

Natural Resources Wales permitting decisions

Waste Recovery Plan – recovery v. disposal assessment

Administrative details

EPR reference number	MB3390HF
Waste recovery plan (customer) ref:	1472r1v0515 Waste recovery plan
Applicant name	Riversee Limited
Facility/site name	Land adjacent to Herbert Road
Local area contact	Anthony Bruten
Assessing (permitting) officer	Hannah Loughlin
Date of assessment	11/06/15

Waste Recovery Plan details

Type of activity	Construction
Type of submission	Assessment at permit application stage
Linked to a previous submission?	Yes
Previous submission reference(s)?	HRWRP01

Annex 1: decision checklist

This checklist should be read in conjunction with;

- the waste recovery plan being assessed
- previous versions of that waste recovery plan (where relevant, and as referenced in the table below)
- Regulatory Guidance Note RGN13: Defining waste recovery - permanent deposit of waste on land.

The decision set out here is made in line with the standards set out in guidance document RGN13 Defining waste recovery - permanent deposit of waste on land.

A 'Yes' response confirms the information provided *does meet* the criteria in RGN13 and is considered recovery.

A 'No' response confirms the information provided *does not meet* the criteria in RGN13 and is considered disposal.

Aspect of the assessment	Justification/ Detail for decision	Recovery Yes / No
Is there a clear benefit from the activity?		
Is the proposed material being put to beneficial use?	Required to provide flood prevention/protection and facilitate the development of a former brown field site into a housing development	Yes
Is there certainty of benefit when the activity is completed?	Yes it will facilitate the development of the brown field site.	Yes
Is the quantity of waste proposed proportionate to the benefit?	The site needs to be raised to 9.8 metres AOD to meet with flood protection standards outlined in the planning process. The site size in total is 27,173 and taking into account of the variation in depth of the site and conversion factors the tonnage equates to 59,780 approximately	Yes
Does the level of benefit achieved warrant a large scale operation?	Medium scale operation and low risk.	N/A
Is the recovered waste material suitable for its intended use?		
Are the proposed wastes appropriate for the stated use?	Only soil is to be used derived from previous deposits already present on site and soil from other building sites of a similar nature.	Yes
Are the proposed wastes appropriate for the location?	Yes soil is already present at site.	Yes
Will the proposed waste result in unacceptable risk to the environment or human health?	No risk posed.	N/A
Are proposed wastes from contaminated sites clearly identified?	Waste will not from contaminated sites will not be being used and waste will be tested to ensure non contaminated waste is being used.	Yes
Is the waste specification comparable (physically and chemically) to the non-waste it's replacing?	Non waste soil would be used if waste soil was not available so it is a direct substitution.	Yes
Is the minimum amount of waste being used to achieve the intended benefit?		

Aspect of the assessment	Justification/ Detail for decision	Recovery
		Yes / No
The amount of waste is no more than what is needed to complete the scheme.	Based upon the site size, the variations in current depth on site and the final levels needed to meet the flood prevention requirement the amount of waste is what is required to complete the scheme.	Yes
Plans and cross-sections showing original and final levels.		Yes
Is the waste being used a substitute for a non-waste material?		
Likelihood of the activity taking place using non-waste materials.	If the use of waste to undertake this proposal was not permitted non waste material would be used to achieve the work.	Yes
Would the cost of importing non-waste materials make the activity unviable?	No the operator has stated that if waste cannot be used non waste will be used instead.	Yes
Is there a real need for the work to take place?	N/A	N/A
Will the proposal be completed to an appropriate standard?		
Has the scheme been designed to achieve the stated benefit?	As the scheme is for flood prevention it will be required to meet the criteria set out in its planning permission in relation to the flood prevention conditions. It has been designed to meet these requirements and all other relevant flood prevention requirements.	Yes
Has the scheme been designed to give effective and lasting benefit?	As the end use of the site is as a housing estate the scheme will be required to meet all relevant construction and building regulations.	Yes
Has the scheme been designed to prevent soil erosion, pollution or increased flooding to local area?	The scheme has been designed in an acceptable way as to prevent the risk of flooding at the site.	Yes

Decision

Based upon all the information provided and given the size of the site and the requirement to raise the levels to 9.8 metres AOD to meet with flood prevention requirements. The proposal is considered to be a recovery operation.