

Surrender of Permit at Race Farm, Newport Road, New Inn, Pontypool, NP4 0TP

Background Information/Guidance Notes

1. Enviresource Consulting Ltd, of 23 Plas-Y-Fforest, Fforest, Pontarddulais, Swansea, SA4 0TG act as agents for Mr Andrew Morgan of Race Farm in the surrender of his permit number EPR/GB3439DE.
2. Enviresource Consulting were appointed to review the current waste management practices at Race Farm midway through 2012. The appointment was made by, and funded by, WRAP Cymru under their interim management initiative.
3. At the time of the appointment, Race Farm already carried out aerobic composting of green waste albeit on a small scale. They operated on a consolidated hardcore base situated in a 15 acre field reference ST3097/2772.
4. This compost operation was permitted under a "Certificate of Existing Lawful Use of Development", application No. 07/P/150B6(E) approved on the 17th May 2007 – copy attached. This permission predates any subsequent exemption or permit applications and confirms that there was an existing green waste compost operation in place prior to Enviresource's involvement.
5. The Interim Management appointment of Enviresource in mid-2012 was to work with Race Farm in achieving the following:
 - (a) Ensure that all operations were compliant;
 - (b) To consider changes to working practices and improved facilities to increase compost volumes and look at the synergies of other similar practices;
 - (c) To look at opportunities to receive, shred and use grades A and B waste wood. To increase green waste inputs and to produce satisfactory topsoil by blending and maturing compost mixed with subsoil inputs;
 - (d) To design the compost slab and leachate collection system necessary for operation under the appropriate permit;
 - (e) To work towards Race Farm achieving PAS100 accreditation.
6. The following exemptions were registered on behalf of Race Farm;
 - Exemptions U1, U10 and T23 reference EPR/ZH0116HC/A001 on the 30th March 2012.
 - Exemptions T6 and U10 reference EPR/CH060FQ/A001 on the 7th March 2011.
7. Subsequently Enviresource applied for permit reference EPR/GB3439DE which was registered on the 9th May 2012.
8. As the interim management process evolved and the requirements for PAS100, obtaining the relevant WAMITAB Level 4 COTC qualifications together with the cost of upgrading the

compost facilities, Andrew Morgan decided that he would remain carrying out his compost practices under the exemption and not the permit.

9. He did not however, surrender his permit at the time, as he should have, and continued to pay his annual fees until the present day. Race Farm has never worked under the requirements of the permit and Enviresource consider it to have been dormant.
10. As the decision to work under the exemption only was made, the subsequent operations were carried out to suit the exemption requirements which would not have been entirely compliant with the permit conditions.
11. In terms of the permit, the compost slab is coincidentally in the position indicated on the permit. No pre-condition survey was carried out neither was the compost slab upgraded to include a membrane and no leachate was collected. The permit allowed for up to 75,000 tonnes of compost to be produced annually. Race Farm intake of green waste annually only produces about 250 tonnes of compost annually.
12. The officers of Natural Resources Wales have been most helpful in identifying the requirement to surrender the permit. Ian James and Laura Moggridge have had a pre-surrender discussion with Race Farm on the 5th April 2018. It is to be a low-risk surrender application with a surrender fee due of £2,532.00.
13. The compost facility has always been operated under the exemption, not the permit, and will continue to do so after the surrender of the permit. So any site remediation is not considered necessary.
14. As the present time, Race Farm has the following exemptions:

Exemption	Start Date	Expiry Date
T23	06/09/2016	06/09/2019
T6	06/09/2016	06/09/2019
U1	06/09/2016	06/09/2019
U10	06/09/2016	06/09/2019
S2	06/12/2016	06/12/2019
T5	06/12/2016	06/12/2019
T8	06/12/2016	06/12/2019
U12	06/12/2016	06/12/2019
U8	06/12/2016	06/12/2019
T7	09/08/2017	09/08/2020

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