



Ameresco

Cellarhead BESS

Materials Management Plan

Project no. 11986 MMP01 (08)

RSK GENERAL NOTES

Project No.: 11986 MMP01 (08)

Title: Materials Management Plan: Cellarhead Bess

Client: Ameresco

Date: October 2025

Office: RSK Environment Limited, Fourways House, 57 Hilton Street, Manchester, M1 2EJ, tel:44 (0)161 236 2757, contact: Alex Smiles

Status: Rev 08

Author	<u>Emma Hobbs</u>	Technical reviewer	<u>Eve White</u>
			
Signature		Signature	
Date:	<u>October 2025</u>	Date:	<u>October 2025</u>

Project manager	<u>Emma Hobbs</u>	Quality Reviewer	<u>Ellie Sanders</u>
			
Signature			
Date:	<u>October 2025</u>		<u>October 2025</u>

Revision control sheet		
Revision reference	Date	Reason for revision
Rev. 00	11 July 2024	First issue
Rev 01	29 August 2024	Updated proposed development plan
Rev 02	26 November 2024	Updated based on planning comments
Rev 03	10 December 2024	Updated based on further planning comments
Rev 04	04 April 2025	Updated development plans and cut/fill volumetrics
Rev 05	07 April 2025	Updates to drawings
Rev 06	29 May 2025	Inclusion of revised Wharfe Rural Planning Compliance Report in Document 6.
Rev 07	06 October 2025	Revised drawings incorporated
Rev 08	16 October 2025	Update based on client comments

RSK Environment Limited (RSK) has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed. The report may not be relied upon by any other party without the express agreement of the client and RSK. No other warranty, expressed or implied, is made as to the professional advice included in this report.

Where any data supplied by the client or from other sources have been used, it has been assumed that the information is correct. No responsibility can be accepted by RSK for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

No part of this report may be copied or duplicated without the express permission of RSK and the party for whom it was prepared.

Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of RSK Environment Ltd.

Materials Management Plan (MMP) Form - October 2014

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 -	This MMP has been produced to specifically support the discharge of planning condition 15 of planning application SMD/2022/0444, dated 22 December 2022. Due to the fact that clean and natural soils are being re-used at the site of origin, a MMP in line with CL:AIRE DOWCOP is not required for the Cellarhead BESS site and has therefore, not been declared to the Environment Agency.
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✓/X 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:

Reuse on the Site of Origin of clean naturally occurring unpolluted soils with Direct Transfer of clean naturally occurring unpolluted soil to one other development site once planning permission has been obtained with a separate MMP to be held by the receiving site.

(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	RSK Environment Limited, Fourways House, 57 Hilton Street, Manchester, M1 2EJ Emma Hobbs (Principal Consultant) Telephone: 0161 236 2757 Email: ehobbs@rsk.co.uk
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Document Control

Date issued	11/07/2024
Revision date	29/08/2024
Summary of revision 1	Updated proposed development plan
Summary of revision 2	Updated based on planning comments
Summary of revision 3	Updated based on further planning comments
Summary of revision 4	Updated development plan and cut/fill volumetrics
Summary of revision 5	Updated development plan and cut/fill volumetrics
Summary of revision 6	Inclusion of revised Wharfe Rural Planning Compliance Report in Document 6.
Summary of revision 7	Inclusion of new drawing for offsite deposition location, request to change planning wording and remove planning document.
Summary of revision 8	Updated based on client comments

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)	Cellarhead BESS
Reuse / receiving site name (inc. full address and postcode):	Land East of Cellarhead Substation and West of Rownall Road, Wetley Rocks, Staffordshire, ST9 OBS A separate MMP will be held by John Pointon & Sons Foxes Plantation, Bones Lane, Cheddleton, Staffordshire, ST13 7BT for the Fields to the East of the Cellarhead BESS development site once planning permission is obtained.

Donor sites name (if Direct Transfer) and full address with postcode	Land East of Cellarhead Substation and West of Rownall Road, Wetley Rocks, Staffordshire, ST9 OBS
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Landowners

4a. Name of Landowner(s) (full address and contact details) – where excavated materials are to be reused	John Pointon & Sons Foxes Plantation, Bones Lane, Cheddleton, Staffordshire, ST13 7BT Tel: 01782 914 124
4b. Name of Landowner(s) (full address and contact details) – where excavated materials are arising from	John Pointon & Sons Foxes Plantation, Bones Lane, Cheddleton, Staffordshire, ST13 7BT Tel: 01782 914 124

Summary and objectives

5a. Provide a brief description of the planned project and how excavated materials are to be reused.	The site is located to the west of Rownall Road, northwest of Rownall Farm and approximately 200 m east of National Grid Cellarhead Substation. The site currently comprises two grassed fields surrounded by hedgerows and mature trees. The site is immediately surrounded to the north, south, east and west by arable farmland with an infilled reservoir to the south (on southern boundary) and Cellarhead substation 200 m west. The proposed development at the site is for a Battery Energy Storage System (BESS) including control room and transformers in the western field. The BESS south is surrounded to the north, east, west and south by a raised embankment. The eastern field is proposed to comprise an attenuation pond, access road in the north and temporary site welfare compound/car park in the northeast. The earthworks proposed at the site includes a cut and fill exercise for the re-use of natural soils within the raised embankment surrounding the BESS. The site will undergo a topsoil strip in the Western land parcel (BESS location), the access road and temporary site compound area within the Eastern land parcel and the attenuation pond area in the South East field, generating approximately 16,970 m³ of topsoil, (14,990 m³ from the BESS area/pond and 1,980 m³ from the welfare/access road area). Of the total topsoil volume, 8,550 m³ would be retained and used to landscape the raised embankments/bunds once these are created, 1,980 m³ would be
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retained in a temporary stockpile until the completion of the project construction works and re-used to reinstate the temporary access road and welfare area at the end of the development phase. The remaining 6,440 m³ will be removed from site, donated for use (under a separate MMP) on the landowner's Fields to the East (for which planning permission is being obtained).

Once the topsoil has been stripped from the site access road and the temporary welfare, the area in the North East will undergo an initial cut & fill exercise whereby all 4,420 m³ of the clean and natural (CAN) soil arisings will be retained for use to level the welfare area pad. This area of the site will also have 1,880 m³ of type 1 recycled aggregate imported and laid at the surface to finish the access road and welfare area pad.

The Western field (The location of the BESS) will then undergo a reduction in site level by an average of 2.30 m bgl and deeper cut area for the main Substation in the North West of the site by approximately 6.00 m bgl, which has been calculated to generate 68,250 m³ of clean and natural arisings of which 27,315 m³ will be used within the raised embankment/bunds around the North, West & South, East sides of the BESS area and 8,600 m³ will be used for the BESS area. An excess of 38,775 m³ will be removed from site, which is to be donated and used on the landowner's Fields to the East (for which planning permission is being obtained separately by the landowner).

The above is summarised in the tables below.

<u>Ref</u>	<u>Description (Temp Access road and welfare area)</u>	<u>Top Soil</u>	<u>Spoil</u>
	Cut/Excavated access road and temp welfare area	1,980m ³	4,420m ³
	<u>Construction requirements</u>		
a	Temp Access road and temp welfare area construction	0	4,420m ³
b	Imported stone to complete	N/A	1,880m ³

<u>Ref</u>	<u>Description (Main Site and bund works)</u>	<u>Top Soil</u>	<u>Spoil</u>
	Cut/Excavated, based on a 2.30 m D BESS area and a 6.00 m D Substation area, site bund areas + attenuation pond location.	14,990 m ³	68,250 m ³
	<u>To be used as follows</u>		
a	Bund/Batter & pond formation + general landscaping	8,550 m ³	27,315 m ³
b	Recycled material for BESS Area Sub-base	N/A	8600 m ³
c	Off site to the landowners proposed deposition location (38,775 m ³ Total)	6,440 m ³	32,335 m ³
If excavated soils on-site are deemed environmentally or geotechnically unsuitable for re-use, these soils will be suitably disposed off-site.			

General Plans and Schematics

6. <u>Attach</u> 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.	Document 1: Site layout plan showing red line site boundary (see Document 10 Design Statement Drawing 11201). Document 2: Development layout plan 3001816-AME-XX-XX-DR-EL-0001 Document 3: Cellarhead Site access road cut & fill general arrangement and sections (drawing reference: 3001816-BMC-CS-XX-DR-CV-0015 rev 1) Document 3.1: Cellarhead Earthworks Volumes New Site Layout (drawing reference 244-05-SK019 rev A) and accompanying volume tables <u>Drawings of cross sections through site</u> Documents 4.1 and 4.2: 00 CELLARHEAD-D-114 Sht 1 of 2 and Sht 2 of 2. Documents 4.3, 4.4, 4.5: 00 CELLARHEAD-D-115 Sht 1 of 3, Sht 2 of 3, Sht 3 of 3.
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	Documents 4.6 and 4.7: 00 CELLARHEAD-D-116 Sht 1 of 2, Sht 2 of 2 Document 4.8: 00 CELLARHEAD-D-117 Documents 4.9 – 4.12: 00 CELLARHEAD-D-307-Sht 1 of 4, Sht 2 of 4, Sht 3 of 4 and Sht 4 of 4
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7. <u>Attach</u> 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.	Description & Schematic Document Reference: Document 5: Schematic of proposed material movement. The site will undergo a topsoil strip in the Western land parcel (BESS location), the access road and temporary site compound area within the Eastern land parcel and the attenuation pond area in the South West field, generating approximately 16,970 m³ of topsoil, (14,990 m³ from the BESS area/pond and 1,980 m³ from the welfare/access road area). Of the total topsoil volume, 8,550 m³ would be retained and used to landscape the raised embankments/bunds once these are created, 1,980 m³ would be retained in temporary stockpile until the completion of the project construction works and re-used to reinstate the temporary access road and welfare area at the end of the development phase. The remaining 6,440 m³ will be removed from site, donated for use (under a separate MMP) on the landowner's Fields to the East (for which planning permission is being obtained). Once the topsoil has been stripped from the site access road and the temporary welfare, the area in the North East will undergo an initial cut & fill exercise whereby all the spoil (4,420 m³) clean & natural soil arisings will be retained for use to level the welfare area pad. This area of the site will also have 1,880 m³ type 1 recycled aggregate imported and laid at the surface to finish the access road & welfare area pad. The Western field (The location of the BESS) will then undergo a reduction in site level by an average of 2.30 m bgl and deeper cut area for the main Substation in the North West of the site by approximately 6.00 m bgl, which has been calculated to generate 68,250 m³ of clean and natural arisings of which 27,315 m³ will be used within the raised embankment/bunds around the North, West & South, East sides of the BESS area and 8,600m³ will be used for the BESS area. An excess of 38,775m³ will be removed from site, which is to be donated and used on the landowner's Fields to the East (for which planning permission is being obtained). A total of 6,440 m³ of topsoil and 32,335 m³ of CAN soil (38,775 m³ in total) will be removed from site and donated to
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	an adjacent site (the landowner's Fields to the East - the details of which fall outside the scope of this MMP). Document 6: Soil Deposition Plan and Typical Sections CELDC-SH-ELS-DR-LS-010 Soil re-use at the receiving site will be the subject of a separate planning application. It is anticipated that a separate MMP for this receiver site will be required. This MMP for the BESS Cellarhead development site will be updated once the planning decision has been decided.
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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	Mayer Earthworks Armshead House, Armshead Road, Werrington, Stoke on Trent, ST9 0ND Tel: 01782 437 134
8b. Main earthworks contractor(s) (full address and contact details) - Where excavated materials are arising from	Mayer Earthworks Armshead House, Armshead Road, Werrington, Stoke on Trent, ST9 0ND Tel: 01782 437 134
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	No treatment of soils for reuse or donation is taking place.
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))	CAN soils surplus to the Cellarhead BESS development requirements will be transported to the landowner's Fields to the East of the Cellarhead BESS development site and to suitable receiving waste facilities (including recycling facilities) by: Mayer Aggregates & Recycling, Dewsbury Road, Fenton, Stoke-on-Trent, ST4 2TE 01782 437134, info@mayeraggregates.co.uk

11. Provide Local Authority contact details (full address and named contacts) where excavated materials are to be reused	Staffordshire Moorlands District Council, Moorlands House, Stockwell Street, Leek, Staffordshire Moorlands, ST13 6HQ High Peak Borough Council and Staffordshire Moorlands Principal Pollution Officer Environmental Health: Dr Daniel McCrory (Tel: 0345 605 3010)
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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 and phone number):	Environment Agency (north.wmdepr@environment-agency.gov.uk), Contact: Leanne Craddock Address: Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, Staffordshire, WS13 8RR Telephone: 03708 506506
For all Cluster Projects: 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 - the site is not a cluster project.

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): Document 7 (provided previously under separate cover): A preliminary ground investigation has been carried out by Soil Engineering Ltd at the site (report reference: TA8526, DRAFT, issue 01, dated June 2023). The report documents an intrusive investigation comprising boreholes, trial pits, in-situ testing, chemical and geotechnical laboratory analysis and gas monitoring. The report presents the data factually. No assessment of the data with the exception of a narrative about the site geology and visual contamination is reported. The report states that the 1:50,000 BGS Geological Map shows the site is not underlain by any superficial deposits and that bedrock geology comprises interbedded sandstone and conglomerates of the Chester Formation. Logs included in the Soil Engineering report show that natural topsoil is present across the majority of the site and proven to depths of between 0.20 m and 0.50 m bgl. Made ground deposits were encountered in two trial pits (TP15 and TP16) from the ground surface to depths of between 0.24 and 0.25 m bgl and included constituents of wood and plastic. The majority of the site is underlain by natural deposits described as firm clays and sand beneath and proven to depths of between 1.70 m and 3.80 m bgl. The report defines these as 'superficial deposits' but RSK interprets these deposits as the upper weathered horizons of the sandstone bedrock recovered as 'orangish brown gravelly sandy clay' and 'reddish brown gravelly clayey sand'. Bedrock of sandstone described as extremely weak, poorly cemented and distinctly weathered and was proven to a maximum depth of 20.00 m bgl. It is proposed that the soil to be re-used to form the raised embankment will be the natural firm clay and sands encountered beneath topsoil/made ground and above the sandstone bedrock at depths of between 0.20 m and 3.80 m bgl. Selected soil samples were tested for a suite of analysis to include metals, poly aromatic hydrocarbons, pH, soil organic matter, asbestos and total petroleum hydrocarbons including BTEX and MTBE. The Soil Engineering report does not include an assessment of soil data against UK screening criteria. RSK has undertaken an assessment and compared soil concentrations against their in-house generic assessment criteria (GAC) protective of a commercial end-use scenario, which RSK feels best fits the land scenario of
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	the BESS following its development. A total of 7 soil samples taken from the natural firm clay/sand stratum were analysed for the suite of testing above and compared against the RSK Commercial GAC. None of the concentrations exceeded the threshold values and therefore, the soil is considered suitable for use within a Commercial end-use setting. Concentrations of PAHs were detected above the inert waste threshold in a sample from BH04 at 0.20 m bgl. The made ground at TP15 and TP16 and the PAHs at BH04 are not located in the main field but along the access track to the field and therefore materials from these locations will not form part of the CAN reuse. If excavated, these materials will be tracked and removed off site as waste to a suitably permitted or exempt facility.
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Where contamination is suspected or known to be present 14a. Please provide copies of or relevant extracts from the risk assessment(s) that has been used to determine the 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:	N/A
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: Document 8: (provided previously under separate cover) Full planning permission for the development granted by Staffordshire Moorlands District Council (application number SMD/2022/0444, determined on 22 December 2022). Condition 15 of the planning permission has been amended under an NMA to state that no excavation of any soil involved in the formation of the BESS facility or the bund

	formations shall take place until such time that a Materials Management Plan (MMP) that defines the excavation and bund formation processes and provides detailed drawings of the proposed raised earthworks has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out strictly in accordance with the approved details. The inclusion of this planning condition specifically relating to the re-use of material within the bund formation shows that the local authority, in conditioning this activity, are aware of the re-use of soil at the site within the embankment. Therefore, this activity is anticipated and has been agreed as a suitable mechanism for construction of the bunds and as such, no objection has been put forward by the local authority.
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: Document 9: It is acknowledged that the re-use of clean and natural soils at the site of origin negates the requirement for a Material Management Plan (MMP) in line with CL:AIRE DOWCOP. As the planning application and NMA specifically includes the production of a MMP to outline the processes of re-using soils on site within a raised embankment, a MMP (this document) has been produced to support the discharge of the relevant condition. In lieu of the above, and to follow the protocols of an MMP outlined in the CL:AIRE guidance, the Environment Agency have been approached to confirm their position in relation to the re-use of clean and natural soils at the site. Their response email acknowledges the activities at the site, and they do not object.
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
Where contamination is not suspected 15a. Please attach copies or relevant extracts from the Desk	A Desk Study has not been produced for the site. A preliminary ground investigation was undertaken at the site – see 15b response

Top Study that demonstrates that there is no suspicion of contamination.	
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): Document 7: (provided previously under separate cover) A preliminary ground investigation has been carried out by Soil Engineering Ltd at the site (report reference: TA8526, DRAFT, issue 01, dated June 2023). The report documents an intrusive investigation comprising boreholes, trial pits, in-situ testing, chemical and geotechnical laboratory analysis and gas monitoring. The report presents the data factually. No assessment of the data with the exception of a narrative about the site geology and visual contamination is reported. The report states that the 1:50,000 BGS Geological Map shows the site is not underlain by any superficial deposits and that bedrock geology comprises interbedded sandstone and conglomerates of the Chester Formation. Logs included in the Soil Engineering report show that natural topsoil is present across the majority of the site and proven to depths of between 0.20 m and 0.50 m bgl. Made ground deposits were encountered in two trial pits (TP15 and TP16) from the ground surface to depths of between 0.24 m and 0.25 m bgl and included constituents of wood and plastic. The majority of the site is underlain by natural deposits described as firm clays and sand beneath and proven to depths of between 1.70 and 3.80 m bgl. The report defines these as 'superficial deposits' but RSK interprets these deposits as the upper weathered horizons of the sandstone bedrock recovered as 'orangish brown gravelly sandy clay' and 'reddish brown gravelly clayey sand'. Bedrock of sandstone described as extremely weak, poorly cemented and distinctly weathered and was proven to a maximum depth of 20.00 m bgl. It is proposed that the soil to be re-used to form the raised embankment will be the natural firm clay and sands encountered beneath topsoil/made ground and above the sandstone bedrock at depths of between 0.20 m and 3.80 m bgl. Selected soil samples were tested for a suite of analysis to include metals, poly aromatic hydrocarbons, pH, soil organic matter, asbestos and total petroleum hydrocarbons including BTEX and MTBE. The Soil Engineering report does not include an assessment of soil data against UK screening criteria. RSK has undertaken

	an assessment and compared soil concentrations against their in-house generic assessment criteria (GAC) protective of a commercial end-use scenario, which RSK feels best fits the land scenario of the BESS following its development. A total of seven soil samples taken from the natural firm clay/sand stratum were analysed for the suite of testing above and compared against the RSK Commercial GAC. None of the concentrations exceeded the threshold values and therefore, the soil is considered suitable for use within a Commercial end-use setting. Concentrations of PAHs were detected above the inert waste threshold in a sample from BH04 at 0.20 m bgl. The made ground at TP15 and TP16 and the PAHs at BH04 are not located in the main field but along the access track to the field and therefore materials from these locations will not form part of the CAN reuse. If excavated, these materials will be tracked and removed off site as waste to a suitably permitted or exempt facility.
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	Document Reference: Document 8: (provided previously under separate cover)
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Please provide a copy of the relevant planning permission	Full planning permission for the development granted by Staffordshire Moorlands District Council (application number SMD/2022/0444, determined on 22 December 2022). Also refer to Box 14b for NMA.
16b. Explain how the reuse of the excavated materials fits within the planning permission(s) for each site.	The re-use of site-won soils within the site of origin, relating to this MMP, are subject to the site boundary within the planning permission SMD/2022/0444 only for the BESS development.
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 – planning permission required

<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
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<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): Document 10: Design Statement: Cellarhead BESS (report reference 11986 DS01 (04), dated October 2025).
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Quantity of Use

19. Please provide a breakdown of the excavated materials for each site and how	Document Reference(s):
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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.	The locations and likely quantities of material for re-use on site are shown in the schematic included in Document 5 and within the cut and fill drawing presented in Document 3. The site will undergo a topsoil strip in the Western land parcel (BESS location), the access road and temporary site compound area within the Eastern land parcel and the attenuation pond area in the South West field, generating approximately 16,970 m³ of topsoil, (14,990 m³ from the BESS area/pond and 1,980 m³ from the welfare/access road area). Of the total topsoil volume, 8,550 m³ would be retained and used to landscape the raised embankments/bunds once these are created, 1,980 m³ would be retained in a temporary stockpile until the completion of the project construction works and re-used to reinstate the temporary access road and welfare area at the end of the development phase. The remaining 6,440 m³ will be removed from site, donated for use (under a separate MMP) on the landowner's Fields to the East (for which planning permission is being obtained). Once the topsoil has been stripped from the site access road and the temporary welfare, the area in the North East will undergo an initial cut & fill exercise whereby all 4,420m³ of the clean and natural (CAN) soil arisings will be retained for use to level the welfare area pad. This area of the site will also have 1,880m³ of type 1 recycled aggregate imported and laid at the surface to finish the access road and welfare area pad. The Western field (The location of the BESS) will then undergo a reduction in site level by an average of 2.30 m bgl and deeper cut area for the main Substation in the North West of the site by approximately 6.00 m bgl, which has been calculated to generate 68,250 m³ of clean and natural arisings of which 27,315 m³ will be used within the raised embankment/bunds around the North, West & South, East sides of the BESS area and 8,600 m³ will be used for the BESS area. An excess of 38,775 m³ will be removed from site, which is to be donated and used on the landowner's Fields to the East (for which planning permission is being obtained).
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20a. How has consolidation/compaction been considered in the above mass balance calculations?	An approximate value of 30% consolidation and compaction factor has been estimated for the bund formation.
20b. How has loss due to treatment being considered in	N/A – no treatment of soils required

the above mass balance calculations (if applicable)?	
20c. How has the addition of treatment materials been 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 – no treatment of soils required

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?	Made ground soils are not anticipated to be encountered given the greenfield nature of the site. Should made ground soils not considered suitable for re-use be encountered during the excavation process, these soils will be removed from site to a suitable waste facility. The cost of this will be covered by the client.
21b. What is to happen to, and who is to pay for any excess materials?	Surplus soils will be removed from site to a suitable waste facility in line with current UK practices and following all relevant legislation.
21c. What happens if the project programme slips in relation to excavated materials or materials under -going treatment?	In general, the materials covered by this MMP are considered suitable for re-use. If the project slips the programme will keep progressing until the development is completed.
21d. Other identified risk scenarios for the project (relating to excavated materials)?	The obtaining of planning permission for the landowner's Fields to the East of the Cellarhead BESS site and the obtaining of the MMP for the Fields to the East of the Cellarhead BESS site to receive the donated CAN surplus soils.

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	The tracking system employed on site will include daily site records, material tracking information, waste duty of care information, as-dug plans of where re-use materials have
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employed to monitor materials movements.	been placed, including thicknesses and types of backfill and the final site levels.
<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> 22d. Demonstrate that materials that do not require treatment and successfully treated materials reach their specific destination	N/A
<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.	Document reference(s); Direct transfer material moving to the re-use areas will be monitored using a tracking form which will be completed by those responsible for generation of the arisings and authorised by those responsible for inspecting and accepting

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.	placement. An example of a material tracking form is included as Document 11 .
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<i>For Hub Sites within Cluster Projects & where materials need treatment before reuse</i> 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.	Permit reference / EA letter reference: N/A – the site is not a hub site
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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	Material tracking notes (as per Document 11) will be completed during the re-use of materials on site. The following information will be recorded: • Cut area (area of site, date of material movement, details of responsible person confirming material complies with specification) • Haulier (haulage company and their representative, estimate of volume quantities) • Re-use area (re-use area identification) Material tracking notes may cover multiple identical vehicle movements over a period of a day but not greater than one working week. Where multiple loads are covered, a summary of the total vehicle movements and material movements will be provided. The completed tracking forms will be kept by the client, or their representative, until the material movement has been completed. The tracking forms will be held in both paper
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	format and digitally. Records will be kept for at least two years following completion of the last material movement.
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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).	This MMP has been produced to specifically support the discharge of planning condition 15 of the NMA for planning application SMD/2022/0444, dated 22 December 2022. Due to the fact that clean and natural soils are being re-used at the site of origin, a MMP in line with CL:AIRE DOWCOP is not required for the Cellarhead BESS site and has therefore, not been declared to the Environment Agency. The NMA amended planning condition 15 (or any other planning condition) does not state that a Verification Report is required, and as this MMP is not being declared, the requirement for a Verification Report is not considered to exist. For auditing purposes and to prove to the Local Authority that material movements have operated in line with the processes stipulated above, material tracking forms, details of variations to the outlined processes, changes to the MMP, topographic surveys of the embankment once complete and details of delineation/removal of potentially contaminated soils/made ground, will be kept on file with the client for a period of at least two years.
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APPENDIX A

Document 1: Site Location plan

***Included within Design Statement in
Document 10 only to avoid duplication***

Document 2: Site Layout Plan