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Ref: 14-110-L2
Date: 25th November 2020

Simon Marsh
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BY Email

Dear

GEOENVIRONMENTAL SUMMARY AND MATERIAL MANAGEMENT SOUTH HEYWOOD LINK ROAD

E3P understands that John Sisk & Son Ltd (herein referred to as the client) are the appointed main contractor for the construction of the new South Heywood Link Road to be delivered for Rochdale MBC.

Due to variation of topography along the route of the proposed highway, significant earthworks will be required to construct the highway sub-grade at the required elevation to ensure compliance with the highway design.

In summary, the requirement exists for a significant quantum of material to be excavated from the western reaches of the proposed highway, where it runs along to the route of the current Hareshill Road, and also where a junction is to be constructed in proximity to the current junction between Hareshill Road and Pilsworth Street (as shown on drawing 14-110-001).

It is proposed to utilise the 'cut' material within areas of the highway in the east (crossing Callop Gate Farm) where the road level will be significantly higher than the current landform.

Within the area of investigation, the prior land use can be subdivided into the area where Made Ground has been placed under a historical EA exemption for the re-use of waste in construction (no permit regulation) and the active area that is subject to an EA waste recover permit. The prior / active land uses are a critical distinction in terms of classifying the material in terms of its legislative status and potential for re-use in the construction of the highway.

The proposed re-use of material within the construction of the road could be considered as a discarded at the point of excavation, therefore to ensure compliance with the UK Waste Framework Directive, a CL:AIRE DoW CoP Materials Management Plan (MMP) is required to demonstrate 'end of life' waste criteria to facilitate the reuse of material within the site of origin without treatment.

E3P has contacted the GMMC EA Authority to ascertain their position in terms of the proposed re-use of material in the construction of the new highway.

The waste team at GMMC has confirmed in writing within a correspondence dated 8th September 2020 from Stephen Bostock that they have no objection for the use of the CL:AIRE DoW CoP for the re-use of material that does not require pre-treatment.

The E3P supplementary environmental testing investigation within the area of defined cut confirmed that the soils are largely inert and will be suitable for use within the context of a bulk upfill to highways.

E3P are commissioned to prepare a Environmental Performance Specification for the re-use of the material to ensure appropriate QC testing and compliance criteria for the works.

The CL:AIRE DoW CoP cannot be utilised for the area that is currently subject to regulation by the EA due to the presence of an active Environmental permit for the Recovery & Re-Use of Waste in Construction.

E3P prepared a letter (ref: 11-094-P1) dated 1st September submitted to the EA to set out the proposed protocols and procedures for the re-use of material originating from the area of the EA Waste Recovery permit Boundary.

In essence, it is proposed to establish a CL:AIRE DoW CoP 'Hub & Cluster' scenario incorporating the deployment of a Standard Rules Permit for Mobile Plant Treatment License (MPTL). This process will allow the recovery of waste from the area of active Environmental Permit prior to re-use in the construction of the road using a 'Hub & Cluster' arrangement.

E3P received written correspondence from the EA dated 10th November pertaining to the Permit Area, however this letter simply confirms that the EA's internal enquiries are ongoing due to the complexity of the situation.

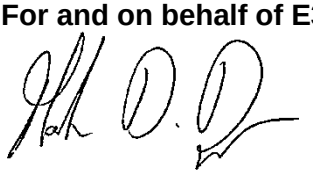
Unfortunately due to the complexity and ambiguity and absence of clear UK guidance, It is not possible to offer a definitive position on this matter, in light of this we continue to engage with the EA.

Our suggested approach of deploying a Standard Rules MPLT to process and recover material excavated from the area of the current EP and subsequent re-use of material that has been validated as suitable in accordance with the CL:AIRE DoW CoP possibly using a hub and cluster arrangement provides the most appropriate mechanism. However, as with all matters in respect to this project, this is entirely subject to approval by the EA.

E3P are aware that Casey Group are progressing the partial surrender of the Environmental Permit within the area of the proposed new highway, we will endeavour to ensure the whole project team is updated in respect to any future developments.

I trust that the above information is sufficient at this time and if you require anything further please do not hesitate to contact me

Yours sincerely,
For and on behalf of E3P Ltd



Martin Dyer
Director