

Simon Howard
simon.howard@stantec.com
By E-mail only

Our ref: EPR/JP3326SM/P002
Your ref: 331201414R1i2

Date: 12/09/2025

Dear Simon,

Environmental Permitting – Recovery vs Disposal assessment of a waste recovery plan

Pre-application reference: EPR/JP3326SM/P002

Prospective applicant name: Suez Recycling And Recovery UK Limited

Site name and address: Clockhouse Quarry, Horsham Road, Capel, RH5 5JL

You have submitted information to us that includes your assessment that the activity you wish to undertake at your site amounts to a recovery operation.

We have now considered your submission and we would like to advise you that:

We agree with your assessment that your activity is a recovery operation. This advice is based on the information you have provided to support that the waste is being used as a substitute for non-waste material plus details in relation to waste types and quantity and the purpose and nature of the proposal. If you change any of this information between now and when you submit an application, this advice may no longer apply.

Please note that the advice contained in this letter is not in itself a permitting decision or an indication that a permit will be granted or permit variation issued following submission of an application. Further assessment will take place during the permit determination stage and pre-application advice should be sought as required before preparing an application. See appendix for more information.

The following documents are considered to form the approved waste recovery plan:

Title	Reference (where applicable)	Date
Waste Recovery Plan	331201414R1i2	10/07/2025
Further information on use of waste to create a soil profile/restoration layer	E-mail from Kate Jones (kate.jones@suez.com)	12/09/2025

If you have any questions regarding our advice above please contact me using the details below.

Yours sincerely

Chris Cumming

Permitting Officer, National Permitting Service

Environment Agency | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

Christopher.Cumming@environment-agency.gov.uk

External: 020 302 58177

Appendix

Recovery vs Disposal advice

The Recovery vs Disposal (RvD) assessment of a waste recovery plan enables us to advise an applicant regarding whether or not we agree in principle that a proposed waste activity is a recovery operation to inform what type of permit would be required (recovery or disposal).

This assessment is discrete from the pre-application advice that would be provided to support the preparation of a permit application (see below) attracting a separate charge.

Our decision to grant a recovery permit or to issue a variation is subject to further assessment carried out during the permit determination stage. In the case of bespoke permit applications, this includes site-specific risk assessment based on the location of the site and technical requirements of the scheme.

For example:

- RvD assessment considers what waste types *may* be suitable, not what waste types *will* be deemed suitable following technical assessment of a permit application which would take into account the sensitivity of the site location and the proposed appropriate measures to be carried out. This is particularly relevant where non-inert wastes are to be deposited.
- RvD assessment considers whether it has been demonstrated that the scheme will be designed and constructed to be fit for purpose. Further technical assessment of the design and the construction methods and/or quality standards to be met may be carried out during permit determination.

If the permit that you are intending to apply for includes the application of waste to improve / enhance or maintain soil quality (landspreading), you must make this clear in your permit application and provide a benefit statement with your application that shows that the specific use of the waste is suitable and will provide no more soils and/or nutrients than the plants need. This is separate to the RvD assessment of the waste recovery plan.

If you plan to mix or blend waste or manufacture a soil substitute under the permit this should be made clear in the permit application as it is a separate activity that will need to be assessed during permit determination.

Pre-application advice on a recovery permit application

Prior to preparing and submitting an application for a recovery permit, you should review our deposit for recovery guidance (<https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits>) and consider seeking pre-application advice (<https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>).

You should use the paid for enhanced pre-application advice service to discuss your proposal if any of the following apply:

- your site is in a sensitive location (<https://www.gov.uk/guidance/landfill-operators-environmental-permits/plan-the-environmental-setting-of-your-site#sensitive-locations>)
- you are depositing waste on top of a landfill
- you are depositing waste into water
- hazardous waste is to be deposited as part of the scheme
- additional activities (such as landspreading or soil treatment) are intended to be included in the permit

Changes to your waste recovery plan

Before making changes to your proposal you should review our waste recovery plan guidance (<https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits>).

Jones, Kate

From: Jones, Kate
Sent: 12 September 2025 09:28
To: Chris Cumming
Cc: Howard, Simon
Subject: RE: EPR/JP3326SM/P002 - Clockhouse Quarry: Waste Recovery Plan 331201414R1i2 for assessment
Attachments: 2025.09.11 e-mail from planning authority re. topsoil.pdf

Good morning Chris

I refer to your e-mail below of the 29th August 2025 relating to Clockhouse Quarry Waste Recovery Plan.

We had a response from Surrey Planning Authority yesterday afternoon relating to the wording of Planning Condition 44 and the use of waste topsoil in the restoration of the Quarry. I have attached the response which confirms that the wording of Condition 44 is not intended to preclude the acceptance of waste topsoil or incidental arisings of peat.

With regards to your second e-mail of the 29th August relating to the need to import waste topsoil and the use of BS 3882:2015, I have been able to confirm that there is no topsoil currently on site with which to complete the top layer of the restoration profile. As such there is a need to import waste topsoil to provide a growing medium for the planting that forms part of the approved restoration scheme. The approved restoration scheme is included in the Waste Recovery Plan (Landscape Strategy, Drawing No. CH 3/1 (Sheet 1) Rev P09) and shows areas of grassland and woodland which require topsoil material to ensure successful growth. I can confirm that any waste topsoil will meet BS 3882:2015.

I trust that this answers the queries relating to the Clockhouse Quarry Waste Recovery Plan and that your assessment can proceed.

SUEZ and Stantec could update the Waste Recovery Plan to include the above information if this is considered necessary, however further time would be needed to do this. Please let Simon and I know if an update is required; this could be provided by the 30th September.

Please do not hesitate to contact me if there are any queries regarding the above?

Kind regards

Kate Jones
Senior Permit Manager
SUEZ recycling and recovery UK

Please note that my working week is Tuesday to Friday

Mobile: +44 (0)7764 658742



SUEZ Recycling and Recovery UK Ltd
Betton Abbots Landfill Site - Cross Houses - Shrewsbury - Shropshire - SY5 6JD - United Kingdom
www.suez.co.uk



From: Chris Cumming <Christopher.Cumming@environment-agency.gov.uk>
Sent: 29 August 2025 10:20
To: Howard, Simon (Guest) <simon.howard@stantec.com>
Cc: Jones, Kate <kate.jones@suez.com>
Subject: EPR/JP3326SM/P002 - Clockhouse Quarry: Waste Recovery Plan 331201414R1i2 for assessment

Dear Simon,

Thank you for your request for pre-application assessment of a revised waste recovery plan (WRP) for the above site.

I tried to call you to discuss your request this morning but you were not available

I require some additional information before I can complete my assessment.

Please can you provide further explanation (ideally in a revised version of the waste recovery plan) to address the following:

1. Provide further evidence to demonstrate that the proposed waste types listed in table 5.3 of the WRP for use as a soil profile / restoration layer are considered by the relevant planning authority to be in accordance with condition 44 of the planning permission MO/2023/0789 which states: *"No material other than clean, inert waste or non-waste material shall be used in the restoration of the site hereby permitted."*

Reason: The planning condition suggests that the use of any non-inert wastes (such as the waste topsoil and peat listed in table 5.3) is not authorised by the planning permission.

Please can you respond by 12/09/2025

Kind regards

Chris Cumming

Permitting Officer, National Permitting Service

Environment Agency | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

Christopher.Cumming@environment-agency.gov.uk

External: 020 302 58177

Working days: Monday to Friday

Pronouns: He/Him ([why is this here?](#))



From: Howard, Simon <Simon.Howard@stantec.com>
Sent: 10 July 2025 16:10
To: PSC Land <PSC@environment-agency.gov.uk>
Cc: Jones, Kate <kate.jones@suez.com>
Subject: Clockhouse Quarry: Waste Recovery Plan 331201414R1i2 for assessment

Hello

On behalf of the applicant, SUEZ Recycling and Recovery UK Limited (SUEZ), please find attached for assessment a Waste Recovery Plan (WRP) for the deposition of waste on land as a recovery operation to restore Clockhouse Quarry, Horsham Road, Capel, Surrey RH5 5JL (the Site).

This WRP is pre-application, and SUEZ has transferred payment by BACS for your assessment fee (£1,231). The BACS reference is **PSCAPPSUEZ0253**.

The reference number given for the submission of the first version of this WRP (dated March 2024) was **EPR/JP3326SM/P001**. The attached is the second version.

Contacts as follows:

Applicant (please ensure that Kate is copied on all correspondence)

Kate Jones, Environment Permit Manager, SUEZ recycling & recovery UK

Mobile: +44 (0)7764 658742

Email: kate.jones@suez.com

Agent

Simon Howard, Technical Specialist, Stantec UK

Mobile: +44 (0)7543 312505

Email: simon.howard@stantec.com

Please confirm receipt at your earliest convenience.

Best regards

Simon

Simon Howard, BSc (Hons) MCIWM FGS

Technical Specialist

Direct: +44 1743 276140

Mobile: +44 7543 312505

simon.howard@stantec.com

Stantec UK Limited

New Zealand House, 160-162 Abbey Foregate, Shrewsbury SY2 6FD, United Kingdom



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Jones, Kate

From: Katie Rayner <Katie.Rayner@surreycc.gov.uk>
Sent: 11 September 2025 16:55
To: Wilshaw, Annemarie
Cc: Jones, Kate
Subject: RE: Clockhouse Quarry MO/2023/0789 - condition 44

Dear Annemarie,

Apologies for the delay in getting back to you on this point.

Your understanding of Condition 44 is correct, it was not intended to preclude the acceptance of waste topsoil or incidental arisings of peat in the material bought to the site for the use in the restoration of the site. As with the Runfold site this material (topsoil and peat) is considered suitable for deposit in the restoration of mineral workings. The intention of the condition was to ensure that only the material discussed within the application documents and no non suitable waste materials were brought on to the site for use in restoring the land.

I hope this is of help, please let me know if you need this information presented more formally.

Kind regards,
Katie

Katie Rayner
Principal Planning Officer
Environment and Planning
Katie.rayner@surreycc.gov.uk



From: Wilshaw, Annemarie <annemarie.wilshaw@suez.com>
Sent: 09 September 2025 11:43
To: Katie Rayner <Katie.Rayner@surreycc.gov.uk>
Cc: Jones, Kate <kate.jones@suez.com>
Subject: FW: Clockhouse Quarry MO/2023/0789 - condition 44
Importance: High

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Hi Katie,

I hope you have had a good summer.

Would you be able to get a response to me this week on the email below please? We have a deadline of this Friday for responding to the Environment Agency on their query.

Many thanks

Annemarie Wilshaw MCIWM MRTPI
Senior Planning Manager
SUEZ recycling and recovery UK

Mobile: +44 7850 058903



SUEZ Recycling and Recovery UK Ltd
Campground VEC – Springwell Lane - Wrekenton - Gateshead – NE9 7XW - United Kingdom
www.suez.co.uk



General

From: Wilshaw, Annemarie
Sent: 01 September 2025 09:17
To: Katie Rayner <katie.rayner@surreycc.gov.uk>
Cc: Jones, Kate <kate.jones@suez.com>
Subject: Clockhouse Quarry MO/2023/0789 - condition 44
Importance: High

Good morning Katie,

As you are aware, we are seeking a 'Deposit for Recovery' environmental permit from the Environment Agency to enable 'inert' waste to be used to infill the void and achieve restoration contours at Clockhouse Quarry.

We have had a query from the Environment Agency as to the intent of condition 44 of permission MO/2023/0789 and whether it is intended to preclude the use of waste topsoil and peat in the soil profile/restoration layer.

This relates, I believe, to the use of the word 'inert' and the fact that topsoil and peat (it is highly unlikely that peat would be more than an incidental element) by their nature contain organic matter.

(As a point of reference, very similar wording was used in the Runfold Quarry ROMP area permission WA/2018/0016 and that was not taken to preclude acceptance of waste topsoils or peat. Indeed acceptance of topsoil has been fundamental to the successful restoration at Runfold.)

Could you please confirm by return of email that condition 44 would not, in the view of the planning authority, preclude acceptance of waste topsoil or peat for use in the restoration soil profile?

Thank you & kind regards

Annemarie Wilshaw MCIWM MRTPI
Senior Planning Manager
SUEZ recycling and recovery UK

Mobile: +44 7850 058903



SUEZ Recycling and Recovery UK Ltd



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