

Agricultural Benefit Statement

For the application of beneficial wastes to fields at;

Park Farm, Malthouse Lane, Caerleon, Newport, NP18 3PB

Updated 22nd March 2022 (M. Stacey) following RFI.

From: Banfield, Ethan <Ethan.Banfield@cyfoethnaturiolcymru.gov.uk>

Sent: 09 March 2022 15:58

To: mark.stacey@4rgroup.co.uk <mark.stacey@4rgroup.co.uk>; Dr Chris Ash <chris.ash@4r-group.co.uk>

Subject: PAN-016983 Request for information

[Warning] This email has originated outside 4R Group. Be careful opening attachments or links from unknown senders.

Dear Mr Stacey

Deployment ref: PAN-016983

Permit reference: EPR/GP3792SK

Permit holder: ByProduct Recovery Limited

Location of the deployment: Park Farm, Malthouse Lane, Caerleon, NP18 3PB

Thank you for your application received on 07/02/22. We need more information from you before we can continue to process your application.

Ethan, please find my responses in red below. This should be read alongside the re-submitted version included in my email.

1. County/Parish/Holding (CPH) number

You have stated this deployment is on agricultural land but have but the supplied a CPH number does not match the CPH for any of the fields listed in this deployment.

ACTION: Please provide the correct CPH number for all fields within the application.

The CPH number provided by the landowner is 60 / 030 / 0065.

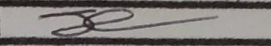
2. Field Ownership and Consent

In your application you have stated that James Mayho is the landowner of Park Farm however our system does not match this and shows these fields under different ownership.

ACTION: Please provide details of the landowner for the fields proposed to be spread on under this application and provide confirmation of their consent.

We can confirm that the land is owned by John Abberley, Llewtrug Farm, Painscastle, Builth Wells, LD2 3YQ. 01982560340 07779 164 810.

I am attaching a scanned imaged of the signed consent agreement for your reference and I also attach a screenshot of the agreement below.

LET OF LAND TO RECEIVE WASTE MATERIAL	
Declaration - to be signed by farmer.	
I declare that I have given permission for the fields listed below to be treated with waste materials and that the information provided is to the best of my knowledge. If waste materials, organic fertilisers or soil improvers are applied I must wait 12 months before grazing animals or harvesting forage crops in those fields.	
Name:	JORIN Abdelqay
Signature:	
Date:	01.12.21

3. Storage of wastes

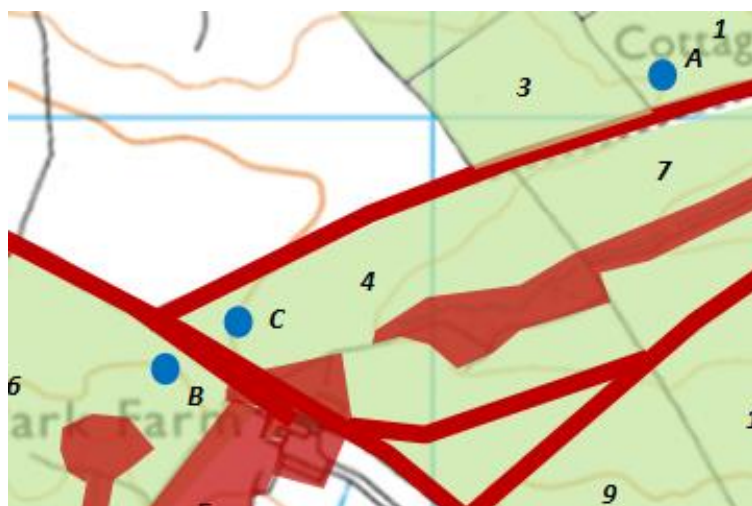
The storage on your application has been classed as field heaps, the location of these field heaps is the same as a deployment on these fields last year (PAN-011693).

The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (and previously The Nitrate Pollution Prevention (Wales) Regulations 2013 (NVZ rules)) does not allow temporary field heaps to be:

- (a) in a field liable to flooding or becoming waterlogged,
- (b) within 50 metres of a borehole, spring or well or within 10 metres of surface water or a land drain (other than a sealed impermeable pipe),
- (c) located in any single position for more than 12 consecutive months, or
- (d) located in the same place as an earlier one constructed within the last two years.

ACTION: Please relocate these field heaps to a compliant location.

The storage locations provided have been re-located to suitable locations. This is illustrated on the below diagram and also updated within the spreading map and Benefit Statement.



4. Field Slopes

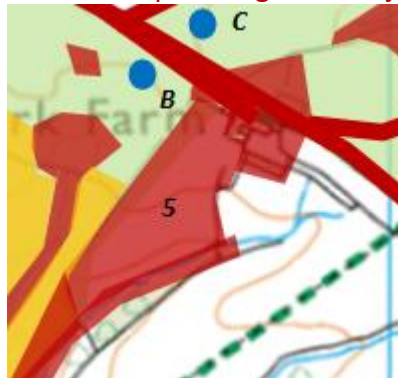
Fields 5, 6, 8, 10 and 11 have areas of slope of 12 degrees or steeper and areas of yellow slope indicating a slope between 7 and 12 degrees of gradient as indicated in

red and yellow respectively on the map attached for information. TGN 8.01 states that waste should not be applied on steep slopes where run-off is a high risk (TGN 8.01-Box 2.1.7a). The following areas are of particular concern:

- Field 5 is mostly red and has several water courses in the field, this is a clear impact pathway for waste entering or leeching into a watercourse.
Removed from deployment
- A section of field 6 also has a slope into a watercourse. **Acted on below.**
- The southern portion of field 11 also slopes into a SINC. **Acted on below.**
The eastern edge of field 11 and western area of field 10 also slope into a watercourse showing a clear runoff risk.
Acted on below.

ACTIONS:

- 1) Remove field 5 from your application due to the very high run off risk into the water course. **This field has been removed from the deployment. Charts 6-10 in the ABS have been updated and total spreading areas adjusted accordingly.**



- 2) Amend spreading maps to include non-spreading zones for the areas of steepest slope marked as red in fields 6,10 and 11 as there is a clear risk of runoff into a protected feature.

The no spread (red) steep areas on the contour map have been expanded to account for the areas of steeper gradient to be protective of the features on the spreading map. Thanks for bringing these to our attention. I will also provide a copy of your EA gradient topographic map in our contractors pack to add further granular detail.

- 3) Please justify spreading on and give details of how you will mitigate the risks of spreading on the lesser sloping (yellow) areas in fields 6,8,10 and 11.

These have been highlighted on the spreading map in Yellow. Spreading will be carried out using a trailing shoe and/or dribble bar to prevent liquid runoff and allow sub-surface penetration of wastes. In addition, in line with CoGAP:

- **No more than 50m³/ha will be applied to prevent high spreading rate flow and eliminate runoff.**
- **The material will only be applied at times when nutrient demand is required by the grass crop (late Feb – April and after silage cutting in summer/autumn).**
- **Slopes will be inspected frequently for signs of run-off collection during and after spreading.**

This combination of control measures and methods will assure protection of the protected features.

5. Waste analysis

You have submitted DCWW Ponticil liquid sludge sample (300991) twice, without submitting the laboratory test results for the waste stream Ponticil sludge cake.

ACTION: Please provide the lab test results for Ponticil sludge cake.

Apologies, this is not clear in the lab reports.

The two DCWW Sample Analysis reports are distinct.

300991 is the sampling point (which is the same for both samples).

However, the Sample ID's and sampling times differ in the lab analysis sheets,

6881058 = Sludge Cake

6881060 = Liquid

I attach both for your review.

6. Testing parameters

The waste analysis supplied does not specify whether the samples taken were tested on a dry matter basis or as received basis

ACTION: Please confirm the testing criteria for your waste streams i.e whether the analysis supplied reflects dry matter or as received basis

Sample	Analysis
Court Farm Sludge Cake	Dry Matter
Pontisticil Sludge Cake	Dry Matter
Pontisticill Liquid Sludge	Dry Matter
Andigestion Ltd (AD)	As Received
Hirwaun Liquid Sludge	Dry Matter

7. Odour

TGN8.01 (page 130) notes [potential to cause odour problems](#) of Wastes from the anaerobic treatment of waste (19 06 06) such as Andigestate.

ACTION: Please provide an odour management mitigation plan for the deployment of this waste stream or further justification for its omission.

I have attached a site specific odour management mitigation plan for the deployment for your review.

8. Available Nitrogen

Waste stream Andigestate has readily available nitrogen content on delivery of 60.9%. This level of available nitrogen could cause issues if it spreads to protected areas such as watercourses, woodland or habitat via over nitrification.

ACTION: Please give additional justification on why this waste is suitable for spreading.

The high RAN is appropriate in the context of spreading of this waste.

1. The N content of the waste is 143kg/ha with a requirement of 235kg/ha. The requirement is greater than the application.
2. The closed periods will be observed – only applied in growing season
3. The waste will be spread with due respect to the no spreading and steeply sloping zones and as outlined above.

Please supply the requested information by 23/03/22. Please note that the assessment of your deployment application has been put on hold as of today until we receive the requested information. The 25-working day assessment period will resume on receipt of all the requested information.

If we do not receive the requested information by the date above, then we may treat your application as having been withdrawn. If this happens you may lose your application fee.

If you have any concerns about being able to provide this information, please let me know.

Kind regards

Ethan Banfield

Swyddog Trwyddedu Gwastraff 1 / Waste Permitting Officer 1

Cyfoeth Naturiol Cymru / Natural Resources Wales

Ffôn/ Phone: 03000 65 3023

Ty Cambria, Caerdydd / Ty Cambria, Cardiff

In light of recent events, I am currently working from home and as such not contactable on the phone. If you need to get in touch, please email me and I will respond as quickly as possible.