



Operational Waste Management Strategy

June 2025



Client Name: Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) & Department for Environment, Food & Rural Affairs (Defra)

Document Reference: 15390-WAT-XX-XX-RP-V-59003

Project Number: BSD15390

Quality Assurance – Approval Status

This document has been prepared and checked in accordance with Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Revision	Status	Date	Prepared by	Checked by	Approved by
P01	S3	January 2025			
C01	A6	March 2025			
C02	A6	June 2025			

Comments

P01	Draft issue for comment
C01	Final issue
C02	Final issue including updated section 1.2.1

Revision		Status	
Pnn	Preliminary (shared; non-contractual)	S1	Coordination
Cnn	Contractual	S2	Information
		S3	Review & Comment
		S4	Review & Authorise
		S5	Review & Acceptance
		A0, A1, An	Authorised & Accepted (n=work stage if applicable)

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1. Introduction

1.1 The Brief

This Operational Waste Management Strategy (OWMS) has been prepared by Waterman Building Services Limited (hereafter “Waterman”) on behalf of the Department for Transport (DfT), His Majesty’s Revenues & Customs (HMRC) and Department for Environment, Food and Rural Affairs (DEFRA) (hereafter the “Applicant”) in support of a full planning application for the retention of the existing Inland Border Facility (IBF) and Border Control Post (BCP) at Sevington near Ashford in Kent, TN25 6GE. The Site is within both the Ashford Borough Council (ABC) and Kent County Council (KCC) administrative boundaries.

1.2 The Site and the Development

Prior to the exit of the United Kingdom (UK) from the European Union (EU) on the 31 December 2020, the Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020¹ was made by the Secretary of State in accordance with Schedule 59 of the Town and Country Planning Act 1990. The application for the Special Development Order (SDO) for the Site was submitted on 20 November 2020, pursuant to Article 4(1)(a) of the overarching SDO (statutory instrument) and granted on 01 December 2020.

Subsequent permission was granted by the Ministry of Housing, Communities and Local Government (and then the Department for Levelling Up, Housing and Communities) on 23rd December 2020, 24th November 2021 and 28th April 2022, to account for evolving operational requirements pursuant to the SDO. The temporary permission is set to expire on 31 December 2025.

The planning description² for the existing facility is as follows:

“The temporary use of land until 31 December 2025, operating 24 hours a day 7 days a week, for an Inland Border Facility for use in different phases by Department for Transport, HM Revenue & Customs / Border Force, Department for Environment, Food and Rural Affairs, Port Health Authority (PHA) and Animal and Plant Health Agency (APHA), Department for Business, Energy and Industrial Strategy for border readiness, CTC, ATA Carnet, SPS, CITES and other customs related checks, and market surveillance activities, and ancillary Covid19 testing and facilities. The proposed development includes the laying out of up to 855 Goods Vehicle parking spaces, capacity for 260 Goods Vehicles in 42 entry lanes, 357 staff car parking spaces, formation of a new permanent access (main access to the M20 junction 10a link road) and an emergency access / small vehicle ejection point to the north, access off Church Road into the staff car park, emergency access points off Highfield Lane, diversions and extinguishments to PRowWs, the erection of buildings and structures for border processing purposes within the development plot area of up to 34,500m², (HMRC, BCP and FM plots) to a maximum height of 8.5m, provision of 24 (19 permanent and 5 reserved) refrigerated semi-trailers covering an area of approximately 870m² associated with the Defra facility, water tank and pump house for sprinkler system, FM cabins, additional storage and additional Defra ancillary infrastructure, security fencing and noise attenuation bunds and fences to a combined maximum height of 5m, CCTV columns to a height of 8m, lighting columns to a maximum height of 12m, drainage, including the installation of surface mounted attenuation storage tanks and all associated engineering works, Site preparation works and extensive hard and soft landscape works. Approval is also sought for additional Site wide ancillary infrastructure covering a maximum development area of 500m², (including back-up generators, marshal gate cabin and emergency exit, GRP Critical Load MCCB Chamber and GRP Busbar Chamber) and for land levelling, construction of bunds and landscaping associated with the creation of biodiversity enhancements on the land east of Highfield Lane.”

¹ Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020 (2020/928). Available at: <https://www.legislation.gov.uk/uksi/2020/928/contents/made> (accessed 21 January 2025).

² Department for Levelling Up, Housing & Communities letter titled “The Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020 (“the Order”)” dated 28 April 2022.

The proposed planning description is as follows:

“Retention of the existing buildings, Goods Vehicle parking spaces, entry lanes, refrigerated semi-trailers, staff car parking spaces, access, site infrastructure, utilities, hardstanding, landscaping and ancillary facilities and associated works; and ongoing use of the site for an Inland Border Facility and Border Control Post, operating 24 hours per day, seven days per week.”

Existing buildings on-site will not change. The buildings are limited to the northern central (BCP) and south-western (IBF) parts of the application Site.

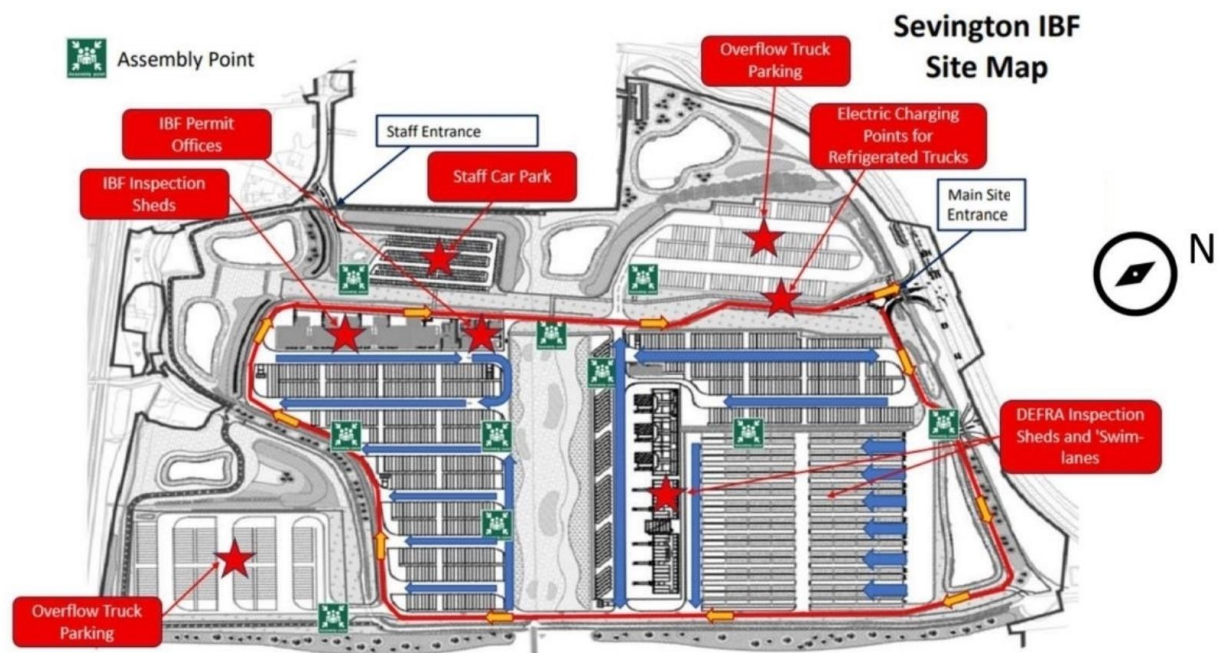
1.2.1 Areas

The Site covers an area of approximately 48ha, comprising the current operational IBF, including:

- Goods vehicle parking for 984 vehicles, including 42 entry lanes with a capacity of up to 240 goods vehicles, 24 refrigerated semi-trailers and 357 staff car parking spaces;
- Border checking facilities; and
- All associated engineering and landscaping works.

These areas are shown in Figure 1 below. It should be noted that the “Main Site Entrance” provides access to HGVs only. The pedestrian access is through the “Staff Car Park”.

Figure 1: Site map



Source: Defra, Sodexo, and Social Impact Planet document titled “Inland Border Facility – Waste Management Plan – Sevington”, dated 2024.

1.2.2 On-site Operations

The proposed development will continue to provide HGV parking and border checking facilities for His Majesty's Government (HMG) and a variety of governing bodies, including DfT, HMRC including Border Force as its operational agent, Defra, including the Port Health Authority (PHA) and Animal and Plant Health Agency (APHA).

The following operations will be undertaken on-site by the respective Government bodies:

- HMRC / Border Force operations for Common Transit Convention (CTC) movements (Offices of Departure / Destination) & Admission Temporaire / Temporary Admission (ATA) Carnets and Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) checks on behalf of Defra;
- Defra checks at BCPs in relation to live animals³, animal products and food and feed of non-animal origin. BCPs (operational for Eurotunnel) would be operated by the Port Health Authority. Defra would also use the Site to undertake sanitary and phytosanitary checks at the BCP designated for consignments from Eurotunnel inbound to the UK; and
- Market surveillance activities, including checking compliance of imported goods for product safety compliance by market surveillance authorities (principally local authority trading standards). Market surveillance activities also include discharging legal obligations. Market surveillance authorities would be operating on-site sharing the HMRC / Border Force premises (i.e. office buildings, inspection sheds, staff car park, HGV parking spaces).

1.3 Report Scope

The purpose of this OWMS is to detail how waste is currently being stored, managed, and collected at the Site, as the extant strategy will continue. This OWMS outlines the types of waste predicted to arise and sets out anticipated waste storage capacity requirements (bin numbers) for the proposed uses.

1.4 Exclusions and Limitations

This report was undertaken in accordance with a scope of works agreed with the Applicant as detailed in the fee letter (reference "WIE20982-101-F-240723 Sevington_Fee Proposal" dated 23 July 2024).

The benefit of this report is made to Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) & Department for Environment, Food & Rural Affairs (DEFRA).

Waterman has endeavoured to assess all information provided during this work but cannot be held responsible, nor make any guarantees or warranties as to the accuracy or completeness of this information.

The conclusions resulting from this study are based on the current conditions and relevant local policies, and therefore are not guaranteed to be indicative of future conditions or operating practices at the Site.

³ In line with Eurotunnel guidance, animals accepted on passenger shuttles include dogs, cats and ferrets (pets or for commercial purposes); rodents, rabbits, birds, invertebrates, amphibians, and reptiles; and domestic equidae (horses, ponies, donkeys and mules).

2. Policy, Guidance, Standards and Legislation

The following policy, guidance, standards and legislation were considered in developing this OWMS and were also applicable at the time the SDO application was granted in December 2020, with the exception of Simpler Recycling in England 2024 which will have a staged implementation of March 2025 and 2027.

2.1 Environmental Protection Act 1990

Section 34 of the Environmental Protection Act 1990 sets out the requirements for the duty of care for controlled waste. The duty of care applies to all businesses that produce, import, carry, keep, treat or dispose of controlled waste from business or industry, or act as a waste broker in this respect. Its purpose is to ensure that all parties in the waste handling chain take all reasonable steps to ensure that waste is handled legally and safely when being passed along the links in the chain between the waste producer and the site of final disposal or recovery.

All businesses are responsible for the safe and proper disposal of waste, even once it has been passed to a third party. This duty of care extends to the point where the waste has either been satisfactorily disposed of, or fully recovered.

The duty of care requires that:

- All waste is stored and disposed of responsibly;
- Waste is only handled or dealt with by individuals or businesses that:
 - Are authorised to deal with it;
 - Have an Environmental Permit or relevant waste exemption;
 - Are a registered carrier of controlled waste; and
- A record is kept of all waste received or transferred through the provision of written information about the waste (previously known as a waste transfer note – WTN – a term still in common usage).

Regulation 35 of the Waste (England and Wales) Regulations 2011 (see below) sets out the content of the written information / transfer note.

The failure of a person who produces, treats, or passes on waste to comply with the duty of care is a criminal offence under Section 34 of the Environmental Protection Act 1990, regardless of whether environmental harm has occurred.

Statutory guidance on how to meet the duty of care is outlined in *Waste Duty of Care, Code of Practice*⁴.

2.2 The Waste (England and Wales) Regulations 2011

The Waste Regulations 2011 require waste producers or those handling waste to comply with the waste hierarchy (prevention, prepare for reuse, recycling, recovery, disposal) unless it can be justified on environmental or technical grounds that this is not appropriate.

The requirements include that:

- Waste is stored correctly i.e. it must be properly contained;
- Waste is only collected by registered waste carriers;
- Records of transfers of waste are kept for at least two years; and
- Waste is only taken to an appropriately authorised facility.

Businesses that carry their own waste need to be registered as a waste carrier. Lower tier waste carriers register once only. Companies transporting construction and demolition waste, whether their own waste or not, need to register as upper tier waste carriers and so must renew their waste carriers licence every three years.

⁴ HSMO, *Waste Duty of Care, Code of Practice*, available from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759083/waste-code-practice-2018.pdf (accessed 21 January 2025).

2.3 Hazardous Waste (England and Wales) Regulations 2005

If controlled waste is classified as hazardous, in accordance with the Hazardous Waste Regulations 2005, enhanced duty of care requirements apply. Facilities receiving hazardous waste must report to the waste producer and the regulator as to the receipt and fate of each consignment of hazardous waste. The written information requirements are met by the use of the consignment note (enabling tracking of waste from producer to final disposal / recovery facility).

2.4 Resources and Waste Strategy for England 2018⁵

The resources and waste strategy for England promotes resource efficiency by detailing ways to preserve materials by minimising waste. The strategy describes the government's commitment to eliminate avoidable waste of all kinds by 2050. Other ambitions include:

- Moving towards a more circular economy;
- Minimising environmental damage by reducing and managing waste safely and carefully;
- At least 65% of municipal waste by weight to be recycled by 2035, with no more than 10% ending up in landfill;
- Appropriately dealing with waste crime; and
- Encouraging waste producers and managers to implement the waste hierarchy in respect to hazardous waste.

2.5 The Building Regulations 2010 Approved Document H⁶

This Approved Document H sets out the requirements of Schedule 1 and Regulation 7 of the Building Regulations 2010 (SI 2010/2214) for England and Wales. Requirement H6, "Solid Waste Storage" specifies:

- "(1) Adequate provision shall be made for storage of solid waste.
- (2) Adequate means of access shall be provided:
- (a) for people in the building to the place of storage
- (b) from the place of storage to a collection point [...]"

Requirement H6 stipulates waste storage should be designed and sited so as not to be prejudicial to health or local amenity.

2.6 British Standard 5906:2005⁷

This British Standard (BS 5906:2005) is a Code of Practice for methods of storage, collection, segregation for recycling and recovery, and on-site treatment of waste. This standard relates to residential and non-residential buildings and healthcare establishments. It is applicable to new buildings, refurbishments and conversions of residential and non-residential buildings, including but not limited to retail and offices. It expands upon the legal requirements set out in The Building Regulations 2010, Approved Document H, requirement H6 as above. BS 5906:2005 advises that:

"Designers should consider:

- Easy and safe access for waste producers, including older persons or persons with disabilities;
- Easy and safe access for collectors and collection vehicles;

⁵ UK Government guidance, "Resources and waste strategy for England", available from [Resources and waste strategy for England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england) (accessed 21 January 2025).

⁶ GOV.UK (2010) "The Building Regulations 2010, Drainage and Waste Disposal" H6 Solid Waste Storage, page 53. Available at www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h (accessed 21 January 2025).

⁷ British Standard BS 5906:2005: Waste management in buildings – Code of practice, December 2005 Revision, Committee reference B/508/1.

- Location and space (including avoidance of opportunity to cause nuisance or injury);
- Protection against animal scavenging of waste;
- Aesthetics of the development;
- Noise (e.g. glass handling);
- Ease of maintenance, including cleaning;
- Robust construction;
- Safety from fire risk and smoke;
- Lighting;
- Ventilation;
- Sound insulation; and
- Special requirements (e.g. separate storage and collection provisions for healthcare waste and bulky waste)."

The document then goes on to provide specific guidance to enable calculations of storage capacity, issues to consider for different building types or occupiers, and design considerations for waste storage and handling areas. As well as recommending the maximum distances waste collection operatives should have to manoeuvre bins e.g. 10m for four wheeled bins or 15m for two wheeled bins.

2.7 Simpler Recycling in England 2024⁸

The Simpler Recycling in England policy states:

"The new default requirement for most households and workplaces will be 4 containers for:

- Residual (non-recyclable) waste
- Food waste (mixed with garden waste if appropriate)
- Paper and card
- All other dry recyclable materials (plastic, metal and glass)

These may be various container types, including bags, bins or stackable boxes.

This is the government's maximum default requirement and is not expected to increase in the future. However, councils and other waste collectors will still have the flexibility to make the best choices to suit local need. This is a sensible, pragmatic approach to the collection of materials for every household and business in England."

The implementation timelines for "Simpler Recycling" are:

- "By 31 March 2025, businesses and relevant non-domestic premises in England will need to arrange for the collection of the core recyclable waste streams, with the exception of garden waste (glass, metal, plastic, paper and card, and food waste)
- By 31 March 2027, kerbside plastic film collections from businesses and relevant non-domestic premises, and households will be introduced".

⁸ DEFRA (2024) 'Simpler Recycling in England: policy update'. Published 29 November 2024. Available at <https://www.gov.uk/government/publications/simpler-recycling-in-england-policy-update/simpler-recycling-in-england-policy-update> (accessed 21 January 2025).

2.8 Local Authority Planning Policy and Guidance

The Site is within both the Kent County Council (KCC) and Ashford Borough Council (ABC) administrative boundaries. In two-tier systems such as this, the county council is responsible for certain services, such as education, transport, and social services, while the borough council is responsible for more localised services such as housing, waste collection, and planning.

2.8.1 Kent Minerals and Waste Local Plan 2013-30⁹

Policy CSW 3, Waste Reduction, of KCC's Minerals and Waste Local Plan states:

"New development should include detailed consideration of waste arising from the occupation of the development including consideration of how waste will be stored, collected and managed.

In particular proposals should ensure that:

- 1. there is adequate temporary storage space for waste generated by that development allowing for the separate storage of recyclable materials; and*
- 2. as necessary, there is adequate communal storage for waste, including separate recyclables, pending its collection; and*
- 3. storage and collection systems (e.g. any dedicated rooms, storage areas and chutes or underground waste collection systems), for waste are of high quality design and are incorporated in a manner which will ensure there is adequate and convenient access for users and waste collection operatives and will contribute to the achievement of waste management targets; and*
- 4. adequate contingency measures are in place to manage any mechanical breakdowns. All relevant proposals should be accompanied by a recycling & waste management strategy which considers the above matters and demonstrates the ability to meet local authority waste management targets."*

2.8.2 Ashford Local Plan 2030¹⁰

The strategic policy, "efficient use of natural resources" states:

"Buildings and landscapes should be designed to make efficient use of natural resources during construction, operation and maintenance. This will contribute to climate change mitigation and adaptation, and reduce the ecological footprint of Ashford's growth. The Council will actively encourage the design of new buildings that minimise the need for energy and water consumption, use renewable energy sources, provide for sustainable drainage, support water re-use and incorporate facilities to enable recycling of waste and resources."

⁹ KCC document titled "Kent Minerals and Waste Local Plan 2013-30" Adopted September 2020. Available at <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/economic-regeneration-and-planning-policies/planning-policies/minerals-and-waste-planning-policy> (accessed 21 January 2025).

¹⁰ ABC document titled "Ashford Local Plan 2030", adopted February 2019, available at <https://www.ashford.gov.uk/planning-and-development/our-planning-policies/current-local-plans/ashford-local-plan-2030/> (accessed 21 January 2025).

3. Operational Waste Management Strategy

3.1 Overview

At the time of writing this OWMS the Site is operational (as set out in section 1.2). The waste types arising can be broadly split into those generated by having offices, staff facilities (including for visiting drivers and general Site operations), and those generated by the inspection activities. As such the OWMS set out below is split into these different site uses, with storage requirements and waste collection considered for each.

The contractor responsible for operating the facility (hereafter “*Site Manager*”) has developed operational waste management plans and established arrangements with waste management services providers to deliver off-site waste management solutions for all anticipated waste types.

This OWMS summarises the Site Manager’s operational waste management plans which set out the current practices at the site for managing waste from offices and staff facilities (report titled “*Inland Border Facility – Waste Management Plan – Sevington*”¹¹) and the inspection activities (report titled “*DEFRA BCP – Waste Management Plan – Sevington*”¹²).

The Site Manager’s day to day responsibilities include overseeing the storage and collection of waste from all areas of the Site. There is no on-site treatment and processing of any type of waste at the Site.

3.2 Waste Strategy - Offices and Staff Facilities¹³

The office activities, staff and visiting driver facilities generate a range of non-hazardous wastes including mixed dry recyclable wastes (e.g. paper, cans, plastics), glass, food waste, sanitary / hygiene wastes and residual waste (non-recyclables wastes from offices etc). Hazardous wastes are also generated, including used spill kits and batteries. It should be noted that these waste types arise Site wide (including from the BCP inspection sheds). These waste streams are subject to contractual targets of less than 5% waste to landfill and at least 70% of waste to be recycled. The remaining waste is sent for energy recovery.

¹¹ Defra, Sodexo, and Social Impact Planet document titled “*Inland Border Facility – Waste Management Plan – Sevington*”, dated 2024.

¹² Defra, Sodexo, and Social Impact Planet document titled “*DEFRA BCP – Waste Management Plan – Sevington*” dated 2024.

¹³ Defra, Sodexo, and Social Impact Planet document titled “*Inland Border Facility – Waste Management Plan – Sevington*”, dated 2024.

3.2.1 Storage Requirements

The cleaning team are responsible for emptying internal bins and placing the full bags into external bins in various compounds across the Site. Waste collections are arranged by the Site Manager.

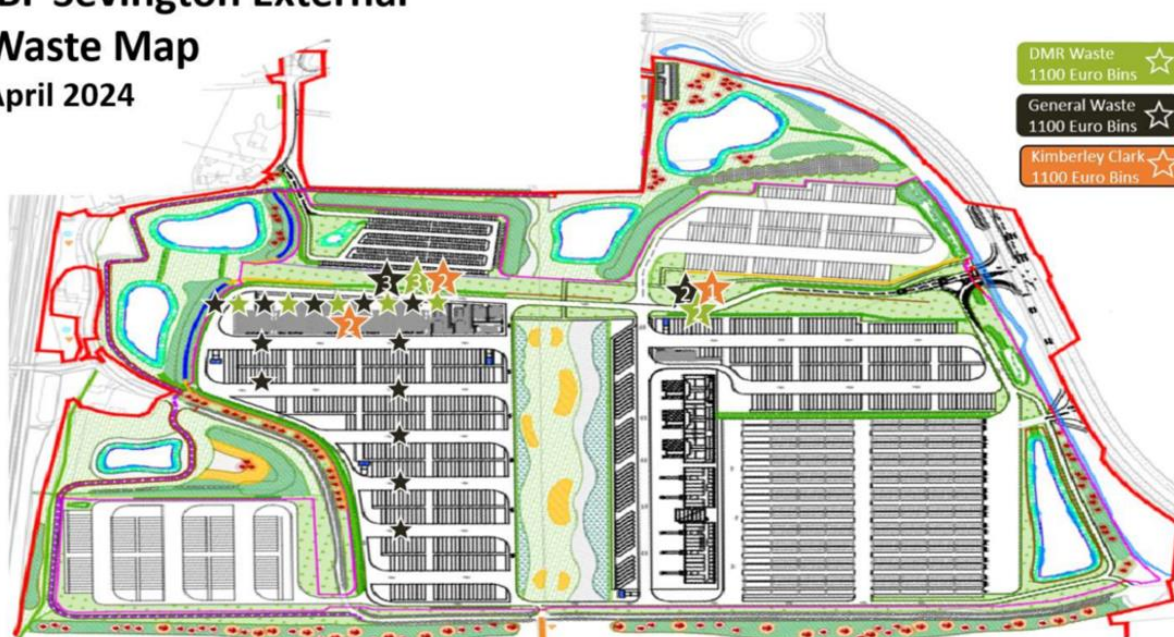
Table 1 and Figure 2 below show the location, type and quantity of the external bins. The waste storage areas will be monitored by the Site Manager to ensure appropriate housekeeping etc.

Table 1: Current external bin provision for waste arising from the offices and staff facilities¹⁴

Waste type	Waste storage capacity
Dry mixed recyclables	10No. 1,100 litre bins
General waste	17No. 1,100 litre bins
Paper towels	5No. 1,100 litre Kimberley Clark bins

Figure 2: Map of current external bin provision for waste arising from the offices and staff facilities¹⁵

IBF Sevington External Waste Map April 2024



¹⁴ Defra, Sodexo, & Social Impact Planet document “Inland Border Facility – Waste Management Plan – Sevington”, dated 2024 (DMR meaning “dry mixed recyclables”. The Kimberley Clark bins are for used paper towels).

¹⁵ (see footnote above)

3.2.2 Collection

The cleaning team will place waste collected from the internal bins (e.g. within offices) into the nearest related waste compound. Waste will then be collected by private waste collection contractor(s) at appropriate frequencies, to prevent a build-up of waste.

Refuse collection operatives will access the Site from the A2070. The refuse collection vehicles (RCVs) will transverse the drivers' parking area to collect the bins from along the "drivers' corridor". They will then collect from the waste compounds on the way towards the Site exit.

Refuse collection operatives will be expected to service bins directly from the locations shown in Figure 2, including to return empty bins back to their original positions.

3.3 Waste Strategy - Inspection Activities¹⁶

The inspections process can result in loads being held and if the reason for the hold cannot be resolved the load will be retained and disposed of. Due to the nature of goods being imported, the waste may be contaminated, hazardous or pathogenic. Proper waste management is essential to ensure compliance with health, safety, and environmental regulations.

Waste management measures to prevent contamination, spread of disease and escape of hazardous material into the environment include:

- For goods being destroyed (including hazardous waste), the Port Health Authority (PHA) label the consignment as condemned for destruction. The PHA supervise the transfer of this load to a container for storage on-site, pending destruction off-site¹⁷;
- Wastes comprising of animals, animal products, animal by-products, animal feed, waste from holding animals, plants, clinical sharps and sanitary/ hygiene waste is dispatched for incineration;
- Liquid waste from animal holding areas is also dispatched for treatment off-site;
- Appropriate storage and segregation for all wastes e.g. secure, leak-proof containers, refrigerated storage to minimise odour and decomposition until disposal, secondary containment for hazardous materials;¹⁸
- Waste storage areas and containers are regularly cleaned to prevent pest infestations and health hazards; and
- An emergency response plan is in place for dealing with accidental spills or contamination incidents and staff are regularly trained.

3.3.1 Storage Requirements

There are five BCP inspection sheds, labelled sheds A-E. Shed A is for food inspections and shed B is for plant inspections. It was proposed that sheds C-E were to be utilised for the inspection and processing of animals and animal-by-products¹⁹. There are Euro bins located in each of the inspection sheds.

If the waste is hazardous it is clearly labelled with tags provided by the PHA and stored in a hazardous skip for animal by-products. The skip is in a bunded waste compound over separate tanks to catch fluids.

Table 2 and Figure 3 show the location and type and quantity of the external bins. The waste storage areas will be monitored by the Site Manager to ensure appropriate housekeeping etc.

¹⁶ Defra, Sodexo, and Social Impact Planet document titled "DEFRA BCP – Waste Management Plan – Sevington" dated 2024.

¹⁷ Defra document titled "PHA Waste Removal & Destruction", emailed from Defra (Chris Spalding) to Waterman (Sarah Owen) on 13 December 2024.

¹⁸ Mott Macdonald report titled "Sevington Inland Border Facility: An Analysis of the Likely Environmental Effects of the Development Report", dated March 2022.

¹⁹ According to the Defra, Sodexo, and Social Impact Planet document titled "DEFRA BCP – Waste Management Plan – Sevington" dated 2024, sheds C-E were to be utilised for the inspection and processing of animals and animal-by-products from October 2024.

Table 2: Current external bin provision for the BCP (managed by Defra)

Waste type	Waste storage capacity
General waste	5No. 1,100 litre bins
Dry mixed recyclables	3No. 1,100 litre bins
Clinical sharps	1No. 1,100 litre bin
Food waste	5No. 240 litre bins
Green waste	1No. 8 yard skip
Animal by-products	1No. hazardous skip

Figure 3: Map of the current external bin provision for the BCP²⁰

DEFRA BCP Sevington External Waste Map June 2024

- General Waste
1100 Euro Bins ☆
- DMR Waste
1100 Euro Bins ☆
- Clinical Sharps
1100 Euro Bins ☆
- Food Waste
240ltr Euro Bins ☆
- Green Waste
8yd Skip ☆
- Animal B-P
Haz Skips ☆



3.3.2 Collection

On waste collection days the Site staff will push the Euro bins from each of the inspection sheds to the waste compound (shown in the bottom left-hand corner of Figure 3). The Site Manager will arrange for waste to be collected by private waste collection contractor(s) at appropriate frequencies, to prevent a build-up of waste.

RCVs will access the Site from the A2070. Refuse collection operatives will be expected to service bins directly from the locations shown in Figure 3, including to return empty bins back to their original positions.

For specialist and hazardous waste, collections are arranged on an ad hoc basis. The Site Manager informs the waste contractor of the need to collect the waste. Following the notice being issued, the waste is destroyed within 5 days at Thriplow Heath incineration plant²¹.

²⁰ Defra, Sodexo, and Social Impact Planet document titled “DEFRA BCP – Waste Management Plan – Sevington” dated 2024 (Animal B-P meaning animal by-products).

²¹ Defra document titled “PHA Waste Removal & Destruction”, emailed from Defra (Chris Spalding) to Waterman (Sarah Owen) on 13 December 2024.

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