

**APPLICATION TO VARY ENVIRONMENTAL PERMIT EPR/BP3095EU TO ADD A
DEPOSIT FOR RECOVERY ACTIVITY**

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APPENDIX A

Multi-Agg Limited director details

Pre-application discussions

Pre-application context is provided below. Pre-application correspondence is presented within Appendix B.

For context, a previous application was submitted by Multi-Agg Limited (Permit holder) on 15th December 2022 to vary the existing Inert Landfill Permit EPR/BP3095EU at Shellingford Quarry Landfill. The variation application was Duly Made by the Environment Agency on 21st June 2024.

Following the Duly Making of the Permit variation application, a meeting was held on 27th November 2024 between the Environment Agency, Multi-Agg Limited and GWP Consultants LLP (consultants who submitted the Permit variation application on behalf of Multi-Agg Limited) as the Environment Agency deemed that the application had *"some issues found which are believed to be beyond the scope of a schedule 5 notice"* (Mr Andrew Westoby – Environment Agency Senior Permitting Officer). The Environment Agency advised that the Applicant (Multi-Agg Limited) should withdraw the Permit variation application. The application was withdrawn on 2nd December 2024 on the agreement with the Environment Agency that the application would be re-submitted after an enhanced pre-application meeting between the Environment Agency and Multi-Agg Limited to ensure that the re-submitted Permit variation application would cover the points that the Environment Agency raised in the meeting and in a follow-up letter sent to the Applicant that were believed to be beyond the scope of a schedule 5 notice.

An enhanced pre-application advice meeting was held on 12th February 2025 between the Environment Agency, Multi-Agg Limited, GWP Consultants LLP and Hafren Water (hydrogeological consultants) to:

- Review and discuss the issues raised in the letter received from the Environment Agency following withdrawal of the Permit variation application within the context of requirements for re-submission.
- Review and discuss the proposals regarding the methodologies proposed to adopt to address the quantitative hydrogeological risk assessment modelling and engineered geological barrier issues raised.
- Ensure advice is provided by the Environment Agency in relation to the bullet points above.

The Environment Agency provided a written response following the enhanced pre-application advice meeting (pre-application reference ENVPAP/BP3095EU/P001). This response is included as '1 Enhanced pre-application advice ENVPAP_BP3095EU_P001 redacted' in Appendix B of this EPR Permit variation application.

It is important to note that within the postscript of the enhanced pre-application advice meeting notes that Dr Paul Hart (Environment Agency – Geoscience Specialist) states: *"Please refer to the letter sent from Andrew Westoby [Environment Agency] to Mr Lillywhite [Multi-Agg Limited] and Mr Coplestone [Multi-Agg Limited] which states: "Should you re-apply we have agreed that the application can be prioritised. If in addition to submitting your application, you could notify us directly then this will help the prioritisation process."*

Therefore, it has been agreed with the Environment Agency that the EPR Permit variation application resubmission for Shellingford Quarry Landfill (EPR/BP3095EU) will be treated as a priority application.

In the interests of efficiency, it has also been requested that Mr Andrew Westoby (Senior Permitting Officer) be assigned the case, and Dr Paul Hart (Geoscience Specialist) reviews the technical information, as that would speed up the determination process since they are familiar with the issues. If Dr Paul Hart is no longer under contract with the Environment Agency then another GOT Officer will be required to be brought up to speed with the background to the application resubmission by Mr Andrew Westoby.

Further pre-application advice was sought from the Environment Agency through a basic pre-application request sent by GWP Consultants LLP on 29th May 2025.

A follow up question relating to the basic pre-application advice request was sent by GWP Consultants LLP to the Environment Agency on 3rd July 2025. The follow up question sought confirmation from the Environment Agency that an existing inert landfill permit for a site can be varied to accommodate restoration infilling in a quarry extension area at the same site under a deposit of waste for recovery activity.

A response to the follow up question was received from the Environment Agency on 16th September 2025 which confirmed that *"an operator can apply for an extension to an existing landfill site to add a Deposit for Recovery activity"*.

Correspondence regarding the pre-application advice follow up question and Environment Agency response are also provided as '2 Pre-application advice follow up question EPR_BP3095EU_P002 redacted' in Appendix B of this EPR Permit variation application.

In addition, the Mr Anthony Watts (Environment Agency – Permitting Technical Specialist (Waste Deposit)) confirmed in telephone and email correspondence with GWP Consultants LLP over the 9th and 10th July 2025 the Environment Agency's position that there is no fundamental reason why a variation to a Permit, which currently provides for quarry restoration infilling with imported waste as an inert landfill activity, would not be issued to provide for restoration infilling with imported waste as a Deposit for Recovery activity in an additional quarry extension area. In this regard, Mr Watts indicated that a variation to an extant Permit is considered by the Environment Agency to be preferable, rather than an application for a stand-alone Permit for the Deposit for Recovery activity in the additional quarry extension area.

This correspondence is provided as '3 Environment Agency position on DfR at an existing Inert LF site redacted' in Appendix B of this EPR Permit variation application.

Further details of the proposed changes are provided in Appendix C.

APPENDIX C

Proposed changes

The EPR Permit application is to vary the existing EPR Permit EPR/BP3095EU to add a deposit for recovery activity to accommodate infilling within the adjacent western quarry excavation area with imported inert waste. The inert fill capacity associated with the deposit for recovery activity is *c.* 1.60Mm³ which equates to a tonnage of *c.* 2.88Mt (using a conversion factor of 1.8t/m³).

The additional deposit for recovery activity associated with the Permit variation will be limited to the western quarry excavation area that is adjacent to the inert landfilling area covered by the existing EPR Permit. This means the current Permit boundary will need to be extended to the west and south to allow for the additional deposit for recovery activity.

Within the Environmental Setting and Site Design Report (Appendix Hii), Drawing No. SHELLQMA2508-1 shows the site location and Drawing No. SHELLQMA2508-2 shows the EPR Permit variation application area within the context of the existing EPR Permit area and includes the specific area where the material associated with the deposit for recovery activity will be placed. Drawing No. SHELLQMA2508-3 is the site plan which shows the total extent of the varied EPR Permit area being applied for. Drawing No. SHELLQMA2508-7 illustrates the phasing of the excavation and infilling of the western quarry extension, approved by Planning Permission P18/V2610/CM (MW.0104/18).

The existing EPR Permit area is *c.* 39.9ha and the adjacent additional western area is *c.* 28.0ha, giving a total area of the varied EPR Permit of *c.* 67.9ha.

The inert waste types provided for by the EPR Permit variation application remain unchanged from the existing EPR Permit and are listed in Appendix L.

Access to the site will remain unchanged.

APPENDIX D

Relevant offences documentation

APPENDIX E

Wamitab certificates and competent manager forms

APPENDIX F

Expenditure plan

APPENDIX G

Environmental Management System summary

A summary of the Environmental Management System for Shellingford Quarry is provided below.

APPENDIX H

Environmental risk assessment

APPENDIX Hi
Environmental Risk Assessment Report

Environmental Setting and Site Design Report

APPENDIX Hiii

Waste Acceptance Procedures

APPENDIX Hiv
Hydrogeological Risk Assessment Report

APPENDIX I
Site Condition Report

Non-technical summary

An EPR Permit application is being submitted to vary the existing EPR Permit EPR/BP3095EU to add a deposit for recovery activity to accommodate infilling within the adjacent western quarry excavation area with imported inert waste at Shellingford Quarry, Stanford Road, Stanford in the Vale, Faringdon, Oxfordshire, SN7 8HE.

The applicant is Multi-Agg Limited.

The works approved by Planning Permission P18/V2610/CM (MW.0104/18) provide for, *inter alia*, site restoration using imported inert fill material at Land to the west of Shellingford Quarry. The inert fill capacity associated with the deposit for recovery activity is *c.* 1.60Mm³ which equates to a tonnage of *c.* 2.88Mt (using a conversion factor of 1.8t/m³).

The additional deposit for recovery activity associated with the Permit variation will be limited to the western quarry excavation area that is adjacent to the inert landfilling area covered by the existing EPR Permit. This means the current Permit boundary will need to be extended to the west and south to allow for the additional deposit for recovery activity.

Within the Environmental Setting and Site Design Report (Appendix Hii), Drawing No. SHELLQMA2508-1 shows the site location and Drawing No. SHELLQMA2508-2 shows the EPR Permit variation application area within the context of the existing EPR Permit area and includes the specific area where the material associated with the deposit for recovery activity will be placed. Drawing No. SHELLQMA2508-3 is the site plan which shows the total extent of the varied EPR Permit area being applied for. Drawing No. SHELLQMA2508-7 illustrates the phasing of the excavation and infilling of the western quarry extension, approved by Planning Permission P18/V2610/CM (MW.0104/18).

The existing EPR Permit area is *c.* 39.9ha and the adjacent additional western excavation area is *c.* 28.0ha, giving a total area of the varied EPR Permit of *c.* 67.9ha.

Access to the site will remain unchanged.

The Environmental Permit application is submitted on the basis that the permanent placement of imported inert fill material specifically within the western quarry excavation area to achieve the approved restoration scheme is a deposit for recovery activity and not a waste disposal activity.

A Waste Recovery Plan (WRP) is submitted as Appendix M of the EPR Permit variation application. The WRP presents justification that the activity within the western quarry excavation area comprises waste recovery.

The recovered waste will be imported inert fill material sourced from construction sites within the general Faringdon 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. Original and continuing competency certificates from the Chartered Institution of Wastes Management/Waste Management Industry Training and Advisory Board (CIWM/WAMITAB) for relevant technically competent managers are provided within Appendix E of the EPR Permit variation application.

The training standards set out in the CIWM/WAMITAB scheme, as relevant to the operation of a waste recovery activity and waste operations in general, are adopted for training purposes.

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. Appropriate Waste Acceptance Procedures are presented in Appendix Hiii of the EPR Permit variation application.

The inert waste types provided for by the EPR Permit variation application remain unchanged from the existing EPR Permit and are listed in Appendix L. The Waste Acceptance Procedures (Appendix Hiii) and Environmental Management System (EMS) will be in place to minimise the risk that unacceptable will be accepted at the site including procedures for the rejection of non-conforming loads. A summary of the EMS is included as Appendix G of the EPR Environmental Permit variation application.

Consideration is given to the potential risks to the local environment from the proposed deposit for recovery activity in the western extension area through the various environmental risk assessment reports presented in Appendix H of the EPR Environmental Permit variation application. Based on the environmental setting and the inert nature of the materials that will be used to achieve the approved deposit for recovery activity in the western extension area, it is considered that the deposit for recovery activity will not have a detrimental impact on the local environment or its users.

In order to minimise any potential impacts of dust associated with the development, the deposit for recovery activity within the approved western extension area will be undertaken in accordance with the Dust Emissions Management Plan (DEMP) provided in Appendix N of the EPR Environmental Permit variation application.

In order to minimise any potential impacts of noise and vibration associated with the development, the deposit for recovery activity within the approved western extension area will be undertaken in accordance with the Noise Management Plan provided in Appendix O of the EPR Environmental Permit variation application.

APPENDIX K

Site plan

APPENDIX L

Waste types

The waste types provided for by the EPR Permit variation application remain unchanged from the existing EPR Permit and are listed below in Table 1.

Table 1 – Waste types to be deposited

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	
Waste Code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	Concrete ⁽²⁾
17 01 02	bricks ⁽²⁾
17 01 03	tiles and ceramics ⁽²⁾
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06 ⁽²⁾
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones (excluding topsoil and peat) other than those mentioned in 17 05 03 ⁽¹⁾
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 09	minerals (for example sand, stones) from the treatment of waste aggregates that are otherwise naturally occurring minerals – excludes fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard ⁽²⁾
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 (excluding topsoil and peat) ⁽¹⁾
<p>(1) For the purposes of waste acceptance, soil includes naturally occurring sands and clays</p> <p>(2) Selected construction and demolition waste (C & D waste): with low contents of other types of materials (like metals, plastic, organics, wood, rubber, etc). No C & D waste from constructions, polluted with inorganic or organic dangerous substances, e.g. because of production processes in the construction, soil pollution, storage and usage of pesticides or other dangerous substances, etc., unless it is made clear that the demolished construction was not significantly polluted.</p> <p>No C & D waste from constructions, treated, covered or painted with materials, containing dangerous substances in significant amounts.</p> <p>If it is unsure whether the waste fulfils the definition of inert waste, or is uncontaminated, then testing of the waste must be undertaken to confirm compliance with the criteria for inert waste as specified in The Landfill (England and Wales) Regulations 2002 as amended. The origin of all waste must be known.</p>	

The waste will be Landfill Directive inert Waste Acceptance Criteria (WAC) compliant *i.e.* the waste will comply with the leaching values for waste acceptable at landfills for inert waste set out in Section 2.1.2 of 'Council Decision of 19 December 2002 establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC'.

APPENDIX M
Waste Recovery Plan

APPENDIX N

Dust Emissions Management Plan

APPENDIX O

Noise and Vibration Management Plan

APPENDIX P
Application checklist