

CONTINUATION SHEET: Part B2, Section 1a

Stantec (formerly Hydrock) as Environmental Consultant for the project have undertaken historical consultations with the Environmental Agency (and CL:AIRE) to discuss the use of materials (as waste and non-waste) at the former Wroughton Landfill site.

EA 2020:

The enhanced pre-application advice (**reference EPR/JB3008CM/A001**) was sought in February 2020 to discuss the operations at the site, which determined that the material(s) being considered for the proposed DfR works are waste. As such, the advice received was focused on the definition of recovery, the ways in which applicants are able to demonstrate that the proposal is a recovery activity, and submission of a Waste Recovery Plan.

Consultation also included discussion on the application of DoWCoP for re-use of the topsoil and cohesive capping material that overly the waste deposits. Hydrock's position is that the topsoil and capping material were placed with a predetermined use and, most significantly, were not discarded as waste. The EA advised Hydrock seek advice from CL:AIRE on this aspect.

CL:AIRE 2022:

Hydrock consulted CL:AIRE in May 2022 with the proposal to reuse the landfill capping material as a non-waste under DoWCoP. CL:AIRE confirmed that DoWCoP would be applicable to the topsoil and capping material described.

(continued overleaf)

EA 2022:

Hydrock reopened the discussion of the Deposit for Recovery permit previously carried out in 2020, in order to agree the strategy, stages of works, documentation, reports and assessments that are required to assist in the writing of the Waste Recovery Plan.

Hydrock requested for the EA (via the enhanced pre-app advice **reference EPR/JB3008CM/A001**) to review the 'Regulatory Framework for Materials Management' document, produced to detail the different regulatory mechanisms in which waste would be handled, processed and reused on or disposed from the site.

Hydrock requested a review of this document to seek any further comments and ideally agreement on these proposals, significantly that the Environment Agency would not unexpectedly disagree with the DoWCoP proposals.

The EA responded indicating that they could not review this document to conclude that the criteria for a recovery had been met – this would need to be done with the submission of a Waste Recovery Plan, which can be reviewed and assessed by the pre-application service.

EA 2024:

Hydrock produced and submitted a Waste Recovery Plan to the EA for review under the pre-application service.

The EA responded to Hydrock on 27/08/2024 (**EA reference EPR/FP3821SP/P001**) confirming that they had reviewed the Hydrock WRP and confirming that the EA agreed the proposed operations were recovery.