



Waste Recovery Plan

Sweethayes Farm

August 2021

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Quality Assurance – Approval Status

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)

Issue	Date	Prepared by	Checked by	Approved by
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Comments

Comments



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1. Introduction

1.1 The Brief

Waterman Infrastructure & Environment Limited (Waterman) are instructed by Laci Land Restoration Ltd (Laci) to prepare a Waste Recovery Plan (WRP), demonstrating the beneficial use of waste soils in development works at Sweethayes Farm, London Road, Etchingam, Hurst Green, TN19 7PS.

The WRP will be submitted to the Environment Agency (EA) for assessment, in advance of an application for an environmental permit (EP) for permanent deposit of waste on land as a recovery activity.

1.2 Report Structure and Scope

This WRP has been constructed in line with the latest guidance¹ from the EA (“EA guidance”) for the permanent deposit of waste on land as a recovery activity. The relevant parts of the guidance in relation to the report structure is set out in section 3.1.

The report provides evidence to support waste recovery, obtained in consultation with Laci. A WRP was submitted previously by others² (“previous WRP”). The EA assessed that WRP and concluded that insufficient evidence had been provided to demonstrate waste recovery³. This report addresses EA comments received, and presents the requisite supporting information.

1.3 Limitations and Constraints

This assessment was undertaken in accordance with the scope agreed between Waterman and Laci, as documented in Waterman’s fee letters (WIE18431-100-210515-BL-Fee and WIE18431-100-210611-BL-Fee), and with Waterman’s standard Terms of Appointment.

The benefit of this report is made to Laci Land Restoration Ltd.

Waterman has endeavoured to assess all information provided to them during this investigation, but makes no guarantees or warranties as to the accuracy or completeness of this information.

The scope of this investigation does not include an assessment for the presence of asbestos containing materials within or below buildings or in the ground at the site.

The conclusions resulting from this study are not necessarily indicative of future conditions or operating practices at or adjacent to the site.

¹ [Waste recovery plans and deposit for recovery permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92444/waste-recovery-plans-and-deposit-for-recovery-permits.pdf) (dated April 2021).

² Beyond Waste Ltd. – Sweethayes Farm Waste Recovery Plan v1.1 29.10.2020.

³ Environment Agency – WRP Advice Letter and RvD Advice Form – ref. EPR/HB3900TY/A001 (Appendix D).

2. Overview of the Development

2.1 Overview

The land the subject of this WRP is a piece of farmland comprising a barn and a grazing area, which has been used for the purposes of raising cattle. The existing barn is dilapidated, and is not fit for the purpose of housing cattle and farm machinery. The grazing slopes are uneven and steep in places. Areas of the slopes are thick with brush and scrub and cannot be accessed by machinery and are unsafe for cattle, due to the gradient. This limits the area of good quality grazing available.

The landowner wishes to replace the barn, and to improve the grazing area to enable the use of the plot for enhanced cattle raising. The position of the new barn needs to be such that it does not cover the path of a public main sewer. A new stable platform (earthworks) is required to support the barn. The grazing area requires recontouring (earthworks) to even out the gradient to improve access for cattle and machinery.

The developer (Laci) wants to use waste soils to create the barn platform and grazing area regrading, as suitable soils are available from development (excavation) works in the local area. These soils are classed as waste as they are discarded from the construction sites.

The works could be completed with primary materials or fully recovered wastes. However, utilisation of “waste” soils sourced from the local area is preferred, also benefitting from the credentials of proximity and sustainability.

2.2 Site Location and Setting

Site address: Sweethayes Farm, London Road, Etchingham, Hurst Green, TN19 7PS.

National Grid Reference: TQ 73533 26229.

Sweethayes Farm is approximately 12 hectares in size. It sits within the High Weald Area of Outstanding Natural Beauty (AONB). A farm dwelling, with garden, working area and other agricultural use structures sits in a level area, accessed off London Road (A21). The area of land the subject of the WRP sits south west of the farm dwelling with the barn behind (west) of the dwelling and the grazing slopes falling to the south west towards the River Rother Valley. At the base of the slope is an area of ancient woodland; also identified as ghyll woodland.

Protecting the woodland, and preventing run-off and land slippage are discussed in section 5 of this report.

2.3 Planning Permission

The development benefits from planning permission (ref. RR 2019 724 P) ⁴:

The local planning authority (Rother District Council) supported the proposal for the barn, as required for agricultural use and there was evidence of this need, also in accordance with the presumption in favour of sustainable development (National Planning Policy Framework) ⁵.

In the planning report (‘D’ Report) it is noted that:

- the barn will be smaller than as previously proposed (and refused in a previous planning application (2017));
- the platform remains largely within the footprint of the previous barn;

⁴ Rother District Council – Planning Permission – Application No. RR/2019/724/P (Decision Date 7th May 2021).

⁵ Rother District Council – ‘D’ Report – Application No. RR/2019/724/P.

- the platform is to be cut into the ground more (generating more site-derived material available for use);
- the revised scheme reduces the amount of material required to be imported to the site; and
- the scheme avoids building over a public main sewer running across the site.

These points are returned to in sections 3.2.2 and 3.7, where opportunities that have been explored to minimise the amount of infill material needed are discussed.

3. Waste Recovery Test

3.1 Introduction

With reference to the EA guidance, the aspects that are relevant and information that has been provided in relation to these, are as follows:

Meaningful financial gain can be demonstrated (section 4.2), therefore funding to use non-waste materials is not relevant. While not necessary, additional information has been provided showing that the scheme is also otherwise worthwhile (e.g. sections 3.5.1 and 5.3).

There are no specific regulatory obligations necessitating the proposed development. However, Southern Water is noted as an interested party on account of the public main sewer (section 3.2.2), and the involvement of the planning authority is referenced (above).

The waste type intended to be used is on the EA list of waste types normally accepted in a typical deposit for recovery activity (see section 3.6.1 of this report). The activities proposed in this WRP are listed against the waste type in the guidance. Therefore further evidence that it is serving a useful purpose is not required.

The purpose of the work is presented in section 3.2 below.

Regarding the quantity of to be waste used, explanation that the amount of waste needed to carry out the function is as would otherwise be provided by non-waste is given in section 3.6.2. A description of alternative options considered is given in section 3.7.

The aspects of information required regarding meeting quality standards are given in:

- section 3:
 - which explains how the scheme is designed and constructed;
 - that the scheme is fit for purpose; and
- section 5 which outlines preventing environmental problems – and a specific comment from the EA on the previous WRP is addressed.

3.2 Purpose of the Development

3.2.1 Site Condition

The land has historically been used for grazing. However, the barn has become substandard and there have been incidents of injury to cattle on the approach to the barn in bad weather, due to the steepness of the slopes. Currently there is not a profitable ongoing use of the land. Mrs Stone (life tenant) has a proposal for raising a herd of Hereford cattle on the land. The landowners include family members of the tenant and the uplift in land value following the improvements will be mutually beneficial (see further detail in section 4.2).

A barn is needed for shelter for the cattle during extreme weather, or when sick or calving. They would not be overwintered in the barn. A tractor and Gator (cross over utility vehicle) would be used to work the land – to herd the cattle and maintain the grazing area. This machinery needs ease of access to the barn (for storage and in moving cattle) and manoeuvrability on the slopes for rounding up cattle, and for maintaining the grazing land.

While Hereford cattle can thrive on a mixture of fodder (shrubbery, foliage and good quality grass), there are patches of the land currently heavily shrubbed, and steeply dipped that machinery cannot access to maintain, and cattle attempting to forage on would be at risk of injury. A mixture of regrowth might be

encouraged as well as just grass, but landscaping is required to be able to manage the land, and optimise the pastureland that develops as a result of the works.

Included in the proposals is retention of an area of woodland, which will be better defined following the development. It will include the proposed graded banking, which leads to the ancient woodland and “exclusion zone” (see plans presented in Appendix A). This area will be allowed to develop tree and shrub cover, providing enhanced protection for the ancient woodland.

3.2.2 Additional Considerations

The proposed design of the barn and platform are as authorised by the planning permission, avoiding the public main sewer and having reduced as far as possible the amount of infill material required. Whilst there is no specific regulatory obligation to complete the scheme, it is unlikely that alternative proposals would be supported by the regulators involved to date.

Southern Water has visited the site⁶ and advised that any replacement barn should be moved away from the sewer. A 3m exclusion zone has been created around the sewer, which is a water company requirement⁷. If the barn were rebuilt over the sewer a build-over agreement with Southern Water would be required, which may not be approved.

3.3 Description of the Development

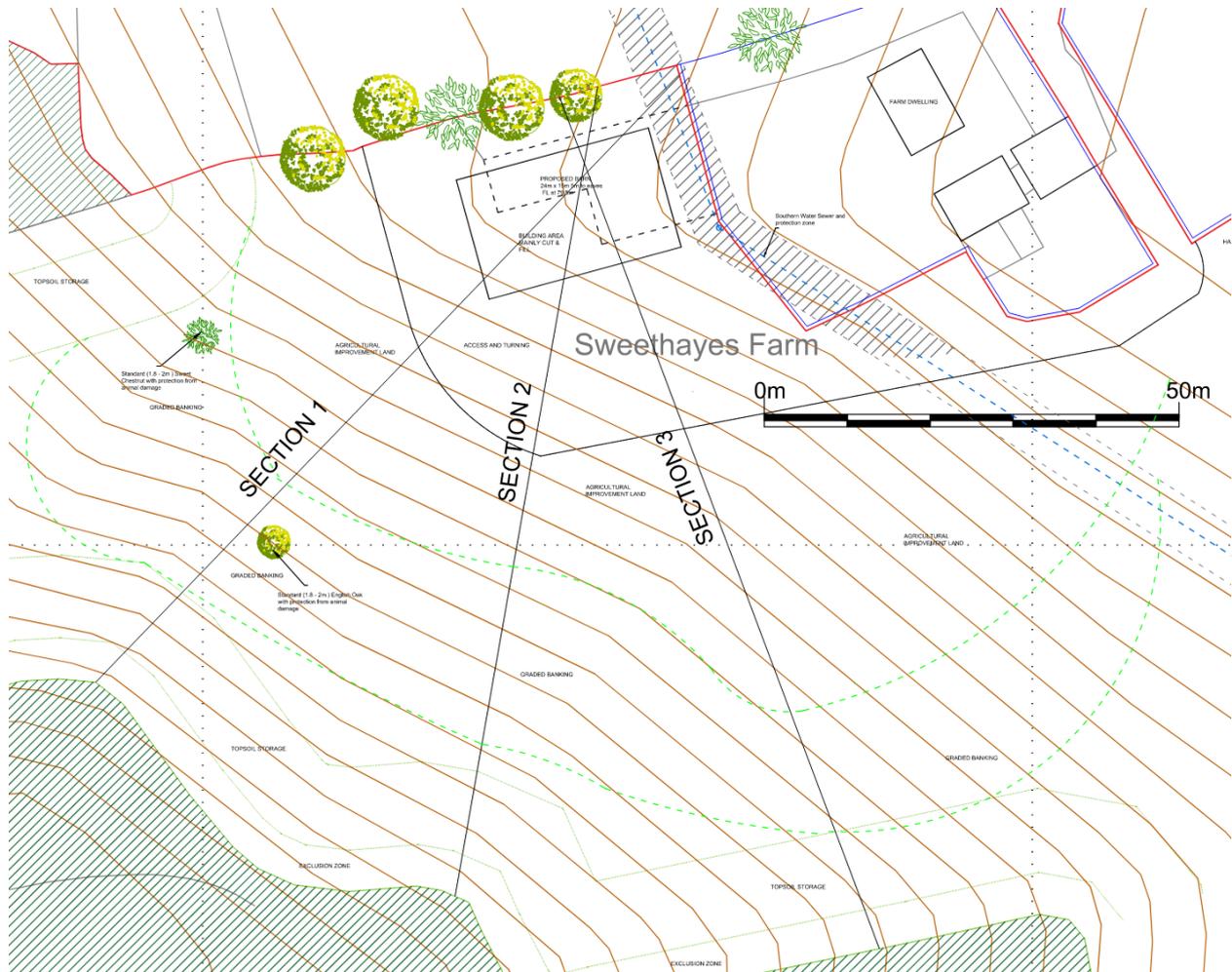
3.3.1 Design Overview

Figure 1 is an extract from Larkins & Pollington (Design Partnership) drawing (905/19/SPL/24) showing an overview of the development (available in full in Appendix A along with detail of the sections indicated on the figure below).

⁶ April / May 2020 – undocumented.

⁷ [Build over a sewer \(southernwater.co.uk\)](https://www.southernwater.co.uk) (accessed 27/08/2021).

Figure 1: Design overview – drawing



Notes:

- the footprint of existing barn is shown as a dotted grey line (where the proposed barn is labelled);
- the line of public sewer and 3m easement shown in hatching (to the east of new barn footprint).

3.4 Barn and Platform

The development seeks to build a new barn suitable for modern farming practices.

3.4.1 Replacement Barn

Substandard condition of existing barn

The condition of the current barn is a state of dilapidation. Its layout and constitution would not suit the proposed purpose in the modern day. A survey⁸ of the barn conducted by Carley Construction Ltd is presented in Appendix B of this report.

An extract from the barn survey (Figure 2 below) shows the current orientation of the barn is impractical for vehicle access and the layout and structure do not provide adequate shelter.

⁸ Carley Construction Ltd. Examination of existing pole barn at Sweethayes Farm, 31/07/2021.

Figure 2: Extract from barn survey



(images 14,15,16)

The reasons the current barn is unfit for the purpose for housing cattle and machinery, and is generally in a poor condition include that it is:

- over 30 years old;
- badly weathered;
- the roof consists of asbestos sheeting and is leaking;
- the floor is uneven and rutted;
- the orientation and heights of the barn are impractical for vehicle access and storage;
 - the roof at its lowest height (2m) is on the southern side, and the highest (4m) is on the northern side – whereas the barn will need to be accessed from the southern or western sides;
 - farm machinery will require a clearance height over 2m;
- historic electrical fittings have been deemed unsafe (and have been isolated);
- the barn layout and structure would offer little shelter to animals;
- the potential asbestos roof deterioration makes the barn unfit for housing animals, and fibres or particles could be released into food / water supplies; and
- the barn currently is an unsafe environment for human staff.

3.4.2 Method

The old barn will be dismantled and removed. Any topsoil available from the platform area will be removed and stockpiled for later use. A level platform will be created using inert fill. A top layer (0.25m) of hard materials (chalk base) will be used to surface the platform.

The new barn “platform” includes the “access at 5%” area which can be seen on the sections drawing (905/19/SPL/24) presented in Appendix A.

An area of cut is available from the section of the existing barn platform, on the north east side, adjacent to the farm house garden. The cut will generate approximately 450m³ of material. This material can be used in levelling the new platform.

The areas of cut and platform creation can be seen on site plan 905/19/SPL/11 in Appendix A.

3.4.3 Fill Requirement

The area to be filled is estimated to cover 4,000m² to an average depth of 1.2m across the platform. This corresponds to a fill requirement of 4,800m³. Deducting the cut volume (450m³), **4,350m³** of fill is required to be made up using imported material.

The average weight of soil required to fill 1m³ “in the ground” is 1.5-2 tonnes. Therefore the imported material requirement for the barn platform will be up to 8,700 tonnes.

The landform will be built up in layers of 0.3m (approximate) thickness, compacted by tracking over with a 13 tonne excavator, creating a stable mass (see section 5.1).

3.5 Grazing Area and Slopes

The development seeks to establish an even and safe working and grazing area for farm machinery and cattle.

3.5.1 Improved Pastureland

Safe gradient for cattle and machinery

A safe gradient has been established as an incline no greater than 15° (degrees⁹) (27%). This is based on advice from:

- farmers and the farming community;
- advice on the welfare and hardiness of Hereford cattle; and
- the manufacturers of the farm machinery that will be used to work the land and the cattle and will be stored in the barn.

A statement (Laci Statement¹⁰) confirming the references for this is presented in Appendix B.

In order to create the desired pastureland, the recontouring has been designed as set out below.

3.5.2 Method

The gradient¹¹ of the current slopes ranges on average between 12° and 17.5°, with some areas at up to 20°. The agricultural land improvement area will tie into the barn platform access (5% / 3° gradient) at a gradient of 7.5% (4°). The slopes will be formed in sections, shown on drawings 905/19/SPL/24 and 905/19/SPL/02C (Appendix A). The slopes will be formed to provide even ground, sloping gradually down to the edge of the agricultural improvement area.

The area of “graded banking”¹² will be retained at a gradient of 35% (19°) this is to provide an area of protection for the woodland. Entry of animals and the risk of animal damage to trees will be prevented. Trees and shrubs will be encouraged to grow on these banks. Providing stability to the slopes and preventing run-off and slippage.

The grazing slopes sections will be developed as follows:

- topsoil will be stripped and stored in the areas shown (“topsoil storage” Appendix A);
- the platforms will be dug using stepped layered platforms, to form safe working areas as the fill is graded and consolidated, including keying into the existing land;
- inert fill material will be placed (using 13 tonne excavator);
- the topsoil layer will be replaced (0.25m) and seeded.

⁹⁹ Safe gradient assessment conducted in degrees, sections plans express gradient using %. Approximate equivalents have been noted for reference.

¹⁰ Steven Kilmartin (Laci) – Confirmation of a safe gradient for livestock and vehicles / machinery.

¹¹ Email Steven Kilmartin (Laci) to Beth Lyon (Waterman) dated 29/07/2021.

¹² Site Plans – Appendix A.

3.5.3 Fill Requirement

The regrading will cover an area of approximately 8,000m² and raise the levels by an average of 1.5m throughout. Therefore, the regrading of the slope requires a volume of **12,000m³** to achieve the required formation. Requiring up to 24,000 tonnes of material imported to site for the purpose (1.5-2 tonnes / m³).

3.6 Use of Waste in the Development

3.6.1 Type of Waste

The type of waste to be used in the development is a single EWC¹³ code 17 05 04 soil and stones.

This would be comprised of subsoil and underlying natural strata from the surrounding area (arising from construction excavation). Top soils may be imported if required for the final planting layer.

The use of these, particularly on the grazing area, is preferred for a naturalised environment.

The waste soils proposed to be used for the intended purpose are within the list of acceptable wastes¹⁴ identified by the EA for use in typical deposit for recovery activity. 17 05 04 is suitable for structural fill for building, stabilising slopes, and agricultural improvement schemes.

Therefore additional information and evidence about the chemical, physical and engineering properties of the waste is not necessary.

Soils will be subject to relevant sampling and testing, and will be inspected on arrival to the site.

Non-waste products available for a similar use include aggregate Type 6F2 – predominantly crushed aggregate and hardcore.

3.6.2 Quantity of Waste

The quantity of waste soils required is the same infill volume as for non-waste (soil / aggregate) product.

Total 16,350m³ (approximately 32,700 tonnes soil).

The minimisation of the volume of infill material required has been discussed in earlier sections of this report.

Final ground levels are referenced at sections drawing (905/19/SPL/24) presented in Appendix A.

3.7 Alternative Options Considered

3.7.1 Enhanced Machinery

To overcome the challenges of the steep and uneven ground for the use of farm machinery, upgraded models of the equipment have been considered.

Higher specification models of machinery, which might be better equipped to cope with steeper gradients and rougher terrain could be purchased and used instead of the current tractor and Gator. This would add 25% to the purchase price (based on good quality second hand). The cost for both (upgraded) machines is estimated at £59,000¹⁵.

However none of the advantages of the land redevelopment would be achieved, in terms of:

- improved productivity of the land;

¹³ European Waste Catalogue.

¹⁴ [Waste recovery plans and deposit for recovery permits - GOV.UK \(www.gov.uk\)](http://www.gov.uk) (accessed 11/08/21).

¹⁵ Laci Statement – Appendix B.

- improved safety of cattle; and
- improved efficacy of the farm machinery (without the need to upgrade them).

It is considered that upgraded farm machinery would not perform the same function as the intended objectives of the development, and is therefore not a viable alternative.

3.7.2 Larger Barn

A larger barn was originally proposed¹⁶. This barn would have required a larger platform, and a larger volume of infill material to create it. This proposal was refused on planning grounds¹⁷, as the barn and extent of level land required would not be in keeping with the landscape of the AONB.

The revised barn size, and resultant volume of infill to create the platform have been approved by Rother District Council. Therefore a minimised volume of infill material will be used in the development.

¹⁶ Planning application reference Ref RR/2017/1690/P (July 2017).

¹⁷ Including on appeal to the Planning Inspectorate – Appeal reference APP/U1430/W/17/3187514 (decision June 2018).

4. Financial Gain from the Development

4.1 Cost of the Development

The cost of the development¹⁸ is as follows.

4.1.1 Barn Build Cost

The building of the new barn involves:

- frame, stanchions, rafters and purlins;
- plastic coated steel roof sheets and walling; and
- corner trims, flashing etc.

The cost of the build (labour and materials) has been quoted at £18,900 (ex VAT).¹⁹

A copy of the quotation is included in Appendix C.

4.1.2 Earthworks – Barn Base and Grazing Land Improvement Costs

The costs involved with the agricultural improvement works have been calculated in the previous WRP (Table 1). A copy of Table 1, and the Non-waste Material Supply Agreement (previous WRP Appendix 6) are provided in Appendix C of this report. The cost of importing non-waste materials to site for infill is estimated at £42,042²⁰ (including haulage and VAT). With labour and fuel (diesel) costs²¹ adding £51,000 and £19,278 respectively.

4.1.3 Overall Cost of the Development

This puts the development cost at:

Table 1: Cost of development

Cost of Development	££
Barn Build	18,900
Non-waste fill material import	42,042
Labour costs	51,000
Diesel costs	19,278
Total	131,220

Prices are inclusive of VAT where relevant.

4.2 Financial Gain from the Development

4.2.1 Land Value

The uplift in land value following the works has been assessed at £150,000²² (rising to a value of £1m following the works, from a current valuation of £850,000). A copy of the valuation letter has been included in Appendix C.

¹⁸ Relating to the earthworks required for agricultural improvement.

¹⁹ Carley Construction Ltd. to Mrs T Sone – Works: To construct agricultural storage barn 25m x 15m, 05/07/2021.

²⁰ Cost based on the required infill volume (16,350m³) x1.5 (to account for loose volume in transport to be imported).

²¹ 2No. operatives and 13 tonne excavator (for 60 weeks).

²² Campbell's Estate Agents to Mrs T Stone Re: Sweethayes Farm, London Road, Hurst Green, East Sussex, TN19 7PS, 21 July 2021.

Mrs Stone is the life tenant of the property. The landowners are her three daughters, to whom the farm is in trust. The family jointly stand to benefit from the uplift in land value in the long term.

4.2.2 Annual Revenue

The business proposal for the Hereford cattle is a joint venture between Mrs Stone and her daughter (Cindy Carley) who also owns a smallholding and meat supply business (Breed Valley Meats). These parties will be funding the works. Ms Carley has cattle at her smallholding and wishes to expand to the land at Sweethayes Farm.

An annual income of around £34,700²³ is estimated to be expected from a herd of 25 Hereford heifers through the sale of calves.

The income over a 10 year period can be projected. Based on a calculation including an outlay of £10,000 initially for the cattle breeding stock (25 heifers at £400 each) (ref. previous WRP Table1), and annual costs. The annual cost for the herd will be winter feed costs, estimated at £2,280 annually. Other costs will be associated with the meat supply business and not with the keeping of this herd, for example Ms Carley has a bull at the small holding that will be used for stud, and vet bills etc. will be paid through Breed Valley Meats.

The projection presented in Table 2 (below) is based on completion of the development in year 1, seven years of calves sales and with the assumption of land sale²⁴ after 10 years.

²³ Beyond Wate Ltd. – Sweethayes Farm Waste Recovery Plan v1.1 29.10.2020 (section 3.14, Table 1, Appendix 9).

²⁴ There is no known intent to sell the land within this timeframe, it is for demonstration purposes only.

Table 2: Revenue from the development over 10 year period

££	Year 1 completion of development ²⁵	Year 2 cattle purchase	Year 3 calves sale	Years 4 calves sale	Year 5 calves sale	Year 6 calves sale	Year 7 calves sale	Year 8 calves sale	Year 9 calves sale	Year 10 property sale (uplift in value)
Cost	131,220	10,000	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	
Balance (income)			32,420	32,420	32,420	32,420	32,420	32,420	32,420	150,000
Subtotal (income accrued)	-£131,220	-141,000	-108,580	-76,160	-43,740	-11,320	21,100	53,520	85,940	150,000
Total financial gain 10 years from development										£235,940

A steady profitable income from the land is anticipated 5 years following completion of the development. The ongoing use is understood to be the intention for the land. However, the landowners would stand to make a profit (in excess of £18,000) if the land were sold immediately following completion of the development.

²⁵ The development project is estimated to take 60 weeks.

5. Control of Pollution

5.1 Soil Erosion

The method used to create the agricultural improvement area ensures the groundworks are secure and stable, including:

- stepped working platforms and keying in of the infill material to the existing land; and
- placing of the material in layers (approximately 0.3m).

It is in the contractors interests to create good quality ground and they are experienced in agriculture. The formation of the land will minimise the risk of slippage and erosion as far as possible.

In the EA's assessment of the previous WRP²⁶ a concern was raised about the compaction of soils deposited on the site, and potential detrimental impact on the ground's ability to drain, and to act as a growing medium. The laying of the soils using the method described (layering using a 13 tonne excavator) ensures the soils are built up in a stable manner.

The method requires approximately 1.5-2 tonnes of soil per m³ "in the ground". This is not a compaction exercise that would result in detrimental soil compaction of the nature that would cause problems with run-off or drainage and the growing ability of the soil. The inert material laid under the topsoil provides a stable and permeable support layer.

The RvD advice note and letter are provided in Appendix D for reference.

5.2 Flooding

The proposed development does not increase the risk of flooding to the valley and protected areas, by way of run-off or otherwise. The site is not identified as being in a flood zone or flood storage area²⁷.

5.3 Ancient Woodland

The areas of ancient woodland adjacent to the land are protected during and after the development by the area of retained woodland comprising:

- a 5m exclusion zone directly adjacent to the ancient woodland;
- a further 10m at the bottom of the slopes (this area will be used to store topsoil temporarily during the development before it is replaced on the agricultural improvement area (see site plans Appendix A)); and
- the graded banking.

This area of retained woodland provides enhanced protection to the ancient woodland, including from the risks of slippage and run-off.

Protected trees within the graded banking area are also identified (1No. English Oak, 1No. Sweet Chestnut). The protected trees are separated from the grazing area and protected against animal damage.

²⁶ Environment Agency – WRP Advice Letter and RvD Advice Form – ref. EPR/HB3900TY/A001.

²⁷ [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/flood-map-for-planning.pdf).

6. Conclusions

The uplift in land value following completion of the development using non-waste would give a net gain in value, immediately profitable if the land were sold, and cumulatively profitable if the land is utilised prior to sale. The project is an investment in the land and security for the family's future.

The development provides an improved and extended grazing area, for which there is a proposed business plan, indicated to return profit as an ongoing concern within 5 years of completion. The area of retained woodland following the development is better defined (graded banking and exclusion zone area), it is an asset in itself, and provides enhanced protection to the adjacent protected ancient woodland following the development.

Laci seek to use waste material for the infill as it is suitable for use and readily available in the area. It is considered that the use of waste soils amounts to waste recovery.



APPENDICES

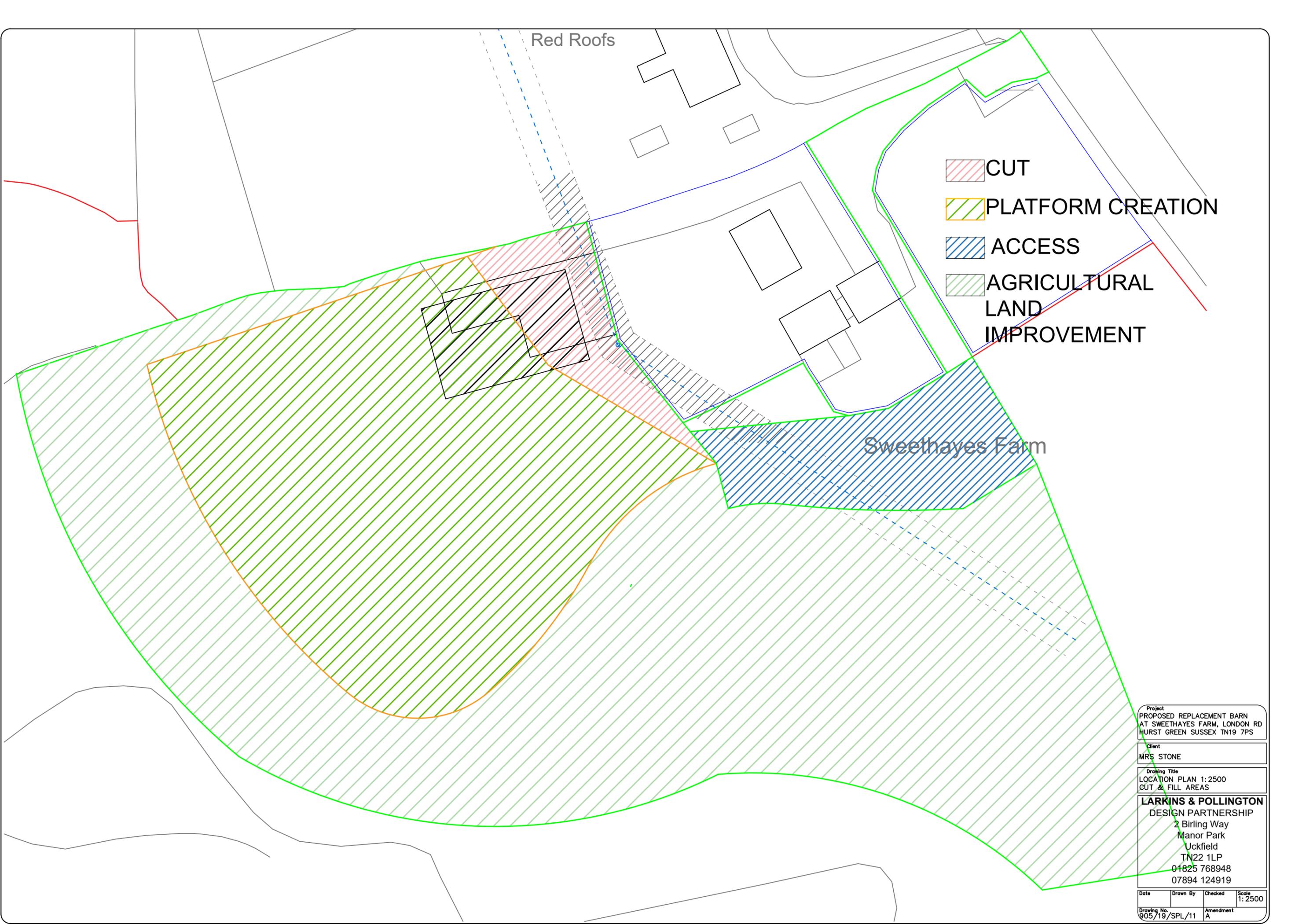
A. Site Plans

Site Layout Plan v1.0 (905/19/SPL/11)

Agricultural Improvement Area (905/19/SPL/23)

Sections (905/19/SPL/02C)

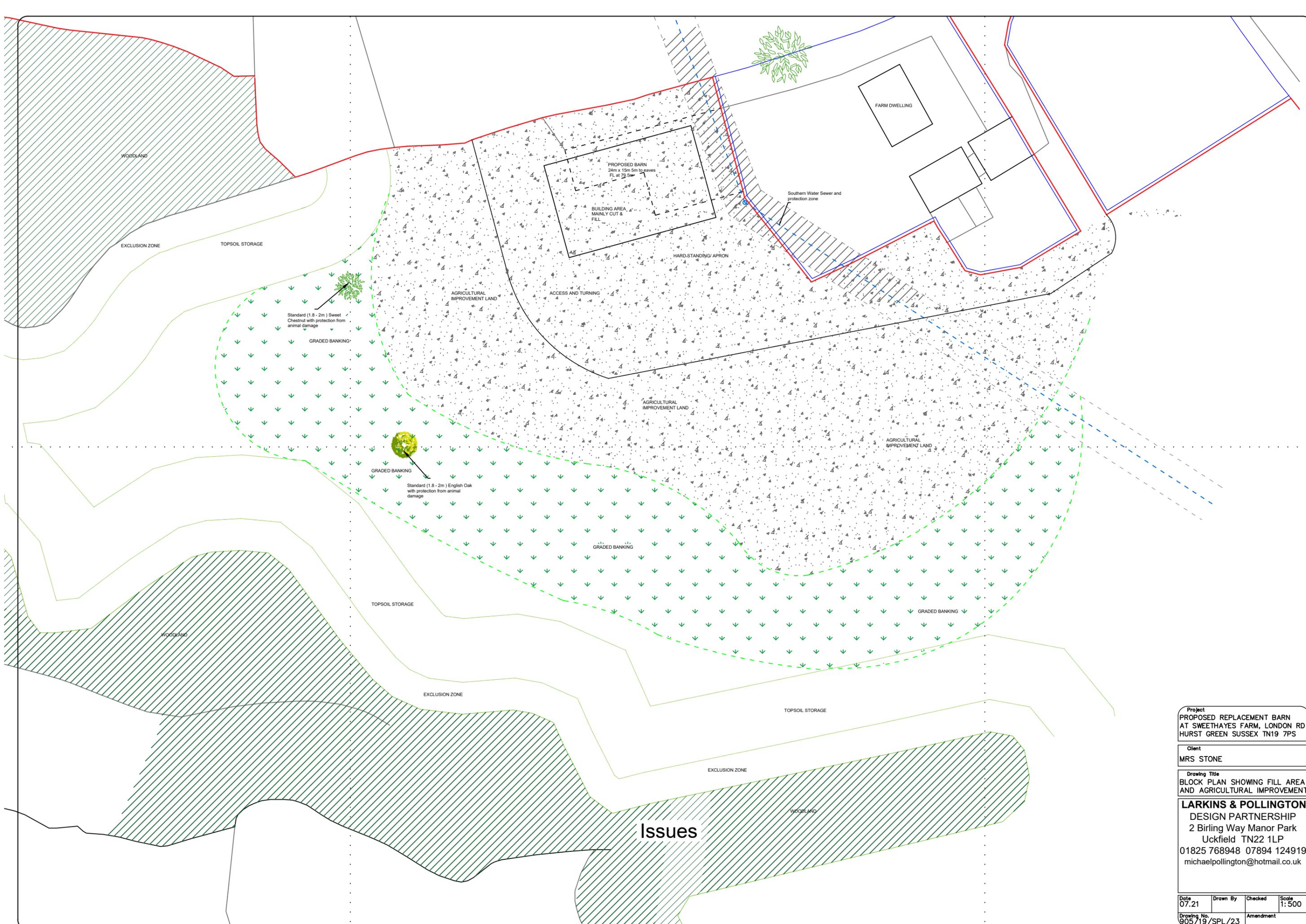
Sections (905/19/SPL/24)



-  CUT
-  PLATFORM CREATION
-  ACCESS
-  AGRICULTURAL LAND IMPROVEMENT

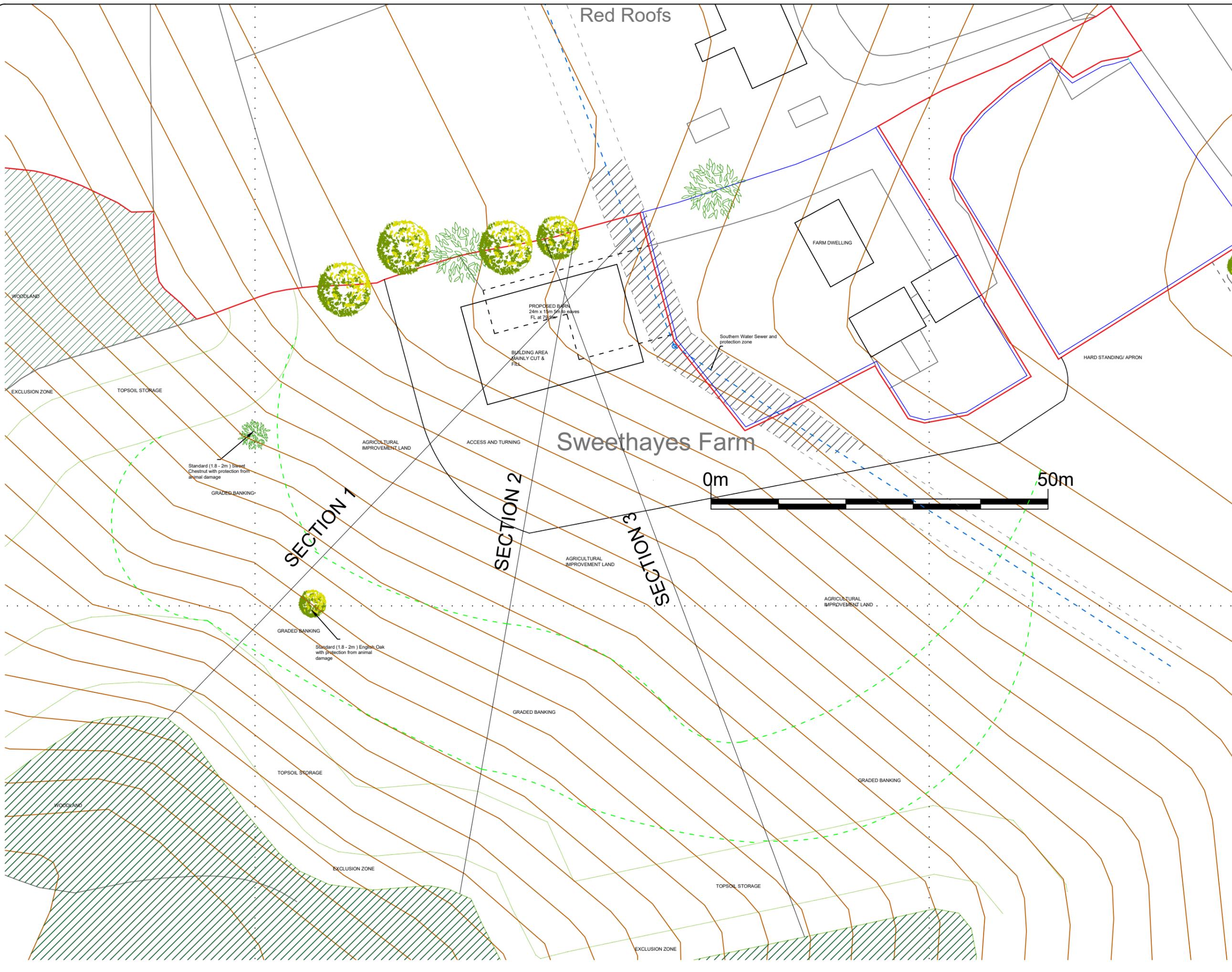
Sweethayes Farm

Project PROPOSED REPLACEMENT BARN AT SWEETHAYES FARM, LONDON RD HURST GREEN SUSSEX TN19 7PS			
Client MRS STONE			
Drawing Title LOCATION PLAN 1:2500 CUT & FILL AREAS			
LARKINS & POLLINGTON DESIGN PARTNERSHIP 2 Birling Way Manor Park Uckfield TN22 1LP 01825 768948 07894 124919			
Date	Drawn By	Checked	Scale 1:2500
Drawing No. 905/19/SPL/11	Amendment A		



Issues

Project			
PROPOSED REPLACEMENT BARN AT SWEETHAYES FARM, LONDON RD HURST GREEN SUSSEX TN19 7PS			
Client			
MRS STONE			
Drawing Title			
BLOCK PLAN SHOWING FILL AREA AND AGRICULTURAL IMPROVEMENT			
LARKINS & POLLINGTON			
DESIGN PARTNERSHIP			
2 Birling Way Manor Park			
Uckfield TN22 1LP			
01825 768948 07894 124919			
michaelpollington@hotmail.co.uk			
Date	Drawn By	Checked	Scale
07.21			1:500
Drawing No.	Amendment		
905/19/SPL/23			



Red Roofs

FARM DWELLING

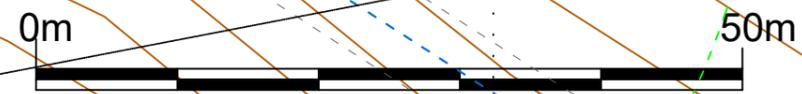
PROPOSED BARN
24m x 11m 560 joists
FL at 75.9m

BUILDING AREA
MAINLY CUT & FILL

Southern Water Sewer and
protection zone

HARD STANDING/ APRON

Sweetthayes Farm



SECTION 1

SECTION 2

SECTION 3

Standard (1.8 - 2m) Sweet
Chestnut with protection from
animal damage

Standard (1.8 - 2m) English Oak
with protection from animal
damage

C	Section Lines added	07.21
B	Trees to planning requirements	06.19
A	Amended to planning & Client	06.19

Project
PROPOSED REPLACEMENT BARN
AT SWEETHAYES FARM, LONDON RD
HURST GREEN SUSSEX TN19 7PS

Client
MRS STONE

Drawing Title
BLOCK PLAN 1:500
ELEVATION 1:200

LARKINS & POLLINGTON
DESIGN PARTNERSHIP
2 Birling Way Manor Park
Uckfield TN22 1LP
01825 768948 07894 124919
michaelpollington@hotmail.co.uk

Date	Drawn By	Checked	Scale
			1:500

Drawing No.	Amendment
905/19/SPL/02	A B C



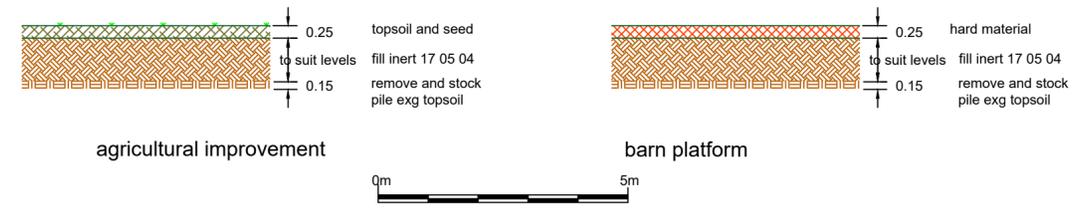
SECTION 2



SECTION 1



SECTION 3



Project
PROPOSED REPLACEMENT BUILDING AT SWEETHAYES FARM AND HURST GREEN SUSSEX

Client
MRS STONE

Drawing Title
SECTIONS 1:200
DETAILS 1:100

LARKINS & POLLINGTON
 DESIGN PARTNERSHIP
 2 Birling Way Manor Park
 Uckfield TN22 1LP
 01825 768948 07894 124919
 michaelpollington@hotmail.co.uk

Date	Drawn By	Checked	Scale
			1:200
Drawing No. 905/19/SPL/24		Amendment	



B. Current Site Condition

Barn Survey

Laci Statement



31/07/21

Examination of existing pole barn at Sweethayes Farm.

Planning permission has been granted to Mrs T Stone at Sweethayes Farm, London Road, Hurst Green, TN19 7PS on the 7/05/2021 by Rother council planning department, allowing for the replacement of the existing sub-standard pole barn for a more suitable purposed built barn that can house both cattle and farm machinery.

The existing pole barn is over 30 years old and has weathered badly. The roof is made of asbestos sheeting which leaks (see images 1 to 4). As the asbestos disintegrates, parts and particles could fall into feed or feeding areas making it unsafe to store feed or shelter animals. This makes the existing barn unfit for housing animals.



(Images 1-4)

Barn Surface

The ground surface of the pole barn floor is dirt based and has become uneven with ruts that would require addressing, adding to the cost of maintaining the barn this has deemed uneconomical (see Image 5).



(image 5)

Location of sewers

At present the pole barn sits on top of the main sewers, the revised planning has taken this into account, the new suggested location for the barn will be clear of the sewers. (see image 6)



(image 6)

Roof profile angle

The existing barn roof is wedge shaped (see images 7, 8, 9) with the north facing open entrance standing at four meters reducing down to two meters on the southern end, rear of the barn, this reduces the effectiveness of the barn to store farm machinery such as tractors that need over two meter clearance to operate safely within the barn. This also limits future development of Sweethayes farm if larger farm machinery is requires to carry out daily duties. This also limits future development of Sweethayes farm if larger farm machinery is requires to carry out daily duties.



(images 7, 8, 9)

Over conditions of existing pole barn

The walls are predominately made up of asbestos sheets that are damaged or missing. Overall the barn is in poor condition (see images 10, 11,12)



(images 10, 11,12)

The electrical fittings are in a dangerous state and has been isolated (see image 13) for safety reasons. The barn requires a complete rewiring.



(image 13)

The external profile of the barn offers very little shelter to both animals and farm machinery, with vast areas fully open to the elements (see Images 14, 15, 16)



(images 14,15,16)

Conclusion on existing pole barn.

That cost of upgrading the barn to meet the needs of modern farm machinery and periodically sheltering of animals would far out-way the cost of simple replacement. There would also be a frequent need for maintenance as older parts of the barn that at present are salvageable but have a short life span. This would include the wooden barn frame which will need sections replacing within the next five to ten years. Maintenance on this scale would potentially require the removal of sections of roof and walls to gain access to the areas requiring repair.

The roof would have to be raised to accommodate the height of the farm machinery and the majority of the wood roofing structure replaced. All asbestos from roof and walls will also have to be removed.

Flooring of the barn requires work to make it a flat workable surface for both Farm machinery as well as animals.

New proposed barn.

The new proposed barn would be built as to accommodate the height of modern farm machinery with the walls able to create suitable shelter. New electrics would be installed to meet the required safety standard.

Confirmation of a safe gradient for livestock and vehicles/machinery.

(Waterman's briefing notes section 3.2 bullet 2/2.4)

Researching the safe gradient for livestock and plant machinery to be used on Sweethayes Farm has lead Laci to believe that anything over a 15 degree incline would prove detrimental to both plant operators and machinery with an increased danger to livestock.

Livestock

The owners of Sweethayes Farm are planning to introduce cattle onto its lands once the project is complete. In particular the Hereford breed, due to the breed producing high quality meats.

The Herefords are a large breed of animal with an average weight of 450 Kg to 550 Kg for a cow with bulls averaging 750 Kg to 850 Kg (Traditional Hereford, 2021). The Hereford breed is susceptible to extreme environments and not suitable to be left to fend for themselves in sudden climate change (Hereford Cattle Advantages and Disadvantages, Facts, Price, 2021), this is one of the reasons for the need for a barn.

As the barn is on a steep incline, this will potentially be dangerous for both the animals and farmers when needed to drive the herd to the barn, especially in harsh weather conditions. An example of this happened to the owner of Sweethayes Farm when a Hereford lost it's footing and the animal slid down a gully sustaining a back injury, which resulted in the animal requiring veterinary attention and the farmer incurring substantial costs.

Plant Machinery

At present, Sweethayes Farm has a *New Holland T4* tractor and a small *John Deere Gator crossover utility vehicle* to assist in running of the farm, both which are unsuitable for the present incline to reach the barn were the machinery is to be stored.

Replacing the machinery to cope with the incline to the barn and still carry out the standard daily duties the current plant is tasked with, would incur a large financial loss of up to £59,312 with no gain in productivity.

The figure of £59,312 was reached by using the price of a good secondhand, 2018, *New Holland T4* tractor at a cost of £29,889 In-text: (2021) then adding 25% for an upgraded tractor suitable for working on steep incline which equates £7,500 making the tractor price around £37,500. Also the same formula was used for a good secondhand *John Deere Gator crossover utility type* vehicle In-text: (2021) at £17,450 adding 25% for upgrade £4,362 make a price of £21,812. In total £59,312

There is also the issue of safety for operator/s and the inevitable damage resulting if the machinery should topple. After talking with a *New Holland* dealership they felt that a *New Holland T4* would be unsuitable for steep inclines. The possibility of injury and/or damage to operator/s and plant machinery multiplies when carrying load up or down an incline, hence the fundamental need for even drivable ground.

In-text: (2021)

Kind Regards
Steven Kilmartin

Reference

Rare Breeds Survival Trust. 2021. *Traditional Hereford*. [online] Available at: <<https://www.rbst.org.uk/traditional-hereford>> [Accessed 26 July 2021].

Sheepadoodle.info. 2021. *Hereford Cattle Advantages and Disadvantages, Facts, Price*. [online] Available at: <<http://www.sheepadoodle.info/2019/11/Hereford-Cattle-Pros-and-cons-Advantages-Facts-Price.html>> [Accessed 26 July 2021].

2021. [online] Available at: <<https://www.agriaffaires.co.uk/used/farm-tractor/1/4046/new-holland/t4.html>> [Accessed 27 July 2021].

<<https://www.farmmachinerylocator.co.uk/listings/farm-machinery/for-sale/list/category/1171/motorsports-utility-vehicles>> [Accessed 27 July 2021].



C. Financial Evidence

Barn Build Costs

Land Valuation Letter

Beyond Waste WRP Table 1

Non-waste Material Supply Agreement (Beyond Waste WRP appendix 6)

Beyond Waste WRP appendices 7, 8 and 9



Carley Construction LTD
Frymans Cottage
Frymans Lane
Broad Oak, Brede
East Sussex TN31 6AH
Email; info@carleyconstructionltd.com
Phone; 01424 883198

05/07/2021

Mrs T Stone

Sweethayes Farm

Hurst Green

TN19 7PS

Works:

To construct agricultural storage barn 25 x 15m .

Lay 200mm chalk base floor

Frame to be 203 x203 uc46 stanchions @ 6250mm open span , rafters to be 203 x 133 uc30.

Stanchions to be resin bolted with M16 bolts 4no into 20mm x300 x300mm base plates .

2 purlins 170mm steel bolted to rafters using 6mm cleats.

Plastic coated green steel roof sheets fixed to purlins with s/ steel fixings , closed in walling to be plastic coated green steel sheets fixed to 150mm c section purlins bolted to stanchions using 6mm cleats.

Corner trims and ridge flashing to match roof/wall sheets.

Total Labour and Materials : £18,900.00 + vat

Kind Regards

Wayne Carley

VAT NO. 725251845

Campbell's Estate Agents
74 High Street, Battle
East Sussex TN33 0AG

telephone: 01424 774774
email: info@campbellsproperty.co.uk
web: campbellsproperty.co.uk
registered no: England 06614389



Mrs T Stone
Sweethayes Farm,
London Road,
Hurst Green,
East Sussex, TN19 7PS.
Email: info@carleyconstructionlimited.com

21 July 2021

Ref.JAM.SMP

Dear Mrs Stone,

Re: Sweethayes Farm, London Road, Hurst Green, East Sussex, TN19 7PS.

Further to your recent instructions and our meeting at your above property I have now had the opportunity of considering the works that are proposed and write to confirm my opinion of where the value currently lies and where the value will be when once the works are completed.

Sweethayes Farm is a detached single storey property that provides spacious accommodation that is generally well presented with three/four bedrooms. The property sits on a level section of ground that is elevated, fronting the A21, with a wide vehicular access. There are two old farm buildings to the side of the bungalow and to the rear a large barn that is currently run down.

I understand you are seeking approval to replace the run down barn with a more substantial farm building to aid your farming needs whilst also re-modelling the undulating nature of the land that falls away from the barn. This will need significant ground brought to the site to create a more level and manageable area.

I would suggest the current value of the property falls in the region of £850,000 (Eight Hundred and Fifty Thousand Pounds) but once the proposed works are completed I would suggest the value will rise to £1,000,000 (One Million Pounds).

I appreciate at this stage you have no immediate plans to sell but I hope this gives you the information you require but if I can be of any further assistance I look forward to hearing from you.

As Battle's longest established agent we pride ourselves on our high level of professional service in the Battle and surrounding areas. We have an experienced team and our prime High Street office is open six days a week. We advertise on a regular basis in the local property section of Rye, Battle, Bexhill and Hastings Observer newspapers. In addition we also take advertisements in the Kent and Sussex Courier, Sussex Express and Wealden Advertiser.



We are also represented by:
The London Office, 40 St James's Place, London SW1A 1NS
telephone: 0207 8390888

Registered Company Address:
91-97 Bohemia Road,
St. Leonards-on-Sea,
East Sussex TN37 6RJ

We have an associated London office at St James's Place where your property will be available. In addition, all our properties appear on the Internet through our dedicated website, the London Office's website, Rightmove, On The Market, Zoopla, Primelocation and Find-a-Property all of which are updated on a daily basis. It is our experience that 75% of our enquiries and sales originate through our website, and we would invite you to inspect our various sites at your leisure. You may also be interested to know that according to Rightmove's official statistics, Campbells have agreed sales on more properties in the local area than any other agent.

We are aware that some estate agents will offer discounted fees in order to attract business. We therefore take the stance that we will never be undercut for a like for like service and so will always be happy to discuss our fee in more detail with you, when you are ready to move.

HIPs (Home Information Packs) are currently suspended, but we are still required to procure an EPC (Energy Performance Certificate), which we can arrange on your behalf.

I would very much value the opportunity of marketing your property and look forward to hearing from you in due course. Should you have any questions please do not hesitate to let either myself or a member of my staff know, when we should be only too pleased to assist. I am very confident that we have a number of people who will be interested in the property.

Yours sincerely



Justin May
Managing Director
CAMPBELL'S ESTATE AGENTS

Beyond Waste for Laci Land Restoration Ltd

Table 1 Breakdown of the costs involved in importing 24,500m³ of non-waste material

Element & unit	Value
Material Required (m ³)	24,500
Cost per m ³ (£) (Evidenced in Appendix 6)	1.43
Total cost (£)	35,035
Total Cost Non-Waste Material (£) (including VAT) *	(a) 42,042
Purchase cost of 1 Calf (£) (Evidenced in Appendix 7)	400
Number of Heifers Purchased	25
Total Cost of Calf Purchase (£)	(b) 10,000
Red Diesel Required (litres)	36,000**
Cost per litre (£) (Evidenced in Appendix 8)	0.51
Total Cost (£)	18,360
Total Red Diesel Cost (£) ** (Plus 5% VAT)	(c) 19,278
Staff Costs (£) ***	(d) 51,000
Cost of additional feed to fatten the calves in winter per year	(e) 2,280
Total Cost (£)	(a+b+c+d+e) = 124,600

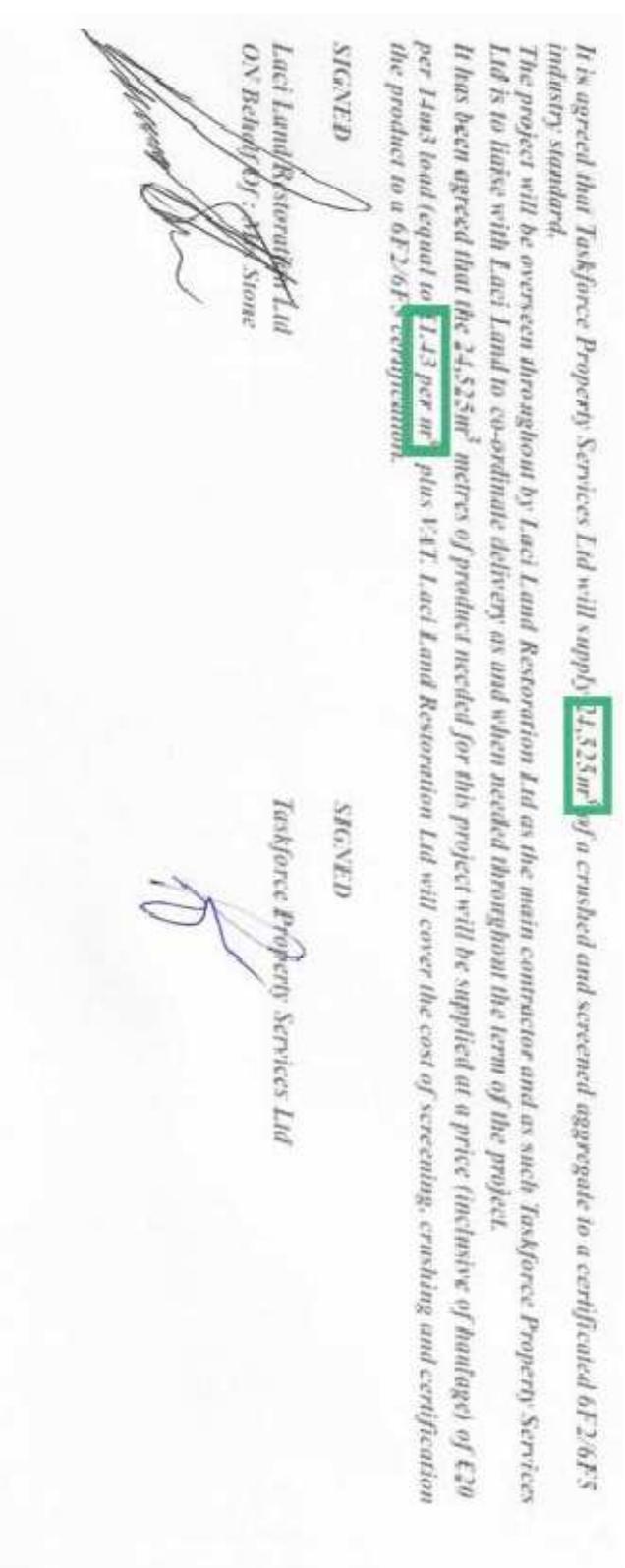
* As per the supply agreement (Appendix 6) haulage of the material to the Site would be included in the material cost.

** It is estimated that approximately 600 litres per week of red diesel will be required throughout the duration of the project. The project is expected to last 60 weeks. Total red diesel costs = 600 x £0.41= £246 per week. £246 x 60 = £14,760. Plus 5% VAT = £19,278

*** Staff wages (for two staff members) are £170 per day. This scales up to £850 per week. The project is expected to last 60 weeks. Staff wages = £850 x 60 = £51,000.

Beyond Waste for Laci Land Restoration Ltd

Appendix 6 Non-Waste Material Supply Agreement



Beyond Waste for Laci Land Restoration Ltd

Appendix 7 Cost of Cattle Purchase

Gaddie Partners
Goatham Farm
Brede:
Rye:

28TH OCTOBER 2018

BILL TO
Name
Brede Valley Meats
Brede valley farm
brede.

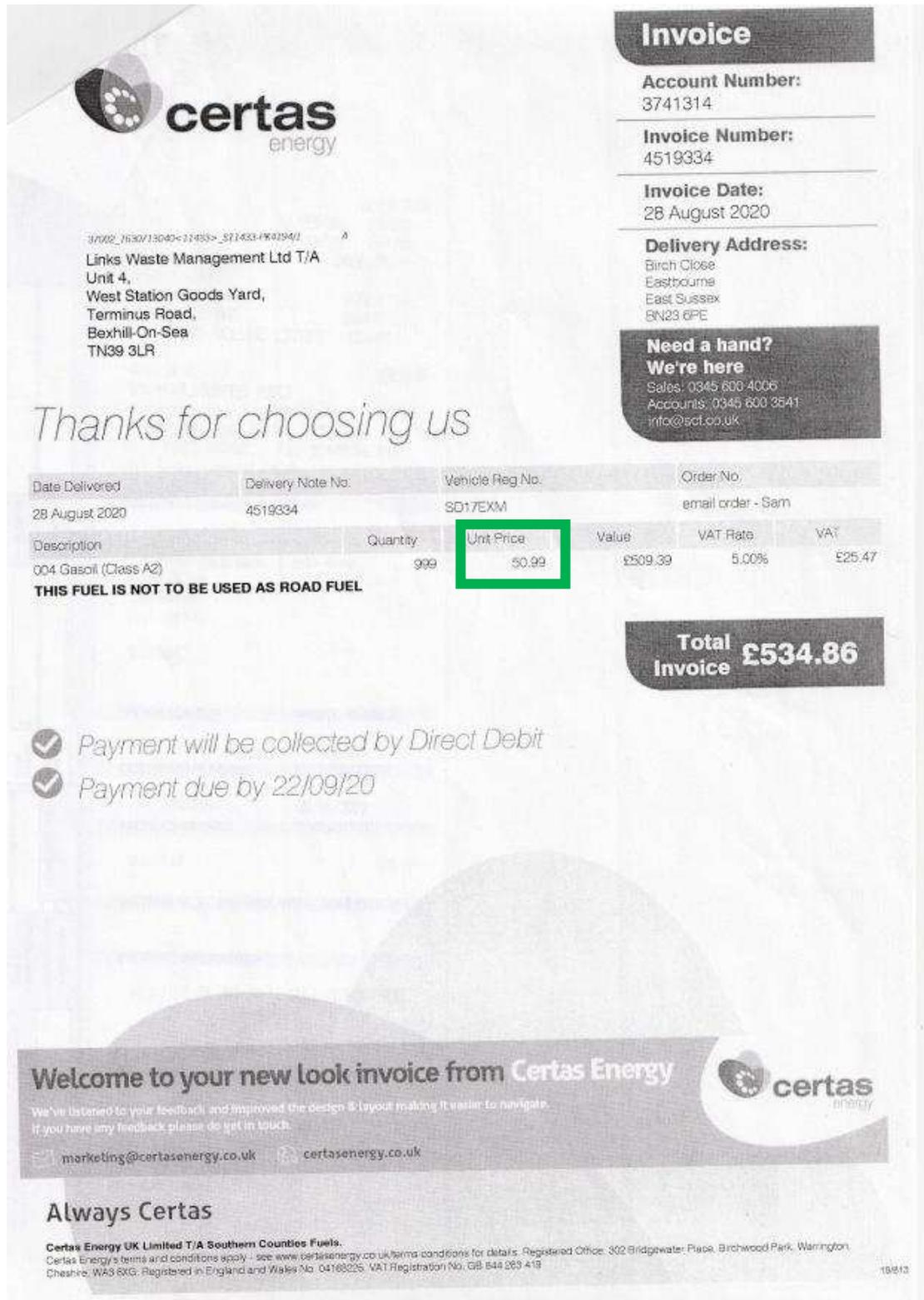
QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL
1 pure Sussex heifer	Calf uk262752300093	£400.00	
1 pure Sussex heifer	Calf uk262752600096	£400.00	

SUB-TOTAL	£800.00
SALES TAX	0.00
SHIPPING & HANDLING	0.00
TOTAL DUE BY DATE	£800.00

Thank you for your business!

Beyond Waste for Laci Land Restoration Ltd

Appendix 8 Red Diesel Cost



certas energy

37002_7630713040-114935>_521433-1749194/

Links Waste Management Ltd T/A
Unit 4,
West Station Goods Yard,
Terminus Road,
Bexhill-On-Sea
TN39 3LR

Invoice

Account Number:
3741314

Invoice Number:
4519334

Invoice Date:
28 August 2020

Delivery Address:
Birch Close
Eastbourne
East Sussex
BN23 6PE

**Need a hand?
We're here**
Sales: 0345 600 4006
Accounts: 0345 600 3541
info@sct.co.uk

Thanks for choosing us

Date Delivered	Delivery Note No.	Vehicle Reg No.	Order No.
28 August 2020	4519334	SD17EXM	email order - Sam

Description	Quantity	Unit Price	Value	VAT Rate	VAT
004 Gasoil (Class A2)	999	50.99	£509.39	5.00%	£25.47

THIS FUEL IS NOT TO BE USED AS ROAD FUEL

Total Invoice £534.86

Payment will be collected by Direct Debit
 Payment due by 22/09/20

Welcome to your new look invoice from Certas Energy

We've listened to your feedback and improved the design & layout making it easier to navigate. If you have any feedback please do get in touch.

marketing@certasenergy.co.uk certasenergy.co.uk

Always Certas

Certas Energy UK Limited T/A Southern Counties Fuels.
Certas Energy's terms and conditions apply - see www.certasenergy.co.uk/terms-conditions for details. Registered Office: 302 Bridgewater Place, Birchwood Park, Warrington, Cheshire, WA3 6XG. Registered in England and Wales No. 04168225. VAT Registration No. GB 844 263 419

19/8/13

Beyond Waste for Laci Land Restoration Ltd

Appendix 9 Evidence of Predicted Revenue Generated by Cattle Sale

INVOICE

Brede Valley Meats

Frymans Cottage

Frymans Lane

Brede

TN316HA

26th august 2020

Archers of Westfield

Belle View

Westfield

TN354QE

Supplied 1 Heifer 180kg & 180kg

£4.60 per kg

Delivery £24.00 (inc vat)

Invoice Total £1680.00

Many Thanks

Cindy

Bank Details: Sort: 600207 Account: 59600861



D. EA Previous RvD Assessment

Advice Letter

RvD Advice Form

Mr Daniel Stone & Mr Steven Kilmartin
(cc Mr Matt Mehegan)
Laci Land Restoration Ltd
Unit 2.02 High Weald House
Glovers End
Bexhill
East Sussex
TN39 5ES

Our ref: EPR/HB3900TY/A001

Date: 10 May 2021

dans@jmwastemanagement.co.uk
steven_kilmartin@yahoo.co.uk
matt.mehegan@watermangroup.com

Dear Sirs

Environmental Permitting – Recovery or Disposal Operation

Application Reference: EPR/HB3900TY/A001
Proposed Operator: Laci Land Restoration Ltd
Regulated facility: Sweethayes Farm
Site Address: London Road, Hurst Green, TN19 7PS

As part of your application for an environmental permit, you have submitted information to us that includes your assessment that the activity you wish to undertake at your site amounts to a recovery operation.

We have now fully considered your submission and we would like to advise you that:

We do not agree with your assessment that your activity is a recovery operation for the following reasons: Not enough evidence has been provided to support the case that the proposed activity is a recovery operation and therefore we cannot confirm that this is a recovery operation. Please see the advice sheet for further information.

You may still apply for a recovery permit, however if you are unable to provide further evidence that supports your claim that the activity is a recovery operation, then the application is likely to be refused. If this happens you will lose your application fee. If your application is refused you have the right to appeal that refusal.

If you have any questions please email me at daniel.makeham@environment-agency.gov.uk.

Yours sincerely

Dan Makeham
Permitting Officer - Waste regime
Environment Agency

RvD Advice Form

Name of permitting officer (RvD assessor)	Dan Makeham
EPR and EAWML References	EPR/HB3900TY/A001 EAWML 406570
Name of the proposed operator	Laci Land Restoration Limited
Name of the site	Sweethayes Farm
Document reference for the submitted waste recovery plan	Waste recovery plan V1.0 Schedule 5 response 15/03/2021 Email response 01/04/2021 Email from applicant 29/04/2021

Consideration of Recovery

Is the waste being used as a substitute for non-waste material?

Has the applicant confirmed that if they could not use waste, they would complete the proposed works in the same way with non-waste materials?

Our guidance includes some factors they can use to show they would carry out the scheme using non-waste:

- 1. Financial gain by using non-waste materials**
- 2. Funding to use non-waste (not-for-profit organisations)**
- 3. Obligations to do the works**

They must provide a clear justification, with evidence, to demonstrate that they would do this.

No. The applicant has attempted to demonstrate that the waste is a substitute material, using financial gain with non-waste materials. The applicant has not demonstrated their expected income and capital gain - for instance, it is not clear what capital gain will be made from the sale of livestock. The applicant has also failed to demonstrate that they have considered all the costs of generating future income and any capital gain. This should include all costs of carrying out the work with non-waste, and any ongoing operating costs, such as the costs of livestock (for instance, breeding animals), rearing of the livestock, staff costs.

The applicant has stated that the company completing the works will do so at cost. We must consider that a company completing works at cost will still benefit from the completion of the work, such as a preferable route for disposal of waste generated from activities elsewhere. The applicant has not demonstrated that the scheme is commercially viable at market rate. They have also not included the cost of removing waste already imported on site, which has been temporarily deposited in order to facilitate the proposed scheme. The removal of this temporary deposit of waste should be accounted for when assessing the cost of the overall scheme.

Further, in relation to the financial benefit, the applicant has submitted a quote which they refer to as being for non-waste material. This quote does not clarify that the material referred to, which includes recycled/treated material, is a non-waste material.

The applicant has used later correspondence to justify their requirement for a recovery permit by stating that should the permit not be granted, their business faces “substantial financial hardship if not ruin, along with the impact this would have on the owners of Sweethayes Farm!” This statement indicates that the proposal is not a recovery activity, as should the permit not be granted, it will not be possible, nor financially viable, for the applicant to carry out the works with non-waste material.

The applicant has not demonstrated that they could and would carry out the works using non-waste.

Is the material suitable for its intended use?

Has the applicant listed the waste types that they intend to use with an appropriate EWC code and description?

The waste types must be physically, chemically and biologically suitable for the works they are proposing (see Appendix 2).

The waste types proposed by the applicant are the same as those included in our standard rules set for this activity (SR2015 No39), with “a rigorous waste acceptance procedure”. These waste types are suitable for the work provided and in accordance with our recovery criteria.

Please note that further assessment of the proposed waste types based on the sensitivity of the site location is carried out as part of the permit determination. ‘Recovery vs. Disposal’ assessment considers what waste types may be suitable, not what waste types will be deemed suitable following technical assessment.

What is the purpose of the works?

Has the applicant clearly described the function of their proposed scheme and shown that they are carrying it out to meet a genuine need?

They must explain the need or driver for this function and provide evidence to demonstrate that the function will be delivered by the proposed works, and the extent of the resultant benefits.

The scheme is to create a platform for a barn to house livestock, and for the re-profiling of an adjacent field to provide pasture for the animals. The applicant has not demonstrated that these proposals are commercially or otherwise worthwhile and therefore we do not determine that the scheme meets a genuine need.

Further, there is no evidence in support of the fact the works are required to improve the safety of the land.

Is the minimum amount of waste being used to deliver the function?

Has the applicant confirmed, and provided justification with evidence, that they only intend to use the minimum amount of waste necessary to carry out the intended function that would otherwise be provided by non-waste? Have they considered

alternative proposals that could use a smaller amount of waste to achieve the same function?

They must include the quantity of waste they intend to use in volume (m³) and tonnage and detail how they have calculated that figure, plus provide plans and cross-sections showing original and planned final levels.

The applicant stated that the land needs to be improved for safety reasons in order to facilitate the rearing of cattle and to provide a sufficient footprint as a development platform for a new barn. There is no evidence of how this assessment was undertaken, nor how the works will result in the necessary improvements. The applicant has provided cross sections detailing how they propose to restore the site, but have provided no analysis from an appropriately qualified person to demonstrate the necessity of this requirement and design. Alternatively we could consider the input of planning on this matter, however there is no approved planning permission at this time.

Will the proposal meet a quality standard?

Has the applicant demonstrated how the scheme will be designed and constructed to be fit for purpose?

They must describe the construction methods and/or standards that will be followed to ensure that the **proposed operation will be finished to an appropriate standard, so that the function will be delivered**

The applicant has indicated that compaction of deposited waste will be required throughout the site (section 3.18 of their Waste Recovery Plan). The applicant has not demonstrated why this is required for material being brought to site to improve agricultural land. If the material is over-compacted, there is a risk this could have a detrimental impact on the ground's ability to drain, and to act as a growing medium. The applicant has not demonstrated how they propose to mitigate this risk or why the compaction of waste is appropriate in this case.

It is not clear what standards will be used to ensure the materials are suitable in composition and through placement to function as a development platform.

The applicant has also failed to demonstrate that the proposal will not result in environmental problems such as soil erosion, pollution, and increased risk of flooding in the surrounding area. This is particularly pertinent in this case due to the steep gradient at the site and the neighbouring hydrological features.

Additional comments

ADVICE: DISPOSAL

We do not agree with the assessment that this operation is a recovery activity. We do not consider that the proposal meets the recovery test as defined in the Waste Framework Directive and outlined in our guidance.

Appendix 1

Supporting evidence

- Waste recovery plan V1.0 (received 29/10/2020)
- Schedule 5 response (received 15/03/2021)
- Email response (received 01/04/2021)
- Email from applicant (received 29/04/2021)

Appendix 2

Waste types to be deposited

Waste code	Description	Typical uses and criteria (see key)
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS	
01 01	wastes from mineral excavation	
01 01 02	wastes from non metalliferous excavation	A, B, E, F
01 04	wastes from physical and chemical processing of non-metalliferous minerals	
01 04 08	waste gravel and crushed rocks other than those containing dangerous substances	A, B, E, F
01 04 09	waste sand and clays	A, B, E, F
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	B, E, F
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)	A, B, D
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	10 13 14
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	
17 01	concrete, bricks, tiles and ceramics	
17 01 01	concrete	A, B, D
17 01 02	bricks	A, B, D
17 01 03	tiles and ceramics	A, B, D
17 01 07	mixtures of concrete, bricks, tiles and ceramics	A, B, D
17 03	bituminous mixtures, coal tar and tarred products	
17 03 02	road base and road planings other than those contained in coal tar	D 4

Waste code	Description	Typical uses and criteria (see key)
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil	
17 05 04	soil and stones	A, B, E, F ³
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE	
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) from the treatment of waste aggregates that are otherwise naturally occurring minerals - excludes fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.	A, B ⁷
19 12 12	soil substitutes other than that containing dangerous substances only	E, F ⁹
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	soil and stones	A, B, E, F

Key to table codes

A. Structural fill for building, stabilising ramps, drainage, road construction.

B. Construction of noise bunds, screening bunds, flood defence bunds, containment bunds, golf courses. Landscaping associated with construction work. Restoration of mineral workings. General fill material.

C. Surface treatment of roads, tracks etc. Drainage.

D. Road/track construction and repair, hard surfacing, car parks etc.

E. Agricultural improvement schemes.

F. Ecological improvements, wetland schemes, lakes

1. Only shellfish shells from which the soft tissue or flesh has been removed.

2. The PFA/FBA/IBA must meet the relevant civil engineering standards for use.

3. If non inert, or where there may be contamination, you must sample and analyse the waste. You may need to carry out an environmental risk assessment to determine if material is suitable for locations where groundwater and/or surface waters could be affected. The Environment Agency will consider this when determining your permit application.

4. Bituminous road planings must not be deposited more than 2 metres deep.

5. Track ballast must be free from significant oil contamination.

6. You must remove water from dredgings before you can use them.
7. Excluding residual 'fines' from mechanical treatment of mixed waste at transfer stations.
8. You must characterise your waste against Environment Agency guidance WM3 to confirm that it is not hazardous waste. The Environment Agency will consider any risks this waste poses when determining your permit application.
9. [TGN EPR 8.01 'How to comply with your landspreading permit'](#) provides guidance on the meaning of soil substitutes.

UK and Ireland Office Locations

