



# **Sandgate Quarry**

## **Environmental Permit Application**

### **Waste Recovery Plan**

**January 2020**

Prepared on behalf of Inert Recycling UK Ltd



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## 1.0 Introduction

### 1.1 Report Context

- 1.1.1 WYG has been commissioned to prepare and submit a Waste Recovery Plan (WRP) on behalf of Inert Recycling UK Limited (Inert Recycling) for Sandgate Quarry.
- 1.1.2 Planning permission reference WSCC/044/18/SR was granted by West Sussex County Council for the 'Continuation of working the mineral (sand extraction), but with an enhanced restoration scheme for nature conservation and informal recreation involving the importation of 1.8 million tonnes of inert material over a period of eleven years'. Inert Recycling seeks to gain a bespoke waste recovery permit for the permanent deposit of inert waste to land at Sandgate Quarry to facilitate the restoration scheme outlined in the planning application.
- 1.1.3 Inert Recycling have proposed to import approximately 1.8 million tonnes of inert waste for the enhanced restoration scheme for the site that will eventually form part of the Sandgate Country Park. The proposed enhanced scheme includes a smaller lake than currently proposed, as well as a series of shallow ponds, and a causeway between the lake and ponds for increased public access and enjoyment. The proposal also allows for creation of wet heath and reed habitats to improve biodiversity.
- 1.1.4 The quarry is required to be progressively restored to ensure compliance with the approved Plan Reference Numbers detailed within Condition 3 and furthermore Condition 16 of the planning permission as follows:

*Condition 3 "The proposed Development shall not take place other than in accordance with the approved information and plans.....Restoration Master Plan (Drawing No. P4/182/10 Rev A)"*

*Condition 18 "No extraction of minerals from the site or infilling of land at the site shall take place other than in accordance with the sequence of phases of operation illustrated on plans P4/182/7."*



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- 1.1.5 The Environment Agency Regulatory Guidance on Waste Recovery Plans and Permits, dated 18<sup>th</sup> October 2016, sets out the Environment Agency's (EA) approach to determining whether an activity involving the permanent deposit of waste on land is waste recovery or waste disposal. This document therefore constitutes a Waste Recovery Plan to satisfy the above.



## 2.0 Site Description

### 2.1 Site Setting

- 2.1.1 Sandgate Quarry is located on the northern side of Washington Road (A283) approximately 500m north of Sullington, 1km to the east of Storrington and 2km north east Washington. The A24 lies approximately 2km to the east. The site is approximately 7km to the north of Worthing. The site is situated outside the South Downs National Park with the border located on the southern side of Washington Road. The site is centred at National Grid Reference (NGR) TQ 10201 14110. The application site is detailed on P4/182/1.
- 2.1.2 The site is bounded by Sandgate Country Park to the north, Hampers Lane to the east, Washington Lane to the south and Water Lane to the west. Access to the site is gained via an access road off Water Lane located on the western side of the site.
- 2.1.3 In order to restore the site to the intended benefit, Inert Recycling seeks to gain a bespoke waste recovery permit for the permanent deposit of inert waste at Sandgate Quarry to facilitate the proposed restoration scheme submitted under planning application number WSCC/044/18/SR.

### 2.2 Planning History

- 2.2.1 The original permission for mineral workings was granted by the then Chanctonbury Rural District Council in April 1949 (ref. SG/16/48). This planning permission was superseded by the following planning applications for further extension to workings under SG/17/49 in 1949, SG/27/60 in 1961, SG/16/64 in 1964, SG/22/70 in 1970 and SG/48/71 1973.
- 2.2.2 In 1999 under planning permission ref. SG/23/98 a 'Review of Minerals Planning Permission SG/16/48, SG/17/49, SG/27/60, SG/16/64, SG/22/70 and SG/48/71 for Sand Extraction' was conducted. The review was conducted under the under Schedule 13 of the Environment Act 1995 as an active Phase 1 site and these conditions came into effect in February 1999 replacing the older conditions of the previous permissions.
- 2.2.3 In 2018 planning application ref. WSCC/044/18/SR was submitted for the continuation of working the mineral (sand extraction), but with an enhanced restoration scheme for nature conservation and informal recreation involving the importation of 1.8 million tonnes of inert material over a period of eleven years. This application was approved on 8/1/2020.



### 2.3 Permitting Context

- 2.3.1 In order to facilitate the enhanced restoration of the quarry, as approved under planning permission WSCC/044/18/SR, Inert Recycling seeks to put 1.8 million tonnes of inert waste to a beneficial use.



### 3.0 Proposed Development

#### 3.1 Introduction

- 3.1.1 The proposed development comprises the importation of 1.8 million tonnes of inert waste to infill the void created by the sand extraction in accordance with planning permission WSCC/044/18/SR. The proposed development changes the original approved restoration to create an enhanced scheme. It seeks to utilise imported inert waste materials rather than using 'virgin' soils for the restoration. The proposed development would use the imported inert waste material to achieve an enhanced restoration over that originally approved under planning permission ref. SG/23/98, which involved no importation of restoration materials.
- 3.1.2 The scheme would provide an enhanced scheme in terms of improved landform, increased biodiversity and improved informal recreational opportunities and form part of the Sandgate Country Park. The approved restoration scheme requires infilling to achieve an appropriately landscaped and restored mineral working.

#### 3.2 Material Requirements

##### Volumes

- 3.2.1 It is proposed that Sandgate Quarry will accept only inert and uncontaminated materials as stipulated in Planning Condition 21 'Permitted Restoration Materials'.
- 3.2.2 The restoration of the site will require approximately 1.8 million tonnes material to be brought to the site to shape the void created by the sand extraction. It is proposed that between 250,000 tonnes and 350,000 tonnes per annum of material would be imported to the site over an 8-11 year period. The annual rates of fill will vary, and at times will be slower to ensure that filling follows on behind extraction. Based on the extraction rate it is envisaged that the site could be worked and restored within a period of some 11 years.

#### 3.3 Waste Types

- 3.3.1 Condition 21 (Permitted Restoration Materials) states that "Imported and any on-site materials required for the purposes of the development hereby permitted shall constitute only inert and uncontaminated waste materials." The restoration material would be generated and recovered from construction, building or infrastructure projects, mainly comprising earth, soils and sub-soils, typical materials used in land raising, engineering and restoration projects.





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- 3.3.2 Any soil forming materials would be screened and used in the landscaping of the site as opposed to the infilling.
- 3.3.3 The proposed waste types would be required to meet the chemical and physical characteristics as stipulated within the landfill directive. As such, the only waste type proposed to be included within the recovery activity is as follows:

**Table 1: Proposed Waste Types**

<b>EWC Code</b>	<b>Description</b>	<b>Restriction</b>
<b>01</b>	<b>Waste resulting from exploration, mining, quarrying and physical and chemical treatment of minerals</b>	
<b>01 01</b>	<b>Wastes from mineral excavation</b>	
01 01 02	Waste from non metalliferous excavation	Restricted to waste overburden and interburden only
<b>01 04</b>	<b>Wastes from physical and chemical processing of non-metalliferous minerals</b>	
01 04 08	Waste gravel and crushed rocks other than those mentioned in 04 04 06	
01 04 09	Waste sand and clay	
<b>10</b>	<b>WASTES FROM THERMAL PROCESSES</b>	
<b>10 12</b>	<b>Wastes from manufacture of ceramic goods, bricks, tiles and construction products</b>	
10 12 08	Waste ceramics, brick, tiles and construction products (after thermal processing)	
<b>10 13</b>	<b>Wastes from manufacture of cement, lime and plaster and articles and products made from them</b>	
10 13 14	Waste concrete	
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>	
<b>17 01</b>	<b>Concrete, bricks, tiles and ceramics</b>	
17 01 01	Concrete	Selected C&D waste only
17 01 02	Bricks	Selected C&D waste only
17 01 03	Tiles and ceramics	Selected C&D waste only
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Selected C&D waste only. Metal from reinforced concrete must have been removed.
<b>17 05</b>	<b>Soil (including excavated soil from contaminated sites), stones and dredging spoil</b>	
17 05 04	Soil and stones other than those mentioned in 17 05 03	Excluding topsoil, peat; excluding soil and stones from contaminated sites
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>	



<b>19 12</b>	<b>Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>	
19 12 09	Minerals only	Wastes from the 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.
19 12 12	Other wastes from mechanical treatment of wastes other than those mentioned in 19 12 12	Restricted to crushed bricks, tiles, concrete and ceramics only. Metal from reinforced concrete must be removed. Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>	
<b>20 02</b>	<b>Garden and park wastes (including cemetery waste)</b>	
20 02 02	Soil and stones	Only from garden and parks waste; excluding topsoil, peat.

3.3.4 This waste type is identified by the Environment Agency as suitable for use in the restoration of mineral workings and as general fill material (Environment Agency Guidance: Waste Recovery Plans and Permits: October 2016).

### 4.0 Justification for Waste Recovery

#### 4.1 Introduction

- 4.1.1 The Environment Agency's Regulatory Guidance on Waste Recovery Plans and Permits (October 2016), sets out the Environment Agency's approach to determining whether an activity involving the permanent deposit of waste on land is waste recovery or waste disposal. The difference between waste disposal and waste recovery is summarised below:-

##### Waste Recovery

*"Waste recovery is about using waste to replace other non-waste materials to achieve a beneficial outcome in an environmentally sound manner.*

*The clearest indicator of waste recovery is when it can be shown that the waste used is a suitable replacement of non-waste materials that would otherwise have to be used to achieve the end benefit."*

- 4.1.2 It is clear from these statements that the purpose of the development is a key consideration in determining whether the operations constitute recovery or disposal. In particular, whether the scheme is driven by a need to achieve a beneficial purpose, in which the use of waste materials will assist, or whether it is intended as a means to dispose of waste, from which incidental benefits arise.
- 4.1.3 The purpose of the scheme for the restoration of Sandgate Quarry is set out in the following section.

##### The Purpose of the Scheme

- 4.1.4 The site is allocated in the Horsham District Planning Framework 2015 Policies Map as forming part of the Sandgate Country Park. This permitted change to the restoration scheme sets out to deliver the enhanced landscape character, informal recreational areas and habitats areas which form the future vision for the country park. The previously approved restoration scheme delivered a steep sided large water body. The revised scheme seeks to reduce the steepness of the sides of the sandpit void and reduce the water area by bringing in inert restoration material.



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- 4.1.5 The site is some 15m north of the South Downs National Park Boundary and approximately 1.5km from the ridgeline 1.4km from the South Downs National Trail. This is a nationally important landscape designation which is important for its landscape character value and for informal recreational opportunities.
- 4.1.6 There are a number of internationally and nationally important nature conservation designations in the vicinity of the proposal site. Immediately to east of the site on the other side of Water Lane lies Sullington Warren SSSI designated as whose main habitat is dwarf shrub heathland. The site includes both wet and dry heaths and is a habitat for breeding birds. This site also has archaeological interest with a total of eight tumuli on site. Chantry Mill SSSI lies to the south west of the site on the opposite side of Washington Road this is designated as it provides the best available exposure of the unusual "iron grit" horizon which characterises the Gault/Folkstone Beds.
- 4.1.7 In terms of public access, there are no rights of way crossing the site, but there are a number of footpaths, and bridleways around the site and in the local vicinity. The nearest public footpaths are Storrington and Sullington 2631 and 3506 which both lead onto Water Lane from the south west. Storrington and Sullington 2626 footpath is some 375m to the north west of the site and Washington 2627 bridleways runs on a north south axis some 300m from the eastern boundary of the site, beyond Washington Quarry
- 4.1.8 The proximity of the site to the South Downs Way, Storrington and Sullington means that changes to the approved restoration scheme would deliver a site more appropriate to its setting and location and the aims for the Sandgate Country Park.
- 4.1.9 The proposed final restoration scheme is envisaged to create an improved landform together with enhanced landscaping can be achieved to improve public access and biodiversity habitat benefits - shallow ponds, wet heath and at the western end of the quarry together with a new lakeside footpath running between the shallow ponds and lake. The revised restoration scheme would be at higher final contour levels than the existing scheme, which involved no off-site restoration materials. The aim of importing materials is to provide slopes so that additional recreational footpaths can be built around the site.

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4.1.10 Planning permission WSCC/044/18/SR was granted by West Sussex County Council. The conclusion from the Planning Committee regarding the proposed restoration through the utilisation of inert waste material was that the development would “*provide the opportunity to enhance both the landscape and ecological benefits of the site (e.g. through the creation of enhanced habitats and biodiversity mix, and ecological management), and with greater benefits to the public than the approved restoration scheme.*”

4.1.11 With regard to the overall proposals, the Planning Committee concluded that the proposed development accords with the relevant development plan policies.

### 4.2 The Recovery Test

4.2.1 In order to reach a formal determination as to whether the restoration of the site constitutes a recovery operation, the Environment Agency will apply the tests set out in the guidance which is based upon a legal test derived from the Waste Framework Directive and European case law, and are set out below:-

- Evidence to show that if you couldn't use waste you would do work to get the same outcome using non-waste;
- It is suitable for the intended purpose;
- Won't cause pollution;
- Purpose of the work;
- Quantity of Waste Used; and
- Meeting Quality Standards.

4.2.2 These questions are answered in the following sections to support the EA's consideration of this Waste Recovery Plan.

### 4.3 Evidence of substitution for non-waste materials

4.3.1 The Environment Agency's Waste Recovery Plans and Permit Guidance states that:-

*"Your plan must show that if you couldn't use a waste material you would do work to get the same outcome using non-waste materials".*

4.3.2 There are three main ways that applicants can demonstrate that a waste material will be substituting a non-waste material. These are as follows:-

- Financial gain by using non-waste materials;



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- Funding to use non-waste; and
- Obligations to do work.

4.3.3 It is IRUK's intention to demonstrate, through this Waste Recovery Plan, that there is a legal obligation to restore the site. There is no further requirement within the aforementioned waste recovery guidance or case law that financial gain or funding to use non-waste must be satisfied in the event that an obligation to undertake works is demonstrated.

4.3.1 It is the aspiration of West Sussex County Council to have 'zero waste to landfill' by 2031 which is defined in the West Sussex Waste Local Plan as the disposal to land (via landfill or landraise) of less than 3% of the waste arising in the County. The use of inert waste material to create an enhanced restoration scheme at Sandgate Quarry would attribute to the diversion of inert waste from landfill and is therefore an example of sustainable waste management.

4.3.2 The approved restoration scheme would improve public access, increase habitat creation and improved the landscape. Policy W8: Recovery Operations involving the Deposition of Inert Waste to Land from the West Sussex Waste Local Plan supports recovery operations involving the deposition of inert waste material. The policy tests of W8 effectively mirror many of the EA's requirements with a need to demonstrate: clear benefits to the site and wider area; a genuine need to use the waste material as a substitute for non-waste material; the material to be used is suitable for its intended use; the amount of waste material to be used is no more than is necessary to deliver the benefits intended; there would be no unacceptable impact on natural resources; the proposal accords with Policy W13: Protected Landscapes; and restoration would be to a high standard. As detailed in paragraph 4.1.7 the West Sussex Planning Committee considered that the enhanced restoration scheme accords with the Development Plan policies, including W8.

4.3.3 Policy W13 notes that proposals for a waste development located outside protected landscapes will be permitted provided that they do not undermine the objectives of the designation. Sandgate Quarry is located outside of a protected area however the boundary of the South Downs National Park is immediately to the south of the A283 Washington Road which bounds the quarry to the south. The enhanced restoration scheme would deliver an improved landform to better reflect the wider landscape setting of the site. The West Sussex Planning Committee concluded that *"The revised final restoration is considered acceptable, and an improvement, in landscape terms...with the proposed planting and land management as well as water features and recreational features that are considered to enhance the future landscape and ecological of the site within the Sandgate Country Park"*.

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- 4.3.4 The enhanced restoration scheme would deliver ecological benefits and the West Sussex Planning Committee noted that the scheme would deliver “*significant biodiversity enhancement to the quarry and surrounding area*”.
- 4.3.5 As detailed above, planning permission WSCC/044/18/SR was issued by West Sussex County Council Planning Committee who provided positive views on the proposed use of inert material to deliver an enhanced restoration scheme for Sandgate Quarry. The Planning Committee have specified that the permitted restoration materials should constitute only inert and uncontaminated materials. Planning conditions which require site restoration following extractive operations are attached to planning permissions when a mineral planning authority (MPA) considers that appropriate restoration of the site is a pre-requisite to the principle of mineral extraction being acceptable
- 4.3.6 This planning permission represents a legal requirement to restore the site. This requirement would be likely be obliged to be fulfilled through the use of non-waste, inert waste through the mechanism of a recovery permit or through an inert disposal permit. There are no conditions pursuant to planning permission WSCC/044/18/SR that require the restoration scheme to be completed using inert waste or how the restoration scheme should be constructed. The site was not granted planning permission on the basis that it might provide inert waste disposal capacity. As such, it is considered that the MPA would pursue enforcement action in the event of a breach of the planning condition in relation to the restoration of the site thereby demonstrating a legally enforceable obligation.
- 4.3.7 The implementation of the planning permission demonstrates that there is a statutory obligation to restore the site. This requirement would be obliged to be fulfilled through the use of non-waste, inert waste through the mechanism of a recovery permit or through an inert disposal permit. Failure to restore the site in accordance with the approved planning permission would lead to enforcement action being undertaken by the planning authority.

### **4.4 Is the recovered waste material suitable for its intended use?**

- 4.4.1 Many of the proposed waste types are physically similar to the likely primary aggregate non-waste materials to be used e.g. soils, sand, stone, gravel etc., and can be considered direct replacements. They are capable of being sufficiently compacted so that they can form a stable landform for the medium and long term and would undergo consolidation rapidly to reduce the risk of short term instability.
- 4.4.2 The proposed waste types are consistent with those which are considered acceptable for



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construction and reclamation activities within Standard Rules SR2015 No39: use of waste in a deposit for recovery operation.

- 4.4.3 It is considered that the proposed wastes are suitable for use in creating the enhanced landform and restoration.

### **4.5 Will the material cause pollution?**

- 4.5.1 A Hydrogeological Risk Assessment has been undertaken in support of the application which demonstrates that there is no impact on the surrounding groundwater through the use of these wastes for the purpose of restoring the site.

- 4.5.2 Strict waste acceptance, including careful screening of materials entering the site, would be undertaken as detailed within the Environmental Permit application. These procedures would be employed on site to ensure that no prohibited materials, which are likely to cause a risk to the environment, would be accepted at Sandgate Quarry.

- 4.5.3 It is considered that in following the strict criteria detailed above, the material is unlikely to cause pollution.

### **4.6 Purpose of the use**

- 4.6.1 The purpose of the scheme is to deliver an enhanced restoration of Sandgate Quarry to allow the restored site to form part of the Sandgate Country Park. The restoration scheme would provide ecological, landscape and recreational benefits including a shallow pond, and wet heath at the western end of the quarry with a lakeside footpath running between the shallow ponds and lakes. The scheme would also involve new tree and shrub planting.

### **4.7 Is the minimum amount of waste being used to achieve the intended benefit?**

- 4.7.1 The use of inert waste material would provide a beneficial use for the waste through the creation of a restoration scheme that would form part of the adjacent Sandgate Country Park and divert the inert waste from landfill. The proposed development would require the importation of 1.8 million tonnes of inert waste to be utilised in the restoration scheme, over a period of 11 years.

- 4.7.2 The proposed landform has been carefully designed to take into account the physical and



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technical requirements for the restoration (e.g. land stability, drainage, etc.) and also the inclusion of landscape features that would fit in with the surrounding landscape character.

- 4.7.3 A volume of 1.8m tonnes of imported material is required to achieve the profiles approved under the planning permission for the restoration scheme.
- 4.7.4 Throughout the restoration of the site, IRUK has sought to re-incorporate as much of the unwanted silt materials and any overburden back into the restoration landform. However, there is insufficient site won material which can be incorporated back into the site to complete the restoration scheme in accordance with the conditions of the planning permission. As such, additional material is required to be imported from off site sources.
- 4.7.5 In determining whether the minimum volumes of waste would be used, consideration was given to alternative schemes during the preparation of an Environmental Impact Assessment, including a 'do nothing' option and a lower level restoration option. As detailed in paragraph 4.3.5 West Sussex County Council considered this same question under Policy W8 and concluded that *"the applicant has satisfactorily demonstrated that the amount of fill material proposed is the minimum required to ensure the delivery of a restoration scheme with a profile that would provide the clear benefits as described...and ensure the future restored use of the site and the wider area as part of the Sandgate Country Park designation."*

### 4.8 Meeting quality standards

- 4.8.1 The proposed development has been carefully and professionally designed, taking into account any physical constraints, such as land stability, land condition and drainage.
- 4.8.2 The fill materials will be placed in accordance with the Specification for Highways Series 600 for general fill materials
- 4.8.3 All works, including construction and landscaping, will be carried out in accordance with current industry best practices and the Environmental Permit. Efforts will be made to minimise disruption to local amenity and measures will be taken to cause as little nuisance as possible (e.g. dust emissions or noise) to local receptors which are controlled through the planning permission.
- 4.8.4 Therefore the restoration of the quarry, in accordance with the planning permission and associated conditions, is considered to be a recovery operation.



### 5.0 Conclusion

- 5.1.1 The restoration scheme for Sandgate Quarry has been approved by West Sussex County Council under planning permission WSC/044/18/R. Inert Recycling UK are seeking to restore the site under the conditions of a bespoke waste recovery permit. This Waste Recovery Plan seeks to demonstrate that the approved restoration scheme should be considered a waste recovery activity.
- 5.1.2 Section 2.0 of this report sets out the requirements of planning permission at Sandgate Quarry. In order to ensure that the environmental impacts of the quarrying were acceptable, Sandgate Quarry was granted planning permission for sand and gravel extraction with appropriate restoration for a beneficial after use. The site was not granted planning permission on the basis that it might provide inert waste disposal capacity. Indeed, had the restoration scheme been designed as a means for the disposal of waste, planning permission is unlikely to have been granted.
- 5.1.3 This Waste Recovery Plan provides information relating to the benefits of the scheme and confirms that the minimum amount of waste is being used to confer these benefits. In addition, the information provided above shows clearly that the scheme meets the test as detailed within EA Waste Recovery Permit and Plans Guidance and that it should be considered as a recovery activity in line with EU Case Law.



## Drawings



## Appendices



**Appendix A – Planning Permission  
WSCC/044/18/R**