



<p>Persimmon PLC</p> <p>Environmental Alert</p> <p>Bulletin Issue Sheet</p>	Issue Ref:	ENV005
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Topic:	Waste Storage & Treatment
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Original Issued By:	Andrew Staufenbiel	Original Issue Date:	10/10/2023
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Distribution	x	Commercial		Finance	x	Administration/MD
		Technical		Sales		Land
	x	Construction		Customer Care	x	PLC – HS&E Advisors

Description
<p>Following an audit by the Environment Agency on one of our development sites, concerns were raised about both the storage and treatment of waste.</p> <p>What happened?</p> <p>Historical waste from across multiple phases had been gathered by groundworks contractors and subsequently stockpiled in an area, awaiting removal from site. The waste materials consisted of non-hazardous and hazardous materials. The mixing of non-hazardous and hazardous waste has resulted in the whole waste pile now being considered as hazardous. This will now attract significantly higher disposal costs.</p> <div style="display: flex; justify-content: space-around;">   </div> <p>Furthermore, regulations restrict the storage of waste on our sites for a period of up to 12 months. Wastes being stored for longer than this may be considered a 'permanent deposit of waste' and therefore an illegal waste activity. This waste is understood to have been on site for in excess of 12 months.</p> <p>Concerns were also raised about the processing / treatment of waste materials on site. The site team had created an 'inert stockpile' consisting of bricks, blocks, mortar, asphalt etc. This was then processed / crushed using mobile plant brought to site, to produce recycled aggregate which was to be reused on site.</p>



Preventing waste must always be the priority and reusing waste materials should also be prioritised, where possible.

However, any activity which crushes and or screens waste materials is considered a 'scheduled activity' by the regulator - this means that a permit/licence must be in place prior to the activity taking place.

Furthermore, any mobile plant operator using such equipment on our sites must be in receipt of a Deployment Notification(s) (DN). A DN is evidence that the plant operator has notified both the Local Authority (LA) who issued the permit for the plant, and the LA as to where the plant is to be operated.

This can be in the form of an email to the relevant department within the LA.

We **MUST** have receipt of the following information before allowing any mobile plant (used for processing/crushing materials) onto site:

- Mobile Plant (Part B) Permit
- Deployment Notification(s)
- Copy of Factory Production Control (FPC) manual

The FPC is a method statement of production that evidences how the materials will be treated / processed / graded etc. in accordance with the Aggregate Quality Protocol (England & Wales) or SEPA Guidance on Recycled Aggregates from Inert Waste (Scotland) and relevant British Standards.

Evidence of this is required to demonstrate to the relevant authorities that the materials produced (on-site) are no longer deemed waste.

Producing recycled aggregate without an FPC means the regulator may take the view that the materials are still a waste, meaning we can face prosecution for the illegal deposit of waste on our development sites (if reused on site).

Action Required

1 - Undertake a review of all sites to ensure no waste materials have been stored / stockpiled for longer than 12 months – this includes ALL waste types*. Where waste has been identified as being stored for more than 12 months, arrange for its removal from site.

***Note** – this timescale **DOES NOT** include clean naturally occurring soils pending reuse on site, or those referenced in a Materials Management Plan (MMP). Soils such as this **are not** considered waste.

2 - Undertake a review of all sites to check where materials are being stored, pending crushing / reuse. Ensure guidelines above and detailed below in the Waste Management Standard and Guidance Note are followed.

[EMS-STD-Waste Management](#)

[EMS-GU-Mobile Plant & Crushing](#)

Revision/Update Details