

Non-Technical Summary

Overview

This Non-Technical Summary supports an application for a normal variation of bespoke permit EPR/LB3502HT.

The permit covers the import and placement of waste material at Lower Hare Farm, Lane from Five Mile Hill, Whitestone, EX4 2HW. The Operator of the waste activity is GRS Stone Supplies Limited. The activity will involve the import and placement of 350,000 m³ of suitable inert waste, restoration soils and geological separation layer (GSL). The permit boundary is shown in 213189/D/001.

Since the permit was granted no landfill activities have taken place whilst site infrastructure is completed. In this time, the CQA strategy has been issued and the location of the monitoring points have been reviewed and results assessed. The further work completed has identified required changes to the permit. This permit application proposes amendments to the conditions on the permit. Some of these amendments have been discussed with EA at a local level and it was deemed appropriate to submit a variation. The CAR report is within this normal variation application for information (CAR Ref: 408577/0584118, dated 30/9/25).

Proposed Variation

This normal permit variation seeks to amend the following:

1. Table S1.2 Operating techniques – update to the Monitoring point plan ('Monitoring Plan'), drawing reference 213189/HP/D/001, rev A, dated June 2024.

It is proposed to move monitoring location SW3 upstream closer to SW4. The revised location provides a more representative downstream compliance point for the tributary feeding the Aller Brook, ensuring monitoring better reflects potential site impacts.

The revised location is set out in Drawing 213189/HP/D/001 and is attached in Section 3 of the Permit Application.

2. Table S1.3 Pre-Operational Measures PO1

It is recommended that this pre-operational condition is removed. A CQA strategy has been submitted and accepted by the Environment Agency that defines the quality and validation requirements of the artificial geological barrier. This is attached in Section 5 of the Permit Application. CQA validation reports will be developed and presented in a 6 monthly basis. This approach reduces administration for the Environment Agency and the operator.

3. Table S1.3 Pre-Operational Measures

A technical note has been provided in section 6 that includes information about supplemental controls being implemented to control the suspended solids. The strategy includes the option to apply a flocculant, subject to trials and further risk assessment.

It is recognized that the use of flocculants ideally is approved within the site permit. The Operator requests that the Environment Agency instigate a new pre-operational condition. The proposed condition would state: *'Flocculants will not be used to manage suspended solids in the surface waters until the type and use of the flocculant has been agreed with the Environment Agency. The applicant will submit a suitable surface water risk assessment to the Environment Agency in support of any application to use a flocculant'*.

4. Table S3.1 Point source emissions to water – change location of downstream compliance point SW3

As per Item 1.

5. Table S2.1. Annual Tonnage Limit

Annual tonnage limit is requested to be increased to 500,000 tonnes per annum. This is to facilitate construction over a peak earthworks season. This would facilitate the timely construction of the land restoration. The increase in through put is not considered to change the risk profile relating to fugitive or point source emissions.

213189/NTS

6. Table S3.1 Point source emissions to water – use of a manual turbidity method for daily suspended solids.

Table S3.1 requires daily monitoring of suspended solids at a laboratory against a limit of 50 mg/l. Laboratory analysis typically requires five working days from receipt, which limits the operator's ability to make real-time operational decisions.

A more pragmatic and routine industry approach is to utilise a meter that provides real-time data on turbidity, which is correlates to suspended solid concentrations. This data would be supplemented by routine laboratory analysis. Details of the meters used within the system are attached in the Project Technical Note 2131890-PTN-SS-001 attached in Section 6 of the Permit Application.

It is proposed that table S3.1 is amended requiring the monitoring of suspended solids at SW4 on a monthly basis at an accredited laboratory. The analysis by the laboratory would be supplemented by daily monitoring using a turbidity meter. The controlled water risk assessment Technical Note TN002 sets out the approach to monitoring and equating turbidity to suspended solids. This approach is widely used in the industry and provides rapid detection of elevated solids, enabling proactive intervention to be applied.

7. Table S3.1 Point source emissions to water – revised limits for monitoring point SW3

If monitoring point SW3 is relocated as per item 1, revised compliance limits are required. Technical Note TN003 proposes limits for water quality at the revised location of SW3.

8. Table S3.5 Surface water

Table S3.5 will require amendment in accordance with any amendments to Table S3.1. In addition, suspended solids monitoring at points SW1 and SW2 and SW3 should be reduced to monthly. Daily monitoring at an accredited laboratory is not considered practicable or sustainable.

9. Table S3.2 Groundwater – update the emission limit for Nickel in BH104.

No waste has been imported and placed for the landfilling activity. During the monitoring period, there have been variations of background Nickel concentrations in BH104. The compliance limit has been updated to reflect the background concentrations.

Supporting Documents

The following documents have been prepared and/or updated as part of the variation application:

- **New** - Technical Note 1776-TN002, McDonnell Cole, addressing groundwater and surface water issues, which are an update to the Hydrogeological Risk Assessment;
- **New** - Project Technical Note 213189-PTN-SS-001 details amendments to the surface water settlement systems;
- **Approved strategy since permit issue** - The Construction Quality Strategy that covers the construction of the artificial geological barrier and the associated Compliance Assessment Report; and
- **Update** - 213189/HP/D/001 Rev B showing revised monitoring points.

The ESSD and H1 risk assessment are included in the application, but have not been revised. The changes proposed will not impact the risk assessment.

There are no changes to the Importation Protocol, Operational Plan, Dust and Emissions Management Plan, Closure and Aftercare Plan, Restoration Plan & Waste Recovery Plan or the Stability Risk Assessment. These documents have not been re-submitted as they are unaffected by the variation.