



Pest Management Plan

Seletia (HW) Limited

Hespin Wood Landfill

Todhills,

Carlisle,

Cumbria,

CA6 4BJ



PROVIDING SOLUTIONS, ENSURING COMPLIANCE

T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way
Telford, Shropshire, TF3 4NR

W www.westburyenv.co.uk



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1. Introduction

- 1.1. Westbury Environmental Limited has prepared this Pest Management Plan (PMP) on behalf of Seletia (HW) Limited.
- 1.2. This Pest Management Plan has been prepared in relation to waste activities carried out under Environmental Permit EPR/BM60261B (Permit) at Hespin Wood Landfill, Todhills, Carlisle, Cumbria, CA6 4BJ (Site).
- 1.3. The Site extends to an area of approximately three hectares. The location and extent of the Site is shown in Drawing No. 24/012u 002 Site Layout Plan.
- 1.4. This PMP has been produced in accordance with the Environment Guidance "Control and monitor emissions for your environmental permit" last updated 3rd December 2025.
- 1.5. This PMP provides detailed information on the sources, risks and mitigation measures related to the potential for pests, such as birds, flies and vermin, as a result of Site operations.

Using this PMP

- 1.6. A copy of this PMP must be kept in the Site office and be readily available to all members of staff.
- 1.7. This PMP forms part of the Environmental Management System (EMS) for the Site. Procedures and forms referenced within this PMP are included within the EMS. Completed forms (records) will be kept, as required by procedures included in the EMS.
- 1.8. The requirements of this PMP will be implemented on the Site through procedures within the EMS. The EMS includes an Environmental Training Checklist that specifies all the required training for Site staff. This training checklist includes housekeeping procedures that include information on pest control. The training undertaken by each member of staff is recorded on their training record as part of the EMS.
- 1.9. Training on EMS procedures will be given to staff on a regular basis. New members of staff will be given training on the PMP during their induction.

Content of the Pest Management Plan

- 1.10. This Pest Management Plan is structured as follows:
 - Section 2 provides a summary of the relevant legislation and guidelines.
 - Section 3 provides information relating to the Site setting, including the location of the Site and nearby sensitive receptors.
 - Section 4 provides information on the pest attraction risks associated with landfill operations.
 - Section 5 provides information on the pest control measures in place at the landfill.
 - Section 6 provides a description of how complaints can be made and how they are addressed by the Site management.



2. Relevant Legislation

Environmental Protection Act 1990

- 2.1. The Environmental Protection Act 1990, Part III, Section 79 is the primary legislation for controlling pests from industrial, trade and business premises.
- 2.2. Local Authorities must review complaints about pests from industrial, trade and business premises that could be a 'statutory nuisance' covered by the Environmental Protection Act 1990.
- 2.3. Pests may be considered a 'statutory nuisance' if one of the following applies:
 - The pests unreasonably and substantially interfere with the use or enjoyment of a home or other premises.
 - The pests injure health or are likely to injure health.
- 2.4. An 'abatement notice' will be served by the Local Authority if it is agreed that a statutory nuisance is happening, has happened or will happen in the future. An abatement notice will require whoever's responsible to stop or restrict the volume of pests.
- 2.5. If an abatement notice is not complied with then the person responsible may be prosecuted and/or fined.
- 2.6. Local Authorities can also take action to stop or restrict the nuisance by:
 - Carrying out works and making the person given the abatement notice pay for them.
 - Applying to the High Court for an injunction (if a prosecution is not adequate).

Compliance with Environmental Permit

- 2.7. The Environment Agency ensures the presence of pests at permitted waste facilities is controlled by including conditions relating to pests in the Environmental Permit.
- 2.8. If the Environment Agency consider that the presence of pests is at an unreasonable level, then the operator will be required to take further abatement measures to reduce population or risk having to reduce or cease operations.
- 2.9. A final determination as to whether there has been a Permit breach will involve an assessment of the impact of the pest population and the appropriateness of the measures being employed.



3. Site Location and Sensitive Receptors

- 3.1. Hespin Wood Landfill is located at Todhills, Carlisle, Cumbria, CA6 4BJ.
- 3.2. The land surrounding the Site is largely agricultural, with the nearest residential area being Todhills which is located approximately 250m east from the Site boundary at its closest point.
- 3.3. The Site is not located within a Groundwater Source Protection Zone. The nearest surface water features are the Channel of River Esk located approximately 1.25km northwest and the River Eden approximately 1km southwest of the Site boundary.
- 3.4. The Site is located adjacent to an area containing protected habitats and species, located 1.15km northwest of the Site boundary at the closest point. This area is made up of a combination of Ramsar Sites, SSSIs, SACs and SPAs at Solway Firth and Solway Flats and Marshes.

Sensitive Receptors

- 3.5. This PMP identifies receptors within 1km of the Site that may be sensitive to the presence of pests as a result of the permit variation to remove annual waste input limits for landfill deposit.
- 3.6. Receptor sensitivity is a key factor in determining the significance of pest populations as some receptors are more sensitive than others. Residential receptors and protected habitats/species tend to have considerably lower tolerance to pests than commercial and industrial receptors.
- 3.7. Locations with a high sensitivity to pests near to the Site include the residential area of Todhills 250m southeast of the Site at its closest point.
- 3.8. The distance from the Site boundary to the sensitive receptor plays an important role in the potential impact experienced from pests. The impact on sensitive receptors from the pest population reduces significantly the further away from the source.
- 3.9. The direction and distances from the boundary of the Site to the boundary of sensitive receptors are provided in Table 3.1 Sensitive Receptors.

Table 3.1 Sensitive Receptors

Receptor	Type of receptor	Bearing from Site	Approx. distance from Site boundary to receptor boundary (m)
M6 Motorway	Road	East	12
Blackrigg Bungalow	Residential	Southwest	225
Todhills	Residential	East	250
Todhills Services	Leisure	Southeast	580
Floriston Rigg Commercial Units	Commercial	North	450
Rockcliffe	Residential	Southwest	1km

- 3.10. Sensitive receptors near the Site are identified on Drawing No. 24/012u 001 Sensitive Receptors Plan V2.
- 3.11. The closest residential area to the Site is Blackrigg bungalow, situated 225m Southwest, and Todhills, situated 250m southeast of the Site. The residential area of Todhills is separated from Site by the M6 motorway.



- 3.12. Solway Firth and Solway Flats & Marshes are a collection of a Special Area of Conservation, Special Protection Area, Site of Special Scientific Interest and a Ramsar Site. These protected areas are separated from the Site by agricultural land.

Meteorology

- 3.13. Adverse weather conditions such as heat waves may increase the potential for increase in pest population. Prolonged spells of high temperatures will lead to biodegradable waste degrading quicker, thereby increasing the potential for the waste to attract pests.
- 3.14. Wet, rainy weather may increase the potential for an increase in pest population. In rainy conditions, waste will become damp. This may increase the population of pests such as flies, as fly larvae generally occur in damp and decaying organic waste.

Other Sources of Pests

- 3.15. Operations undertaken by nearby industrial/commercial businesses may also attract pests, such as Jobling Purser Asphalt Plant which borders the Site to the southeast, Cumbria Waste Management waste transfer station which borders the Site to the south, and AWJ Recycling Centre, located approximately 280m southeast of the Site.
- 3.16. It is also considered that agricultural activities carried out on the land surrounding the Site may have the potential to attract pests.



4. Pest Attraction Risks

- 4.1. Certain waste types and operational practices at landfill sites can attract pests, including birds, vermin, and flies. Effective identification and management of these risks are essential to prevent nuisance, protect public health, and maintain compliance with permit conditions.

Birds

- 4.2. Birds are primarily attracted to exposed waste containing organic material, such as food scraps. Open tipping areas, inadequate daily cover, temporary storage of waste prior to landfilling, and delays in waste compaction provide easy feeding opportunities.
- 4.3. Bird activity can result in litter dispersal beyond the Site boundary, damage to daily cover, and increased bird-strike risk near airports. Birds may also spread pathogens to water bodies, agricultural land, and livestock, creating environmental and public health concerns.
- 4.4. At Hespín Wood Landfill, the primary risk of bird attraction arises from the deposition of biodegradable and food-containing wastes. The Site applies daily cover to all active tipping areas, significantly reducing the availability of exposed food sources.

Vermin (Rodents)

- 4.5. Rodents are drawn to waste piles that provide both food and shelter, particularly where organic waste is present and housekeeping standards are poor. Long-term stockpiling of waste or insufficient containment measures can exacerbate attraction. Waste that is accepted to Site is stored for a short period of time prior to being deposited in the landfill and is not stockpiled long term.
- 4.6. Rodents can damage Site infrastructure by gnawing through liners, cables, and equipment. They are known carriers of diseases that pose risks to humans and livestock. Their presence can result in complaints from nearby communities.
- 4.7. Due to the fact that Hespín Wood Landfill is located in a largely agricultural area, it is considered that there will be a large population of rodents in the vicinity of the Site.

Flies

- 4.8. Flies breed in moist, decomposing organic waste. Delays in applying daily cover, temporary storage of waste prior to landfilling, or inadequate compaction create ideal conditions for fly infestation.
- 4.9. Flies are a nuisance to Site workers and nearby residents, and they can transmit pathogens. Severe infestations may result in enforcement action, reputational damage, and increased operational costs for remedial measures.



5. Pest Control Measures

- 5.1. Effective pest control is essential to maintaining environmental standards and preventing nuisance at Hespín Wood Landfill. The following measures are implemented to monitor, manage, and mitigate the presence of pests and vermin on Site:

Waste Acceptance Controls

- 5.2. Waste acceptance procedures are strictly applied to prevent the receipt of contravening or strongly malodorous wastes that may attract pests, see Appendix 1 Waste Acceptance Procedure.
- 5.3. Loads are inspected upon arrival and any non-conforming waste is rejected or quarantined in designated containers to prevent exposure.
- 5.4. Waste with high odour potential is deposited promptly and covered at the end of each operating day to reduce emissions and pest attraction.

Daily Waste Cover

- 5.5. Operational landfill cells are covered at the end of each day with temporary cover materials (typically soils or fines) to prevent odour emissions and pest access outside of operational hours.
- 5.6. This daily cover also acts as a barrier to birds, rodents, and insects, reducing the likelihood of infestation.

Housekeeping and Site Hygiene

- 5.7. Housekeeping procedures ensure that litter and waste residues are regularly collected and removed from operational areas, see Appendix 2 Housekeeping, Litter, Pest and Vermin Control Procedure.
- 5.8. Plant and equipment are cleaned when cool to remove grease, oil, fuels, dust, and fluff that may attract pests.
- 5.9. Windblown litter caught in perimeter hedging is cleared routinely to prevent nesting and harbourage.
- 5.10. General cleaning of waste storage areas is carried out to reduce odour and pest attraction.

Landfill Cell Capping

- 5.11. Cells that are no longer operational are temporarily or permanently capped using engineered systems including geomembranes, geosynthetic clay liners (GCL), and protective geotextiles.
- 5.12. Permanent capping reduces exposure of waste to the atmosphere, thereby limiting odour and pest attraction.
- 5.13. Temporary capping is used to control emissions and pest access until final restoration is completed.

Pest and Vermin Monitoring

- 5.14. The Site is inspected regularly for signs of pest activity, including rodents and birds. Findings are recorded and reviewed as part of inspection checklists, see Appendix 3 Inspection Checklist.
- 5.15. If evidence of infestation is identified, a specialist pest control contractor is engaged to manage or eradicate the issue.

Bird Management

- 5.16. Birds can pose a nuisance on Site, particularly through soiling of plant and equipment.
- 5.17. Operational areas are monitored for bird activity, and deterrents may be used if necessary.

Odour Control Integration

- 5.18. The Odour Management Plan includes measures to minimise odour emissions that could attract pests, such as:



- Immediate deposition and daily cover of odorous waste.
- Sheeting of vehicles transporting potentially malodorous waste.
- Regular cleaning of waste handling areas.

5.19. Odour monitoring is conducted daily or more frequently depending on weather conditions and risk magnitude.

Staff Training and Responsibilities

5.20. All Site operatives receive training on pest identification, odour control, and housekeeping procedures as part of the EMS.

5.21. The Site Manager is responsible for ensuring compliance with pest control procedures and engaging contractors when required.

**Table 7.1: Source Pathway Receptor Routes**

Source	Pathway	Receptor	Impact	Control Measures
Food waste, biodegradable waste, and other odorous materials.	Airborne odour emissions; direct access by pests (e.g. birds, rodents, insects).	Nearby residential areas (e.g. Todhills, Rockcliffe), Site operatives, local businesses, and agricultural land.	Attraction of pests (vermin, birds, insects); nuisance; complaints from local residents.	<p>Strict waste acceptance procedures to reject strongly malodorous or contravening waste.</p> <p>Immediate deposition and daily cover of waste.</p> <p>Prompt handling and compaction of waste.</p> <p>Use of enclosed or sheeted vehicles for odorous waste.</p> <p>Regular housekeeping and cleaning of waste storage and operational areas</p>
Exposed waste in active landfill cells	Direct access by pests; windblown litter	Nearby residential areas (e.g. Todhills, Rockcliffe), Site operatives, local businesses, surrounding environment	Nesting, scavenging, spread of litter.	<p>Daily cover of active cells with inert material.</p> <p>Temporary and permanent capping of completed cells.</p> <p>Litter fencing and regular litter picking.</p> <p>Bird deterrent systems if required</p>
Leachate and stagnant water pools.	Waterborne breeding grounds.	Nearby residential areas (e.g. Todhills, Rockcliffe), Site operatives, local businesses, local fauna.	Breeding of pests; increased insect populations.	<p>Effective leachate management and drainage.</p> <p>Regular inspection and maintenance of leachate and surface water systems.</p>
Poor Site hygiene (e.g. food waste in staff areas, uncleaned equipment)	Direct attraction	Nearby residential areas (e.g. Todhills, Rockcliffe), Site operatives, local businesses, Site operatives.	Localised pest infestations; health and safety risks.	<p>Implementation of Housekeeping measures.</p> <p>Routine cleaning of plant and equipment.</p> <p>Secure storage of food and waste in welfare areas</p>



Inadequate pest monitoring and response.	Lack of detection and delayed response.	All receptors.	Escalation of pest populations; ineffective control.	Regular pest monitoring and inspections. Engagement of licensed pest control contractors upon detection. Staff training in pest identification and reporting
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6. Reporting and Complaints Response

- 6.1. A Complaint Form will be available on Site, see Appendix 4 Complaint Form. A Complaint Form must be filled in and kept on file whenever a complaint is received in accordance with the EMS Complaints Procedure.

Engagement with the Community

- 6.2. A Site Notice Board is located at the Site entrance and includes the following information:
- The Permit holder's name.
 - The operator's name.
 - An emergency contact name and telephone number.
 - A statement that the Site is permitted by the Environment Agency
 - The Environmental Permit Ref. EPR/BM6026IB
 - The Environment Agency national numbers, 03708 506506 and 0800 807060 (incident hotline).
- 6.3. The provision of the above information ensures that members of the public can contact the Operator should they be concerned by the presence of pests or wish to make a complaint. This also applies to any events that may happen when the Site is unmanned / not operational.

Reporting of Complaints

- 6.4. Should a complaint regarding pests be received by the Site, the complaint is recorded on the Complaint Form in the EMS and investigated in accordance with the Complaints Procedure within the EMS implemented on the Site. The Complaint Form records who made the complaint, what the complaint was about and what has been done to resolve the issue and make sure this does not happen again.
- 6.5. The Site Manager must identify what caused the pest complaint to be generated. may have been caused by failure of pest control measures. If the complaint has been caused by a procedure not being carried out properly, then staff will receive repeat EMS training on the pest control procedures and Site management.
- 6.6. In all cases, and where information is available, all complaints will be acknowledged and investigated, with resultant actions reported to the complainant. Any complaints received by the Environment Agency or Local Authority relating to pests are dealt with on the same day.

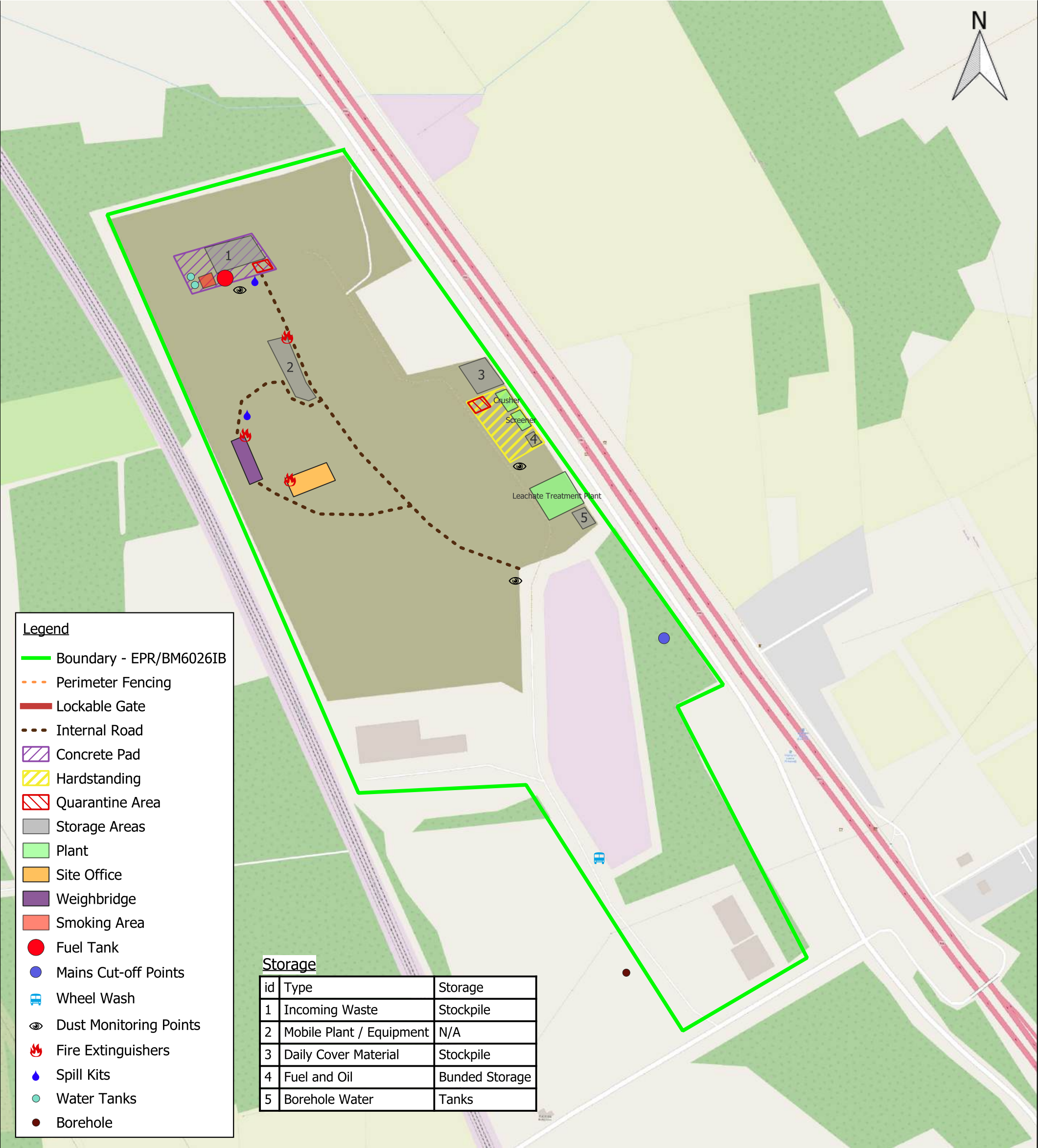
Management Responsibilities

- 6.7. Site staff are responsible for pest management issues and detecting/reporting the presence of pests. All members of staff are given training on the EMS for the Site, which includes a Pest Control Procedure. All staff on the Site are trained on the Pest Control Procedure which includes details regarding mitigation measures and recording complaints.
- 6.8. On receipt of a complaint the Site Manager investigates and establishes the cause. The most effective corrective or preventative action must then be determined to prevent future emissions occurring. Where additional time is required in order to implement the appropriate corrective or preventative action the complainant will be contacted with details on the actions to be implemented and the estimated timescales for completion. The maximum response time for contacting a complainant will be two working days.
- 6.9. Should numerous complaints be received at the Site regarding the same issue, the cause of the complaint(s) will be investigated in accordance with the Accidents, Incidents & Complaints Procedure within the EMS. Operations on the Site will cease or be reduced should excessive pest populations be identified following the implementation of other mitigation measures or when instruction from the Environment Agency to cease operations has been received.



Drawings

Drawing No. 24/012w 001	Sensitive Receptor Plan V2
Drawing No. 24/012u 002	Site Layout Plan





0100200 m

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Drawing Ref: 24/012u 002 Site Layout Plan

Seletia (HW) Limited

Hespin Wood Landfill

Todhills
Carlisle
Cumbria
CA6 4BJ

14th October 2025

Scale:
Map: 1:5,000
Features: Not to scale

Version Number: 1

Created By: SW
Checked By: TW



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T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way
Teiford, Shropshire, TF3 4NR

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Legend

Boundary - EPR/BM6026IB

Radius - 1km

Receptors

- Leisure
- Residential
- River
- Road
- SAC, SPA
- SSSI, Ramsar Site
- Agricultural
- Commercial
- SAC,SPA,SSSI,Ramsar Site Approximate Border



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Hespin Wood Landfill

Todhills
Carlisle
Cumbria
CA6 4BJ

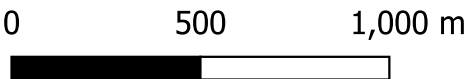
Drawing Ref: 24/012u 001 Sensitive Receptors Plan

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29th September 2025

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T 01952 879705 E info@westburyenv.co.uk

A Agriculture House, Southwater Way
Telford, Shropshire, TF3 4NR

W www.westburyenv.co.uk

id	Name	Type	Bearing	Distance	Noise	Dust	Odour	Fire
1	M6 Motorway	Road	East	12m	No	Yes	No	Yes
2	Blackrigg Bungalow	Residential	Southwest	225m	Yes	Yes	Yes	Yes
3	Todhills	Residential	East	250m	Yes	Yes	Yes	Yes
4	Wilson T Farm	Agricultural	Southwest	365m	No	No	No	Yes
5	Floriston Rigg Commercial Units	Commercial	North	450m	Yes	Yes	Yes	Yes
6	Todhills Services	Leisure	Southeast	580m	Yes	Yes	Yes	Yes
7	Rockcliffe	Residential	Southwest	1km	Yes	Yes	Yes	Yes
8	Solway Firth (Closest Point)	SAC, SPA	Northwest	1.15km	Yes	Yes	Yes	Yes
9	Solway Flats & Marshes (Closest Point)	SSSI, Ramsar Site	Northwest	1.15km	Yes	Yes	Yes	Yes
10	Channel of River Esk	River	North	1.15km	No	No	No	Yes
11	River Eden	River	Southwest	1.2km	No	No	No	Yes



Appendix 1

Waste Acceptance Procedure

Procedure No. 2.1 Waste Acceptance**V.2, November 2025**

Purpose: To ensure that all waste imported on to the Site is acceptable under the conditions of the Environmental Permit.

	RESPONSIBLE PERSON	RECORD
<u>Environmental Permit and Waste Codes</u>		
1. The Environmental Permit contains the list of waste types that are permitted to be accepted at the Site. A table containing the codes and descriptions of waste types that are permitted on this site is included at the end of this procedure, see Tables 1-2 Permitted Waste Types: <ul style="list-style-type: none"> Table 1 Permitted waste types for disposal at a landfill for non-hazardous waste. Table 2 Permitted waste types accepted for leachate treatment <p>This list of waste types should be consulted if you are unsure whether a load can be accepted, alternatively the Site manager should be consulted.</p>	All	Tables 1-2 Permitted Waste Types Appendix B.1 Environmental Permit
2. Waste types and wuantities that can be accepted for restoration are outlined in the approved Restoration Plan.		Appendix A.17 Restoration Plan
3. The following annual waste inputs for Landfill should not be exceeded as stated in the Environmental Permit: <ul style="list-style-type: none"> 132,000 tonnes of non-hazardous waste 50,000 tonnes of inert waste 1,500 tonnes of hazardous leachate or other hazardous liquids from offsite accepted at the onsite leachate treatment plant. 2,600 tonnes of non-hazardous leachate or other non-hazardous liquids from offsite accepted at the onsite leachate treatment plant. 		Tables 1-5 Permitted Waste Types
4. The following wastes should not be accepted for disposal in the Landfill: <ul style="list-style-type: none"> Hazardous waste, Liquid waste, including waste waters but excluding sludge and excluding liquid waste accepted at a permitted leachate treatment activity. Whole used tyres (other than bicycle types and tyres with an outside diameter of more than 1400mm) Shredded used tyres. Chemical substances from research and development or teaching activities (e.g., Laboratory residues) which are unidentified and/or which are new and whose effects on man/or environment are unknown. 		
5. Waste must not be accepted for disposal in the landfill if they have been diluted or mixed solely to meet the waste acceptance criteria.		
6. Waste shall only be accepted for disposal in the landfill if it has been treated first, unless: <ul style="list-style-type: none"> It's inert waste and treatment is not technically feasible. It's non-hazardous waste and treating it wouldn't make it safer or reduce how much there is. 		
7. Waste codes starting with 17 05 or 16 03 must only be accepted for disposal in the landfill if they do not include: <ul style="list-style-type: none"> Medicinal products. Pharmaceutically active waste materials from the manufacture of medicinal products. 		
8. Wastes must only be accepted for restoration if: <ul style="list-style-type: none"> They are accepted in accordance with a restoration plan approved in writing by the Environment Agency. 		Appendix A.17 Restoration Plan
9. If unsure whether to accept a load onto the Site, consult Tables 1-2, and then		

	RESPONSIBLE PERSON	RECORD
the Site Manager if necessary.		
10. Unsuitable wastes are rejected in accordance with the Waste Rejection Procedure.	Site Operative	Procedure No. 2.3 Waste Rejection
11. The Site does not typically experience seasonal variation in incoming waste material.		
<u>Waste Pre-Acceptance</u>		
12. Following a customer enquiry, information about the waste is requested from the waste producer.	Site Manager	Form No. 2.1a Waste Information Forms
13. This information is recorded on the Waste Information Form and the information reviewed to assess if the waste is acceptable or not.		
14. Review of the information in the Waste Information Form will determine the need for sampling / testing / Hazardous Waste Assessment.	Site Manager	Procedure No. 2.2 Waste Classification Form No. 2.1a Waste Information Forms
15. A judgement should be made as to the necessity to obtain comprehensive information at this stage. If the source of the waste is not likely to be contaminated, then it may not be necessary to obtain further information or hazardous waste assessment on the waste. If the source of the waste is likely to be contaminated, then further information and/or a hazardous waste assessment should be requested.		
16. If required, a Hazardous Waste Assessment (based on WM3 Guidance) is completed in accordance with the Waste Classification Procedure.		Procedure No. 2.2 Waste Classification
17. The information requested from customers at the pre-acceptance stage is re-assessed on an annual basis to ensure it is preventing unsuitable wastes being sent to the Site.	Site Manager	
18. Pre-acceptance information requirements will be reviewed when: <ul style="list-style-type: none"> • There are changes in the waste. • There are changes in the process generating the waste. • Received waste does not conform to pre-acceptance information provided. 		

All Vehicles on Site

19. Third-party hauliers used for transporting waste must be an Upper Tier Waste Carrier registered with the Environment Agency.	Site Operative	Waste Transfer Note
20. Copies of third-party haulier registrations certifications will be retained in the Site office.	Site Operative	
21. Periodic checks should be completed on registration certificates of third-party hauliers to ensure they remain valid. If the registration has expired, a copy of the renewed registration will be obtained.	Site Operative	

	RESPONSIBLE PERSON	RECORD
<u>Acceptance of Waste onto the Site</u>		
22. All incoming vehicles will provide the accompanying Waste Transfer Note to the Site Operative unless a Season Waste Transfer Note has been provided.	Site Operative	Waste Transfer Note
23. A season waste transfer note is a document that covers transfers for up to twelve months. Season waste transfer notes may be used for wastes from a given site if it is well characterised or a regularly generated waste.		
24. The Site Operative will complete the section relating to transfer of waste and will return the waste transfer note to the driver keeping a copy of the WTN for their own records.		
25. Unless a season WTN has been provided, a Waste Transfer Note for every load is obtained from the driver and the Waste Transfer Note is checked to ensure it contains the following: <ul style="list-style-type: none"> • Vehicle registration and driver's name and signature. • Waste haulier name and valid waste carrier's registration number. • Name, address (of source site) and signature of the transferor. • Name, address (of destination site) and signature of the person receiving the waste (transferee). • Permit number or exemption reference of the Site Description of waste including waste type, waste source and waste containment. • Amount of waste (tonnes). • List of Waste (LoW) code. • SIC Code of the waste holder using SIC Codes (2007). • Date and time of waste transfer. • Waste Transfer Note number. • Confirmation that the Waste Hierarchy has been considered. 	Site Operative	Waste Transfer Note
26. Loads will be visually checked by Site Operatives prior to offloading to ensure that an accurate written description and List of Waste code has been provided on the Waste Transfer Note.	Site Operative	Waste Transfer Note
27. After initial checks by the Site Operative, loads are then directed for tipping, inspection, and stockpiling in the offloading area.	Site Operative	
28. Each load is visually inspected during tipping by Site Operatives. Inspections are made to check the accuracy of the waste description provided on the Waste Transfer Note again and to identify any contravening waste types.	Site Operative	
29. The Site Manager shall be immediately informed if there are discrepancies with the load or its paperwork.	Site Operative	
30. If the load is not acceptable under the Environmental Permit, then, it should be rejected from site in accordance with the Waste Rejection Procedure.	Site Operative	Procedure No. 2.3 Waste Rejection

Compliance Testing

31. Compliance testing will be carried out on waste accepted on to the Site.	Site Manager	Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling Pre-acceptance flow chart
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	RESPONSIBLE PERSON	RECORD
		Waste Classification flow chart
32. The purpose of compliance testing is to ensure that the information provided during pre-acceptance was representative of the waste received and that the waste is acceptable.	Site Manager	
33. Samples taken from waste piles will be tested at a laboratory to determine the characteristics of the waste and to ensure that the waste is as described on the WTN.	Site Manager	
34. A Hazardous Waste Assessment, in accordance with WM3 Guidance, will be completed using the testing results received from the laboratory. This Hazardous Waste Assessment will classify the waste as non-hazardous or hazardous.	Site Operative	Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling
35. If a waste sample is found to be classified as hazardous waste, then the corresponding waste pile will be quarantined and removed from the Site in accordance with the Waste Rejection Procedure. The Hazardous Waste Classification Report will ensure that this waste is removed under the correct LoW code.	Site Operative	Pre-acceptance flow chart Waste Classification flow chart
36. Hazardous wastes will be sent to a suitably licensed facility and accompanied by a Hazardous Waste Consignment Note.	Site Operative	Procedure No. 2.2 Waste Classification Procedure No. 2.2.1 Waste Sampling

Records

37. Waste Transfer Notes will be stored for a minimum of two years.	Site Manager	Procedure No. 6.1 Waste Returns
38. Information from the waste transfer notes and any consignment notes will be used to provide the necessary data to complete the waste return as required by the Environment Agency.		

Consequences

39. The consequence of not following this procedure may result in unsuitable waste being accepted on to the Site. This may constitute a breach in the conditions of the Environmental Permit, in addition to causing potential contamination of the Site.		
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Appendix 2

Housekeeping, Litter, Pest and Vermin Control Procedure

Procedure No. 3.4 Housekeeping, Litter, Pest and Vermin Control**V.1, June 2025**

Purpose: To ensure good housekeeping and control of litter, pest, and vermin at the Site.

	RESPONSIBLE PERSON	RECORD
<u>Housekeeping and Litter</u>		
1. The waste accepted onto site is likely to contain litter.	Site Operative	Procedure No. 2.1 Waste Acceptance
2. The Site is inspected regularly for litter. Necessary actions are taken to ensure that litter does not build up on the Site.	All	Procedure No. 3.3 Maintenance
3. Plant and equipment are cleaned when cool to remove the build-up of grease, oil, fuels, dust, and fluff.		
4. Contravening waste is stored in a designated container which reduces likelihood of litter.		
5. Waste stored in stockpiles is not allowed to escape from boundary of the Site. The hedges and trees around the perimeter of the Site reduces the risk of waste escaping from Site.	All	
6. Onsite litter is collected and disposed of regularly to keep the Site tidy. Windblown material caught in boundary hedging is cleared regularly	All	Procedure No. 3.3 Maintenance

Pests and Vermin Control

7. Due to the location of the Site bordering agricultural fields, it is considered likely that there will be a natural population of rats and/or mice.		
8. Significant numbers of birds can cause a nuisance to operations, e.g., soiling of processing plant.		
9. The Site is inspected regularly for evidence of pest and vermin infestations and the findings recorded. If evidence of any of these is found, an appropriate specialist contractor shall be called in to manage or eradicate the problem.	Site Operative	Procedure No. 3.3 Maintenance



Appendix 3

Inspection Checklist

Form No. 3.3a Inspection Checklists

V.2, November 2025

Daily Inspection Checklists				
Item for Visual Inspection	Aspects for Inspection	Checked?	Remedial Action Required?	Action Completed Form
Plant/Equipment	Pre-use checks			
Fire Watches	Plant and equipment			
Litter	Within tipping area			
	Within storage area			
	Along Site boundaries			
	Outside Site boundary			
Fuel Storage	Mobile bowser is securely located			
	Mobile bowser checked for any sign of damage, corrosion, deterioration, incident, leakage, or spillage.			
	The bund that encloses the fuel container is free from damage, deterioration, leakage or spillage.			
	The bund that encloses the fuel container is emptied of any accumulated rain water.			
Fire	Fire extinguishers / hoses in place and no obvious damage			
	Soil / sand available to aid in firefighting			
	Spill kits available			
Dust emissions	No excessive dust emissions should be escaping the Site boundary			
	Spray bar in crusher operational and has water supply			
Roads	Public highway clear of mud and debris			
	Access road clear of mud and debris			

Weather	Weather is recorded in Site Diary			
Fugitive emissions to air	Check if waste on Site is causing an odour.			
Fugitive emissions to water	<p>Check if there has been any contamination in runoff water, for example if there is oil sheen visible.</p> <p>Check for leaks from the quarantine area or containers that could cause contamination in runoff water.</p> <p>Check any nearby lagoons/sumps, tanks, collection points and drainage channels to prevent escape of contaminated water.</p>			

Date: _____

Completed by: _____

Signature: _____

Form No. 3.3a Inspection Checklists**V.2, November 2025**

Weekly Inspection Checklists					
Item for Visual Inspection	Aspects for Inspection	Checked?	Remedial Action Required?	Action Form Completed	
Pests and vermin	Observations of pests and vermin or evidence of their presence e.g. faeces.				
Site Security	Security measures are functional and fit for purpose				
Hoses and containers	Hoses should be in good condition and free from holes. Wheel washing hose functioning and not leaking. Containers free from cracks which may result in loss of containment.				
Hardstanding	Check for potholes and pooling water.				

Date: _____

Completed by: _____

Signature: _____

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Form No. 3.3a Inspection Checklists**V.1, June 2025****Monthly Checklist**

Item	Aspects	Checked ✓ / ✗	Comment	Remedial Action (if required)	Action Form ✓ / ✗	
					Required	Completed
Access Road on Site	In good condition, no potholes/damage					
Leachate management system	In good condition, no leaks/damage					
Landfill gas management system	In good condition, no leaks/damage					
Spill Kits	Present on the Site, ready for use and fully stocked with contents.					
Welfare/Site Office	Integrity of the records stored within the Site Office.					

Date: _____

Completed by: _____

Signature: _____



Appendix 4

Complaint Form

Form No. 7.1c Complaints Form**V.1, June 2025**

Who made the complaint?	Name:	
	Address:	
	Phone No.:	
Date and time they made the complaint:		
What happened? What was it about?		
Was anyone else aware of this – other neighbours or your staff? If so, who?		
Did the complaint relate to your site? If so, what happened? What went wrong?		
What have you done to make sure that it does not happen again?		
Was there any significant pollution – for example: dust, odour or noise outside the Site or spillage of polluting liquids onto the ground, into a drain or a watercourse?		
If there was, then you must notify the Environment Agency on 0800 807060 and any other relevant regulators. Have you done so? Yes ☐ No ☐		At what time did you phone?
You must also write or send an email to confirm this to your local Environment Agency office. Have you done so? Yes ☐ No ☐		What date did you contact?
Please print and sign your name:		