

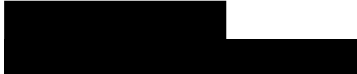
Materials Management Plan (MMP) Form – July 2025

This form should be completed once the lines of evidence have been marshalled in relation to suitability for use, certainty of use and quantity required.

The answers to the questions posed within this form, together with the supporting information will constitute the MMP and must be provided to the Qualified Person.

A Qualified Person may comment on draft versions of this MMP but will not complete the Declaration until all the relevant documents, demonstrating lines of evidence have been provided for each site.

The person / organisation who will pay the Declaration fee should confirm that they have read and understand the Terms and Conditions relating to the payment of the Declaration fee to CL:AIRE. These can be found on the CL:AIRE website.

The person / organisation agreeing to pay the Declaration Fee - Name, organisation and contact details inc. email address -	Jim Davis – Company Secretary and Finance Director – Inert Recycling UK Ltd Highbridge Estates, Highbridge Road, Brambridge, Eastleigh, SO50 6HS 
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☒ I confirm I have read and understood the Terms & Conditions.

Each question must be answered. If the question is not applicable please state this and provide a brief explanation.

1. Specify the scenario to which this MMP relates, as described in the Definition of Waste: Development Industry Code of Practice (DoW CoP) (1, 2, 3 or 4):

- ☐ 1. Reuse on the Site of Origin
- ☒ 2. Direct Transfer of clean naturally occurring soil / mineral materials
- ☐ 3. Cluster Project
- ☐ 4. Combination of any of the above

In the case of a combination of reuse scenarios, please describe it below (e.g. (i) Reuse on Site of Origin and Direct Transfer of clean naturally occurring unpolluted soils, (ii) Reuse on the Site of Origin with Direct Transfer of clean naturally occurring soil to x number of development sites etc:

(NB: A Declaration is required for reuse on the Site of Origin and for any 2-site arrangement i.e. there is no facility for a combination Declaration)

2. Organisation and name of person preparing this MMP	(Full address and contact details) Luke Bridges – MTS Environmental Ltd
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	Unit 21 Filwood Green Business Park 1 Filwood Park Way Bristol BS4 1ET 
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Document Control

Date issued	30/07/2025
Revision date	
Summary of revision 1	Original draft
Summary of revision 2	Amendments

Insert additional lines to the table above for any subsequent revisions.

Note - revisions to the MMP do not trigger an additional Declaration by a Qualified Person, unless an additional site is added to the project.

Revisions to the MMP must be recorded and summarised in the Document Control box above.

Site Details

3. Site / Project name(s)	East Horton Golf Club
Reuse / receiving site name :	East Horton Golf Club
Donor site name (if Direct Transfer)	(1) Boorley Green

Landowners

4a. Name of Landowner(s) (full address and contact details) – where excavated materials are to be reused	Messer's Edward and Richard Bastian East Horton Golf Centre Mortimers Lane Fair Oak Hampshire SO50 7EA [REDACTED]
4b. Name of Landowner(s) (full address and contact details) – where excavated materials are arising from	Donor Site One – Boorley Green Jackson Rowe Harley House Brooklands Park Farningham Road Crowborough East Sussex TN6 2JD [REDACTED]

Summary and objectives

5a. Provide a brief description of the planned project and how excavated materials are to be reused.	This MMP concerns one donor site. Clean inert surplus soil generated the donor site have been assessed as clean re-worked naturally occurring. Material will be re-used at East Horton Golf Club for the
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	development of event space and golf course enhancements, including footpath, drainage works and landscaping. The proposed development requires 39,000 m³ of fill material. The planning permission permits the <i>'re-siting/ alterations to 1st tee box, fairway and green, enlarging 18th green and creation of event space with associated re-profiling, landscaping, footpath and drainage works following closure of existing driving range.'</i> Materials will be re-used as class 1A general engineering fill for land re-profiling.
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General Plans and Schematics

6. **Attach** a location plan for the site(s) and a plan of the site(s) which identifies where different materials are to be excavated from, stockpile locations (if applicable), where materials are to be treated (if applicable) and where materials are to be reused.

Plan Document Reference(s):

Receiver Site

East Horton Golf Club Location Plan

East Horton Golf Club Site Plan

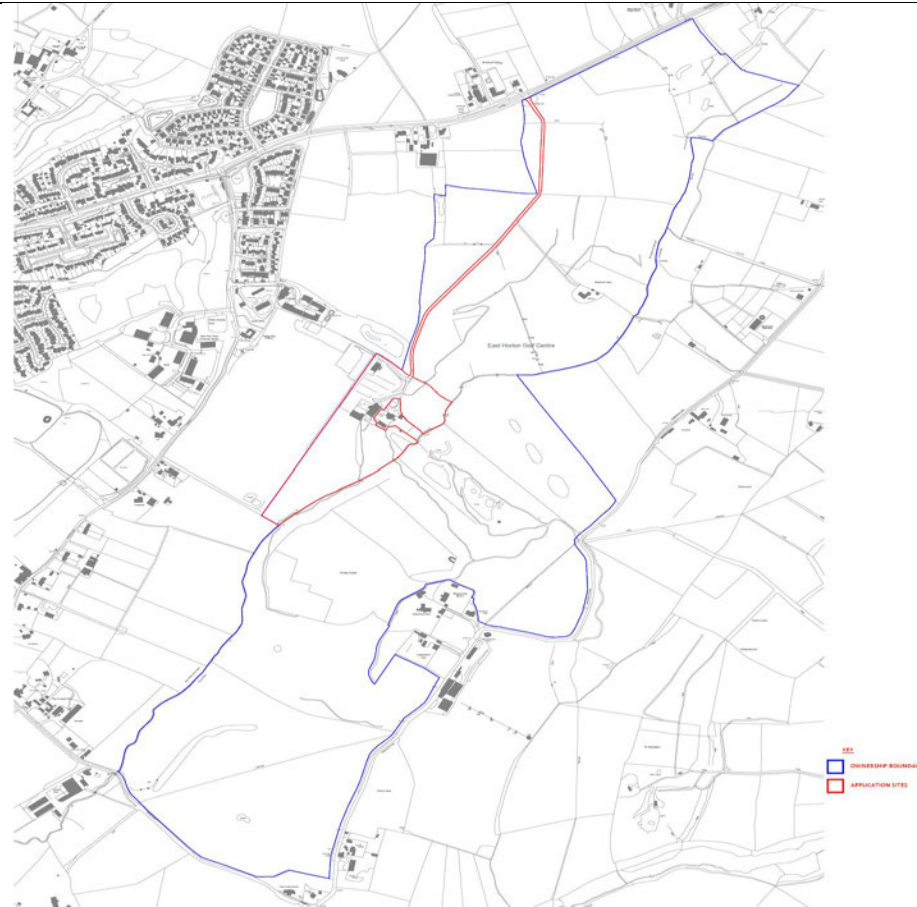


Figure 1 Location Plan of the Receiver site – East Horton Golf Club site.

	The above documents detail the areas for development (East Horton Golf Club site) and what areas are being used.
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Figure 2 Site plan of the material imported from the donor site to East Horton Golf Club site, including the proposed contours and proposed development across the whole site, created by Deacon Design, February 2025.

7. Attach a schematic of proposed materials movement. Where there is only one source area and one placement area briefly describe it. For all other projects a schematic is required.	Clean and naturally occurring soils from the Boorley Green development have been assessed for removal of the site. The material is sourced from one area and is to be placed as dug.
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Parties Involved and Consultation – if more than one party please provide additional details for them and identify the location that they will be working e.g. where a site is zoned.

8a. Main earthworks contractor(s) (full address and contact details) – Where excavated materials are to be reused	Mr Nigel Funnell Inert Recycling UK Ltd Highbridge Estate, Highbridge Road, Eastleigh, Southampton, SO50 6HS [REDACTED]
8b. Main earthworks contractor(s) (full address and contact details) - Where excavated materials are arising from	Donor Site One – Boorley Green KAMM Civil Engineering Ltd 19 Bridge Moor House Ebblake Industrial Estate Verwood

	Dorset BH31 6AX Contact: Scott Steel 
9. Treatment contractor(s) (full address and contact details) – for treatment on site of origin, or at a Hub site within a fixed STF / Cluster Project	N/A - no treatment done or required
10. Where wastes and materials are to be transported between sites, provide details of the transport contractor(s) (full address, contact details and waste carriers registration details (if applicable))	Mr Jim Davis Inert Recycling UK Ltd Highbridge Estates Highbridge Road Brambridge Eastleigh SO50 6HS  Waste Carriers Licence No: CBDU130099
11. Provide Local Authority contact details (full address and named contacts) where excavated materials are to be reused	Clare Martin Eastleigh Borough Council Eastleigh House Upper Market Street Eastleigh

	SO50 9YN  LC No Objection Confirmation East Horton Golf Club
12a. For the site where materials are to be reused and for Hub Site locations provide Environment Agency contact details (full address and named contacts):	David Nickells Environment Agency Teville Gate House, Railway Approach, Worthing, West Sussex, BN11 1UR  EA No Objection Confirmation East Horton Golf Club
<i>For all Cluster Projects:</i> 12b. Attach any relevant documentation from the EA relating to the excavation and reuse of the materials to demonstrate no objection to the proposals (see 3.37 of DoW CoP) If the EA has not been consulted, please explain why (see paragraph 3.39 of the DoW CoP).	EA references: N/A

Lines of Evidence

There is no one single factor that can be used to decide that a substance or object is waste, or when it is, at what point it ceases to be waste; as complete a picture as possible has to be created.

The following sections require completion to ensure the correct decision is made.

If a requested item is not relevant it is important to clearly state why this is so (e.g. no planning permission required because permitted development status exists).

Suitable for use criteria

13. Please describe or provide copies of the required specification(s) for the materials to be reused on each site.	Document Reference(s): Prior to the commencement of works on any part of the site, the material must comply with specifications set out in the Design Statement. The material must also comply with any planning conditions. East Horton Golf Club Design Statement Planning Permission Decision Notice
<i>Where contamination is suspected or known to be present</i> 14a. Please provide copies of or relevant extracts from the risk assessment(s) that has been used to determine the	Document Reference(s): N/A

specification for use on the site. This must relate to the place where materials are to be used. This must be in terms of (i) human health (ii) controlled waters and (iii) any other relevant receptors. If a risk assessment is not relevant for a particular receptor given the site setting please explain why below:	
14b. Please attach any relevant documentation from the LA relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 of the CoP)	LA Document references: N/A
14c. Please attach any relevant documentation from the EA relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 and Table 2 of the CoP)	EA Document references: N/A
14d. Please attach any relevant documentation from any other regulators (if relevant) relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 of the CoP)	Document Reference(s): N/A Contamination has been ruled out on all sites, the source material is re-worked naturally occurring and the receiving site had no industrial activity. Chemical analysis has also confirmed that there is not a contamination issue.

	Furthermore, an investigation into the donor site material has been undertaken to confirm suitability for the receiver site.
<i>Where contamination is not suspected</i> 15a. Please attach copies or relevant extracts from the Desk Top Study that demonstrates that there is no suspicion of contamination.	Document Reference(s) Contamination has been ruled out on all sites: the source material is naturally occurring and the receiving site has had no industrial activity. Chemical analysis has also confirmed that there is not a contamination issue. Furthermore, an investigation into the donor site material has been undertaken to confirm suitability for the receiver site. Findings of the investigations are included in the following reports. Donor Site 1 Ground Investigation & Desk Study East Horton Golf Club Ground Investigation and Desk Study The report findings are that the material is suitable for its re-use under CL:AIRE.
15b. Please attach copies of or relevant extracts from the site investigation/testing reports that adequately characterise the clean materials to be used (if appropriate).	Document Reference(s) A ground investigation at the receiver site has been undertaken to confirm suitability of the source material. The findings of this report are detailed in: East Horton Golf Club Ground Investigation and Desk Study

	A design statement for the site has been produced detailing how material will be used and managed on site. East Horton Golf Club Design Statement Comprehensive testing has been conducted in accordance with the design statement on the donor sites material to characterise the clean materials and conclude that there is no contamination. Donor Site 1 Ground Investigation & Desk Study
15c. Please attach copies of any other relevant information (if available) confirming that land contamination is not an issue.	Document Reference(s) N/A

NB: It is your responsibility to assess the nature of the material to be used and that it fits within the limitations of the scenario under which it is to be used

Certainty of use

Various lines of evidence are required to demonstrate that the materials are certain to be used. This includes:

- The production of this MMP
- An appropriate planning permission (or conditions that link with the reuse of the said materials)
- An agreed Remediation Strategy(ies)
- An agreed Design Statement(s)
- Details of the contractual arrangements

Please identify in the following sections what lines of evidence relate to the site(s) **where the materials are to be used**.

16a. Planning Permission(s) relating to the site where materials are to be reused Please provide a copy of the relevant planning permission	Document Reference: Planning Permission Decision Notice The above planning permission was issued in July 2025. <i>The planning permission permits the 're-siting/ alterations to 1st tee box, fairway and green, enlarging 18th green and creation of event space with associated re-profiling, landscaping, footpath and drainage works following closure of existing driving range.'</i> Prior to the commencement of development, soil testing protocols, certification procedures and on-site storage proposals for all imported materials for use in the agricultural improvement shall be submitted to and approved in writing by the Local Planning Authority. They shall be fully complied with.
16b. Explain how the reuse of the excavated materials fits within the planning permission(s) for each site.	The planning permission requires 39,000 m³ of clean soils for development of event space and golf course enhancements, including footpath, drainage works and landscaping. The design statement and planning permission confirm the appropriate use of the materials.

	East Horton Golf Club Design Statement
16c. If planning permission is not required for any one site please explain why below e.g. permitted development, clean up of a chemical spill, surrender of an Environmental Permit, re-contouring within the existing permission.	N/A
<i>Where contamination is suspected or is known to be present</i> 17. Please provide a copy of any Remediation Strategy(ies) that have been agreed with relevant regulators.	Document Reference(s): N/A
<i>Where contamination is not suspected</i> 18. Please provide a copy of any Design Statement(s) that have been agreed (e.g. with the planning authority or in the case of permitted developments the client).	Document Reference(s): East Horton Golf Club Design Statement

Quantity of Use

19. Please provide a breakdown of the excavated materials for each site and how much will be placed at each site or sub area of each site. Where this is not specific to a single readily identifiable source refer to an annotated plan, schematic or attach a tabulated summary.	Document Reference(s): 39,000 m³ Total Fill Requirement placed in accordance with the site layout plan. Donor Site 1 will be providing 30,000 m³ Total Fill Requirement placed in accordance with the site layout plan.
20a. How has consolidation/compaction being considered in the above mass balance calculations?	The shallow depth of the imported soils to be placed to re-profile the land, along with careful handling and placement by the contractor (in accordance with best practice guidance) is expected to result in very limited compaction. The works will be subject to regular topographical surveys to monitor levels against the approved plans. The final as-built survey to approved levels will be cross-checked against the recorded imported loads (wasteaccountant.com) to calculate final imported volumes.
20b. How has loss due to treatment being considered in the above mass balance calculations (if applicable)?	N/A

20c. How has the addition of treatment materials being considered in the above mass balance calculations (if applicable)? Note - An exact figure is not required but one that is reasonable in the circumstances and can be justified if challenged.	N/A
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Contingency arrangements

Explain what is to happen in the following situations and **identify the appropriate clauses** in the contract(s) (Such clauses must be provided to the Qualified Person, preferably as a summary document): or

21a. What is to happen to, and who is to pay for out of specification materials?	Inert Recycling UK Ltd are project managing the earthworks and will be responsible of out of spec materials. Inert Recycling UK Ltd Highbridge Estates Highbridge Road Brambridge Eastleigh SO50 6HS [REDACTED]
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21b. What is to happen to, and who is to pay for any excess materials?	Inert Recycling UK Ltd are project managing the earthworks and will be responsible day to day monitoring of material volumes. The MMP will be modified if additional volumes are required. In the unlikely event too much material is imported Inert Recycling UK Ltd will remove to a suitably licenced facility. Inert Recycling UK Ltd Highbridge Estates Highbridge Road Brambridge Eastleigh SO50 6HS [REDACTED]
21c. What happens if the project programme slips in relation to excavated materials or materials under -going treatment?	Inert Recycling UK Ltd are project managing the earthworks and will be responsible day to day monitoring of material volumes. The MMP will be modified if project timelines result in a material change to the MMP. Inert Recycling UK Ltd Highbridge Estates Highbridge Road Brambridge Eastleigh SO50 6HS [REDACTED]
21d. Other identified risk scenarios for the project (relating to excavated materials)?	N/A

The Tracking System

Where contamination is suspected or known to be present, state the procedures put in place to:

22a. For all sites please describe the tracking system to be employed to monitor materials movements.	Inert Recycling Ticketing System and Waste Transfer Notes www.WasteAccountant.com
<i>Where contamination is suspected or known to be present, state the procedures put in place to:</i> 22b. Prevent contaminants not suitable for the treatment process being accepted	N/A
<i>Where contamination is suspected or known to be present, state the procedures put in place to:</i> 22c. Prevent cross contamination of materials not in need of treatment, wastes awaiting treatment and treated materials	N/A
<i>Where contamination is suspected or known to be present, state the procedures put in place to:</i>	N/A

22d. Demonstrate that materials that do not require treatment and successfully treated materials reach their specific destination	
<i>Where contamination is suspected or known to be present, state the procedures put in place to:</i> 22e. Ensure that waste for off-site disposal or treatment is properly characterised and goes to the correct facility	N/A
23. Please attach a copy of the tracking forms / control sheets that are to be used to monitor materials movements. To include transfer of loads on site into stockpiles prior to treatment (if applicable), stockpiled after treatment (if applicable), stockpiled awaiting use (as appropriate) and final placement.	Document reference(s) East Horton Golf Club Material Transfer Note
<i>For Hub Sites within Cluster Projects & where materials need treatment before reuse</i>	Permit reference / EA letter reference: N/A

24. Please attach a copy of the Environmental Permit covering the treatment process. Alternatively, if the treatment is covered by a Mobile Plant Permit and associated Deployment Form, attach a copy of the EA agreement to the Deployment Form.	
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Records

25. Where, and in what form, are records to be kept? Note – records e.g. transfer notes, delivery tickets, Desk Top Study, Site Investigation, Risk Assessment(s), Verification Report(s) need to be kept for at least 2 years after the completion of the works and production of the Verification Report	Records will be kept at Inert Recycling UK Ltd central office. A back-up of records relating to the MMP will stored in MTS Environmental Ltd head office. Jim Davis Company Secretary Inert Recycling UK Ltd Highbridge Estates Highbridge Road Brambridge Eastleigh SO50 6HS 
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Verification Plan

26. Provide or explain the Verification Plan which sets out how you will record the placement of materials and prove that excavated materials have been reused in the correct location and in the correct quantities within the development works (see 3.4 of the DoW CoP).	Records of material movements will be stored on www.WasteAccountant.com and the MMP will be continuously updated during the life of the project. Once the project is complete the MMP and MTNs will be exported and included in the verification report. MTS Environmental will assess, evaluate and produce the verification report for the development works once complete. This will then be submitted to CL:AIRE following DoW:CoP guidance.
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