Bespoke Environmental Permit Application

PJ Brown (Civil Engineering) Limited

Crouch's Farm,
Hollow Lane,
Hoathly,
Lewes,
East Sussex,
BN8 6QX.

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Change log

Version	Changes	Produced by	Checked by	Date
1	Original Environmental Permit Application Report.	Vicky Cawley	Tracey Westbury	30 May 2025
2	Changes made to 3.4, 3.9, 5	Vicky Cawley	Tracey Westbury	05 November 2025
3	Updates to Table 4.1 removal of erroneous text.			

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1. Introduction

1.1. Westbury Environmental Limited have been instructed to prepare this Environmental Permit Application on behalf PJ Brown (Civil Engineering) Limited.

1.2. This application comprises a bespoke environmental permit application for a waste deposit for recovery permit. The environmental permit will authorise the acceptance of suitable wastes, that will be used to construct new silage clamps and make improvements to an existing lagoon.

1.3. The proposed deposit of waste recovery operation will take place at Crouch's Farm, Hollow Lane, East Hoathly, BN8 6QX (Site).

1.4. The works will all be above ground using imported material. The volume of material required to complete the development has been calculated to be approximately 152,000m^3.

Waste Recovery Plan

1.5. A Waste Recovery Plan for the development was submitted to the Environment Agency in July 2023. The Waste Recovery Plan evidenced that the development would be commercially worthwhile through financial gain if non-waste materials were used instead of waste.

1.6. The Environment Agency considered the proposed works to be a 'recovery' operation and approved the Waste Recovery Plan on 25th August 2023, see Appendix 1 Pre-Application Recovery vs Disposal Assessment Advice Letter.

Planning Permission

1.7. Planning permission was granted for the refurbishment of a slurry lagoon, three silage clamps and their associated engineering operations, provision of temporary construction access route and the permanent diversion of a footpath on 4th October 2022 under planning permission reference WD/2021/2672/MAJ.

Operator Details

1.8. Company details, including information regarding the director of the company, are provided below:

Company Name	PJ Brown (Civil Engineering) Limited
Company Number	07185077
Registered Office Address	Burlands Charlwood Road, Ifield, Crawley, West Sussex, RH11 0JZ
Incorporation Date	10 March 2010
Companies House Link	P.J.BROWN (CIVIL ENGINEERING) LIMITED overview - Find and update company information - GOV.UK (company-information.service.gov.uk)
Director Name 1	Mr Peter John Brown
Director Date of Birth 1	06 October 1954

2. Site Setting

2.1. The Site covers approximately 4.6 hectares.

2.2. The Site will be accessed from Hollow Lane utilising a purpose-built access.

2.3. The Site is located 1.8km to the north of the town of East Hoathly and 2.4km east of the A22 trunk road.

2.4. The Site is located within an agricultural setting. Open grassland bounds the Site to the east with woodland found to the north and south. The proposed Site boundary is shown on the Permit Boundary Plan Drawing No. 20/014i 001.

2.5. The Site is located within Flood Zone 1 (www.gov.uk. Flood Map for Planning). There is a very low risk of flooding from rivers and the sea reported for the Site (www.gov.uk. Long-term Flood Risk Map).

2.6. The Site is not located within a Groundwater Source Protection Zone.

3. Non-technical summary

3.1. This application comprises a bespoke environmental permit application for a waste deposit for recovery permit. The environmental permit will authorise the acceptance of 152,000m^3 (152,000 x 1.5tonnes/m^3 = 228,000 tonnes) of suitable wastes, that will be used to construct new silage clamps and make improvements to an existing slurry lagoon.

3.2. Waste will be brought onto the Site in HGV vehicles and will be deposited in an area within the permit boundary close to where the construction works will take place.

3.3. If the ground is too wet to deposit the soils, then it will be temporarily stored on a hardstanding surface. there will be two areas of hardstanding surface within the permit boundary where materials will be stored, see Site Layout Plan Drawing No. 20/014j 001.

3.4. Strict waste acceptance procedures will be applied on the Site to ensure that only the permitted waste types are accepted, see Appendix 2 Waste Acceptance Procedure.

3.5. The imported waste will be used in the proposed construction works in accordance with best practice guidance by experienced staff members. Mobile plant such as bulldozers and excavators will be used to move and deposit the waste materials.

3.6. The proposed works will be completed in accordance with the approved planning permission. The local planning authority will regulate the conditions of the planning permission.

3.7. All materials will be handled in accordance with the “Good Practice Guide for Handling Soils in Mineral Workings” (2021) produced by the Institute of Quarrying.

3.8. The final ground constructed levels will be surveyed to ensure compliance with the approved design drawings included in the planning permission.

3.9. A Stability risk Assessment of the proposed development has been undertaken, see Appendix 3 Stability Risk Assessment.

4. Proposed List of Waste Codes

4.1. Imported materials for deposit, will be subject to strict waste acceptance procedures to ensure that only suitable wastes are accepted and used in the proposed construction works.

4.2. The proposed List of Waste Codes to be accepted for the deposit of waste for recovery activity are presented in Table 4.1.

Table 4.1: Proposed waste types – waste recovery

Exclusions
Wastes having any of the following characteristics shall not be accepted:
- Consisting solely or mainly of dusts, powders or loose fibres
- Wastes that are in a form which is either sludge or liquid

Source	Sub-source	Waste code	Description	Additional restrictions
01 Waste resulting from exploration, mining, quarrying and physical and chemical treatment of minerals	01 01 wastes from mineral excavation	01 01 02	Wastes from mineral non- metalliferous excavation	Restricted to waste overburden and interburden only.
	01 04 wastes from physical and chemical processing of non-metalliferous minerals	01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 06	
		01 04 09	Waste sand and clays	
02 Waste from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing	02 04 wastes from sugar processing	02 04 01	Soil from cleaning and washing beet	
10 Wastes from thermal processes	10 12 wastes from manufacture of ceramic goods, bricks, tiles and construction products	10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)	
	10 13 waste from manufacture of cement, lime and plaster and articles and products made from them	10 13 14	Waste concrete	
17 Construction and demolition wastes	17 01 concrete, bricks, tiles and ceramics	17 01 01	Concrete	
		17 01 02	Bricks	
		17 01 03	Tiles and ceramics	
		17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Metal from reinforced concrete must have been removed.
	17 03 bituminous mixtures	17 03 02	Bituminous mixtures other than those mentioned in 17 03 01	Road planings only.

Source	Sub-source	Waste code	Description	Additional restrictions
	17 05 soil stones and dredging spoil	17 05 04	Soil and stones other than those mentioned in 17 05 03	Restricted to topsoil, peat, subsoil and stones only.
19 Wastes from waste management facilities	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) only	Restricted to wastes from treatment of waste aggregates that are otherwise naturally occurring minerals. Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard
		19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	Restricted to crushed bricks, tiles, concrete and ceramics and soils from the mechanical treatment of construction / demolition waste. Metal from reinforced concrete must be removed. Does not include gypsum from recovered plasterboard.
20 Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions	20 02 garden and park wastes	20 02 02	Soils and stones	Restricted to topsoil, peat, subsoil and stones only.

5. Operating techniques

Environmental Management System Summary

5.1. PJ Brown (Civil Engineering) Limited will operate under an Environmental Management System (EMS).

5.2. A hard copy of the EMS will be kept on the Site at all times.

5.3. The EMS folder shall include a copy of the Environmental Permit and will contain the following sections:

EMS Report: This report contains a description of the purpose and scope of the EMS, all Site details including the location of the Site, receptors located in close proximity to the Site boundary, waste storage, the plant and equipment that is used on the Site, the waste handling procedures carried out on Site, the Site security measures, information on the competence of the staff working on Site, roles and responsibilities for each member of staff and details for Site closure.

Appendix A.1 Site Condition Report: This is used to record the condition of land covered by the Environmental Permit at various stages during the life of the permit. Site Condition Report, Part 1 to record the condition of the land at the permit application stage is included as Appendix 4 in this application report.

Appendix A.2 Environmental Impacts and Controls Assessment: This assessment will provide information on the processes, activities and equipment on site, the potential emissions and impact that they may have on air, water, energy usage, waste disposal, land contamination, nuisance and resource consumption and how any identified impact may be controlled.

Appendix A.3 Environmental Accident Management Plan: This report will contain an assessment of the potential accidents that could occur on Site, details of the likelihood of each accident occurring, the preventative measures taken to reduce the risk of each accident occurring, actions to be taken in the case of an accident on Site and an explanation on how to record any accidents that occur on Site. The types of accident included in this report include.

- Leaks or Spillages.
- Fire.
- Flooding (increasing risk from climate change).
- Unauthorised entry.
- Failure of plant and equipment.
- Cross-contamination.
- Failure of Services.

Appendix A.4 Flood Management Plan: This report will contain a brief description of the Site, its size, the key contacts to contact in an emergency, whether there are staff employed with any special needs, the locations of any gas, water and / or electric cut off points of Site and ways to keep all plant and computers / files safe in the event of a flood.

Appendix A.5 Dust Management Plan: This report provides details on managing the potential causes of dust at the Site, the dust suppression measures and dust monitoring methods. It includes critical information on the storage requirements for the Site and managing dust emissions. The Dust Management Plan has been included as Appendix 5 of this application report, see Appendix 5 Dust Management Plan.

Appendix A.6 Noise Management Plan: This report provides details on managing the potential causes of noise at the Site and noise monitoring methods. It includes critical information on the storage requirements for the Site and managing noise emissions. The Noise Management Plan has been included as Appendix 6 of this application report, see Appendix 6 Noise Management Plan.

Appendix A.7 Climate Change Risk Assessment and Adaption Plan: This document considers the projected weather and climatic changes between the present day and future critical decision points of 2050 and 2100. The document contains a risk assessment for all potential changing climate variables

and lists potential impacts and mitigation measures in place. The adaptation plan uses the risk assessment to identify the most relevant impacts to operations on the Site. Control measures to minimize these potential risks while remaining compliant with the environmental permit and without increasing the risk to the surrounding environment and sensitive receptors are identified.

Appendix A.8 Residues Management Plan: This document provides guidance on:

- Optimising the reuse, regeneration, recycling, or energy recovery of residues, including packaging.
- Properly disposing of residues where recovery is technically or economically impractical

Appendix A.9 Contingency Plan: A document sets out the procedures to:

- Ensure compliance with the Environmental Permit and operating procedures during maintenance or shutdown on Site.
- Minimise the impact of non-operation of associated third-party facilities.
- Ensure Site storage capacity limits are not exceeded.
- Minimise the impact on the environment and ensure business continuity, from any breakdowns, enforced shutdowns and any other changes from normal operations.

Appendix B Authorisations: A copy of the permit and EA Registrations for the Site will be found in the EMS.

Appendix C Procedures & Forms: The EMS contains a number of procedures that cover its implementation, waste acceptance & storage, site management, environmental protection, environmental monitoring, emergency provisions and reporting. Records to be produced in accordance with these procedures are provided in the EMS as forms. These completed forms provide records that evidence the implementation of the EMS. The following list details procedures that are included in the EMS.

<u>Implementation</u>

- Environmental Training.
- Roles and Responsibilities.
- Reviewing & Auditing Documentation.
- Compliance with Legal & Other Requirements.

<u>Waste Acceptance & Storage</u>

- Waste Acceptance.
- Waste Classification.
- Waste Rejection.
- Waste Storage & Handling.

<u>Site Management</u>

- Fuel & Oil Storage.
- Refuelling of Plant / Equipment
- Housekeeping, Litter, Pest & Vermin Control.
- Wheel Washing.
- Site Security.
- Removal of Waste.
- Waste Recovery Operations.

<u>Environmental Protection</u>

- Dust, Fibres and Particulates.
- Mud and Debris.

- Noise Control.
- Odour Control.
- Surface Water Management.

Maintenance

- Maintenance – Planned Preventative Maintenance and Inspection Checklists.

Emergency Provisions

- Environmental Accidents / Incidents / Complaints.
- Near Miss Reporting.
- Spill Response.
- Flood Management.
- Utility / Equipment Failure.
- Fire Prevention.

Reporting

- Waste Returns.
- Notifications to the Environment Agency.

(This list is not exhaustive)

Drawings

The drawings included in the EMS include:

- Permit Boundary Plan – showing the boundary of the permitted area.
- Site Layout Plan – showing waste storage areas and development areas.
- Sensitive Receptors Plan – showing nearby receptors including water courses, protected habitats, and residential, commercial, and industrial premises.

5.4. The Maintenance Procedure will ensure inspections of infrastructure, plant and equipment will be carried out on a daily, weekly and monthly basis. This procedure will also specify when planned preventative maintenance should be carried out on each item of plant and equipment located on the Site.

5.5. The EMS will include a Utility / Equipment Failure Procedure and Flood Management Procedure to ensure contingency measures are implemented in the event of a utility / equipment failure or a flood on the Site. The Flood Management Procedure will account for the potential increase in the risk of flooding at the Site due to climate change.

5.6. The Site will display a notice board at the site entrance which will include the following details:

- The permit holder's name – PJ Brown (Civil Engineering) Limited.
- An emergency contact name and telephone number.
- A statement that the site is permitted by the Environment Agency.
- The permit number.
- Environment Agency telephone number and the incident hotline telephone number.

5.7. The EMS will include a Complaints Procedure that will provide details for recording, investigating, and resolving complaints in regard to the permitted activities.

5.8. Each procedure within the EMS will specify who is responsible for implementing the required actions. The EMS will include a staff organogram which will show the roles and responsibilities of each staff member in relation to the activities covered by the permit.

5.9. An Environmental Training Procedure will be included in the EMS to ensure regular training on the EMS procedures is given to all site staff and is well documented.

5.10. Records required by the permit e.g., waste transfer notes, chemical analysis, hazardous waste assessments, maintenance records, staff training records etc. will be kept on file within the EMS.

5.11. The Reviewing & Auditing Documentation Procedure included within the EMS will ensure regular checks are carried on the EMS documentation in order to assess whether the EMS implements the requirements of the permit and relevant environmental legislation. Any changes to the permit or site operations will be recorded within the EMS and the relevant EMS documents will be updated accordingly.

5.12. Each member of staff at the Site will have access to the EMS.

Technically Competent Management

5.13. James Legate will be the Technically Competent Manager for the Site. Evidence of the suitable WAMITAB certificate is provided in Appendix 7 Evidence of Technically Competent Management.

Site Condition

5.14. Part 1 of a Site Condition Report has been produced for this Site, see Appendix 4 Site Condition Report.

Environmental Risk

Environmental Risk Assessment

5.15. An Environmental Risk Assessment has been completed as part of this permit application, see Appendix 8 Environmental Risk Assessment.

5.16. The Environmental Risk Assessment considers the potential impacts of the proposed waste operations with regard to the local receptors; population, watercourses, protected sites etc.

5.17. The Environmental Risk Assessment concludes that, except for the Dust Management Plan (Appendix 5) and Noise Management Plan (Appendix 6), no other management plans are considered to be required to mitigate risks from the proposed operations.

5.18. An assessment of the risk to controlled waters has been prepared by Hafren Water Limited. A copy of their detailed, site-specific Hydrogeological Risk Assessment (HRA) is provided, see Appendix 9 Hydrogeological Risk Assessment.

5.19. The HRA concludes that Crouch's Farm is not considered to be in a sensitive location due to a bedrock geology that prevents vertical flow from acting within significant timescales, a relatively deep-water table and an absence of sensitive receptors down-gradient of the site. Additionally, the source is considered to pose a low risk due to the material being placed above ground level, the nature of the proposed waste types and the proposed testing regime. The proposed waste operations will not pose an unacceptable risk controlled waters, in particular to the superficial Secondary A aquifer or adjacent River Blackwater.

5.20. It is concluded in the HRA that further monitoring is not necessary, see Appendix 9 Hydrogeological Risk Assessment.

Dust Management Plan

5.21. A Dust Management Plan has been completed as part of this permit application, see Appendix 5 Dust Management Plan.

Noise Management Plan

5.22. A Noise Management Plan has been completed as part of this permit application, see Appendix 6 Noise Management Plan.

Environmental Setting & Site Design Report

5.23. An Environmental Setting & Design Report (ESSD) has been produced to consider the operational impacts of a Deposit for Recovery Permit on the Site, see Appendix 10 Environmental Setting & Design Report.

Application Forms

Part A

Application Forms

Part B2

Application Forms

Part B4

Application Forms

Part F1

Drawings

Permit Boundary Plan	Drawing No. 20/014i 001
Site Layout Plan	Drawing No. 20/014j 001

Appendix 1

Pre-Application Recovery vs Disposal Assessment Advice Letter

Appendix 2

Waste Acceptance Procedure

Appendix 3

Stability Risk Assessment

Appendix 4

Site Condition Report

Appendix 5

Dust Management Plan

Appendix 6

Noise Management Plan

Appendix 7

Evidence of Technically Competent Management

Appendix 8

Environmental Risk Assessment

Appendix 9

Hydrogeological Risk Assessment

Appendix 10

Environmental Setting & Site Design Report