



**WASTE RECOVERY PLAN FOR THE DEPOSITION OF
WASTE ON LAND AS A RECOVERY ACTIVITY FOR
THE RESTORATION OF PHASES 3A, 3B, 4A, 4B, 5A,
5B, 6A, 6B, 6C AND 7 AT ALREWAS QUARRY,
ALREWAS, STAFFORDSHIRE**

Report reference: TAR/AL/AKM/5648/01
August 2021



Technical advisers on environmental issues

Baddesley Colliery Offices, Main Road, Baxterley, Atherstone, Warwickshire, CV9 2LE
Tel. (01827) 717891 Fax. (01827) 718507

CONTENTS

1.	Introduction	2
2.	Waste Recovery Plan	4

TABLES

Table 1	Waste types that may be accepted at Alrewas Quarry for deposition as a recovery activity
---------	--

FIGURES

Figure 1	The site location (drawing reference TAR/AL/08-21/22723revA)
Figure 2	The area the subject of the waste recovery plan and the boundary of the anticipated Environmental Permit application (drawing reference TAR/AL/11-20/22065revA)
Figure 3	Cross sections (drawing reference TAR/AL/10-20/22007revA)

APPENDICES

Appendix A	A copy of drawing reference A301-0079-03 entitled Southern Extension Working Plan
Appendix B	A copy of planning permission reference L.19/09/817 MW
Appendix C	A copy of drawing reference A301-0079-05 entitled Southern Extension Restoration Plan (North) and a copy of drawing reference A301-0079-06 entitled Southern Extension Restoration Plan (South)
Appendix D	A copy of drawing reference A301-0079-07 entitled Cross Sections
Appendix E	A copy of the Restoration Scheme Review submitted pursuant to Condition 66 of planning permission reference L.14/03/817 MW including drawing reference A301-0007-01 and drawing reference A301-0007-02
Appendix F	A copy of a letter from Staffordshire County Council dated 30 September 2020 (Ref L.19/09/817 MW)

This report has been prepared by MJCA with all reasonable skill, care and diligence, and taking account of the Services and the Terms agreed between MJCA and the Client. This report is confidential to the client and MJCA accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by MJCA beforehand. Any such party relies upon the report at their own risk.

1. Introduction

- 1.1** MJCA is commissioned by Tarmac Trading Limited (Tarmac) to prepare a Waste Recovery Plan (WRP) for the deposition of waste on land as a recovery activity in order to restore Phases 3A, 3B, 4A, 4B, 5A, 5B, 6A, 6B, 6C and 7 (Phases 3-7) at Alrewas Quarry, Alrewas, Staffordshire.
- 1.2** Phases 3 to 7 form part of the wider Alrewas Quarry complex and are centred on National Grid Reference (NGR) SK 171 133 approximately 70m south east of the village of Alrewas as shown on Figure 1. Phases 1 and 2 of the Alrewas Quarry complex are located to the north east of Phases 3 to 6 and to the south east of Phase 7 and are currently being restored by the importation of inert waste materials. Phases 1 and 2 are the subject of Environmental Permit number EPR/EB/3509GE. The Phases of operation are shown on drawing reference A301-0079-03 a copy of which is presented at Appendix A. Only the southern part of Phase 7 is shown on drawing reference A301-0079-03. The full area of Phase 7 is shown on Figure 2.
- 1.3** The site and the surrounding area is shown on Figure 2. The majority of the western boundary of Phases 3 to 7 is delineated by a railway line which runs in a generally north east to south west direction and beyond which is the A38. The A513 which runs in a generally east west direction separates Phases 1 and 7 to the north of the A513 from Phases 2-6 to the south of the A513. There are several other minor roads in the area of Phases 3 to 7 some of which separate and/or delineate the phases of operation. The village of Fradley is located to the west of the A38 and approximately 530m west of Phases 3 to 7 at its closest point. In addition to the properties in Alrewas and Fradley there are several residential properties and agricultural and commercial premises in the area of Phases 3 to 7 (Figure 2). Whitemoor Lakes and the associated conference and activity centre is located to the east and north east of Phases 3 to 6 and east-south east of Phase 7. The National Arboretum is located to the east of Phase 7 beyond Croxhall Road. Access to Phases 3 to 7 will be via Croxall Road and Barely Green Lane.
- 1.4** The Alrewas Quarry complex has a long history of planning permissions for mineral extraction and restoration, including the phases which are referred to in this WRP as Phases 3A, 3B, 6A, 6B, 6C and 7. Phases 3A, 3B, 6A, 6B, 6C and 7 are now the subject of planning permission reference L.19/09/817 MW together with Phases 4A, 4B, 5A and 5B. Planning permission reference L.19/09/817 MW (the planning

permission) was granted by Staffordshire County Council (SCC) on the 21 June 2021 for inter alia:-

'...the winning and working of sand and gravel including a southern extension and the re-phasing of permitted working and restoration schemes; the restoration of the quarry by the importation of inert waste material...'

- 1.5** The principles of the operation and restoration of Phases 3A, 3B, 6A, 6B, 6C and 7 have not been changed by the grant of the planning permission but the phases have been renumbered to provide for a revised scheme of working which incorporates the southern extension (Phases 4A, 4B, 5A and 5B). A copy of the planning permission, is presented at Appendix B. It is specified in Condition 3 of the planning permission that:-

'The development hereby permitted shall be deemed to have commenced on the date of this permission...'

The boundary of the planning permission which includes other areas of the Alrewas Quarry complex is shown on Figure 2.

- 1.6** The restoration of Phases 3 to 7 will necessitate importation of approximately 3.6Mm³ of inert materials to restore the site to agriculture, amenity and nature conservation. Phases 3 to 7 cover an area of approximately 118ha. The approved restoration scheme is shown on drawings reference A301-0079-05 and A301-0079-06 copies of which are presented at Appendix C.
- 1.7** A WRP presenting justification that the activity comprises recovery is presented in Section 2 of this report. Further to the agreement of the WRP by the Environment Agency an application will be submitted for a bespoke Environmental Permit.

2. Waste Recovery Plan

2.1 The WRP has been prepared with reference to Article 3(15) of the Waste Framework Directive (2008/98/EC)¹ and the latest guidance on the deposition of waste on land as a recovery activity entitled 'Waste recovery plans and deposit for recovery permits' published by the EA on GOV.UK on 21 April 2021² (the recovery guidance). Article 3(15) of the Waste Framework Directive states that:-

'recovery' means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function...'

2.2 The recovery guidance states that:-

'Waste recovery on land, or deposit for recovery, is when you use waste material instead of non-waste material to perform a function.'

2.3 The recovery guidance specifies that there are three main ways that can be used to demonstrate waste recovery. One of the three ways identified in the recovery guidance is to *'... provide evidence that you're obliged to carry out the scheme.'* In respect of an obligation the EA states in the recovery guidance:-

'This could be because a regulator has imposed a requirement on you so you would have to do the work whether you use waste or non-waste. For example, if you operate a quarry and are required by planning conditions of an already implemented planning permission to restore it according to an approved plan.'

2.4 The recovery guidance is clear that where there is a specific obligation to undertake the work it is unnecessary to present in a WRP the information referred to under the headings *'Purpose of the work'*, *'Quantity of waste used'* and *'Meeting quality standards'* in the recovery guidance.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0098&from=EN>

² <https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits>

The obligation

- 2.5** As described in Section 1 the restoration of Phases 3 to 7 is the subject of planning permission reference L.19/09/817 MW granted by SCC on 21 June 2021 (Appendix B). Condition 1 of the planning permission states that:-

'.....the development hereby permitted shall only be carried out within the site in accordance with the approved documents and plans listed below:'

- 2.6** Condition 1 lists amongst other documents the plans showing the extraction and restoration phasing, the approved restoration scheme and cross sections through the site together with the planning application, Environmental Statement and the indicative timescales for the phased working and restoration. The plans referred to in Condition 1 are discussed in further detail below under the 'Evidence of the obligation'.

- 2.7** It is clear that in granting the planning permission, SCC has imposed specific obligations in respect of restoring the site according to approved plans. In respect of specific obligations the EA states in the recovery guidance that:-

'Obligations may specify the scheme you have to carry out. If you have specific obligations to complete the scheme you propose, the Environment Agency will normally accept recovery where your waste recovery plan includes:

- *evidence of the obligation*
- *plans and cross sections that show your proposal matches the obligation on you*
- *evidence that the waste is suitable for the intended purpose'*

Taking each of these points in turn.

Evidence of the obligation

- 2.8** As explained earlier, planning permission reference L.19/09/817 MW confirmed the specific obligation in respect of restoring the site according to the approved scheme and plans. Conditions 1, 5, 7, 8, 54 and 56 of the planning permission refer to the

restoration of the site in accordance with the approved scheme and plans. The conditions clearly demonstrate the obligation.

2.9 Condition 1 of the planning permission (*Definition of Consent*) states that, inter alia:-

'...the development hereby permitted shall only be carried out within the site in accordance with the approved documents and plans listed below

- *Supporting Planning Statement (September 2019)*
- *Indicative Timescales for Proposed Working/ Restoration Phases (estimates only subject to change based on market activity)*
- *Environmental Statement...*
- *Southern Extension Working Plan (March 2020) (Dwg no A301-0079-03) [Appendix A]*
- *Southern Extension Restoration Plan (North) (Dwg no A301-0079-05) [Appendix C]*
- *Southern Extension Restoration Plan (South) (Dwg no A301-0079-06) [Appendix C]*
- *Southern Extension Sections (Dwg no A301-0079-07) [Appendix D]'*

The Appendices referenced in brackets refer to the Appendix in this WRP in which the drawings are presented.

2.10 The reason stated in the planning permission for imposing Condition 1 is:-

'To define the permission.'

2.11 Condition 5 of the planning permission (*Dates for Cessation of Mineral Extraction, Restoration and Aftercare*) states that:-

...all other restoration works shall be completed in accordance with the programme of implementation of the approved Restoration and Aftercare Scheme (Conditions 54 to 57).'

- 2.12** Condition 7 of the planning permission (*Dates for Cessation of Mineral Extraction, Restoration and Aftercare*) states that:-

'This planning permission shall expire when the Mineral Planning Authority has provided written confirmation that the Site has been restored and subject to aftercare in accordance with the requirements of the approved Restoration and Aftercare Scheme (Conditions 54 to 58).'

- 2.13** The reason stated in the planning permission for imposing Conditions 5 and 7 is:-

'To secure the working and restoration of the site within the approved timescales and to accord with the Minerals Local Plan for Staffordshire (policies 4 and 6) having regard to the National Planning Policy Framework (section 17).'

- 2.14** Condition 8 of the planning permission (*Phasing, Limits of Extraction, Depth of Working and Importation of Inert Material*) states that:-

'No working operations or restoration operations shall be carried out other than in a phased manner in accordance with the Southern Extension Working Plan (March 2020) (Dwg no A301-00079-03) and as described in Section 3.2 of the Environmental Statement...'

- 2.15** The reason stated in the planning permission for imposing Condition 8 is:-

'...to comply with the requirements of the proposals of the planning application...'

- 2.16** Condition 54 of the planning permission (*Restoration and Aftercare*) states that:-

'The Site shall be progressively restored in accordance with the approved Restoration Scheme Review and shown on plans Restoration Scheme (Northern Area) (ref. A301-00071-01) and Restoration Scheme (Southern Area) (ref. A301-00071-02) (ref.

L.14/03/817 MW D6 dated 24 June 2019) (the 'Restoration Strategy'), and in general accordance with the Southern Extension Restoration Plan (South) (Dwg no A301-00079-06) unless otherwise agreed following the review of the Restoration Strategy required by Conditions 55 and 57 below.'

2.17 A copy of drawing reference A301-00079-06 is presented at Appendix C. Planning permission reference L.14/03/817 MW D6 was the subsisting planning permission in respect of Phases 3A, 3B, 6A, 6B, 6C and 7 prior to the grant of planning permission reference L.19/09/817 MW which, as explained in Paragraph 1.5, was deemed to have commenced on the date of planning permission reference L.19/09/817 MW. The Restoration Scheme Review including drawing reference A301-00071-01 and drawing reference A301-00071-02 is presented at Appendix E for completeness.

2.18 Condition 56 of the planning permission (*Restoration and Aftercare*) states that:-

'No later than 12 months after the date of this permission, a detailed Restoration and 5 year Aftercare Scheme ('the Restoration and Aftercare Scheme') for the Site (including the southern extension with Phases 4A, 4B, 5A, 5B as shown on Southern Extension Working Plan (March 2020) (Dwg no A301-0079-03)) shall be submitted for the written approval of the Mineral Planning Authority.

The Restoration and Aftercare Scheme shall include but may not be limited to the following details:

- a) identification of the areas to be restored to agriculture, woodland and nature conservation purposes respectively;*
- b) the removal of plant, buildings, structures, and hardstanding areas as shown on the Plant Site Layout (Dwg no A301_00055);*
- c) final (pre and post settlement) restoration contours and gradients with no increase in levels compared with original ground levels;*
- d) a programme for the progressive restoration of the Site to the approved final contours;*

- e) *a programme for the removal of the accesses, crossing points, wheel wash, ancillary plant and equipment, buildings, structures, conveyor, hopper, perimeter security fencing, gates and hard-surfaces;*
- f) *soil management including replacement depths, ripping, cultivation and stone picking;*
- g) *preparation of the land to be restored to agriculture;*
- h) *preparation of the land to be restored to woodland;*
- i) *preparation of the land to be restored to nature conservation;*
- j) *provision for the establishment and appropriate management of the pond and wet ditches in the areas to be restored for nature conservation purposes;*
- k) *the ecological measures included in the submitted ecological surveys;*
- l) *detailed agricultural aftercare programme taking into account the original land quality as described in 'Appendix 4 Soil Resources and Agricultural Use and Quality report dated 28 May 2019 (ref. 1547/2)', and the 'Environmental Statement Volume 2 Appendix 4 Soil Resources and Agricultural Use and Quality of Land South-East of Alrewas, Staffordshire' accompanying permission L.14/03/817 MW;*
- m) *the use of fertilisers;*
- n) *the management of weeds and any invasive species;*
- o) *measures to minimise damage in the event of drought or fire;*
- p) *tree planting and woodland management techniques during the aftercare period including the protection measures and the provision for replacement of failures of individual trees, shrubs and plant species to secure 85% survival rate at the end of the aftercare period;*

q) *the arrangements for the collection and disposal of surface water arising from the restoration of the Site bases on the pre-extraction drainage system and including regular maintenance of installed drainage;*

r) *the provisions for public rights of way*

s) *the provision for annual meetings and annual reports describing the previous year's aftercare measures, including comments on the successes and failures and plans for the next year's aftercare; and,*

t) *the programme of implementation.'*

The latest approved Scheme shall be carried out in full and in accordance with the approved programme of implementation.

2.19 The reason stated in the planning permission for imposing Conditions 54 and 56 is:-

'To secure the restoration and after care of the site at the earliest possible opportunity to high environmental standards in accordance with the minerals local plan for Staffordshire (policies 4 and 6); and the National Planning Policy Framework (sections 11, 13, 14, 15 and 17)...Note – the Section 106 Legal Agreement includes a requirement to carry out additional 10-year period of aftercare to the 5-year aftercare required by planning condition.'

2.20 Notwithstanding that there are no restrictions within the planning permission in respect of whether the site is restored using non-waste or waste materials, a letter from SCC confirming that the restoration of the site can be completed with suitable imported waste or non-waste inert restoration materials is presented at Appendix F.

2.21 Consistent with the requirements set out in the recovery guidance in respect of an obligation, it is clear that SCC require Tarmac to assume the specific obligation of the approved working plans, schemes of working and restoration scheme as conditions of obtaining planning permission. Tarmac are required to comply with the planning conditions and associated Section 106 Agreement and there is no evidence to suggest otherwise.

Plans and cross sections that show your proposal matches the obligation on you

- 2.22** As described in Paragraph 2.9 of this WRP, Condition 1 of the planning permission specifies the relevant plans and drawings which comprise the approved scheme. The final restored landform for the site is shown on drawings references A301-0079-05 and A301-0079-06 copies of which are presented at Appendix C. Cross Sections through Phases 4A, 4B, 5A and 5B are shown on drawing number reference A301-0079-07, a copy of which is presented at Appendix D and cross sections through Phases 3A, 3B, 6A, 6B, 6C and 7 are shown on Figure 3.
- 2.23** The total quantity of inert restoration material that will need to be deposited to complete the approved restoration scheme is limited by the final levels shown on the restoration scheme. It is proposed that drawings reference A301-00079-05 and A301-00079-06 will comprise the relevant contour plan for the site to be specified in the Environmental Permit.

Evidence that the waste is suitable for the intended purpose

- 2.24** The waste types it is proposed may be accepted at the site the subject of a bespoke Environmental Permit are presented in Table 1. The waste types listed in Table 1 are specified in the guidance³ as waste types that may not need to be tested, apart from testing for classification purposes with the exception of Waste Code 01 04 12 (tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11). Detailed waste acceptance procedures, including testing of waste as required, will be in place so that unacceptable waste materials are not accepted at the site and procedures will be in place for the rejection of nonconforming loads. The waste acceptance procedures will include robust waste characterisation and testing procedures. No wastes will be accepted from contaminated sites. Only waste that is suitable for the intended purpose will be imported as to do otherwise would undermine the potential to achieve the approved restoration scheme.

³www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-acceptance-procedures-for-deposit-for-recovery

- 2.25** It is clear that Tarmac has specific obligations in respect of the approved scheme. The deposit of waste as a recovery activity will enable Tarmac to satisfy the specific obligations in respect of the restoration of the site.

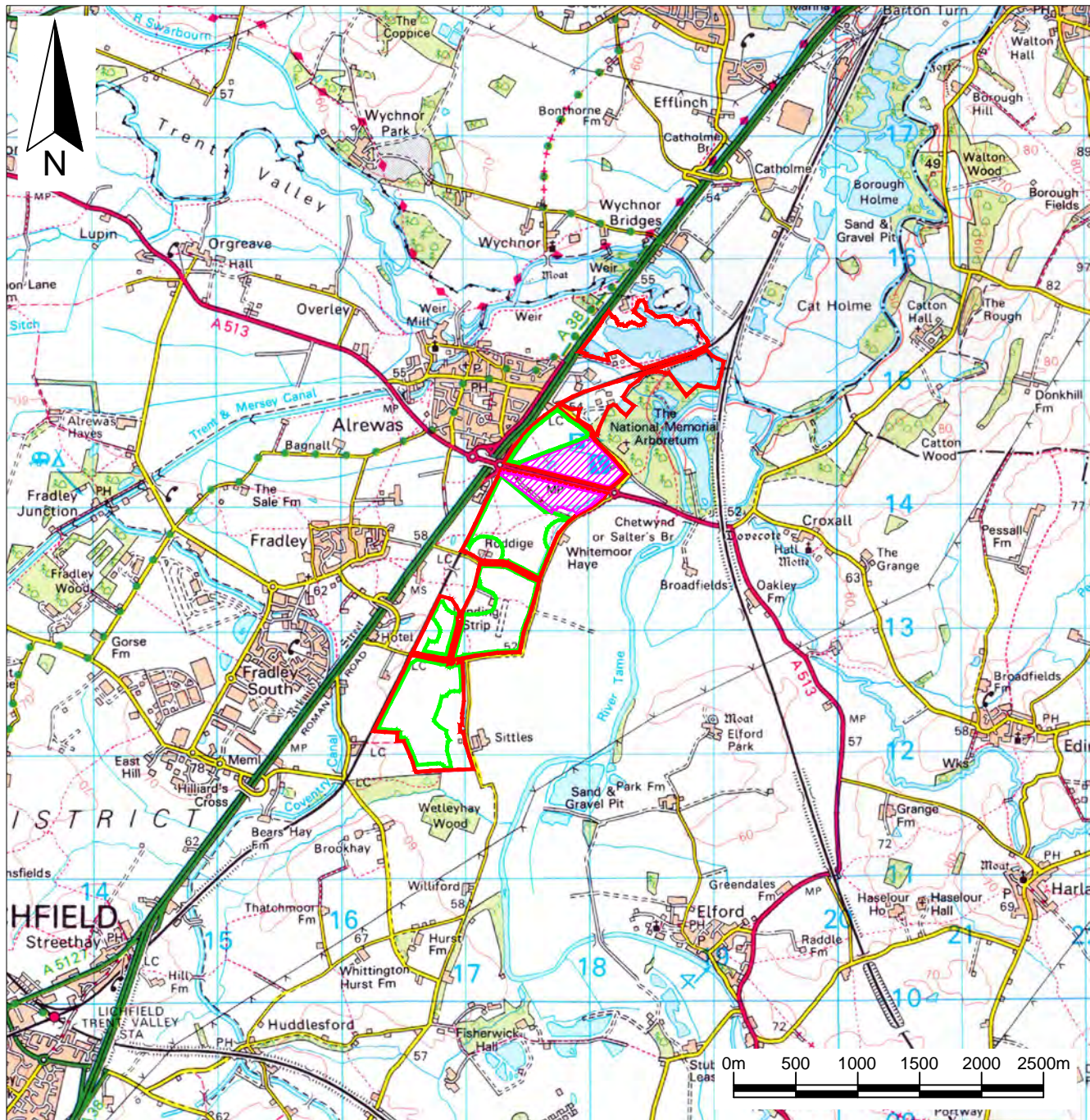
TABLES

Table 1

Waste types that may be accepted at Alrewas Quarry for deposition as a recovery activity

Waste Code	Description (consistent with SR2015_No39)	Restrictions (consistent with SR2015_No39)
01 01	wastes from mineral excavation	-
01 01 02	Wastes from mineral non-metalliferous excavation	Restricted to waste overburden and interburden only
01 04	wastes from physical and chemical processing of non-metalliferous minerals	-
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 06	-
01 04 09	Waste sand and clays	-
01 04 12	Tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11	-
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products	-
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)	-
17 01	concrete, bricks, tiles and ceramics	-
17 01 01	Concrete	-
17 01 02	Bricks	-
17 01 03	Tiles and ceramics	-
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Metal from reinforced concrete must have been removed.
17 05	soil stones and dredging spoil	-
17 05 04	Soil and stones other than those mentioned in 17 05 03	Restricted to topsoil, peat, subsoil and stones only.
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	-
19 12 09	Minerals (for example sand, stones) only	Restricted to wastes from treatment of waste aggregates that are otherwise naturally occurring minerals. Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.
20 02	garden and park wastes	-
20 02 02	Soil and stones	Restricted to topsoil, peat, subsoil and stones only.

FIGURES



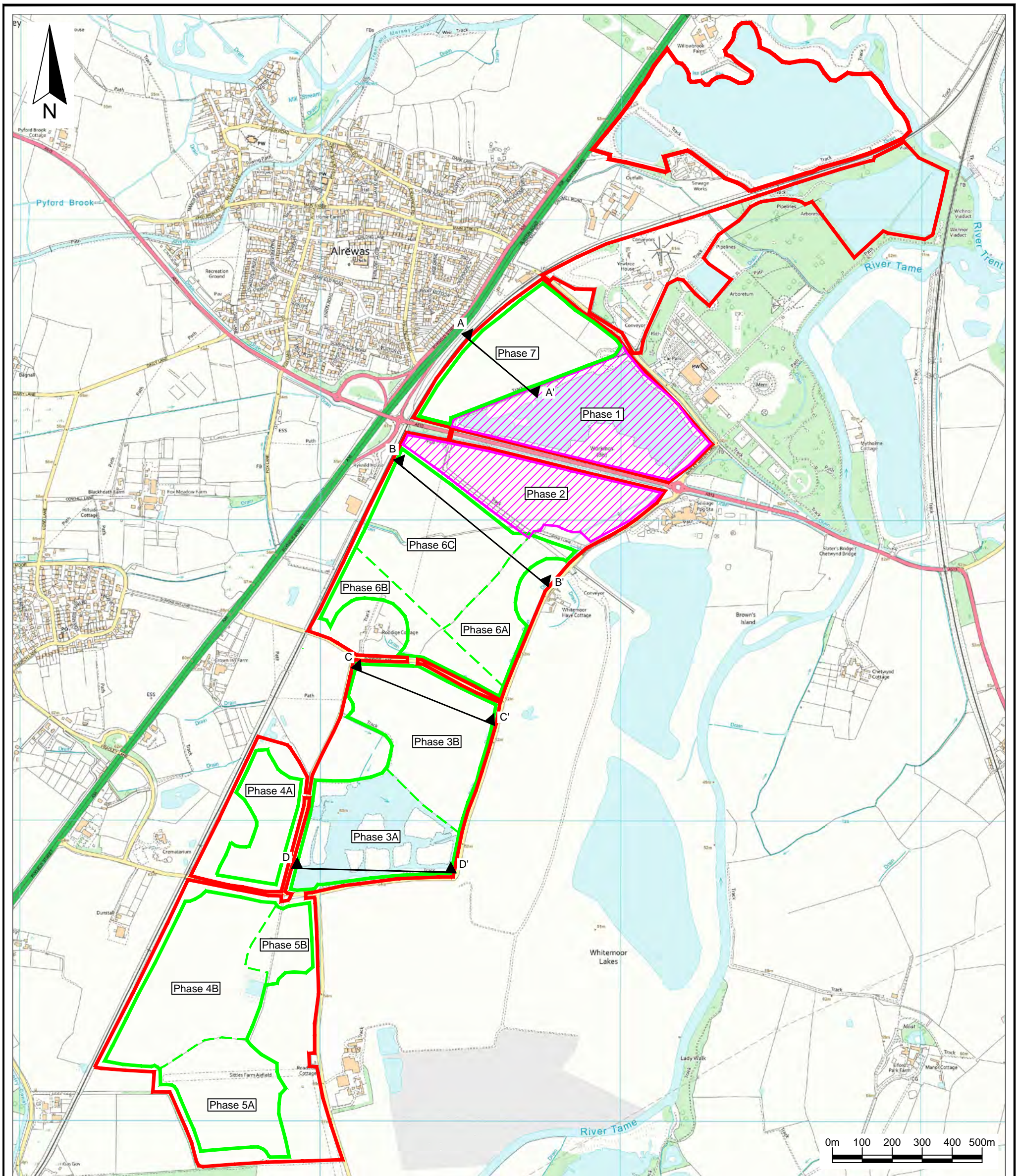
Key / Notes

- Boundary of planning permission reference L.19/09/817 MW

- The area the subject of the Waste Recovery Plan and the boundary of the anticipated Environmental Permit application

- Currently permitted area the subject of Environmental Permit number EPR/EB3509GE

A	Addition of Phase 7	KR	LBA	GT	27/08/21				
	Final	KR	AKM	GT	10/08/21				
Rev	Status	Drn	App	Chk	Date				
Site ALREWAS QUARRY									
Client 									
Title The site location									
Figure 1					Scale 1:50,000@A4				
Drawing Ref TAR/AL/08-21/22723revA									
Reproduced scale mapping by permission of Ordnance Survey on behalf of The Controller of Her Majesty's Stationery Office. © Crown copyright 2017. All rights reserved. Licence number 100017818.									



Key / Notes

- ▭ Boundary of planning permission reference L.19/09/817 MW
- ▭ The area the subject of the Waste Recovery Plan and the boundary of the anticipated Environmental Permit application
- ▨ Currently permitted area the subject of Environmental Permit number EPR/EB3509GE



Location of cross sections (Cross sections shown on drawing reference TAR/AL/10-20/22007)

A	Addition of Phase 7	KR	LBA	GT	27/08/21
	Final	KR	LBA	GT	10/08/21
Rev	Status	Drn	App	Chk	Date

Site
ALREWAS QUARRY
Client
 TARMAC
A CRH COMPANY

Title
The area the subject of the waste recovery plan and the boundary of the anticipated Environmental Permit application

Figure 2 Scale 1:12,500@A3

Drawing Ref
TAR/AL/11-20/22065revA

Reproduced scale mapping by permission of Ordnance Survey on behalf of The Controller of Her Majesty's Stationery Office. © Crown copyright 2017. All rights reserved. Licence number 100017818.



Baddesley Colliery Offices,
Main Road, Baxterley, Atherstone,
Warwickshire, CV9 2LE.
Telephone : 01827 717891
Fax : 01827 718507

Technical advisers on environmental issues

APPENDIX A

**A COPY OF DRAWING REFERENCE A301-0079-03 ENTITLED SOUTHERN EXTENSION
WORKING PLAN**

APPENDIX B

A COPY OF PLANNING PERMISSION REFERENCE L.19/09/817 MW

APPENDIX C

A COPY OF DRAWING REFERENCE A301-0079-05 ENTITLED SOUTHERN EXTENSION RESTORATION PLAN (NORTH) AND A COPY OF DRAWING REFERENCE A301-0079-06 ENTITLED SOUTHERN EXTENSION RESTORATION PLAN (SOUTH)

APPENDIX D

A COPY OF DRAWING REFERENCE A301-0079-07 ENTITLED CROSS SECTIONS

APPENDIX E

**A COPY OF THE RESTORATION SCHEME REVIEW SUBMITTED PURSUANT TO
CONDITION 66 OF PLANNING PERMISSION REFERENCE L.14/03/817 MW INCLUDING
DRAWING REFERENCE A301-0007-01 AND DRAWING REFERENCE A301-0007-02**

APPENDIX F

**A COPY OF A LETTER FROM STAFFORDSHIRE COUNTY COUNCIL DATED 30
SEPTEMBER 2020 (REF L.19/09/817 MW)**