIR VEHICLES/MACHINES.
- 6. EMPTY AND LOAD CONTAINERS ONLY IN THE MANNER DIRECTED AND IN COMPLIANCE WITH CONTAINER LABELLING & SHEETING SYSTEMS.**
- 7. DO NOT SMOKE, EAT OR DRINK WITHIN THE WASTE-HANDLING AREA.**
A HYGIENE REGIME IS MAINTAINED FOR YOUR SAFETY.
- 8. IMMEDIATELY REPORT ANY DANGEROUS SITUATION OR ACCIDENT TO THE SITE SUPERVISOR OR NOMINATED MANAGER.**
- 9. ENSURE THAT PAPERWORK IS COMPLETED**
DELIVERY NOTE AND WASTE TRANSFER NOTE COPIES FOR WASTE DELIVERIES SHOULD BE PREPARED FOR RETENTION IN THE SITE REGISTER AND TO TRAVEL WITH THE VEHICLE LOAD.
- 10. BEFORE LEAVING THE SITE, CHECK YOUR VEHICLE IS SAFE FOR THE HIGHWAY** e.g. NO LOOSE LOAD CONTENT; NO PUNCTURES; LOAD SHEETS FOR SKIPS, NO STONES TRAPPED BETWEEN TANDEM WHEELS etc.

**ALL PEOPLE NOT FOLLOWING THE SITE RULES
DO SO AT THEIR OWN RISK**

Daily Site Controls

- (50) The site will be attended by a site supervisor at all times. When not attended, the entrance gates will be locked.
- (51) It is anticipated that, when the facility is open, the site machinery will comprise a bulldozer/loading shovel and a 360° excavator. These will be operated by experienced operators. Pick Up Skips already utilises mobile excavators and loading shovels within its waste treatment operations.

Site personnel will receive certificated Induction Training and will operate in accordance with:

- The Site Rules
 - The Operational Risk assessment (2014; reviewed and amended February 2017)
 - A Site Waste Recovery Plan (*the final version of this document*) that it is to be sanctioned by the Environment Agency.
 - Relevant health, safety & environmental legislation
- (52) Twice each day, the Site Foreman or Manager will personally monitor and record his/her assessment of the immediate impact of the operation in the Site Diary. Remedial measures will be implemented immediately.

The status / presence of Noise, Dust, Mud, Litter and Odour generation will be recorded in the Site Diary, and will be available for inspection by officers of the Statutory Authorities.

- (53) Throughout the land recovery operation, the infill exercise will be regularly inspected by officers of the Environment Agency.

The Materials for Acceptance

- (54) Wastes accepted for the Construction of Roads & Drainage

These have been / are being initially sanctioned by an Environment Agency Type U1 Exemption Certificate.

It is likely that, as advised by the Environment Agency, site-won aggregate might be produced and laid under the provisions of an EA T5 Exemption that authorises the screening and blending of waste.

(55) Wastes Imported for Infill and Restoration

These will be sanctioned and limited by a Bespoke Environment Agency Permit, intended to be broadly equivalent to a Standard Rules Permit: Ref: *SR 2015 No. 39, The Use of Waste for Reclamation, Restoration or Improvement of Land*, but to authorise a Cumulative Total of ~84000 Tonnes

Wastes having any of the following characteristics shall not be accepted:

- Consisting solely or mainly of dusts, powders or loose fibres
- Hazardous wastes
- Wastes in liquid form

A summary of eligible infill materials is included in the following table.

European Waste Code	Waste Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 04	wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 04	wastes from sugar processing
02 04 01	soil from cleaning and washing beet
10	WASTES FROM THERMAL PROCESSES
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 14	waste concrete and concrete sludge

17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 03	bituminous mixtures
17 03 02	Road planings only. (<i>for Road Maintenance only</i>)
17 05	soils (excluding soils from excavated sites), stones and dredgings
17 05 04	soils and stones including chalk other than those mentioned in 17 05 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 09	minerals (for example sand, stones)
19 12 12	soil substitutes other than that containing dangerous substances only Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	garden and park wastes (including cemetery waste)
20 02 02	soils and stones

Infill Techniques

- (56) Delivered Wastes will be deposited on the ground in a nominated tipping zone at the base of the cutting. It will then be checked / sorted by manual and mechanical methods to segregate the delivered waste into components for: -
- *Materials for Acceptance and Incorporation*
e.g. soil, clay brick, concrete, hardcore, soil, tarmac road planings (for the access road only).
 - *Tramp Rejects for External Disposal*
e.g. biodegradable wastes, paper, wood, plastics etc, arising as tramp constituents of incoming wastes and sent to licensed transfer stations or landfill sites

The site will retain a skip container for the contingency secure storage for segregated tramp materials of a hazardous nature

- (57) The infill soils will initially be laid as a single basal layer of up to 2m depth, displacing the standing water as it progresses.

This depth is required to:

- Provide a stable dry base for site machinery and delivery vehicles.
- Shield and protect the wildlife pond water and lake water from contamination by historic railtrack oils, cokes etc.

- (58) The basal layer will be excavated at appropriate positions to reach the original soakaway drainage system that served the railbed. These infill positions will be progressively inset with rising columns of free-draining rubble to allow surplus surface water to drain into the original trackbed drainage system.

- (59) Secondary infill will be conducted in layers of 500mm-1mm depth. The layers will be constructed with:
- Berms and benching to create the lakes.
 - Contingency overflow pipes to prevent any lakewater flowing into the wildlife pond.

The lakes will be lined with an impervious membrane to prevent unintentional seepage.

The flanks of the lakes will incorporate fishing-stations and a partial reinstatement of the overgrown historic footpath, to once again be accessible by the public.

Advance Information Required for Input Wastes

- (60) The projected range of soils would not be expected to compromise the quality of the local groundwater system, the surfacewater system or the water in the fishing lakes.

Appropriate quarantine and removal systems will be adopted for the detection and handling of any undesirable tramp components in delivered materials.

- (61) The UK Guidance Note *Waste Acceptance Procedures for Waste Recovery on Land* (Oct 2016) notes that certain waste-streams would not necessarily require testing in advance of delivery. The list is included in Section (H2) of the Annexe to this document.

However, it is intended that all external contractors will need to provide advance analytical details for large-scale deliveries of soil and excavation waste.

- (62) The site will not accept Hazardous Waste and soil quality will be broadly compliant with the CL:AIRE template prepared by Black Rock.

In order for any soils to be CL:AIRE-deregulated, producers must produce comprehensive analyses of their "waste" soils

A copy of the Black Rock Claire Contaminant Template is included in the Appendix to this Waste Recovery Plan document.

- (63) Pick Up will itself commission validation and quality control testing of soil and water samples. Analysis will be conducted by a suitable M-Certs / UKAS-registered laboratory.

Soil analysis records will be kept in perpetuity.

Site Records

(64) Pick Up Skips will be responsible for maintaining the record system for the Fishing Lakes Development site.

The site office will hold copies of the: -

- Site Rules
- Work Instructions
- Management Team Reports
- Site Diary
- Emissions Control Plan
- Waste Transfer Notes
- Analyses of Input Wastes

These will be available for examination by visitors, delivery drivers and site personnel.

(65) It is likely that operational/security circumstances will demand that archived document storage will be maintained off site.

In such instance the records will be available for inspection by the Environment Agency at the Pick Up Skips HQ in Wakefield.

HQ-retained information will include: -

- Import Quantities/Tonnages
- Output Quantities /Tonnages
- Site Accident Book
- Waste Transfer Notes
- Consignment Notes
- Copies of Registered Carrier Certificates
- PPE Issues
- Training Records
- Historical Site Diaries
- Historical Waste Transfer Notes
- Maintenance Records
- Site Diary Entries
- CoTC Attendance
- Historical Visitors Book

(66) The company has future plans for other sections of land that it owns beyond the Planning Consent area and the railway cutting itself.

Pick Up management personnel will visit the site daily and the company will retain the site portacabin when the infill operation is complete.

**PLEASE SEE THE FOLLOWING ANNEXE THAT ADDRESSES ISSUES
AND REQUIREMENTS THAT HAVE BEEN SPECIFICALLY PRESENTED
BY ENVIRONMENT AGENCY OFFICERS DURING THE EXTENDED
PERIOD OF PERMIT APPLICATION**

**An Application for a Bespoke Environment Agency Permit:
*The Use of Waste for the Reclamation, Restoration or Improvement of Land***

**JP Land Restoration Services Ltd
Warmfield Fishing Grounds Development**

**ANNEXE
Specific Environment Agency Requirements**

The Environment Agency has identified the following issues that are addressed in this amended Waste Recovery Plan.

(A) Is there a clear benefit from the activity? You need to provide a clear description of what is wrong with the current landform

Please see Sections 1 and 13 of this document. Wakefield Council has granted Planning Consent on the firm understanding (and requirement) to improve the wildlife diversity of the area.

(B) How will you increase the biodiversity?

Please see Sections 1, 25, 29-34 and 57 of this document, plus the full Application File will include photoplates, Simply Ecology Report and Tree Planting Report. In addition to the fishing lakes that will enhance the current biodiversity, a specific wildlife pond and herpetaria-friendly areas are to be created

(C) Is the recovered waste suitable for its intended use?

The list of acceptable wastes has been abstracted from those authorized for a Standard Rules Permit for Land Recovery.

Please see Sections 20-25 and 54-59 of this document, plus the accompanying photoplates.

- (D) Is the minimum amount of waste being used to achieve the intended benefit?*

The infill zone does not fill the railway cutting and the majority of bankside deciduous trees will remain.

Please see Sections 12 & 13 of this document, plus the accompanying cross-sectional drawings.

- (E) You will need to provide plans and cross sections showing original and planned final levels. They must be provided at a scale appropriate to the size of project and must be sufficiently detailed so that they can be clearly understood and checked on site.*

Please see the accompanying Ramsden / Den drawings and photoplates.

- (F) You will also need to show how the amount of waste that will be used at the site is calculated. An exact tonnage of waste will need to be specified*

Please see the accompanying Ramsden / Den drawings, a copy of the Den Architecture E-Mail and section R of the Annexe to this document confirming the calculations.

- (G) Is the waste being used as a substitute for non waste material?*

The infill material is being strictly controlled in quality and quantity. Pick Up Skips is a longstanding waste contractor operating a large-scale EA-Permitted waste treatment station in Wakefield. Only appropriate waste materials ... waste soils and natural soils, road-building materials etc ... will be accepted.

Please see Sections 22-23, 54 of this document and section R of the Annexe to this document.

(H) *What your waste acceptance procedures must cover*

- *Testing waste*
- *Waste that may not need testing*
- *Testing waste yourself*

(H1) External contractors will be required to furnish analyses of soils in advance of sanctioned acceptance. The majority of excavation wastes will have been analysed as part of the Site Investigation programme for the production point.

The Black Rock operational footprint is largely devoted to preparatory and remedial earthworks in the construction industry.

There is provision to check individual loads on deposit and to segregate tramp components. Please see Sections 22, 60 - 65 of this document.

The complete Bespoke Permit Application Package will include an accompanying Operating Statement & Risk Assessment document.

(H2) The UK Guidance Note *Waste Acceptance Procedures for Waste Recovery on Land* (Oct 2016) notes that certain waste-streams would not necessarily require testing in advance of delivery. The list is included below.

However, it is intended that all external contractors will need to provide advance analytical details for large-scale deliveries of soil and excavation waste.

EWC Waste Code	Description
<i>01</i>	<i>Waste from exploration, mining, quarrying, and physical and chemical treatment of minerals</i>
01 01	Waste from mineral excavation
01 01 02	Waste from non metalliferous excavation
01 04	Waste from physical and chemical processing of non-metalliferous minerals
01 04 08	Waste gravel and crushed rocks other than those containing dangerous substances
01 04 09	Waste sand and clays
<i>10 12</i>	<i>Waste from manufacture of ceramic goods, bricks, tiles and construction products</i>

10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
17	<i>Construction and demolition waste (excluding excavated waste from contaminated sites)</i>
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics
17 05	Soil (excluding excavated soil from contaminated sites), stones and dredging spoil
17 05 04	Soil and stones
19	<i>Waste from waste management facilities, off-site waste water treatment plants and the preparation of water for human consumption and water for industrial use</i>
19 12	Waste from mechanically treating waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 09	Minerals (for example, sand, stones)
20	<i>Municipal waste (household waste and similar commercial, industrial and institutional waste) including separately collected fractions</i>
20 02	Garden and park waste (including cemetery waste)
20 02 02	Soil and stones

(I) *Waste producers must classify their waste as hazardous or non-hazardous and make sure it's described (characterised) accurately. This helps waste producers work out where they're allowed to send waste and helps you work out if you're allowed to accept it.*

There is no proposal to accept Hazardous Waste. There is potential to export it in the form of segregated Tramp Components and Used Oils (lubricating/hydraulic) from on-site machinery maintenance.

- (J) *If you have a permit to recover waste at your site, you must have waste acceptance procedures in place to make sure you only accept waste that:*
- *is suitable for your activity*
 - *is allowed by your permit*
 - *you have considered in your risk assessment for your permit*

Please see Sections 20 – 23 & 54-60 of this document, plus the accompanying Black Rock Template for growth-zone soils.

The complete Bespoke Permit Application Package will include an accompanying Operating Statement & Risk Assessment document. The Environment Agency is already in possession of this document.

- (K) *Your waste acceptance procedures will also help you:*
- *make sure the waste doesn't cause pollution*
 - *decide which wastes you will accept and from which sources*
 - *prevent waste arriving at your site that isn't covered by your permit*

When you apply for a bespoke waste recovery permit you must provide a copy of your waste acceptance procedures with your permit application. These procedures will usually be part of your management system.

Please see Sections 20-23 & 47 - 53 including the Site Rules, of this document, the Black Rock Template and the content of the (original) Operating Statement & Risk Assessment document.

- (L) *Your waste acceptance procedures must set out the:*
- *evidence you need from producers to confirm the waste matches its description*
 - *measures you'll take to make sure the waste is free from contamination*

- *criteria you'll use to decide whether or not to accept the waste, for example the results of waste testing*
- *other criteria you'll use to make sure you only accept waste that is suitable*

You can develop your own site-specific criteria or you may be able to use the Landfill Directive's waste acceptance criteria. Your risk assessment will tell you what is appropriate.

Please see Sections 20-23 & 47 - 53 including the Site Rules, of this document, the Black Rock Soil Contamination Template and the content of the Operating Statement & Risk Assessment document.

(M) Your procedures must also set out what information you'll require producers to supply about the waste. This must include the:

- *original source of the waste*
- *previous use of any site generating excavation or demolition waste*
- *details of any treatment used to remove unsuitable waste*
- *results of any waste tests carried out*

Please see Sections 20-23 & 47 - 53, including the Site Rules, of this document, the Black Rock Template and the content of the Operating Statement & Risk Assessment document.

Each Waste Transfer Note is required to confirm that the Waste Hierarchy has been applied.

External contractors will be required to furnish analyses of soils in advance of sanctioned acceptance. The majority of excavation wastes will have been analysed as part of the Site Investigation programme for the production point.

- (N) *The waste producer must test waste and give you the results of the analysis if the waste has come from:*
- *land that has or may have been contaminated by previous use*
 - *a waste treatment or transfer facility*
 - *any site where you have reason to suspect that the waste may have been contaminated*

This rule also applies if you're going to use the waste as a substitute for subsoil or topsoil.

Please see Sections 20-23 & 47 - 53, including the Site Rules, of this document, the Black Rock Template and the content of the Operating Statement & Risk Assessment document.

External contractors will be required to furnish analyses of soils in advance of sanctioned acceptance. The majority of excavation wastes will have been analysed as part of the Site Investigation programme for the production point.

- (O) *Waste producers may not need to test certain types of waste apart from testing them for classification, if they:*
- *come from a single source*
 - *are well characterised and described*
 - *carry no risk of contamination, for example from a site that hasn't previously been developed*
 - *are a waste listed in this table*

External contractors will be required to furnish analyses of soils in advance of sanctioned acceptance. The majority of excavation wastes will have been analysed as part of the Site Investigation programme for the production point.

Please see Sections 20-23 of this document, the Black Rock template for growth soils and the content of the accompanying Operating Statement & Risk Assessment document.

Hywel Wilcox is a graduate chemist with forty years' experience in the waste industry.

The site is programmed for after use as a wildlife resource and producers of both regular and one-off arisings will be required to provide representative analysis of their waste.

(P) You may not need to test any waste described in this table apart from testing it for classification purposes:

- *01 01 02 Waste 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)*
- *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 12 09 Minerals (for example, sand, stones)*
- *20 02 Garden and park waste (including cemetery waste)*
- *20 02 02 Soil and stones*

You can use these untested wastes if:

- *you're allowed to accept this type of waste – your permit lists wastes you can accept*
- *your risk assessment shows that it's acceptable to do so*

External contractors will be required to furnish analyses of soils in advance of sanctioned acceptance. The majority of excavation wastes will have been analysed as part of the Site Investigation programme for the production point.

Please see Sections 20-23 & 47 - 53, including the Site Rules, this document, the Black Rock template for growth soils and the content of the accompanying Operating Statement & Risk Assessment document.

The site is programmed for after use as a wildlife resource and producers of both regular and one-off arisings will be required to provide representative analysis of their waste.

(Q) Testing waste yourself: You must test the waste you're using in your recovery activity to confirm it matches the description provided by the waste producer. This is particularly important if you're using non-inert waste, or if you think the waste may be contaminated. You should do this between 1 and 3 times a year for each waste stream, depending on your knowledge of the waste, its variability and your risk assessment.

External contractors will be required to furnish analyses of soils in advance of sanctioned acceptance. The majority of excavation wastes will have been analysed as part of the Site Investigation programme for the production point.

The site is programmed for after use as a wildlife resource and producers of both regular and one-off arisings will be required to provide representative analysis of their waste.

Pick Up Skips / JP Land Restoration will implement a monitoring programme for a range of control limits for imported soils and rubble. The control limits will be stricter for growth soils than for fill soils. Verification testing will be commissioned from a UKAS / MCERTS-Registered Laboratory ... provisionally Concept Life Sciences Ltd of Manchester.

The site specific control limits will be drawn up using a combination of ATKINS ATRISK guidance limits, applicable CLEA and ADAS guidance limits and the UK Government's C4SL. No Hazardous Waste will be accepted.

Sampling & Testing on behalf of the site operator is programmed to be commissioned via Black Rock. Hywel Wilcox of Black Rock is a graduate chemist with over 40 years' experience in the waste industry.

(R) *Can You Demonstrate that the proposed Land Recovery Scheme would be viable if no waste materials were accepted and were replaced by Non-Waste materials?*

Calculated Construction Costs

(R1) Pick Up Skips has calculated the input volumes at

Fill Soils:	63,000 tonnes
Clay for Lakes	10,000 tonnes (provisional)*
MOT Type 1 Aggregate	400 tonnes (Fishing Stations)
MOT Type 1 Aggregate	1200 tonnes (800m of footpath)
Top Soil	8,000 for planting of Trees & Grass

*Pick Up has been in liaison with Turtle Productions Ltd, a company that supplies and lays heavy-duty polymeric pond liners. The quantity of clay might thus be reduced and the differential made up with fill soil.

A copy of the Turtle Productions Ltd Quotation is included in the Appendix to this Waste Recovery Plan document.
[£92,400 inc of VAT]

- (R2) Pick Up has a business relationship with Allied Plant Ltd of Castleford. Allied Plant:
- Operates an EA-Permitted soils and aggregate reprocessing station
 - Has provided a quotation for delivering the nominated processed materials that are routinely sold for re-use as construction products.

Type 1 Aggregate at £10 per tonne exc of VAT/ £12 inc of VAT
Nominal Density: 2.3 tonnes per m3.

Topsoil at £8 per tonne exc of VAT / £9.60 inc of VAT
Nominal Density: 1.6 tonnes per m3

Fill Soil at £4 per tonne exc of VAT / £4.80 inc of VAT
Nominal Density: 2 tonnes per m3

A copy of the Allied Plant Ltd Quotation is included in the Appendix to this Waste Recovery Plan document.

(R3) The financial purchase costs for Non-Waste materials then can be estimated at:

	Exc VAT	Inc VAT
Fill Soils: 73000 x £4 =	£292,000	£350,400
Type 1 Aggregate: 1600 x £10 =	£ 16,000	£19,200
Topsoil: 8000 x £8 =	£ 64,000	£76,800
Liner:	£76,666	~£92,000
Total	£448,666	£538,400

(R4) The annual operating costs have been calculated at:

	Exc VAT	Inc VAT
Wages:	£21,000	£21,000
Fuel:	£ 7,800	£9,360
Facility hire(portaloo):	£ 1,196	£1,435
Plant hire:	£13,000	£15,600
Gas Monitoring	£5000	£6000
Total:	~£48,000	~ £57,600

It is anticipated that the construction operation will take 2 years to complete, giving a cumulative total of:

2-year Total:	~£96,000	~ £115,200
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(R5) One off Costs

	Exc VAT	Inc VAT
Tree Planting	£4,750	£5,700
Lighting	£1,000	£1,200
Ecology Plan	£1,770	£2,124
Waste Recovery Plan	£300	£360
Fencing of Wildlife Plan	£1200	£1440
Total	£9,020	£10,824

The derived Total Construction Completion Costs are thus calculated at:

Total	£553,686	£664,423
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(R5) It will then be necessary to stock the lakes with fish. Pick Up has consulted fishing experts and Fishtanks and Ponds Ltd.

Fish-stocking numbers are calculated by dividing the total volume of water by a factor that gives a total eligible length of fish in inches. The derived calculation gives 88,889 fish-inches for each 16m x 100m x 2.5m-deep lake.

Fishing experts have advised the following stocking specification for each lake:

Fish	Cost (£)	Adult size (inches)	Number of fish	Cost (£)	Adult Fish (total inches)
Perch	1.70	12	700	1190	8,400
Rudd	1.80	15	500	900	7,500
Roach	1.70	15	350	595	5,250
Bream	1.80	23	250	450	5,750
Common Carp	2	35	700	1400	24,500
Mirror Carp	2	35	700	1400	24,500
Crucian Carp	3	15	700	2100	10,500
Gudgeon	2.50	6	200	500	1,200

Per Lake = £17,070 exc Vat / 20,484 inc Vat
For 2 x Lakes £34,140 exc Vat / 40, 968 inc Vat

(R6) Thus the combined outlay to complete the construction exercise is calculated at:

£553,686	£664,423
<u>£ 34,140 +</u>	<u>£ 40,868 +</u>
~£587,826 exc Vat	~£705,291 inc Vat

Calculated Income

(R7) Fishing experts have advised:

- Fishing stations ("Pegs") can be set at 5m linear distance
- Standard daily fees can be charged at £8 per peg exc of Vat and £9.60 inc Vat
- Operators can expect a 40% take-up on Mon-Fri, and 90% on Sat-Sun.

For the Warmfield facility with 2 x 100m lakes, this equates to:

- 40 Pegs ... 20 per lake
 - Mon-Fri 16 people per day £640 per week
 - Sat-Sun 34 people per day £544 per week +
- Total: £1184 per week exc Vat**
Total: £1420 per week inc Vat

- (R8) There will be no cost allied to collecting the fishing gate fees.
- Pick Up has a current e-payment arrangement at its waste treatment system, where fishing stations can be booked and paid-for by credit card over the phone.
 - Pick Up management personnel will visit the site daily and the company will retain the site portacabin when the infill operation is complete. The company has future plans for other sections of land that it owns beyond the Planning consent area and the railway cutting itself.
 - Personal contacts have found two local fishermen who are retired from work. They have volunteered to collect fees from speculative arrivals in return for free fishing on an available peg and surrender of that peg if it is the only one available on a given day.
- (R9) By dividing the forecast 2-year development costs exc of Vat by the forecast income of £1184 per week exc of Vat, the timescale for the return of investment can be calculated.

From the derived table, it can be projected that, if solely Non-Waste materials are accepted (and purchased), there would be a return on the investment of ~£587, 826 + Vat / ~£705,291 inc Vat in:

- in less than 9 years when Vat is added to the proposed fishing fee per peg. (as expected)
- in less than 12 years if Vat is not added to the proposed fishing fee per peg. (notional)

Development Costs	~£587,826 exc Vat	~£705,291 inc Vat
Years of Fishing Revenue	Money made overall (£) Exc of Vat	Money made overall (£) Inc of Vat
1	61,568	73,840
2	123,136	147,680
3	184,704	221,520
4	246,272	295,360
5	307,840	369,200
6	369,408	443,040
7	430,976	516,880
8	492,544	590,720
9	554,112	664,560
10	615,680	738,400
11	677,248	812,240
12	738,816	886,080
13	800,384	959,920
14	861,952	1,033,760

(R10) The infill exercise expected to be completed without problem within 2 years with savings on the imported aggregate costs.

The company produces a fill-soil that meets Highways Agency Grade 2C specification for use in construction (see grading certificate). However, the production point has limited open storage space and, if there is no demand for the product, the material is currently perforce exported as a waste.

If the Warmfield facility was in operation, the 2C fill soil, subject to SSRC compliance, could be preferentially re-used in the construction bases/flanks for the Wildlife Pond and Fishing Lakes.

(R11) The company has acquired the field and land abutting the South Lake infill zone and thus holds contiguous ownership of the acquired land on the opposite side of the highway.

The field retains a historic mound of historical virgin soil and stone that was excavated to create the cutting. Its matrix comprises rock soil and clay.

The mound has prevented the field from being utilised as prime arable land, in the same manner as its neighbouring fields.

The field is required as a construction zone for the HS2 rail-line that is to pass through Warmfield. Plan of the route has been included in the annexe to this Waste Recovery Plan (as amended) document.

The approximate dimensions of the mound are 125m x 3m (averaged) x 33m . This would yield a volume of ~12,000m³/ circa 12,000m³ for preferential deployment at the Pond Infill zones

It is proposed to remove the mound, process it and import it into the fishing pond infill programme. This exercise will produce:

- Highways-grade fill soils and aggregates at cheaper rates than those in the budget.
- A reclaimed field to be available for (medium-term) rental to HSE and (longer term) arable production or camping/glamping.

This operation would be of overall benefit to HS2, Pick Up and the local amenity. Presumably, the Environment Agency would also endorse it.

Pick Up Skips, JP Land Restoration Services and Black Rock trust that the provisions detailed in this document are sufficient for the purposes of the Environment Agency. Its contents remain the intellectual property of Black Rock.

Should any points be identified for further clarification or discussion, I would be grateful if you could contact me directly at the above address.

Hywel Wilcox

Director

Black Rock Environmental Asstes Ltd

On behalf of:

Pick Up Skips / JP Land Restoration Services Ltd

Circulation

Mr Jim Pickup	Pick Up Skips
Mr Daniel Addison	Pick Up Skips
Mr Alan Powell	Ramsden / Den Architects
Ms Anna Gribben	Environment Agency Permitting Unit
Mr John Murray	Environment Agency Permitting Unit
Ms Caroline Wynn	Environment Agency Permitting Unit

Documents Associated with the Waste Recovery Plan

- ***Den Architecture Site Plans***

Appendix for the Environmental Permit Application Package

- *Den Architecture Site Plans*
- *Den Architecture E-Mail confirming calculations of infill volume*
- *Pick Up Skips 6F2 Grading Certificate for Processed Aggregate*
- *Allied Plant Pricing List for Processed Aggregates*
- *Black Rock Template for Contamination Limits in Growth Soils*
- *Turtle Productions Ltd Quotation for Pond Lining Membrane*
- **(Original) Operating Statement & Risk Assessment document***
- ****Wakefield MDC Planning Consent*
- *Correspondence with the Environment Agency (John Murray / Anna Gribben)*
- *Confirmation of Land Purchase (Mound)*
- *HSE Route Plan*
- *Supporting Letter to EA (Ms Caroline Wynn)*

*** The original Operating Statement has been included in the documents submitted to the EA for initial appraisal of the Waste Recovery Plan. It is accepted that it will need modification, along with other original documents before the formal full Application for a Bespoke Permit is submitted. [January 2019 Comment; this Document is now amended as agreed.]**

**** The original Permit Application and associated documents were submitted under the aegis of Pick Up Skips ... the parent organisation of JP Land Restoration Services Ltd.**

*****The original Planning Application was submitted under the aegis of the site's previous owner ... Mr Gary Asprey. All Planning Conditions have been resolved and discharged.**