

Our Ref: LT_20014_23.01.2026
Your Ref: EPR/EP3025SE/A002

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FAO: Maggie M.K. Wong

23rd 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. For ease of reference I have included your comments in **bold text** below, alongside our response to each.

Please note in accordance with our conversation today I have included notes on information that will follow separately.

- 1. In Table 1a of the Application Form Part B4, clarify whether the recovery operation listed as R3 should instead be R13.**

The recovery operation previously shown as R3 was incorrect. The code R3 is not applicable to the proposed deposit for recovery activity.

The proposed recovery and associated activities are:

R5 – Recycling or reclamation of other inorganic materials

R10 – Land treatment resulting in benefit to agriculture or ecological improvement; and

R13 – Storage of waste pending recovery operations R5 and R10 (excluding temporary storage pending collection at the place of production).

I have updated the Application Form Part B4 to include these codes, see attached Application Form Part B4-V2.

- 2. Provide copies of (a) the original WAMITAB certificate for the qualifications listed in the C.C. certificate, and (b) the associated credit unit certificates for the Technically Competent Manager.**

We have not provided the documents requested above as James Legate now has acquired further WAMITAB awards. It is considered that these awards fulfil the TCM requirement for the Use of waste in a deposit activity.

These comprise:

CIWM (WAMITAB) Level 4 Certificate in Waste and Resource Management – Physical Treatment, including associated units achieved, see attached James Legate - Full Award & VRQ406 Unit.

CIWM (WAMITAB) Level 4 Certificate in Waste and Resource Management – Inert Landfill, including associated units achieved, see attached James Legate - VRQ410 Unit Only.

3. Clarify whether the areas for Phases 3 and 4 of the scheme involve the storage and deposit of waste as part of the proposed deposit for recovery operation.

I can confirm that Phases 3 and 4 involve the storage and deposit of waste as part of the proposed deposit for recovery operation. These phases form an integral part of the engineered landform to be constructed using recovered waste materials and are required to achieve the final site levels and restoration objectives. Waste will therefore be stored and deposited within Phases 3 and 4 in accordance with the approved recovery design. For this reason, Phases 3 and 4 are included within the proposed permit boundary and are shown on the submitted drawings and within the Hydrogeological Risk Assessment.

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.

This information will be provided separately.

5. Include a Code 2 protected species adjacent to the north-eastern site boundary in Table 1 of the Environmental Risk Assessment, Table 3 of the Dust Management Plan, and on the Sensitive Receptors Plan. See screenshot below.



I have updated the above-mentioned application documents to include a Code 2 protected species to the northeast of the Site. The Code 2 protected species has been included in Table 1 of the Environmental Risk Assessment, Table 3.1 of the Dust Management Plan, and on the Sensitive Receptors Plan, see attached; Environmental Risk Assessment V3, Dust Management Plan V3, and Sensitive Receptors Plan 20_014j 002 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.

This information will be provided separately.

7. Clarify whether waste code 19 12 12 excludes any fines from the treating non-hazardous wastes.

Reason: *In Table 4.1 on page 7 of 306 and Table 1 on page 78 of 306 of your complied application submission, the waste description for waste code 19 12 12 includes 'fines from treating non-hazardous wastes'. In accordance with the Environment Agency guidance [Check if your waste is suitable for deposit for recovery - GOV.UK](#), waste code 19 12 12 should exclude fines from treatment of any non-hazardous waste.*

I can confirm that the description waste code 19 12 12 used throughout the application excludes any fines from the treatment of non-hazardous wastes in accordance with the Environment Agency guidance. The reference to fines within the compiled application submission was erroneous and does not reflect the intended waste specification. I have updated the Application Report and the Waste Acceptance Procedure to remove this erroneous text, see attached; Application Report V3, Waste Acceptance Procedure V2.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'V. Cawley', written in a cursive style.

Vicky Cawley
Client Services Coordinator

List of Attachments

Application Form Part B4-V2
James Legate - Full Award & VRQ406 Unit
James Legate - VRQ410 Unit Only
Environmental Risk Assessment V3
Dust Management Plan V3
Sensitive Receptors Plan 20_014j 002 V3
Application Report V3
Waste Acceptance Procedure V2