

Waste Recovery Plan Review - Sweethayes Farm

Briefing Note

Date: August 2023

Client Name: Laci Land Restoration Ltd.

Document Reference: WIE18431-100-BN-3.4.1-AddWRP

This document has been prepared and checked in accordance with Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

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1. Introduction

- 1.1. Waterman Infrastructure & Environment Ltd (Waterman) has been appointed by Laci Land Restoration Ltd ("the applicant" or "Laci" as the case may be) to prepare and submit a Waste Recovery Plan (WRP)¹ to the Environment Agency (EA).
- 1.2. The subject site lies at Sweethayes Farm, London Road, Hurst Green, TN19 7PS.
- 1.3. Waterman submitted a WRP on 2 September 2021.
- 1.4. On 19 November 2021 the EA reverted to Waterman asking:
 - *"Please provide a comprehensive breakdown of what exactly the non-waste product is, and all of the costs associated with it."*
- 1.5. In response Waterman provided an update to the WRP by means of an addendum report – issued in the form of a Briefing Note (BN)².
- 1.6. On 14 January 2022 the EA approved the WRP³.
- 1.7. On 14 August 2023 the EA reverted to the applicant asking it to:
 - *"...submit a revised waste recovery plan..."*
- 1.8. It is noted the EA had previously said⁴ the applicant needed to show:
 - *"...it would be hypothetically possible... to remove the tipped waste, dispose of it in the correct manner and the [sic.] re-import non-waste to complete the scheme"*.
- 1.9. The EA's reference to "tipped waste" refers to a deposit at the site of some 400 loads⁵.

¹ Waste Recovery Plan - Sweethayes Farm, reference WIE18431-101-R-2.2.2-WRP, Waterman, August 2021.

² Briefing Note ref: WIE18341-100-BN-3.1.2-AddWRP, Waterman, December 2021.

³ EA ref: EPR/KB3706MB/A001, dated 14/01/2022.

⁴ Email (Anthony Watts, EA to Steven Kilmartin, Laci) 9 November 2022.

⁵ Confirmatory Duty of Care documentation provided to Adrian Redfern, EA on 26 September 2022.

2. Review

- 2.1. Waterman now turns to reviewing the applicant's submissions (including footnotes 1 and 2).
- 2.2. The applicant's costs model is set out at Tables 1 and 2 of its WRP⁶.
- 2.3. The BN analysed an alternative supply scenario. It showed that:
 - "...a profit would be returned within a reasonable timeframe..."⁷.
- 2.4. Running the removal of the "tipped waste" through the costs model Waterman calculate as follows.
- 2.5. Haulage from site to disposal site⁸ at the rate of £53.58 per load. This figure is inclusive of the anticipated transport costs, namely including fuel; driver time; and profit.
- 2.6. Cost of disposal at receiving site at the rate of £150 per load.
- 2.7. Accordingly, disposal cost per lorry load: £53.58 + £150 = £203.58 + VAT. The 400 lorry loads would therefore cost £97,718 (including VAT) to dispose of.
- 2.8. Insert additional costs row into Table 1. Total development cost is £506,061. See Table 1B, hereby enclosed at Annex A.
- 2.9. Take the total figure from Table 1B forward into the method shown in Table 2 and model the costs and income. These show that a profit would be returned within a reasonable timeframe. See Table 2B, hereby enclosed at Annex B.
- 2.10. In response to the point the EA makes (footnote 4) as to "re-import" of non-waste. The figures above assume the importation of the original amount required to complete the original scheme.

3. Conclusions

- 3.1. The applicant's submission includes analysing an off-site disposal scenario.
- 3.2. Under the scenario a return to profit is shown at year 16.
- 3.3. The proposals still appear reasonable.

⁶ Refer to pages 11 and 13 of the WRP.

⁷ Paragraph 1.12 of the BN.

⁸ Maidstone, Kent. Return trip 47 miles.

Annex A

Table 1B: Cost of development

Cost of development ⁹	£
Barn Build	18,900
Non-waste fill material import	319,165
Labour costs	51,000
Diesel costs	19,278
Disposal of previously deposited material to an authorised site elsewhere	97,718
Total	506,061

Prices are inclusive of VAT where relevant.

⁹ Note that, including to enable comparison, values are normalised to the date of the original WRP submission (August 2021).

Annex B

Table 2B: Revenue from the development

	Year															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Development complete	Buy cattle	Sell calves	Property sale (uplift in value)												
Cost	506,061	10,000	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	
Revenue			34,700	34,700	34,700	34,700	34,700	34,700	34,700	34,700	34,700	34,700	34,700	34,700	34,700	
Balance (income)			32,420	32,420	32,420	32,420	32,420	32,420	32,420	32,420	32,420	32,420	32,420	32,420	32,420	150,000
Subtotal (income accrued)	-506,061	-516,061	-483,641	-451,221	-418,801	-386,381	-353,961	-321,541	-289,121	-256,701	-224,281	-191,861	-159,441	-127,021	-94,061	
Total financial gain from completion of development (£)																55,399

Annex B