

In the matter of the use of land and buildings at Dock Road and Cranborne Road, Gosport, Hampshire, PO12 1RL

I, Don Stewart, , do solemnly and sincerely declare as follows:-

- 1 I am employed by St Regis Paper Company Limited trading as Severnside Recycling ("the Company") as Depot Manager for the Gosport Depot at Cranborne Road, Gosport, Hampshire, PO12 1RL and a location plan is now produced to me marked 'A' ("the Plan") showing the current limits of the Depot as edged red ("the Depot").
- 2 I am authorised by the Company to make this declaration on its behalf.
- 3 I first began working at the Depot in about 1979 and have remained working there ever since apart from a period between 1998 and 2008 and have an extensive knowledge of the Depot and its activities throughout that period. In the period between 1998 and 2008 I was manager of the Company's recycling premises at Derby but returned to Gosport as manager of the Gosport Depot in March 2008 on the retirement of the former Depot Manager Derek Richards. In the period when I was at Derby, I retained a close interest in the proceedings at Gosport and remained fully aware of the activities there and the nature of the recycle materials. I did this by monthly visits to the Depot and the people there many of whom were my personal friends and by examination of the computer records produced by and viewed by all the depot managers showing the weekly breakdown of recycle materials passing through the individual recycling depots around the country. Although as is indicated in paragraph 8 of this declaration no records have been kept prior to 2005, the form of the records that I would have viewed appears at Annex "C" to this declaration and to the best of my knowledge information and belief the nature and form of the recycle material passing through the Gosport Depot did not change during the period 1998 to 2008 and that would have been shown on the records for the period from 1998 to 2005 .
- 4 Until 1996, the Depot comprised only that portion of it to the East of the broken red line on the Plan. In that year, the area to the West of that line was acquired by the Company. The initial set-up was inevitably smaller than it is now, but the process was essentially the same as today, although it was confined to waste paper and cardboard. In essence those items would be collected, processed, baled and sent out. Until 1988, the Depot was part of the Bowater Group, but in 1988 the Depot was acquired by the Company as part of the DS Smith Paper and Packaging Group, a global paper and packaging group.
- 5 On acquisition by the Company in 1988, the work of the Depot immediately began to spread into other areas comprising waste paper, cardboard, steel and aluminium cans, plastic film, with bottles and glass joining them in about 1990.

6 Throughout the period since 1988/1990, all of these materials, namely waste paper, cardboard, steel and aluminium cans, bottles, glass and plastic film, have continuously been collected and processed through the Depot which made necessary the expansion in 1996 to acquire the area and building to the West of the broken red line on the Plan. This existing building on that part of the Depot, whilst retaining its footprint, was (with the benefit I believe of a planning consent) extensively altered with a new roof, larger doorways and housing a much larger baler and canteen and offices.

7 The nature of the operation which was established from 1996 has been continuous and remains the same today and a series of photographs taken on 29 March 2011 is now produced to me and marked 'B'. These photographs show the basic arrangement within the Depot where photographs 1 and 2 show the reception area for mixed material which is then separated into its component parts in the areas shown on photographs 4 and 5 and is then baled and stored outside the building, as is shown in the remaining photographs. Those photographs make clear the different materials processed through the Depot. In particular:-

- Photograph 6 shows cardboard.
- Photograph 7 shows shredded paper and plastic film.
- Photograph 8 shows coloured plastic film.
- Photographs 9 and 10 show bottles and glass.
- Photograph 11 shows bagged processed mixed plastics.
- Photograph 13 shows baled steel and aluminium cans at the lower level and baled paper at the higher level.

8 Although all of the material passing through the Depot will have been recorded internally, it is unfortunately the case that the Depot does not hold records prior to 2005. All documentation prior to that date has been recycled. There is now produced to me a set of records relating to the earliest date that we hold, namely the beginning of 2005, and being an intake summary for the period 1.3.2005 to 30.4.2005, vehicle productivity reports for the period 1.3.2005 to 1.4.2005 and a Weighbridge report for the Tesco contract for the period 1.8.2005 to 8.8.2005, all of which are produced to me and marked 'C'. Those reports indicate as follows:-

8.2 The intake summary shows clearly the variety of material being received by the Depot comprising office records, mixed paper, polythene, polycups (insulated cups for hot drinks), steel cans and glass of different grades.

8.3 The vehicle productivity report shows mixed paper, polycups, shavings, office records, polythene, glass.

8.4 The Weighbridge reports for the Tesco contract designate waste according to a numbered reference. Each of those references corresponds to a different grade of material. In particular, the following grades have the following meanings:-