



# The Old Peat Works – Frequently Asked Questions

For the proposed treatment and storage of wastes destined for use as soil improvers and fertilisers

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## 1 Who are the 4R Group and what do you do?

4R Group comprises of two operating Companies; 4Recycling Ltd and By Product Recovery Ltd.

Most staff employed by the group are dedicated operations managers and field officers who look after multiple agricultural waste recycling contracts across the UK. We currently have 23 core operational staff who coordinate recycling to land contracts in individual geographic regions across England and Wales.

We also have an in-house team of environmental consultants who are technically trained specialists in recycling wastes to land. We currently have 6 consultants who carry out all the technical work for the groups own activities and who also deliver a variety of specialist work relating to waste management, soil science and contaminated land for external clients.

## 2 Where do you operate from?

All operational and technical teams are supported day to day by our group support team based at our head office in Knottingley. These 10 members of staff manage and assist with key aspects of the business, including compliance, health and safety, HR, account management and transport. The group also has regional offices in Newent, Gloucestershire and Plymouth, Devon.

Every aspect of the 4R Group business is overseen and led by the board of Directors who are hands-on in their specialist areas and guide the strategic direction of the business. All our Directors are committed to giving the old peat works a new lease of life, securing and repurposing the site as a regulated and controlled centre for materials destined for land. 4Recycling Ltd was founded by four experienced waste professionals in 2006 and has been operating for 12 years to date. In 2011, the company purchased ByProduct Recovery Ltd and the two companies collectively became known as the 4R Group.

## 3 What do you recycle?

Our core business is recycling 'waste' materials that have a value to soil. We recycle both organic (*i.e.* materials which naturally 'break down') and inorganic (*i.e.* materials which are more mineral-based) 'wastes'. Both are important in soil. Last year, we diverted more than 750,000 tonnes of waste materials from landfill or incineration across England and Wales.

All the materials which we recycle have a value to soils. The value to soil is different for each type of waste we use however benefits are typically associated with plant nutrients (Nitrogen, Phosphorous, Potassium and trace nutrients), soil organic matter and/or liming benefits to help balance soil pH. Everything we recycle to land, as agricultural fertiliser or for land restoration (*i.e.* restoring collieries, spoil tips or landfills) directly replaces use of chemical and synthetic fertilisers.

Materials recycled by 4R include:

- utility sludges (*e.g.* sludges created as by-products of potable water treatment and sewage treatment)
- composts
- gypsum
- liming materials
- food manufacturing wastes such as wash waters and effluent treatment
- anaerobic digestates

All the materials we recycle are fully regulated and approved for application to land by the Environment Agency. They have been applied to land across the country for several decades and it is extremely likely that this already happens in the local area surrounding the old peat works.

#### **4 Do you handle any other waste materials?**

We **do not** handle any wastes that we cannot apply to land e.g. clinical wastes, hospital wastes, mortuary wastes, veterinary wastes, radioactive wastes, nuclear wastes or any other materials which cannot be legally and safely recovered to land.

#### **We would not be allowed to:**

- **Import these types of materials to the site**
- **Spread these types of materials**
- **Store these types of materials at the site.**

#### **5 What are your qualifications?**

Our staff are qualified specialists in recycling wastes to land and have extensive experience across a broad range of waste types and applications. We hold several long-term contracts with international waste management Companies and have been recognised for our skill and diligence in the waste recycling sector through industry awards and client testimonials. In 2018, we were finalists in the Awards for Excellence for organic wastes recycling.

All our operating procedures, management systems and health and safety compliance are independently audited. We are ISO 9001, 14001 and 18001 accredited and we are Achilles verified.

The team has numerous qualifications and professional memberships including:

- 2 x PhDs in plant and soil science disciplines, including research into wastes for land restoration for biofuel production and the fate and mobility of heavy metals in soils
- 3 x MSc degrees in Environmental Sciences
- 10 x BSc degrees in plant, soil and environmental sciences
- 8 x FACTS Qualified Advisors (Fertiliser Advisors Certification and Training Scheme)
- 6 x WAMITAB operatives (Waste Industry Certification for Waste Management and Technical Competency)
- 1 x Chartered in Waste Management through the Chartered Institution of Wastes Management (CIWM)
- Membership of numerous professional bodies (CIWM, BSSS, IPSS, UK Spill Association, REA)
- 1 x Chartered Soil Scientist (CSci) chartered through the Institute of Professional Soil Scientists and the Science Council

#### **6 What are the products you make used for and why do we need to improve soil?**

As a nation and a society, we are duty bound to protect our soils.

One of the key challenges facing the UK agricultural industry at present is the declining amount of soil organic matter in arable soils. Soil organic matter is directly linked to soil health: soils that have a degree of organic matter in them are healthier than soils that do not.

Declining soil organic matter levels is caused by numerous factors including continuous cultivation, crop choices, a changing climate and changing agricultural practices. Historically, UK agriculture was a mixture of both arable and livestock farming, meaning that most farms had a source of soil organic matter from their own livestock.

Over the last 70 years there has been a gradual shift towards increasing arable farming in the East of the country and livestock farming in the West of the country. The fields around the local region rarely have animals present in them, and there are very few physical boundaries between fields as a result. Without significant local livestock numbers, there is a lack of organic material to put back to the land. Farmland in the local area will have a declining soil organic matter status and addressing this is a current key focus of the UK Government.

The decline in a soil's organic matter content means that the soil becomes less fertile, is more likely to erode and will absorb less water in high rainfall, leading to increased flooding.

All the materials we propose to handle at the old peat works are those which can be used on and in soil to help plants grow. As previously mentioned, depending on the material used, the benefits to the soil vary and we've summarised these in Table 1 below.

**Table 1. Benefits associated with different waste types**

Waste material	Which nutrients?	Will it add Soil Organic Matter?	Does it help soil pH
<b>Composts</b>	Potassium Nitrogen and Phosphate (slow-release)	Yes	Yes, to a degree and dependent on specific compost
<b>Biosolids</b>	Nitrogen (slow-release) Phosphate Some Potassium	Yes	Yes, if lime treated as per our proposals
<b>Lime (Derived from Cement Manufacture) *</b>	Potassium and trace elements (dependent on source)	No	Yes
<b>Anaerobic Digestates</b>	Nitrogen (readily available) Phosphate Potassium Trace elements	Solid digestates - Yes  Liquids - No	No
<b>Gypsum (Derived from Plasterboard)</b>	Calcium and Sulphur	No	To a degree. The main benefit is from calcium sulphate which reacts with soil clays and significantly improves soil structure
<b>Compost Like Output</b>	Potassium Nitrogen and Phosphate (slow-release)	Yes. This material will only be stored and treated at the site. It will be used on restoration sites <i>i.e.</i> non-agricultural land.	Yes

\*Cement Kiln Dust is a residue from the production of cement. This material is commonly produced at cement kilns across the world and collected from the gas stream. The material has a high potassium concentration and a good liming value. It is comprised of a combination of processed chalk (c. 80%) which is not suitable for cement manufacture, and abatement dusts from the combustion process. By-Pass Dust is produced from the abatement process in newer kilns and has a higher free lime content than Cement Kiln Dust. Both are important sources of nutrients for soil.

## **7 What other sites did you consider before choosing the old peat works?**

4R considered numerous sites including:

- A facility in Gloucestershire
- A facility in Leicestershire
- A site in Devon
- A site in Cornwall
- Several sites across Yorkshire

The sites were all considered on their own merits and were declined either due to their location, cost, rental term, planning history or cost of redevelopment. The old peat works has been under consideration as a potential site for some time prior to the decision being made to progress to this stage.

## **8 Why Swinefleet?**

The site on Reading Gate is a former peat works which includes buildings that can be renovated and reused by 4R. The site is suitable for industrial activity, has planning for industrial use and is allocated in The East Riding of Yorkshire Council's local plan for this use.

Our plan is to bring the site back into use through reusing the existing buildings and adding storage tanks for liquid materials and storage bays for solid materials to the external yard areas of the site.

## **9 What was the scale of operation at the peat works?**

Data obtained from the former operators of the peat works (Scotts/Fisons) demonstrate that the site consumed and processed 300,000m<sup>3</sup> of peat each year, of which 175,000m<sup>3</sup> was imported with a significant peak of activity during spring. The balance of the volume of peat (125,000m<sup>3</sup>) was harvested from the adjacent moors and brought to the site by narrow gauge railway. The imported peat came from other peat bogs both in the UK and occasionally abroad (The Baltic States and Canada). Once delivered to the factory the peat was screened; fertiliser, lime and other additives were included in the bespoke mixture and the growing media was then bagged and sold to domestic gardeners across the UK.

The horticultural growing media market is not directly comparable to organics recycling, however there are similarities between the two industries:

- a. The growing media market is very seasonal, and the bulk of sales occur over the spring months- March, April and May. Organics recycling is also seasonal although less so than growing media production. Some wastes are spread all year round however most wastes used as arable fertilisers are spread in spring and/or autumn in accordance with the Code of Good Agricultural Practice and crop/soil requirements. Wastes are stored in fields over winter if ground, soil and/or crop conditions are not suitable for spreading. Field stores are regulated, and closely monitored and controlled.

- b. Peat harvest occurs only in warm dry weather, typically April until September. Wastes are generally produced all year round. This is because there is a constant need for sewage and potable water treatment and a continuous production and manufacture of products to meet consumer demand. Wastes from these processes (e.g. food production, cement manufacture and plasterboard manufacture) are also therefore continually produced.
- c. Import of peat will have been in bulk articulated lorries. This is also typical transport for the wastes we handle.
- d. Export of peat will have been palletised on lorries (curtain sides or flat-bed). Export of products produced by 4R at the old peat works will be in bulk, however a large proportion of the material brought in will be taken out by local farmers.

## 10 How many HGV movements did the former peat works generate?

Data from the former peat operation showed that there were 175,000m<sup>3</sup> *per annum* of imported peat products. This will have been done in 2692 deliveries (65m<sup>3</sup> per load). These lorries will then have returned empty. 300,000m<sup>3</sup> *per annum* of peat products were exported (the balance coming from the adjacent moors). This would have been palletised, with 2.25 m<sup>3</sup> per pallet (30 x 75L bags per pallet). A total of 22 pallets would have been taken per load, amounting to 6060 empty lorries arriving at the site, and subsequently leaving loaded.

Total lorry movements therefore amount to 17,504 *per annum*. About 50% of the above activity (deliveries in and product sales out) would have taken place within a 3-month period.

## 11 How does this compare to what we want to do?

A maximum of 100,000 tonnes *per annum* of imported waste materials will be brought to the site in 4,000 vehicles. A maximum of 100,000 tonnes *per annum* of exported materials destined for land application will leave the site in 4,000 vehicles which, where possible, will be vehicles which have delivered to the site.

A significant proportion of the materials from the site will also be used in the local vicinity, reducing the number of vehicles passing down the A161 through Swinefleet village and old Goole.

**Maximum** total lorry movements therefore amount to 16,000 *per annum* (assuming a worst-case scenario where no lorries delivering wastes are re-loaded to remove product on their return journey). Imports will largely be carried out as a steady input throughout the year. Exports will be more seasonal (with some peaks shortly ahead of the spring and autumn spreading windows) but there will continue to be some export throughout the year.

## 12 How will the site operate?

If we are granted planning permission, the site will become a centre for 4R's existing activities in the area. Materials will be transported to the site, stored and processed before use by local farmers/landowners to replace manufactured synthetic fertilisers. The bulk of the proposed activities listed below will be carried out inside the existing, renovated sheds at the site. The sheds will be restored and repurposed to suit our operations.

We propose to carry out the following activities at the former peat works. All the activities will facilitate the recycling of beneficial wastes to land:

### 12.1 *Liming of Biosolids*

Biosolids is a collective term used in the industry for the solid material which is produced as a by-product from waste water treatment at wastewater treatment works (*i.e.* sewage treatment). Biosolids have been applied to agricultural land for several decades and are applied on a regular basis across the UK and Europe.

Prior to any use on land, both the soils and the biosolids must be rigorously tested to ensure compliance with a range of chemical and biological parameters.

The utility companies treat the biosolids they produce using a process utilised across the industry known as HACCP- Hazard Analysis and Critical Control Points. HACCP defines a process and highlights the critical points required to ensure compliance. If any one of these points fails *i.e.* a certain temperature has not been met or a residence time is not achieved, then the batch is classed as failed. The batch may subsequently pass end of line testing but is still categorised as a failure due to the failure of the HACCP.

It is this type of biosolids we would look to import and process via lime treatment. Utility companies sometimes lime treat their biosolids themselves, but often they may not have space or resources to do this in-house. All batches we receive and treat, will meet our regulated and audited HACCP process. Following lime treatment, the biosolids will have reached the enhanced (the highest) treatment standard. It will then be subsequently distributed to agricultural land under the Sludge Use in Agriculture Regulations and used across a range of growing crops.

4R will provide final treatment to biosolids from utility companies, following a rigorous process recognised by the water industry and regulators, to ensure materials meet the highest treatment and product quality standards, enabling the material's use on arable land to the benefit of soil. This is the same material, meeting the same standards and following the same rigorous processes as may already currently be used on land in the local area.

### 12.2 *Physical treatment of waste and storage prior to spreading to agricultural land*

Similar to the biosolids treatment activity described above, we are often asked by waste producers to assist them in removing and recycling off-specification batches of material from their production sites. These requests vary in terms of the type of waste output and/or the treatment process or the element of the quality assurance checks which have resulted in non-conformance.

As an example, sometimes green waste compost contains an element of physical contamination (such as glass or plastic or large woody fractions), so it requires further processing before it meets the specification and standards demanded by us, the regulators or our customers before it can be applied to land. Another example is waste lime derived from cement manufacturing which often requires conditioning with water to help make it more granular, so it can be spread using conventional agricultural equipment and minimises potential dust emissions generated when spreading to land.

Often production sites cannot do this themselves due to time or space constraints so look to move materials on to give themselves more space to continue processing their standard incoming material streams. It is our proposal to carry out physical treatments to wastes which require such treatment *i.e.* screening/size separation.

### 12.3 Storage of waste prior to land spreading

Land spreading of waste is a seasonal activity and it is common practice to use regulated, temporary field storage heaps to allow materials to be stored where they will be used. Access to these field stores requires consistent good weather and ground conditions to get material to the right place without causing damage to soils and farm tracks. These temporary field storage piles often do not have the benefit of hard standing or sealed drainage systems.

A storage facility such as the old peat works with hard standing or an impermeable surface, sealed drainage and weather protection is therefore the most environmentally sound way to temporarily store materials prior to their application to land. This will ensure that material is only delivered to the field in appropriate weather and ground conditions which safeguards the soils and the surrounding environment.

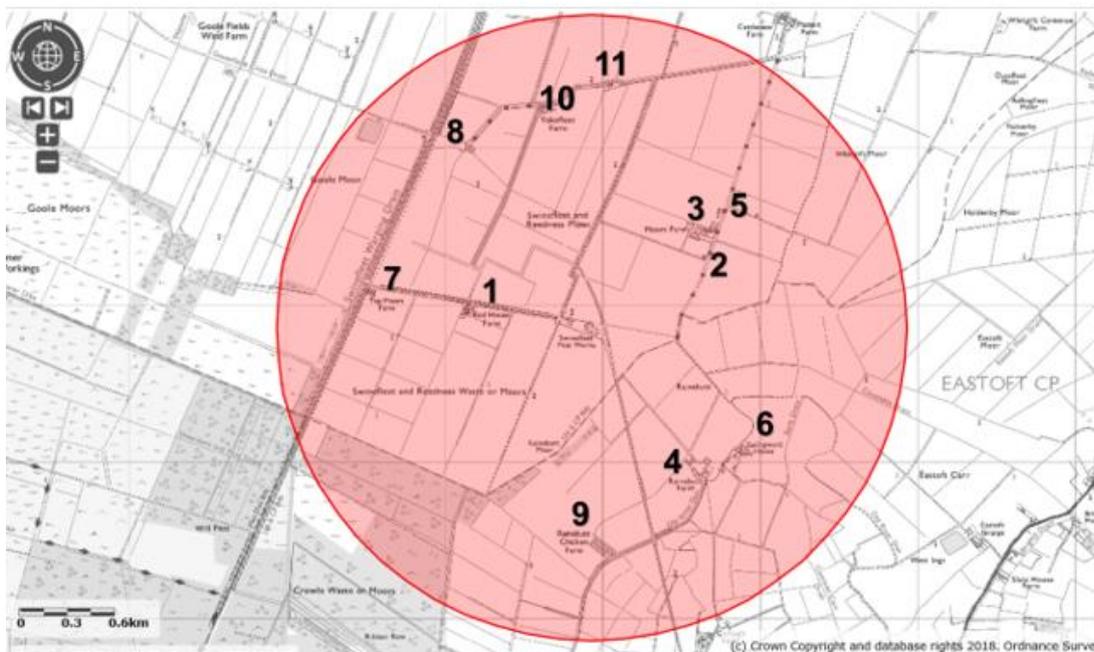
The proposed storage at the old peat works will either follow one of the two treatment processes outlined above or will simply be storage for materials suitable for land application when ground/crop conditions are favourable for delivery and when registration paperwork for its final use is in place. Some material (chicken litter) is already stored at the site, prior to being spread to land.

## 13 Will there be any smell?

The most odorous waste we will handle at the former peat works will be the biosolids - the sludges produced from waste water treatment. The other wastes we propose to process and/or store are not particularly odorous or have no odour at all.

The site is clearly remote and a substantial distance away from villages and centres of population. The distances to the nearest residences and towns and villages are shown below in Figure 1 and Table 2.

**Figure 1. Receptors within 2000 metres of The Old Peat Works**



**Table 2. Proximity of residential receptors to The Old Peat Works**

Location	Property Name	Distance from Site Boundary
1	Red House Farm	525
2	The Red Bungalow	770
3	Moors Farm	790
4	Rainsbutt House	890
5	The Bungalow	1029
6	Easingwold House	1044
7	Swinefleet Moor Farm	1164
8	Station House	1203
9	Rainsbutt Chicken Farm	1255
10	Yokefleet Farm	1317
11	Railway Cottages	1510

Odours will be effectively controlled through a comprehensive Odour Management Plan (OMP), that must be approved by the Environment Agency before we can commence operations. All materials will be unloaded and processed inside the renovated buildings which will have enclosed walls, roofs and doors. This will minimise odours coming from the site. The OMP covers deliveries, processing, storage and export of material, identifies 'sensitive receptors' (homes and businesses) and identifies the control measures to ensure no adverse odours are detected during delivery, processing, storage or export.

#### **14 What are the potential environmental and health impacts?**

Potential environmental and health impacts are assessed for every waste activity. We have a duty of care to protect the environment and human health. Firstly, we identify all the potential 'receptors' in the locality of our operations as it is different for each site. These may be residential properties, villages, amenity sites, footpaths/roads, protected environmental sites and habitats, wild animals and livestock, soils, surface water, ground water/aquifers *etc.*

We then identify all potential ways that the different receptors could be reached. These are called 'pathways' and include:

- air and wind (for pollution carried by air such as dust, particulates, gases, odour)
- slopes and gradients (for pollution travelling down slope via runoff, leachate)
- spreading activity (which directly places materials onto the ground)

We then identify all the hazards that could arise from the wastes we want to use and what we want to use them for. If used incorrectly, the benefits for which we are utilising the wastes for (e.g. plant nutrients, trace elements) can sometimes become pollutants.

As an example, key nutrients required to achieve optimum yield of crops include nitrogen and phosphorus (as phosphate). Our crops need these nutrients otherwise they won't grow properly. However, if too much nitrogen and phosphorus is applied, or it is applied at the wrong time or in the wrong form, then these nutrients don't get used by the crops and end up in surrounding surface waters. When this happens,

nutrients then feed water-based plants (algae), promoting prolific growth which has detrimental impact on the aquatic environment. Any source of nutrients, whether it be from farmyard manure, synthetic or mineral fertilisers or organic wastes can cause this problem.

All our processes therefore need careful and meticulous management to ensure that risks from the materials we use do not cause harm to people or the environment. We must have comprehensive plans for all the key potential emissions that may arise from the site, without them we won't be granted a permit to allow us to operate.

The above process of identifying receptors, pathways, hazards and mitigation/management measures needed to control the risks is called a risk assessment. Our risk assessments form the basis of our management procedures and determine what we need to do to mitigate risks to people and the environment.

Potential risks to environmental and human receptors will be controlled by the permit and Environmental Management System which is an approved management document written by 4R and regulated by the Environment Agency. This will cover all aspects of operations on the site including:

- Protection of water: sealed drainage systems, bunded tanks, dirty water capture, prevention of odours, dust and noise
- Protection of air from odours, potential fugitive emissions, potential gaseous emissions
- Protection of soil: sealed surfaces indoor operations, bunding.

Other potential environmental and health impacts sometimes associated with waste sites are bioaerosols (e.g. microscopic air-borne spores) and pests such as flies and vermin. Every material will be assessed for these potential risks, by us and by the Environment Agency, before being imported to the site using our ISO accredited assessment procedures. Where any risks are identified, including bioaerosols, we will be required to test and monitor this regularly with all results reported to the regulators. The likelihood of pests is relatively low with the materials we are proposing to bring to the site. We will have an agreed plan of action to deal with this promptly should the need arise.

## **15 How will surface water be protected?**

Contrary to incorrect information published in a recent article in the Goole Times, dirty water or any runoff/leachate from the site or the materials stored there will **not** be permitted to enter local water courses, soak away or leave the site other than via consented and regulated routes. The same applies to all waste materials leaving the site.

All contaminated water will need to leave via authorised and approved routes either via a regulated discharge consent (which will have threshold values for potential contaminants), removal of runoff/leachates collected in drainage sumps and re-used on site or exported for disposal to an appropriately permitted facility.

## **16 How will you manage other potential impacts?**

Management of environmental and health risks are also accounted and mitigated for through extensive legislation and regulation when it comes to applying the wastes to land.

The potential environmental risks of the materials when they are applied to soils are accounted for and regulated by two separate regulatory pathways depending on the type of material being used. These are

described below. Both are similar in that the materials must provide benefit to the receiving soils and the operation is undertaken without harm to the environment. Prior to the application of any materials, the receiving soils and the wastes are analysed by a fully accredited laboratory and an application rate is calculated based on the results. This ensures that the properties of the receiving soils and the properties of the waste are appropriate and proportionate, and that the application can confer benefit without harm.

#### *16.1 Regulatory pathway for biosolids*

The application of biosolids to land is governed by various legislation and codes of practice which 4R Group and the water industry adhere to:

- Sludge Use in Agriculture Regulations 1989
- Code of Practice for the spreading of Sewage Sludge
- Safe Sludge Matrix
- Nutrient Management Matrix
- Biosolids Assurance Scheme

Some 4 million tonnes of biosolids are spread to agricultural land in the UK every year under these framework agreements. Compliance is monitored by the Environment Agency (in England; NRW in Wales), local Environmental Health regulators, the operators and the water companies.

#### *16.2 Regulatory pathway for all other wastes*

Spreading material derived from sources classified as 'waste' to land is governed by the Environmental Permitting Regulations. A land-spreading permit must be obtained prior to any waste being delivered, stored or spread onto land for agricultural benefit or ecological improvement. The permit is deployed at specific locations where application rates are calculated for specific waste streams, crop and soil types and nutrient requirements.

### **17 How will you access the site?**

The identified access route is from the A161, southwards down Reading Gate and onwards to the site although there may be a small number of deliveries that come from the other direction (via the A161 from Ealand, Crowle and Eastoft). Alternatives were assessed in detail, but the routes were considered unsuitable for HGV deliveries and egress. Full details of the proposed transport route will be available to review during the statutory consultation period.

### **18 Are local roads good enough for these many vehicles?**

We used a local transport consultancy firm to assess the traffic routes and road suitability for our proposed activities at the old peat works. Their report indicates that the local roads are up to the required standard. They indicate that minor works to some of the passing places along Reading Gate may be required to facilitate HGV passing. A full copy of this report will be available to review during the statutory consultation period.

### **19 How many people will the site employ?**

The numbers of staff employed will depend on the tonnage processed through the site. At the maximum throughput of 100,000 tonnes, the site will require:

- 1 x Administrator/ Weighbridge Operator
- 1 x Yard Officer
- 3 x Machine Operators
- 1 x Site Manager / Technically Competent Manager
- 3 x Field Officers, dealing with farmers, soil sampling *etc*
- 2 x Delivery Drivers, collecting material and distributing to customers

There will also be employment opportunities during the construction and refurbishment stage of the operations.

We are interested to hear from local people who have a background in waste management and/or agriculture, or people who want to find out more about starting a career in the organics recycling sector.

## **20 How will the site be regulated? Who will check you do what you said?**

Alongside the planning application, the 4R Group are preparing a bespoke Environmental Permit application. This is a series of site-specific technical and operational documents which is submitted to the Environment Agency for assessment and approval. The Environment Agency are responsible for regulating waste activities in England. They will need to be satisfied that the operations will not have a deleterious - or harmful - impact on the environment and that the activities and wastes proposed are appropriate for the site, the surrounding environment and the intended use. The Environment Agency will carry out regular checks and inspections at the site and issue a Compliance Assessment Report which records their findings.

The permit will cover all aspects of mitigation against adverse impacts on water, soil and air and also human health. In the event of non-conformances with agreed permit conditions, the Environment Agency have a range of enforcement options available to them, which are proportionate to the severity of the offence. This ranges from simple guidance and advice through to permit revocation, fines and jail terms for the worst offenders.

In addition to permitting, the site will also be regulated by the planning authority for a wider scope of measures as listed in agreed planning conditions if the application is approved. This will include operating hours, traffic routes and tonnage throughputs.

## **21 Can you tell me about your track record?**

4R has a very good track record in terms of our environmental and health and safety compliance. Waste activities are very closely regulated by both the Environment Agency in England and Natural Resources Wales in Wales, and by the Health and Safety Executive.

The 4R Group is currently responsible for 750,000 tonnes of waste *per annum*. We transport, process and spread the wastes to land in accordance with our ISO accredited operating procedures, regulated by environmental permits and where needed, planning permission.

We operate across approximately 500 farms, receiving and spreading waste materials for agricultural benefit or environmental and ecological improvement. The 4R Group collectively holds 6 Environmental Permits. We have received no Enforcement Notices since 2014 and no prosecutions since 2012.

Five of our permits are rated as compliance band A – leading to a 5% reduction in our regulatory fees as we are classed as a low risk operator. One of our permits has a compliance band rating of B. For this we pay 100% of the regulatory fees as it rates us as a good operator. Permit holders are charged a percentage more than the 100% regulatory fee if their compliance band rating falls to C or lower as they would be considered 'higher risk'. Regulatory fees are proportionate to how good an operator is.

The 4R Group did pay a fine in 2011 for two offences resulting from activities carried out by MWH ByProduct Recovery in 2010. ***The 4R Group purchased ByProduct Recovery Ltd (BPR) from MWH in September 2011, including the liability of the offence caused under previous ownership. The 4R Group did not commit these offences.***

Dates surrounding this situation are detailed as follows:

### **Orton Grange**

[29/10/2010](#) MWH ByProduct Recovery receive letter from EA asking for waste movement at Orton Grange between October 2008 to October 2010.

[01/11/2010](#) details sent to EA

[14/01/2011](#) MWH ByProduct Recovery attended interview under caution

**[29/09/2011](#) 4R purchased the BPR business from MWH ByProduct**

December 2011 – 4R Group report to EA that they believe that the records submitted by MWH ByProduct for 2009 and 2010 had been falsified

[05/01/2012](#) 4R attend a meeting with EA

[12/12/2012](#) BPR convicted in Carlisle Magistrates Court: Between [01/09/2010](#) and [15/10/2010](#) ByProduct Recovery did breach Regulation 38 (1)(a) of the Environmental Permitting Regulations (EPR) 2007 in that they carried out a waste operation without or not in accordance with an Environmental Permit.

### **High Aketon**

[25/06/2011](#) EA inspected site following report of milk pollution

[13/09/2011](#) MWH Byproduct Recovery receive invitation for an interview letter from EA

**[29/09/2011](#) 4R purchases the BPR business from MWH ByProduct**

[11/10/2011](#) 4R employee (previously employed by MWH ByProduct Recovery) attend interview under caution

[12/12/2012](#) BPR convicted in Carlisle Magistrates Court: On [25/06/2011](#) ByProduct Recovery did breach Regulation 38 (1)(a) EPR 2010 (referring back to Regulation 12(1)) in that they caused or knowingly permitted a water discharge activity into Crummock Beck, Cumbria other than to the extent authorised by an Environmental Permit.

Following the acquisition of ByProduct Recovery, all ByProduct Recovery operating procedures and management practices were reviewed and updated and brought in line with the rest of the 4R Group.

In addition to the above, the 4R Group have had no enforcement action from the Health and Safety Executive or any other enforcement body. All incidents and near miss incidents are reported and recorded in accordance with our ISO management procedures and reviewed in monthly board meetings. This prompts updates to or reviews of our procedures wherever necessary.

## 22 How does the planning process work in the case of 4R's application?

Planning permission is required before any new activity can take place on a site. The planning authority for the old peat works is The East Riding of Yorkshire Council. There are four stages to the planning process.

1. For this type of planning application, it is normal to request an initial pre-application meeting and for a prospective applicant to submit a pre-application advice request to the planning authority. The purpose of this is to establish the key issues that will need to be considered by the applicant and covered in any planning application, for example design, visual impact, biodiversity assessments, traffic *etc.* 4R submitted pre-application details in April 2018 and received the Council's response at the end of May 2018 after a meeting at County Hall in Beverley earlier that month. The response includes input from the Environment Agency, Yorkshire Water Services, Lead Local Flood Authority and Natural England as regulators or statutory consultees, as well as key departments within the Council such as Highways, all of which will have an interest in 4R's application for the old peat works site.
2. The applicant then carries out research and gathers together the information that will be necessary to support its planning application, assuming the site is suitable for the proposed activity, which in the case of the old peat works site and our proposals, it is. A planning application is drafted. It is normal during this period and in particular for larger developments or developments that may be of particular interest to local residents and businesses, to engage with local communities and businesses at this pre-application stage. Indeed, planning authorities encourage this through their Statement of Community Involvement. This information gathering exercise is designed to enable the applicant to improve its proposals and ensure it has taken views of local stakeholders and statutory consultees into account. 4R is currently in this information gathering phase and will be holding a public exhibition in Swinefleet Community Hall on Monday 1 October 2018, from 2 to 8pm.
3. A planning application is then finalised, taking into account the feedback that has been provided by stakeholders and information that has been gathered by the applicant, and submitted to the planning authority. Once it has been accepted and registered by the local planning authority, it is then consulted on. The planning authority runs this 'statutory' consultation, which typically lasts for a few weeks. Residents, businesses, other local stakeholders and statutory consultees are consulted by the council. Officers then write a report and recommend approval or refusal; or they may require additional information before a decision can be made and their report can be completed. This report and recommendation is then passed to the council's planning committee.
4. The decision is given to the applicant, and a decision to approve allows the applicant to proceed. There may be conditions attached to this, for example setting limits on operating hours or tonnages imported. If the decision is to refuse permission, the council must give valid planning reasons. The applicant can appeal to the Planning Inspectorate. If a council is unable to determine an application in a set period of time, an applicant can also appeal to the Planning Inspectorate for 'non-determination'.

## 23 How can I get involved?

4R is keen to hear the views of local residents and businesses and has already started to reach out to local community organisations and businesses. Representatives attended Swinefleet Parish Council's monthly meeting in July and undertook to hold a public exhibition where members of the public will be able to find out more, directly ask questions about 4R's initial plans and meet representatives of the company.

We are planning to hold the exhibition on 1 October at Swinefleet Village Hall from 2pm-8pm. This pre-application exhibition will ensure everyone who attends the event will be able to ask their own questions and that those questions can be answered by our team of Directors and Senior Management, and our planning consultant.

Feedback from stakeholders will inform our final planning application, which we expect to submit in the autumn. The Council, as planning authority, will then hold a statutory consultation, where local residents, businesses, other stakeholders and statutory consultees will be able to provide feedback on our proposals. The output from the statutory consultation will be taken into account by the planning authority in determining the application.

#### **24 How will you make sure local residents are aware of the plans?**

We will communicate with residents via local parish councils, local media and updates on our website. We will also keep all individuals who have directly expressed an interest to us updated. 4R can be contacted via the project email address which is [theoldpeatworks@4r-group.co.uk](mailto:theoldpeatworks@4r-group.co.uk)

Thank you for reading. If you have any additional questions, please do not hesitate to contact us.