



Permit Variation Application

Seletia (HW) Limited
Hespin Wood Landfill,
Todhills,
Carlisle,
Cumbria,
CA6 4BJ



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1	Original Application Report	Sian Wilcox	Tracey Westbury	10 April 2025
2	Addition of proposed tonnage limit in Section 1.4. Addition of Appendix 3 Environmental Risk Assessment.	Sian Wilcox	Tracey Westbury	25 June 2025
3	Addition of Appendix 4 Market Assessment, Update to company details in 1.2, Table 1.4 and Table 1.5. Update to TCM details in Table 4.1. Updates to Section 2, Section 3	Sian Wilcox	Tracey Westbury	10 November 2025
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1. Introduction

- 1.1. Westbury Environmental Limited have been instructed to prepare this Environmental Permit Variation Application on behalf of Seletia (HW) Limited (Operator).
- 1.2. This application is a resubmission of the original application submitted on 22nd April 2025.
- The Environment Agency issued a Request for Information (RFI) on 11th June 2025.
 - The requested information was provided on 26th June 2025.
 - The application was deemed “not duly made” and was returned by the Environment Agency on 28th July.
- 1.3. The Environmental Permit Ref. EPR/BM60261B (Permit) for Hespin Wood Landfill, Todhills, Carlisle, Cumbria CA6 4BJ contains conditions allowing the landfilling of waste. The bespoke landfilling activities included in the permit are listed below.

Table 1.1 Activities

Activity reference	WFD Annex I and II operations (where applicable)	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
A1	D5 –Specially engineered landfill; R5 - the recycling or reclamation of inorganic material and R10 – Land treatment resulting in benefit to agriculture or ecology	Section 5.2 Part A(1) (a) , The disposal of waste in a landfill.	Landfill for non-hazardous waste and landfill restoration	Receipt, handling, storage and disposal of wastes, consisting of the types and quantities specified in conditions 2.6, as an integral part of landfilling. Only inert waste shall be deposited in Phases 2 and 3 of the landfill.
A2	D8 – Biological treatment of waste	Section 5.4, Part A(1)(a)(i), Biological treatment of hazardous waste	Treatment of leachate in a facility with a capacity of >50 tonnes/ day	Leachate arising from the landfill and other permitted hazardous liquid waste imported into the Leachate Treatment Plant from off-site.
A3	D8 – Biological treatment of waste	Section 5.4, Part A(1)(a)(i), Biological treatment of non-hazardous waste	Treatment of leachate in a facility with a capacity of >50 tonnes/ day	Leachate arising from the landfill and other permitted non-hazardous liquid waste imported into the Leachate Treatment Plant from off-site.

Table 1.2 Directly Associated Activities

Activity reference	WFD Annex I and II operations (where applicable)	Description of specified activity	Limits of specified activity
A4	R1 – use principally as a fuel to generate energy	Pre-treatment and utilisation of landfill gas for energy recovery in an appliance with a rated thermal input < 50MW	Treatment and utilisation of landfill gas arising from the landfill.
A5	N/A	Flaring of landfill gas for disposal in an appliance.	Landfill gas arising from the landfill.
A6	D6 – release to water body except seas/ oceans	Discharges of site drainage from the landfill.	From surface water management system to point of entry to controlled waters.
A7	N/A	Storage of fuel for operation of plant and equipment.	Fuel storage tank.
A8	N/A	Storage of sodium hydroxide and methanol for use in the Leachate Treatment Plant	From the sodium hydroxide/methanol storage tanks to the leachate treatment/storage tanks.

- 1.4. The Schedule 1 reference activity reference A2 for ‘biological treatment of hazardous waste’ is incorrect in the activities table S1.1 in the permit. This application requests that the Schedule 1 reference activity ref. A2 “Section 5.4, Part A(1)(a)(i)” is amended to “Section 5.3, Part A(1)(a)(i)”.



- 1.5. The permit also includes annual input limits for the permitted activities, see Table 1.3 Annual Waste Input Limits.

Table 1.3 Existing Annual Waste Input Limits

Category	Limit Tonnes/Year
Non-hazardous waste	132,000
Inert waste	50,000
Waste for restoration	To be agreed in accordance with Improvement Condition 12, Table S1.3
Hazardous Waste – Leachate or other hazardous liquids from offsite accepted at the onsite Leachate Treatment Plant (as agreed per PO1, table S1.4)	1,500
Non-hazardous Leachate or other non-hazardous liquids from offsite accepted at the onsite Leachate Treatment Plant (as agreed per PO1, table S1.4)	2,600

- 1.6. The application seeks to vary the Annual Waste Input Limits for Non-hazardous and Inert waste to the proposed limits shown in the table below.

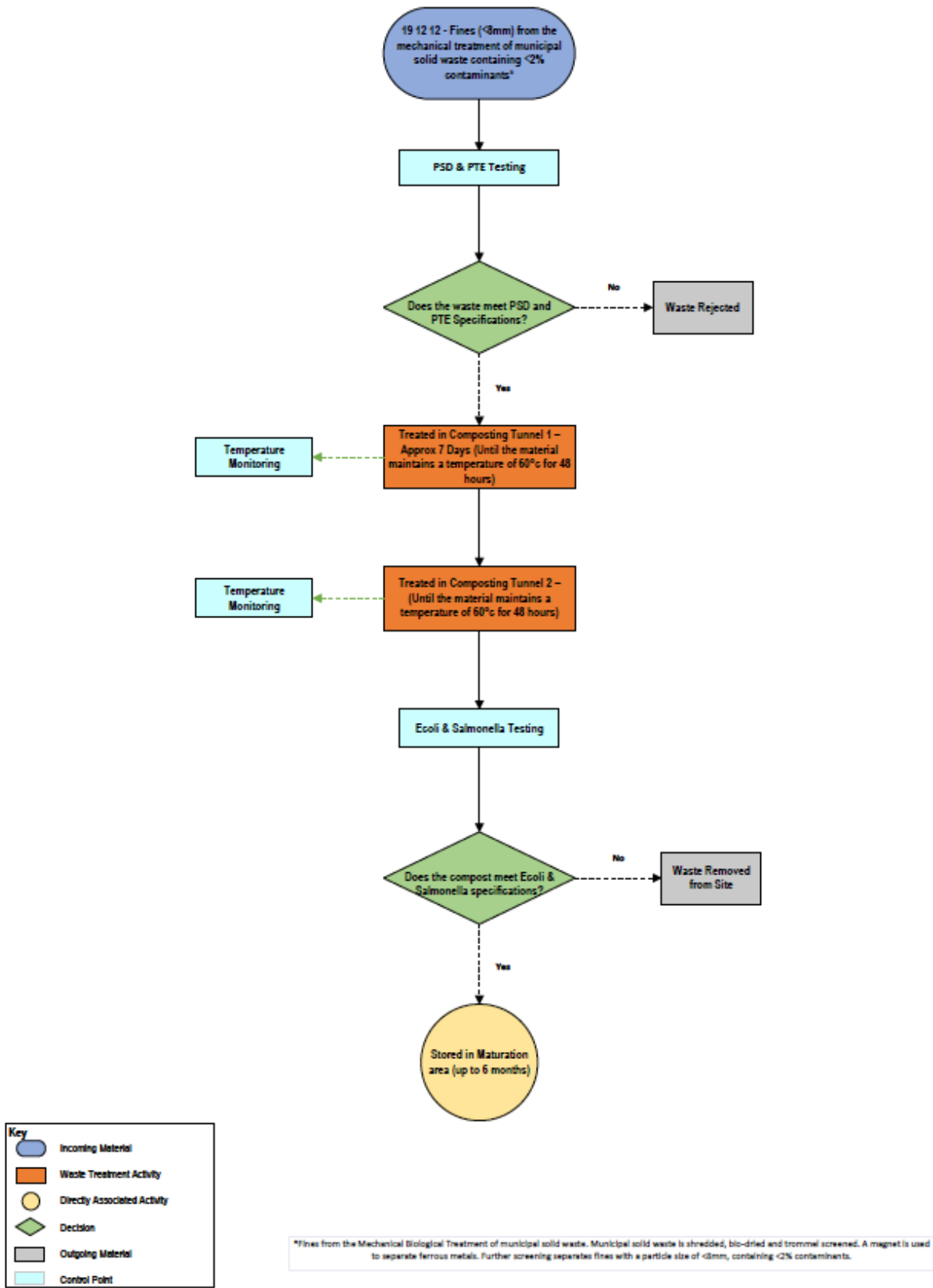
Table 1.4 Proposed Annual Waste Input Limits

Category	Limit Tonnes/Year
Non-hazardous waste	750,000
Inert waste	100,000
Waste for restoration	To be agreed in accordance with Improvement Condition 12, Table S1.3
Hazardous Waste – Leachate or other hazardous liquids from offsite accepted at the onsite Leachate Treatment Plant (as agreed per PO1, table S1.4)	1,500
Non-hazardous Leachate or other non-hazardous liquids from offsite accepted at the onsite Leachate Treatment Plant (as agreed per PO1, table S1.4)	2,600

- 1.7. There are no proposed changes to the input limits for leachate treatment.
- 1.8. This application also seeks to make the following additions to the lists of accepted wastes.
- Addition of waste code 18 02 03 (Wastes whose collection and disposal is not subject to special requirements in order to prevent infection) to Table S2.1 Permitted waste types for disposal at a landfill for non-hazardous waste, in the Permit.
 - This waste stream will consist of animal faeces.
 - This waste will be bagged before arrival on Site.
 - This waste will be stored on Site for less than one day prior to deposit in the landfill.
 - Addition of waste code 19 05 03 (off specification compost) to Table S2.3 Permitted waste types for restoration, in the Permit.
 - This waste will be produced in accordance with the requirements of the Animal By-Products Regulations.
 - This waste will have been tested and evidenced to meet the specifications for pathogenic microorganisms.
 - A process flow containing information on the production of this waste is provided below.



Compost Like Output (CLO) Origin Flow Diagram





- 1.9. The relevant Environment Agency forms (Part A, Part C2, Part C4, and Part F1) and supporting information are included within this Environmental Permit application report.
- 1.10. Due to the proximity of the Site to protected habitat designations at Solway Firth and Upper Solway Flats, a Habitats Risk Assessment has been requested in Application Form Part F1, Part 1.19 Charges for Plans and Assessments.

Background

- 1.11. The original permit was issued to Cumbria Waste Management Limited in October 2005.
- 1.12. An administrative variation was issued on 20th August 2025, updating the company name to Seletia (HW) Limited.



2. Non-Technical Summary

- 2.1. This Environmental Permit variation application seeks to vary the Permit Ref. EPR/BM6026IB to increase the annual input limits for non-hazardous waste and inert waste.
- 2.2. This application proposes the addition of waste code 18 02 03 consisting of animal faeces to the waste codes for landfilling and the addition of waste code 19 05 03 to the waste that can be used in the restoration of the landfill.
- 2.3. There are no other proposed changes to the permitted activities being carried out on Site.
- 2.4. The increase of the annual tonnage limits for incoming non-hazardous and inert waste will enable efficient and prompt completion of the landfill.
- 2.5. A comprehensive Environmental Risk Assessment has been prepared to identify risks associated with the proposed changes and provide information on the proposed mitigation for those risks, see Appendix 3 Environmental Risk Assessment.
- 2.6. A report outlining the market demand and justification for the increase to annual waste input limits has been provided, see Appendix 1 Market Assessment.
- 2.7. The following certificates for the Technically Competent Manager (TCM) for this Site are provided in Appendix 2, Technically Competent Management.
 - Original Certificate of Technical Competency (COTC)
 - Continued Compliance Certification
- 2.8. Within Application Form C2 question 3c: *Finances* we have responded “Other”. The landfill will already have Financial Provision in place.



3. Environmental Risk

Environmental Risk Assessment

- 3.1. This permit variation application seeks to increase the annual waste input limits for non-hazardous and inert wastes, and add two waste codes. A Site specific Environmental Risk Assessment (ERA) has been prepared to assess the potential impact to environmental risk associated with these changes, see Appendix 3 Environmental Risk Assessment.
- 3.2. The key environmental risk factors that have been considered in the ERA include:
- Dust
 - Noise
 - Odour
 - Landfill Gas
 - Leachate
 - Litter
 - Mud on local roads
- 3.3. While no new sources of environmental risk have been identified, the increased annual throughput is expected to impact existing environmental risk factors due to the impact that the changes are expected to have on Site operations, such as:
- An increase in vehicle movements due to higher volumes of waste being delivered to and handled on site.
 - More frequent waste handling and tipping activities.
 - Accelerated cell competition and infrastructure installation, such as landfill gas extraction systems and capping works.
- 3.4. These operational changes have been considered when assessing the impact of the proposed changes on environmental risk.
- 3.5. The ERA considers the potential impact of the proposed changes on sensitive receptors, including nearby residential areas, local roads, surface waters and protected habitats.
- 3.6. Mitigation measures currently in place, including odour control, dust suppression and litter management, are expected to remain effective, however may require more frequent application as a result of the proposed changes.
- 3.7. The Site is located 1.5km from protected habitats and species. The protected area is Solway Firth, and Upper Solway Flats and Marshes which contain Ramsar Sites, Sites of Special Scientific Interest, Special Areas of Conservation and Special Protection Areas for England and Scotland.
- 3.8. The impact of the proposed changes on the nearby protected habitats and species have been considered in the ERA. A Habitats Assessment has been requested in Application Form part F1 of this application.

Management Plans and Procedures

- 3.9. An Odour Management Plan (OMP) has been produced, see Appendix 4 Odour Management Plan. This OMP considers the impact of odour emissions on nearby receptors as a result of the proposed changes, and details how odour emissions will be managed.
- 3.10. To manage any potential risk of an increase in odour emissions as a result of the proposed changes, a self-imposed limit on sulphur content will be applied to incoming waste loads. This will be implemented through the Waste Acceptance Procedure in the EMS, see Appendix 5 Waste Acceptance Procedure.
- 3.11. The increased risk of mud being tracked on to local roads will be managed in accordance with a Mud, Litter and Debris Procedure in the EMS, see Appendix 6 Mud, Litter and Debris Procedure.
- 3.12. A Fire Prevention Plan has been produced addressing the risk of fire as a result of waste being stored on Site prior to landfilling, see Appendix 7, Fire Prevention Plan.



- 3.13. A Gas Management Plan (GMP) was produced in February 2011. This GMP provides a framework for the management of landfill gas at Hespian Wood Landfill, see Appendix 8 Gas Management Plan. Due to the changes in Operator at the Site and over tipping of existing waste an updated Gas Management Plan is being prepared at this time by SLR Consulting Ltd.
- 3.14. A Dust Management Plan (DMP) has been produced, see Appendix 9 Dust Management Plan. This DMP considers the impact of dust emissions on nearby receptors as a result of the proposed changes, and details how dust emissions will be managed.
- 3.15. A Noise Management Plan (NMP) has been produced, see Appendix 10 Noise Management Plan. This NMP considers the impact of noise emissions on nearby receptors as a result of the proposed changes, and details how noise will be managed.
- 3.16. A Pest Management Plan (PMP) has been produced, see Appendix 11 Pest Management Plan. This PMP considers the impact of pests on nearby receptors as a result of the proposed changes, and details how pests will be managed.

Assessments and Management Plans Not Impacted

- 3.17. The proposed increase in annual tonnage limits impacts the rate of waste disposal rather than the total volume of waste deposited in the landfill. As such, there are no proposed changes to restoration contours, settlement levels, engineering infrastructure, or environmental control systems for gas, leachate, and surface water.
- 3.18. The following assessments and management plans have not been revised or included within this application for the proposed increase in annual tonnage limits:
 - Environmental Setting and Installation Design (ESID)
 - There are no proposed changes to restoration contours, engineering design, or monitoring infrastructure.
 - The increase in annual tonnage limits will only impact the rate of waste disposal, not the total volume of waste disposed of in the landfill.
 - The additional waste types will not pose any risks not already included in the ESID assessments completed for the landfill.
 - Hydrogeological Risk Assessment (HRA), Stability Risk Assessment (SRA), and Gas Risk Assessment (GRA)
 - There is no proposed change to the total volume of waste to be landfilled. Therefore, no change to the above assessments are considered to be required.
 - The proposed waste code (18 02 03 including animal faeces) for landfilling is not considered to pose additional risks compared to the wastes already in the permit and therefore would not change the above assessments.
 - Leachate Management Plan (LMP)
 - It is not considered that the proposed changes will have a significant impact on leachate management.
 - Since there is no additional waste proposed, there are no proposed changes to leachate management infrastructure.
 - Surface Water Management Plan (SWMP)
 - Since there are no proposed changes to restoration contours, it is not considered that there will be any changes to surface water runoff management measures already in place.



4. Operating Techniques

Environmental Management System

- 4.1. The Site will be operated in accordance with a written Environmental Management System (EMS).
- 4.2. A hard copy of the EMS will be kept on Site at all times. Each member of staff at the Site will have access to the EMS.
- 4.3. The EMS folder shall include a copy of the Environmental Permit and will contain the following sections:

EMS Report

This report contains a description of the purpose and scope of the EMS, all Site details including the location of the Site, receptors located in close proximity to the Site boundary, waste storage, any plant and equipment that is used on the Site, the different types of waste activities carried out on Site, the Site security measures, information on the competence of the staff working on Site, roles and responsibilities for each member of staff and details for Site closure, where appropriate.

Site Condition Report

This records the condition of land covered by the Environmental Permit at various stages during the life of the permit.

Climate Change Risk Assessment and Adaptation Plan

This report identifies how climate change will impact the Site and what will be done to mitigate the impacts of climate change.

Odour Management Plan

This report considers the potential impact of Site operations on local receptors and details relevant mitigation measures.

Technical Competence

This section of the EMS includes details of the competence status of the Technical Competent Manager(s) (TCM), the operational hours for the Site, the minimum attendance requirements for the TCM and copies of relevant certificates.

Authorisations

A copy of the permit and any EA Registrations for the Site will be located in the EMS.

Technical Competence

This section of the EMS includes details of the competence status of the Technical Competent Manager(s) (TCM), the operational hours for the Site, the minimum attendance requirements for the TCM and copies of relevant certificates.

Procedures and Forms

The EMS contains a number of procedures, covering; implementation, operational control, waste acceptance and rejection, environmental protection, emergency provisions and reporting. Records to be produced in accordance with these procedures are provided in the EMS as forms. The associated completed forms provide records that evidence the implementation of the EMS. The following list details procedures that are included in the EMS:

Implementation

- Environmental Training, Awareness and Competence
- Compliance with Legal requirements
- Staff Organogram



- Reviewing and Auditing Documentation that outlines how reviewing of the EMS and associated documentation is undertaken. This procedure contains a list of how frequently documents within the EMS should be reviewed / audited.

Operational Control

- Housekeeping, litter, pests and vermin
- Noise Control
- Waste storage and Handling
- Site Security
- Reporting and Investigation of Accidents, Incidents and Complaints
- Dust, Fibres and Particulates
- Maintenance
- Waste Storage procedure including information on the following:
 - Identification of wastes stored on site.
 - Storage times of waste on site.
 - Quantity of Waste Stored on site.

Waste Acceptance and Rejection

- Waste Acceptance
- Waste Rejection and Non-compliance
- Waste Reporting
- Duty of Care

Environmental Protection

- Dust Fibres and Particulate
- Mud and Debris
- Noise Control
- Odour
- Surface Water Management

Environmental Monitoring

- Groundwater
- Landfill Gas
- Surface Water

Emergency Provisions

- Environmental Accidents /Incidents / Complaints and associated forms
- Fire
- Flood
- Spillages
- Utility Failure

Reporting

- Waste Returns
- Notifications to the Environment Agency

This list is not exhaustive.



5. Technically Competent Manager

- 5.1. George Brown will be the Technically Competent Manager for this Site, See Table 5.1 TCM Details.
- 5.2. The following certificates for the Technically Competent Manager (TCM) for this Site have been provided, see Appendix 2 Technically Competent Management.
- Original Certificate of Technical Competency (COTC)
 - Continued Compliance Certification

Table 5.1 TCM Details

First Name	George
Last Name	Brown
Date of Birth	29/09/1976
Phone	07950278280
Email	george@seletia.eco



Application form

Part A



Application form

Part C2



Application form

Part C4



Application form

Part F1



Appendix 1

Market Assessment



Appendix 2

TCM



Appendix 3

Environmental Risk Assessment



Appendix 4

Odour Management Plan



Appendix 5

Waste Acceptance Procedure



Appendix 6

Mud, Litter and Debris Procedure



Appendix 7

Fire Prevention Plan



Appendix 8

Gas Management Plan



Appendix 9

Dust Management Plan



Appendix 10

Noise Management Plan



Appendix 11

Pest Management Plan