

Our Ref: 30.01.2026_LT_20014u
Your Ref: EPR/EP3025SE/A002

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FAO: Maggie M.K. Wong

30th January 2026

RE: Response to email “EPR/EP3025SE/A002 Crouch’s Farm - Request for Information” dated 9th January 2026, in relation to P.J. Brown (Civil Engineering) Limited [‘Operator’], Crouch’s Farm, Hollow Lane, Hoathly, Lewes, East Sussex, BN8 6QX [‘Site’].

Dear Maggie,

We write on behalf of our client, P.J. Brown (Civil Engineering) Limited, in response to the above-referenced email and following your agreement to our extension request for the outstanding information not supplied in our letter response of 23rd January 2026 (*‘LT_20014_23.01.2026a’*). For ease of reference, I have included your comments in **bold text** below, alongside our response to each.

- 4. Amend the Waste Acceptance Procedure to clearly present the waste acceptance criteria for the deposited waste mass. For the avoidance of doubt, classification as non-hazardous under WM3 is not sufficient to demonstrate that the waste does not pose a pollution risk to the environment.**

The Waste Acceptance Procedure has been updated to apply additional requirements for testing the incoming wastes. This includes inert waste WAC limits, see attached Waste Acceptance Procedure V3.

- 6. Provide an assessment of the risks to surface water.**

Reason: The application identifies surface water as the primary receptor and notes the boundary stream within the conceptual model. However, risk screening references a more distant water body. The proposed waste code (19 12 12) originates from the treatment of waste from multiple sources, introducing significant variability and uncertainty in the leachable fraction. Under these circumstances, the Environment Agency cannot conclude low risk to surface water.

To progress, the applicant must demonstrate the site’s sensitivity to the variability and uncertainty introduced by this waste code. Withdrawal of waste code 19 12 12 would reduce uncertainty, potentially allowing a risk-based decision without further sensitivity assessment. Any future environmental permit must include surface water monitoring.

Following question 6 above, if you decide to retain waste code 19 12 12 as one of the waste types to be accepted at the site, please also follow up on question 7 below.

The HRA has been amended to include detailed information on the provision of a ditch and berm and holding pond to control surface water run-off from the Site. The HRA assesses the risk to surface water and concludes a low risk of contamination to nearby water courses. It also proposes surface water monitoring of the discharge from the holding pond, see attached 3591_HRA SWRA vn F1 (Jan 26)

In your email of 26th January 2026, you also asked:

- 1. Additionally, it is noted that R10 activity has been included in Table 1a of the updated Application Form Part B4. Please confirm whether this activity involves creating a growing medium, as your answer to question 8a in Appendix 2 of the same form is still 'no'.**

I have updated the Application Form Part B4 to confirm that the R10 Activity does involve the deposit of waste to create a growing medium, see attached Application Form Part B4-V3.

I trust the above information addresses your queries. Please do not hesitate to contact us should you require anything further.

Yours sincerely,



Vicky Cawley
Client Services Coordinator

Attachments

Waste Acceptance Procedure V3.
3591_HRA SWRA v1 F1 (Jan 26)
Application Form Part B4-V3