

RvD Advice Form

Name of permitting officer (RvD assessor)	Jeanette Ringham
EPR and EAWML References	EPR/KB3507KY/A001 EAWML 407842
Name of the proposed operator	Hills Quarry Products Limited
Name of the site	Airfield Quarry
Document reference for the submitted waste recovery plan	Airfield Quarry Waste Recovery Plan 13 th October 2021 Airfield Quarry Waste Recovery Plan v1.2 17 11 2021 Airfield Quarry Waste Recovery Plan v1.3 19 11 2021

Consideration of Recovery

Is the waste being used as a substitute for non-waste material?

Has the applicant confirmed that if they could not use waste, they would complete the proposed works in the same way with non-waste materials?

Our guidance includes some factors they can use to show they would carry out the scheme using non-waste:

- 1. Financial gain by using non-waste materials**
- 2. Funding to use non-waste (not-for-profit organisations)**
- 3. Obligations to do the works**

They must provide a clear justification, with evidence, to demonstrate that they would do this.

Sections 1.13 and 1.14 of the WRP detail that if the site is quarried there will be a requirement for the land to be reinstated. As the site is in very close proximity to RAF Fairford the Defence Infrastructure Organisation (DIO) acting on behalf of the Ministry of Defence (MoD) have been heavily involved in what could be permitted at the site which does not include any open water.

The local planning authority will be seeking a dry restoration of the quarry to avoid changing the bird strike risk at RAF Fairford.

Confirmation of the DIO's requirements regarding open water is provided in appendix A within the WRP.

The applicant has provided sufficient clarification that if mineral extraction is granted the site will need to be restored to prevent water bodies forming and increasing the risk of bird strikes. The restoration of the site will be completed either by using inert waste or non waste materials.

However until such time as planning permission is granted, the reasoning for the recovery activity is an obligation being planning, a recovery decision cannot be confirmed.

Is the material suitable for its intended use?

Has the applicant listed the waste types that they intend to use with an appropriate EWC code and description?

The waste types must be physically, chemically and biologically suitable for the works they are proposing (see Appendix 2).

The materials the applicant is proposing are inert in nature and those listed in SR 2015 No 39 which are to be imported along with using in-situ material retained during extraction.

The final list of waste codes proposed will be submitted with the permit application.

Please note that further assessment of the proposed waste types based on the sensitivity of the site location is carried out as part of the permit determination. 'Recovery vs. Disposal' assessment considers what waste types *may* be suitable, not what waste types *will* be deemed suitable following technical assessment.

What is the purpose of the works?

Has the applicant clearly described the function of their proposed scheme and shown that they are carrying it out to meet a genuine need?

They must explain the need or driver for this function and provide evidence to demonstrate that the function will be delivered by the proposed works, and the extent of the resultant benefits.

Sections 1.13 and 1.14 of the WRP detail that if the site is quarried there will be a requirement for the land to be reinstated. As the site is in very close proximity to RAF Fairford the Defence Infrastructure Organisation (DIO) acting on behalf of the Ministry of Defence (MoD) have been heavily involved in what could be permitted at the site which does not include any open water.

It is clear any proposal which is granted will have a significant input from the DIO to restrict the attraction of vermin and birds by not allowing putrescible wastes or open bodies of water to be included in the restoration of the site along with a number of other caveats.

The site sits beneath the approach and take off climb for RAF Fairford, meaning this airspace needs to be kept free of obstruction from tall structures and restricts the habitats which can be created so as not to increase the attraction of wild birds to the area.

The local planning authority will be seeking a dry restoration of the quarry to avoid changing the bird strike risk at RAF Fairford.

Confirmation of the DIO's requirements regarding open water is provided in appendix A within the WRP.

The applicant is proposing to use the existing onsite soils to complete the final growing medium restoration profile so this is not a consideration of this assessment as this will be completed with non waste materials.

Is the minimum amount of waste being used to deliver the function?

Has the applicant confirmed, and provided justification with evidence, that they only intend to use the minimum amount of waste necessary to carry out the intended function that would otherwise be provided by non-waste? Have they considered

alternative proposals that could use a smaller amount of waste to achieve the same function?

They must include the quantity of waste they intend to use in volume (m³) and tonnage and detail how they have calculated that figure, plus provide plans and cross-sections showing original and planned final levels.

An estimation of 4,870,000 tonnes of appropriate inert materials will be required to restore the 178 HA site. This is at a volume of 3,250,00 cubic metres with a conversion factor of 1.5 tonnes/cubic metre.

Volumes and tonnages are only estimates and due to the large size of the site and the variances of minerals as the site progresses will be subject to change.

It is recommended that when the WRP is submitted with the permit application these are reviewed and the decision finalised as part of the permitting process. This of course can be changed once the permit is issued by varying the WRP and permit to reflect the changes.

The recovery decision is based on the proposed information provided, as planning has not as yet been granted it is recommended this is reviewed at application stage to consider any changes which may have occurred in the intervening period. If no changes have been made the decision will be subject to planning permission being granted.

Until planning has been granted as this is the purpose of the obligating requirement the quantity and type of materials to be used cannot be confirmed.

Will the proposal meet a quality standard?

Has the applicant demonstrated how the scheme will be designed and constructed to be fit for purpose?

They must describe the construction methods and/or standards that will be followed to ensure that the **proposed operation will be finished to an appropriate standard, so that the function will be delivered**

The proposed development has been carefully and professionally designed, considering any physical constraints, such as land stability, land condition and drainage. The works will comply with planning condition requirements and the Environmental Permit conditions, including the operation of an Environmental Management System incorporating WAPs, Noise and Dust Management Plans and any other management, monitoring or mitigation that the environmental risk assessment for the Permit concludes is necessary.

Additionally the site will potentially, subject to agreement through the Permit application, require installation of an engineered barrier to an agreed permeability. The specifications of this barrier will be established through the hydrogeological risk assessment (HRA), and this will then dictate the degree of work needed to achieve that barrier's standard. These works will be subject to a Construction Quality Assessment by a suitably qualified engineer on completion which will be provided to the before waste is placed in that specific area.

The imported material will be placed using earthmoving equipment, primarily bulldozers, and will be shaped into the appropriate profile as per the restoration plan employing GPS technology to ensure the correct, approved landform configuration is complied with. The

material will be placed within each phase in layers 0.3-0.5m in depth, layers will be laid to a slight fall if they are to remain exposed to aid surface water run off.

Material will not be handled if excessively wet or frozen. Any large “boulders” of material will be placed in the lower layers of the restoration. Any areas noted as being excessively wet will be re-worked. The measures noted in the Soils Management Plan will be employed and tracking reduced where possible in the upper layers to reduce compaction.

This is subject to planning permission being granted with the final details of the agreed restoration scheme so at this time the details cannot be confirmed as meeting the end requirements.

Additional comments

ADVICE: NOT YET SATISFIED TO AGREE RECOVERY

We do not agree with the assessment that this operation is a recovery activity. Not enough evidence has been provided to support the case that the proposed activity is a recovery operation and therefore we cannot confirm that this is a recovery operation.

The recovery decision is based on the proposed information provided, as planning has not yet been granted a recovery decision based on planning obligations cannot be confirmed. Based on the information provided so far if planning was to be granted then depending on the final details it should be possible to obtain a recovery decision. Please note if planning is not granted then a recovery decision based on the information provided would be very difficult to obtain.

Appendix 1

Supporting evidence

- Airfield Quarry Waste Recovery Plan v1.1 13th October 2021
- Airfield Quarry Location Plan D10_LAN_201 Oct 2020 v1.0
- Airfield Quarry Existing Situation D10_LAN_203 Oct 2020 v1.1
- Airfield Quarry Phasing D10_LAN_204 Oct 2020 v1.0
- Airfield Quarry Restoration Proposals D10_LAN_215 Oct 2020 v1.0
- Airfield Quarry Cross Sections D10_LAN_216 Oct 2020 v1.0
- Appendix A - Correspondence with the DIO Safeguarding Team
- Appendix B – Correspondence with E&B Advisor, Landfill and Deposit for Recovery
- Airfield Quarry Waste Recovery Plan v1.2 17 11 2021
- Airfield Quarry Waste Recovery Plan v1.3 19 11 2021

Appendix 2

Waste types to be deposited

Waste code	Description	Typical uses and criteria (see key)
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 non metalliferous excavation	A, B, E, F
01 04	wastes from physical and chemical processing of non-metalliferous minerals	
01 04 08	waste gravel and crushed rocks other than those containing dangerous substances	A, B , E, F
01 04 09	waste sand and clays	A, B, E, F
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING	
02 02	wastes from the preparation and processing of meat, fish and other foods of animal origin	
02 02 02	mollusc or crustacean shells from which the soft tissue or flesh has been completely removed	C ¹
02 04	wastes from sugar processing	
02 04 01	soil from cleaning and washing beet	B, E, F
10	WASTES FROM THERMAL PROCESSES	
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)	A, B, D
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them	
10 13 14	waste concrete and concrete sludge	A
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	
17 01	concrete, bricks, tiles and ceramics	
17 01 01	concrete	A, B, D
17 01 02	bricks	A, B, D
17 01 03	tiles and ceramics	A, B, D
17 01 07	mixtures of concrete, bricks, tiles and ceramics	A, B, D

Waste code	Description	Typical uses and criteria (see key)
17 03	bituminous mixtures, coal tar and tarred products	
17 03 02	road base and road planings other than those contained in coal tar	D 4
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil	
17 05 04	soil and stones	A, B, E, F ³
19	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	
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 12	soil substitutes other than that containing dangerous substances only	E, F ⁹
19 13	wastes from soil and groundwater remediation	
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	
20 02	garden and park wastes (including cemetery waste)	
20 02 02	soil and stones	A, B, E, F

Key to table codes

A. Structural fill for building, stabilising ramps, drainage, road construction.

B. Construction of noise bunds, screening bunds, flood defence bunds, containment bunds, golf courses. Landscaping associated with construction work. Restoration of mineral workings. General fill material.

C. Surface treatment of roads, tracks etc. Drainage.

D. Road/track construction and repair, hard surfacing, car parks etc.

E. Agricultural improvement schemes.

F. Ecological improvements, wetland schemes, lakes

1. Only shellfish shells from which the soft tissue or flesh has been removed.

2. The PFA/FBA/IBA must meet the relevant civil engineering standards for use.

3. If non inert, or where there may be contamination, you must sample and analyse the waste. You may need to carry out an environmental risk assessment to determine if material is suitable for locations where groundwater and/or surface waters could be affected. The Environment Agency will consider this when determining your permit application.

4. Bituminous road planings must not be deposited more than 2 metres deep.

5. Track ballast must be free from significant oil contamination.

6. You must remove water from dredgings before you can use them.
7. Excluding residual 'fines' from mechanical treatment of mixed waste at transfer stations.
8. You must characterise your waste against Environment Agency guidance WM3 to confirm that it is not hazardous waste. The Environment Agency will consider any risks this waste poses when determining your permit application.
9. [TGN EPR 8.01 'How to comply with your landspreading permit'](#) provides guidance on the meaning of soil substitutes.