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**BOW FARM WASTE RECOVERY PLAN TO SUPPORT A
DEPOSIT FOR RECOVERY ENVIRONMENTAL PERMIT
APPLICATION**

For

MORETON C CULLIMORE (GRAVELS) LIMITED

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Appendix 2	Method Specification

BOW FARM WASTE RECOVERY PLAN TO SUPPORT A DEPOSIT FOR RECOVERY ENVIRONMENTAL PERMIT APPLICATION

1. INTRODUCTION AND BACKGROUND

This report presents a Waste Recovery Plan (WRP) for the works approved by Planning Permission 19/000048/CM (Worcestershire County Council) and Planning Permission 19/0081/TWMAJM (Gloucestershire County Council) which provide for, *inter alia*, site restoration using imported inert fill material at Bow Farm, Ripple, Worcestershire (the site).

Planning Permission 19/0081/TWMAJM was approved by Gloucestershire County Council through the successful appeal (Appeal Ref. APP/T1600/W/23/3324695) by the applicant following initial refusal of Planning Permission 19/0081/TWMAJM.

The WRP has been prepared in order to provide the information necessary for the Environment Agency (EA) to confirm that the permanent deposit of imported inert fill within excavation area Phases 1 to 9 at the Bow Farm site is a waste recovery activity and not a waste disposal activity. The EA has recently confirmed that this is the case for very similar activities (Land at Manor Farm South and Dairy Farm, Ashton Keynes (Environmental Permit EPR/AB3101LV), Land East of Spratsgate Lane and Adjacent to Keynes Country Park, Shorncote (Environmental Permit EPR/EB3304HS), and Whetstone Bridge Farm, Down Ampney (Environmental Permit EPR/GB3002MQ)).

The WRP has been prepared having regard to EA guidance (last updated 29th June 2023).

It is considered that recovery operations coded R3, R5 and R13 in Annex IIB of the Waste Framework Directive (Directive 2006/12/EC) are applicable to the completion of the approved works at the Bow Farm site.

This WRP accompanies an application for a Bespoke Environmental Permit, based on SR 2015 No. 39 (use of waste in a deposit for recovery operation). The applicant is Moreton C Cullimore (Gravels) Limited.

2. PURPOSE OF THE WORK

Completion of the approved site restoration scheme, involving the restoration of the mineral extraction areas requires 1.4Mm³ (approximately 2.45Mt using a standard conversion factor of 1.75t/m³) of imported inert fill material within Phases 1 to 9 of the excavation area in the main site area.

The approved site restoration scheme also provides for excavation and low-level restoration of Flexible Working Areas A and B in the west of the site. Flexible Working Areas A and B will only be excavated seasonally during non-high flow periods of the River Severn, located c. 25m to the west at its closest approach. Restoration of Flexible Working Areas A and B will be to wetlands and water features using only site derived mineral waste (silts and clays) and will have a final landform below pre-extraction ground levels. No imported inert fill material will be placed in Flexible Working Areas A and B.

Drawing No. BOWFEPR2511-1 presents a site location plan and Drawing No. BOWFEPR2511-2 shows the different areas of the site, including the excavation area Phases 1 to 9 where imported inert fill material will be placed under the EPR Permit. Drawing No. BOWFEPR2511-3 shows the EPR Permit application area within the context of the site approved under the Planning Permissions.

A site plan is presented as Drawing No. BOWFEPR2511-4.

The approved restoration scheme provides for the restoration of the site to a mix of wetland, nature conservation and agriculture. The latter will safeguard the best and most versatile soil resources on site.

All site restoration activities will be carried out in accordance with the Detailed Restoration and Aftercare Proposals and Landscape and Ecological Management Plan (LEMP) (David Jarvis Associates Limited (DJA) Report ref. 2636-4-5-LM-0001) approved by extant Planning Permissions 19/000048/CM (Worcestershire County Council) and 19/0081/TWMAJM (Gloucestershire County Council), which is included in Appendix L of the EPR Permit application.

It is important to note that the proposed scheme has been designed by professional specialists.

The overall objectives of the site restoration centre on the assimilation of the restoration landform into the surrounding landscape and enhancing habitats appropriate to the context of its wider setting.

Specific objectives in relation to landscape and ecology are outlined below.

- **Landscape objectives:**

- Introduce structural planting that reflects the best and most characteristic elements of the local landscape;
- Return the site to its existing use at the earliest opportunity in order to reduce the visual presence of the extraction activities;
- Ensure that the nature conservation interest within the site is managed to maximise ecological benefits; and
- Ensure the restoration scheme and its on-going management respects the local landscape character.

- **Ecological objectives:**

- Encourage a more diverse and species-rich environment using appropriate management techniques and enhance and strengthen connectivity between existing and restored habitats and the wider landscape;
- Enhance biodiversity within the restored areas through the creation and management of an appropriate mix of habitats including hedgerows, scrub, wet and dry grassland, permanent and ephemeral water features to enhance the site for a range of wildlife including invertebrates, amphibians, reptiles, birds (including waterfowl) and mammals (including bats); and
- Control threats to biodiversity by suppressing/eradicating more vigorous and less desirable (*i.e.* non-native or invasive species) plant species.

Appendix 1 presents detailed scheme drawings approved by the extant Planning Permissions.

A further important benefit of the activity is the diversion of non-recyclable inert waste from landfill disposal to a more beneficial end use.

It is considered that there is a clear benefit from the activity.

3. PLANNING PERMISSIONS

The works, involving the importation and placement of inert fill material within excavation area Phases 1 to 9, are approved by Planning Permission 19/000048/CM (Worcestershire County Council) and Planning Permission 19/0081/TWMAJM (Gloucestershire County Council).

Planning Permission 19/0081/TWMAJM was approved by Gloucestershire County Council through the successful appeal (Appeal Ref. APP/T1600/W/23/3324695) by the applicant following initial refusal of Planning Permission 19/0081/TWMAJM.

The approved site restoration scheme also provides for excavation and low-level restoration of Flexible Working Areas A and B in the west of the site. Flexible Working Areas A and B will only be excavated seasonally during non-high flow periods of the River Severn, located c. 25m to the west at its closest approach. Restoration of Flexible Working Areas A and B will be to wetlands and water features using only site derived mineral waste (silts and clays) and will have a final landform below pre-extraction ground levels. No imported inert fill material will be placed in Flexible Working Areas A and B.

The Planning Permission 19/000048/CM (Worcestershire County Council) Decision Notice is provided in Appendix Ci of the EPR Permit application.

The Planning Permission 19/0081/TWMAJM (Gloucestershire County Council) Appeal Decision document (Appeal Ref. APP/T1600/W/23/3324695) is provided in Appendix Cii of the EPR Permit application.

4. QUANTITY OF WASTE USED

As outlined in Section 2, the imported inert fill material is to be placed within Phases 1 to 9 of the excavation area in the main site area. No imported inert fill material will be placed in Flexible Working Areas A and B in the west of the site. Restoration of Flexible Working Areas A and B will be to wetlands and water features using only site derived mineral waste (silts and clays) and will have a final landform below pre-extraction ground levels.

Therefore, the WRP focusses only on the placement of imported inert fill material within the Phases 1 to 9 excavation area in the main site area associated with the deposit for recovery activity.

It is indicated that 1.4Mm³ (approximately 2.45Mt using a standard conversion factor of 1.75t/m³) of fill material is required to achieve the approved restoration landform in excavation area Phases 1 to 9 using mostly imported inert fill material, with some site derived mineral waste, provided for by the Planning Permissions. A lesser volume of fill material would not deliver the approved scheme.

The scheme was designed by DJA having specific regard to the requirements for delivering the intended benefits associated with restoration of the site to a mix of wetland, nature conservation and agriculture. The latter will safeguard best and most versatile soil resources on site.

Appendix 1 presents detailed scheme drawings approved by the extant Planning Permissions. Drawing No. 2636-4-4-2-1 DR-0007 S4-P9 in Appendix 1 shows approved final site restoration contours.

The thickness of imported fill to be placed within excavation area Phases 1 to 9 ranges from 0m to c. 7.5m (average 4.5m).

The ability of the scheme to successfully deliver the identified important ecological habitats and associated benefits is contingent upon the site being restored in the approved manner and to the approved restored surface levels provided for by the Planning Permissions.

Restoration of the site at lower surface levels would not deliver the identified benefits given that the restored surface would then be generally too wet and at greater risk of flooding. Such a hydrological setting would not be compatible with the establishment and maintenance of the specific ecological habitats and the safeguarding of best and most versatile soil resources on site provided for by the approved scheme.

There is not enough on-site fill material available to achieve the approved restoration scheme. Accordingly, there is a requirement to import c. 1.4Mm³ of inert fill material to achieve the approved restoration within excavation area Phases 1 to 9. This requirement was identified in, and formed part of, the original Planning Application. The scheme has been approved and accordingly the importation of the inert fill material is provided for by the extant Planning Permissions.

The application is submitted on the basis that the minimum amount of waste is being used to achieve the intended benefit and that the permanent deposit of c. 1.4Mm³ imported inert fill within excavation area Phases 1 to 9 at the site is a waste deposit for recovery activity and not a waste disposal activity.

5. MEETING QUALITY STANDARDS

5.1 Is the recovered waste material suitable for its intended use?

The recovered waste will be imported inert fill material sourced from construction sites within the general Tewkesbury area. To ensure that the recovered waste material is suitable for its intended use, the works will be managed by staff having the appropriate level of technical competence with relevant qualifications gained from one of the accepted industry schemes. Waste Acceptance Criteria inspection procedures will be in place to ensure that the inert fill material used in the works is as described on Waste Transfer Notes, is permitted by the Environmental Permit and is fit for purpose. The Waste Acceptance Criteria and Procedures document is included as Appendix Giii of the EPR Permit application.

The waste types in Table 1 are to be provided for in the Environmental Permit (it should be noted that the waste types provide for the importation of uncontaminated wastes from brownfield developments).

Table 1 – Waste types

Waste types

Exclusions

Wastes having any of the following characteristics shall not be accepted:

- consisting solely or mainly of dusts, powders or loose fibres
- hazardous wastes
- wastes in liquid form

EWC Waste Description

Code

01 WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS

01 01 wastes from mineral excavation

01 01 02 wastes from mineral non-metalliferous excavation

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 07

01 04 09 waste sand and clays

17 CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)

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

17 05 soil (including excavated soil from contaminated sites), stones and dredging spoil

17 05 04 soil and stones other than those mentioned in 17 05 03

17 05 04 waste will be sourced from greenfield sites and/or will be waste of 'greenfield quality' sourced from brownfield sites (*i.e.* naturally occurring material for which there is no suspicion of contamination based on specific source specific environmental risk assessment, supported as necessary by laboratory analysis).

5.2 **Will the proposal be completed to an appropriate standard?**

The works will be undertaken by an experienced earthworks operator (Moreton C Cullimore (Gravels) Limited) and will be managed by staff having the appropriate level of technical competence with relevant qualifications gained from one of the accepted industry schemes. Robust Waste Acceptance Criteria and Procedures will be implemented to ensure that the inert fill material used in the works is as described on Waste Transfer Notes, is permitted by the Environmental Permit and is fit for purpose.

The works will be undertaken in accordance with principles of best practice including British Standard BS 6031:2009 (Code of practice for earthworks).

A method specification for the placement and compaction of imported inert fill is presented in Appendix 2.

Management of the completed restoration scheme will be in accordance with the Detailed Restoration and Aftercare Proposals and Landscape and Ecological Management Plan (LEMP) ((DJA) Report ref. 2636-4-5-LM-0001) approved by extant Planning Permissions 19/000048/CM (Worcestershire County Council) and 19/0081/TWMAJM (Gloucestershire County Council), which is included in Appendix L of the EPR Permit application.

5.3 **Engineering and Monitoring**

An engineered side slopes Artificial Geological Barrier (AGB) will be constructed on a phased basis against the perimeter slopes of excavation area Phases 1 to 9 to provide protection to soil, groundwater and surface water. A Construction Quality Assurance Plan for the side slope AGB is provided as Appendix M of the EPR Permit application (GWP Report No. 250927).

The risk assessments provided in Appendix G of the Environmental Permit Application have established that the deposit for recovery activity, approved by the extant Planning Permissions, will not cause environmental harm.

The imported fill material to be placed within excavation area Phases 1 to 9 will be inert and robust Waste Acceptance Criteria and Procedures will be implemented to ensure that this is the case. The Waste Acceptance Criteria and Procedures document is included as Appendix Giii of the EPR Permit application.

Based on the outcomes of the Generic Quantitative Risk Assessment (GQRA) undertaken as part of the Hydrogeological Risk Assessment (HRA) (GWP Report No. 251041 which accompanies the EPR Permit application (Appendix Giv of the Permit application documentation)), including the use of numerical modelling, there will be no significant potential for the imported fill material to impact adversely on the local groundwater or surface water environments.

Groundwater and surface water quality monitoring at the site is discussed in Sections 6.3 and 6.4 of the HRA report.

There will be no significant potential for the imported fill material to generate gas.

Based on the findings of the Gas Risk Assessment (GRA) (GWP Report No. 251040 which accompanies the EPR Permit application (Appendix Gvi of the Permit application documentation)), no gas monitoring is required and none is proposed as the risk screening revealed no potential for significant gas generation.

No aftercare monitoring will be required given that the imported fill material will be strictly inert and will not cause environmental harm.

6. OBLIGATIONS TO DO THE WORK

As described in Section 2, the restoration of the Bow Farm site is the subject of Planning Permissions 19/000048/CM and 19/0081/TWMAJM approved by Worcestershire and Gloucestershire County Councils, respectively. This places a legal obligation on the applicant to complete the approved restoration within the main mineral extraction area, whether with waste or non-waste material. This alone demonstrates that the waste is being used as a substitute for a non-waste material.

Condition 4 of Planning Permission 19/000048/CM states that; -

'The development hereby approved shall be carried out in accordance with the details shown on the following approved drawings, except where otherwise stipulated by conditions attached to this permission: The approved plans comprise....'

Condition 4 lists, amongst others, the phasing plans for extraction and restoration and the approved restoration scheme for the main extraction area together with the Planning application, Environmental Statement and working scheme description. The plans referred to in Condition 1 are discussed in further detail in Section 6.1. Condition 4 of approved Planning Permission 19/0081/TWMAJM is similarly worded to Condition 4 of Planning Permission 19/000048/CM.

In granting Planning Permissions 19/000048/CM and 19/0081/TWMAJM, Worcestershire and Gloucestershire County Councils have imposed specific obligations in relation to restoring the site according to approved plans. In respect of specific obligations, the EA states in the recovery guidance:-

'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'*

Section 6.1 refers to each of these points in turn.

6.1 **Evidence of the obligation**

Planning Permissions 19/000048/CM and 19/0081/TWMAJM confirm the specific obligations in respect of restoring the site according to the approved plans. These are referred to under Conditions 4 and 8 of Planning Permission 19/000048/CM.

Condition 4 of Planning Permission 19/000048/CM (Approved Plans) states that:-

The development hereby approved shall be carried out in accordance with the details shown on the following approved drawings, except where otherwise stipulated by conditions attached to this permission: [inter alia]

- 2636-4-4-2-1-DR-0002-S4-P9, titled: 'Initial Works and Phase 1 Extraction';
- 2636-4-4-2-1-DR-0003-S4-P8, titled: 'Phases 3 and 4 Extraction';
- 2636-4-4-2-1-DR-0004-S4-P8, titled: 'Phases 5 and 6 Extraction';
- 2636-4-4-2-1-DR-0005-S4-P8, titled: 'Phases 7, 8 and B Extraction';
- 2636-4-4-2-1-DR-0006-S4-P9, titled: 'Phase 9 Extraction';
- 2636-4-4-2-1-DR-0007-S4-P9, titled: 'Proposed Restoration';

The reason for the condition is to ensure the development is carried out as proposed.

Condition 8 of Planning Permission 19/000048/CM states:-

The site shall be progressively worked and restored in accordance with the phased working programme and contiguous restoration scheme as shown on the approved drawings numbered: 2636-4-4-2-1-DR-0002-S4-P9, titled: 'Initial Works and Phase 1 Extraction'; 2636-4-4-2-1-DR-0003-S4-P8, titled: 'Phases 3 and 4 Extraction'; 2636-4-4-2-1-DR-0004-S4-P8, titled: 'Phases 5 and 6 Extraction'; 2636-4-4-2-1-DR-0005-S4-P8, titled: 'Phases 7,8 and B Extraction'; and 2636-4-4-2-1-DR-0006-S4-P9, titled: 'Phase 9 Extraction', except where otherwise stipulated by conditions attached to this permission.

The reason being to ensure that the development is carried out as proposed, environmental impacts are minimised and that restoration takes place in a timely manner.

Conditions 4 and 8 of Planning Permission 19/000048/CM and Condition 4 of Planning Permission 19/0081/TWMAJM place a legal requirement for Moreton C Cullimore (Gravels) Limited to progressively restore the Phases 1 to 9 excavation area. The construction of the proposed scheme would technically be feasible using imported primary source non-waste material. However, use of such material would be inappropriate and would not be consistent with sustainability principles. Placement of imported inert waste under a deposit for recovery scheme is fully in accordance with the aspirations set out in various His Majesty's Government waste management documents including:

- Planning Policy Statement 10: Planning for Sustainable Waste Management;
- Waste Management Plan for England: December 2013; and
- Government Review of Waste Policy in England 2011.

7. **SUMMARY**

This report presents a Waste Recovery Plan (WRP) for the works approved by Planning Permission 19/000048/CM (Worcestershire County Council) and Planning Permission 19/0081/TWMAJM (Gloucestershire County Council) which provides for, *inter alia*, site restoration using imported inert fill material.

Completion of the approved site restoration scheme, involving the restoration of the mineral extraction areas requires 1.4Mm³ (approximately 2.45Mt using a standard conversion factor of 1.75t/m³) of imported inert fill material within Phases 1 to 9 of the excavation area in the main site area.

This WRP accompanies an application for an Environmental Permit to allow the approved works to be completed. The application is for a Bespoke Environmental Permit based on SR 2015 No. 39 (use of waste in a deposit for recovery operation). The applicant is Moreton C Cullimore (Gravels) Limited.

It is considered that the approved works satisfy the waste recovery tests and that this WRP confirms that the permanent deposit of imported inert waste on the land within excavation area Phases 1 to 9 at the Bow Farm site to achieve the proposed restoration scheme is a waste recovery activity and not a waste disposal activity.

GWP CONSULTANTS
November 2025

APPENDIX 1

**Earthworks drawings submitted as part of Planning Permissions
19/000048/CM (Worcestershire County Council) and
19/0081/TWMAJM (Gloucestershire County Council)**

APPENDIX 2

Method Specification