



## Whittlesey Quarry (Saxon Pit) Site Community Briefing

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### Overview

#### Welcome to Whittlesey Quarry Site (Saxon Pit) community briefing page.

As the primary regulator of three sites, Forterra, East Midlands and Johnsons, we publish this page to share information to the public about what we do and to outline some of our activities to keep the public informed. **We aim to provide** updates monthly.

### Our Objective

We are responsible for granting or refusing environmental permits, setting the conditions, and making sure that permit holders comply with them. We carry out periodic audits and inspections to check that the operators are complying with their permit conditions. We investigate complaints of amenity issues and make sure the operator is taking measures to prevent or minimise any amenity issues off site. If a breach of permit conditions is identified, we will investigate and take appropriate enforcement action; this action can range from advice and guidance through to prosecution for serious offences.

## The Sites

Whittlesey Quarry is located to the East of Peterborough, also known as Saxon Quarry or Saxon Pit. The three operations are regulated facilities that we manage and are associated with Permit Numbers: Forterra EPR - GP3435WX / East Midlands - EPR/FB3406KC / Johnsons – EPR-DP3131NM.

- Johnsons Aggregate Recycling Limited deal with the treatment of Incinerator Bottom Ash (IBA)
- Forterra manufacture house bricks at Kings Dyke works, the clay (raw material) is supplied by adjacent quarries
- East Midlands Waste Management Ltd, operate a Deposit for Recovery Permit within Saxon Pit.



Map indicating Quarry site location.

## Site Introductions

**East Midlands.** The site known as Saxon Pit is a former brickwork. Saxon Pit sits as a void space at about 22-25 metres below the surrounding ground level. Post-brickmaking the site has been, and continues to be, used for a wide range of commercial enterprises by different legal entities involving waste and non-waste related activities. Saxon Pit is a site of high public interest because commercial activities take place close to residential houses which can give rise to amenity issues (noise, dust and odour). Non-conforming waste has also been deposited within the restoration and stabilisation works on the Eastern Buttress of Saxon Pit requiring ongoing routine monitoring and remediation.

On 30 January 2012, we issued an environmental permit for Deposit for Recovery operations at Saxon Pit. Following the cessation of the former clay brickworks by backfilling the eastern excavation void with inert waste and soils, the operator fulfilled the required project to ensure the stability of the surrounding embankments. Over time, this permit was transferred to different operators and since 26 October 2017 it has been with the current permit holder and operator, East Midlands Waste Management Ltd.

The operator has and is continuing to undertake remediation and restoration works at Saxon Pit on the site's eastern buttress. Remediation works commenced in June 2021. Once the restoration

scheme is fully landscaped it should provide ecological benefit, such as wetlands, reed beds, grassland, and scrub habitat.



**Forterra.** The Whittlesey brickworks were first issued a Pollution Prevention and Control permit in 2004 which covered Saxon Pit. This permit covered two former clay extraction quarries- the Kings Dyke works with four Hoffman kilns, but also Saxon Pit which had two kilns.

These kilns had last been re-built in the 1970s and were a time proven technology to both fire and dry refractory products originally using coal as the primary energy source. – It is acknowledged that the organic matter present in the Lower Oxford clay source material contributes a significant percentage of the fuel required to fire what is usually described as “London brick(s)”. All kilns were converted to using mains gas instead of coal in the 1990s.

Saxon Pit last produced bricks in October 2011 and that part of the environmental permit has been (partially) surrendered, the land sold and it now has various tenants within it.

Forterra Plc have committed to investigate whether local reports of malodour could be linked to the brickworks by sending staff out to the area of a report. Therefore, anyone experiencing a “burning or sulphurous malodour is encouraged to report it to Forterra by telephoning 01733 359148 as well as calling our hotline on 0800 807060 to report it.



**Johnsons Aggregate Recycling Limited.** Manage a site located within the former brickworks in Saxon Pit and we first issued a permit for this in 2022. This Waste Treatment activity is for the treatment of Incinerator Bottom Ash (IBA) that has potential to be a direct substitute for virgin aggregate.

Johnsons produces an Incinerator Bottom Ash Aggregate (IBAA) that can be used in specific construction activities under Regulatory Position Statement 247 or with specific permitted activities. <https://www.gov.uk/government/publications/using-unbound-incinerator-bottom-ash-aggregate-ibaa-in-construction-activities-rps-247/using-unbound-incinerator-bottom-ash-aggregate-ibaa-in-construction-activities-rps-247>

The treatment process involves removal of metals and screening of the IBA to produce different sized fractions of Incinerator Bottom Ash Aggregate (IBAA). Unprocessed IBA that is received at the site is stored outside to undergo a cooling and 'ageing' process for a maximum period of 12 weeks. The IBA is then processed using a combination of a trommel, vibrating screens, electrostatic and magnetic separators. These processes are undertaken within two purpose-built and enclosed buildings. Other than the trommel, which is located outside, all the IBA treatment plants are situated within the enclosed buildings.

The permitted operations include:

- Recovery or a mix of recovery and disposal of non-hazardous waste
- Storage of waste prior to and after treatment
- Raw material storage
- Collection and storage of contaminated and uncontaminated surface water



## Odour Monitoring

We conduct off site odour monitoring outside of the Saxon Pit Permit boundaries. This monitoring is associated with weather conditions and mandated routes.

Monitoring will continue to gather more data to substantiate if there are any amenity issues in the area that are related to sites regulated by the Environment Agency or otherwise. We will continue to conduct audits and inspections to ensure the operator complies with their permit conditions and make sure the operator takes measures to prevent and minimise odours offsite if substantiated.

Johnson Aggregate Recycling Limited have a duty and regularly conduct on site amenity monitoring relating to odour and dust, we receive incident reports through Incident Communication Service (ICS) Hotline number, that may be related to their site, the relevant information will be passed on and we will conduct the monitoring to substantiate whether an odour is present and if so the potential source.

If anyone is detecting odours that are similar to “wet or damp smelling concrete”, residents are encouraged to report this matter by telephoning the Environment Agency reporting hotline on 0800 80 70 60. It is important to provide accurate information such as level of offensiveness, if the odour is persistent, duration and location.

## Updates:

**Forterra** - The last Forterra liaison group meeting was held at Whittlesey town council offices on 18/06/24.

The Environment Agency send an officer to a 6 monthly local liaison group meeting that is arranged by Forterra building products limited. Detailed reports on the environmental and health and safety performance of the brickworks are provided and subject to questioning by attendees at these meetings.

In September 2024 the Agency received 6 reports of malodour that were linked to the brickworks. All these reports are forwarded to Forterra to investigate and in September a maximum of 2 of these reports were recorded as the malodour was likely to be linked with the brick production process.

**East Midlands Waste Management Services** - are currently applying the soil capping layer to the Eastern Buttrass area. This has caused odour reports from local residents which we are currently investigating. I have spoken with the site operator and his agent and they will attempt to spread this layer of soil when the weather conditions are favourable.

Work on the remediation of the Eastern Buttrass is ongoing with regular and unannounced site inspections taking place by the Environment Agency.

Separately a water discharge permit has been applied for to remove water from the onsite lagoon to the nearby Kings Dyke Watercourse. This application is being determined by our Permitting Team.

**JARL** - On 20 August 2024, two officers visited the site to conduct a routine compliance assessment visit. This was preceded by a formal odour assessment within the residential industrial and countryside areas surrounding the permit boundary. During the visit, it was found to be compliant in their dust management techniques. There were no high volumes of waste exceeding their permit. JARL commit to their own assessments on dust and air within the confines of their operational procedures. The site score was Band (A) against the Compliance Classification Scheme (CCS).

**Dust Monitoring** - We will shortly be conducting dust monitoring off site to establish if IBA (A) is evident outside of the permit boundary. As soon as we collect any evidence on the results of our monitoring programme, they will be updated to this page.

**NIRS** - From 01 October to 22 October, the total incident reports from the public amounted to 98 reports across all three sites. These were a mix of odour and noise.

## Regulating

Findings from all inspections are detailed within our Compliance Assessment Report Forms (CAR). We use our guidance on compliance through - <https://www.gov.uk/government/publications/assessing-and-scoring-environmental-permit-compliance/assessing-and-scoring-environmental-permit-compliance> to score permit breaches in accordance with our Compliance Classification Scheme (CCS).

The risk category and score we give a non-compliance reflects the potential impact it could have if it were not addressed promptly and adequately. The only exception is for non-compliances relating to amenity conditions - odour, dust, noise. We categorise the risk and score these according to their actual (rather than potential) impact. Further details on this can be found in our FAQs.

Copies of our Compliance Assessment Forms (CAR) forms will be available on request, 28 days after they are issued to the operator. A period given to them to challenge the content within the report. If The operators choose to challenge our report this will delay the release. Once a CAR is available on the public register, we will also provide copies on this page.

## Are the operators compliant with their permit?

Providing the operators use appropriate measures to prevent, or where not practical, minimise off site odour annoyance, they will not fall into non-compliance of their permit. The operations by all businesses will have a degree of odour, noise, dust at different operational times of the day.

The scores associated with these non-compliances of the permit will lead to an increased subsistence charge for the site and is based on the polluter pays principle.

We have not ruled out taking enforcement action at this time, as such we are unable to provide detailed information or specific updates on the underlying causes of these permit non-compliances, beyond the information contained within our CAR forms. This includes timescales for completion of any investigations.

Any enforcement action will be taken in line with the Environment Agency's Enforcement and Sanctions Policy. The policy outlines a range of available enforcement options that can be applied. The decision to pursue enforcement will depend on factors including (but not limited to) intent, foreseeability, financial implication, attitude, and previous history.

## Why your views matter

Odour intensity describes the strength of the odour as perceived by an individual officer. Our officers record odour intensity using a scale of 0 to 6 as follows:

1. No Odour
2. Very faint odour (need to inhale into the wind to smell anything)
3. Faint odour (you can detect an odour when you inhale normally)
4. Distinct odour (there is clearly an odour in the air as you leave your car or enter the area)
5. Strong odour (a bearable odour but strong, you could stay in the area for some time)
6. Very strong odour (unpleasantly strong, you will want to leave the area quickly)
7. Extremely strong odour (likely to cause nausea and a strong need to remove yourself from the odour immediately).

The human nose is still the best means we have for detecting the full range of gases that cause odour. The concentrations at which these odorous gases are present in outdoor (ambient) air is usually very low beyond site boundaries (even if the smell is intense), and few pieces of equipment are sensitive enough to pick up the full range of these gases, when compared to the nose. In addition, sniff testing is physically versatile and allows us to assess odour at most locations without restrictions relating to external power, weather conditions, terrain etc.

## How we assess compliance

It is our role to assess compliance with the permits and to take appropriate regulatory action if we identify any breaches. We do so by reference to our [enforcement and sanctions policy](#) and the Government's [core guidance on environmental permitting](#), and with appropriate regard to the [Regulators' Code](#).

Our regulatory team assess compliance with the permit conditions in several ways including site inspection, audit, off-site odour assessments, and review of reports and monitoring data. We charge all permit-holders subsistence fees, which cover the cost of these routine regulatory activities. Subsistence fees do not cover provision of a constant officer presence on any permitted site. This is explained in more detail in the guidance to our [charging scheme](#).

A CAR is used to record the findings of our site inspections, audits and monitoring activities, reviews of monitoring and other data/reports. We use our guidance on [assessing and scoring environmental permit compliance](#) to score permit breaches in accordance with our Compliance Classification Scheme (CCS).

The risk category and score we give a non-compliance reflects the potential impact it could have if it were not addressed promptly and adequately. The only exception is for non-compliances relating to amenity conditions - odour, dust, noise and pests. We categorise the risk and score these according to their actual (rather than potential) impact.

There are 4 risk categories of non-compliance. They represent the severity of the reasonably foreseeable impact, or in the case of amenity conditions, the actual impact. Each risk category is scored. The scores are accumulated during the compliance year.

Category	Description
CCS 1	a non-compliance associated with a major impact on human health, quality of life or the environment.
CCS 2	a non-compliance associated with a significant impact on human health, quality of life or the environment.
CCS 3	a non-compliance associated with a minor impact on human health, quality of life or the environment.
CCS 4	a non-compliance associated with no potential environmental impact. We describe a CCS 3 breach as a minor breach and CCS 4 is often used for administrative errors.

We will continue to attend meetings on dates and time provided by the Saxon Gate Group, to update the community on operations from within Saxon Pit.

#### Audiences

- Members of the public

#### Interests

- Waste




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