

Application reference: EPR/LB3304MN/A002

Applicant: SAMUEL GLEDHILL AND SONS LIMITED

Facility: Elland (Low) Edge Quarry, LOWER EDGE ROAD, BRIGHOUSE, HD6 3LE

Return of Not Duly Made Permitting Application CRM:0291074 from the EA 10 April 2026 16:46

Waste Acceptance - Information Required: Confirm which waste codes will be accepted at the site.

The waste codes for the application are those permitted in standard rules permit SR2015 No.39. 'Use of waste in a deposit for recovery operation (Construction, reclamation, restoration or improvement of land other than by mobile plant)'. The ESSD and Permit Management System have been updated to reflect these.

The original Waste Recovery Plan stated that waste imported would fall into the 'categories tabulated in appendix C of the WRAP Protocol on the Production of Aggregates from Inert Waste and are tabulated in Table 1 of the Standards and Measures for the Deposit of Inert Waste'.

This statement is not clear, but the nature of material described in the WRP, and intended to be used in the recovery, scheme falls under the waste codes in SR2015 No. 39. Adopting this list of waste codes is considered to align with the intention of the agreed WRP.

Waste Volumes - Information Required: Confirm the waste volumes for the site

The volume of imported waste will be 217,200m³. The ESSD and Permit Management System have been updated to reflect these. This volume is slightly less than the 263,000m³ stated in the WRP. The amended figure is based on an updated survey of the volume of natural overburden generated from the voids stored on site for restoration works.

Surface Water Management - Information required: Clarification is required on the proposed surface water management arrangements for the site.

There are no off site discharges. An updated surface water management plan has been included in the Permit Management System which confirms rainwater will be managed, if necessary, via collection and soakaway to an area of undisturbed Elland Flags.

Rainwater collected may also be used for dust suppression, if necessary, as per the WRP.

Groundwater Monitoring and Compliance limits- Information Required:

a) Review the proposed monitoring suite (HRA Table 7.1) and propose a more extensive list of monitoring parameters and set out monitoring frequencies.

Parameter list has been expanded in section 15 the Permit Management System

b) Propose groundwater quality control and compliance limits at downgradient boreholes, with associated action plans.

A detailed groundwater monitoring plan is included in section 15 of Permit Management System

c) Provide existing groundwater quality data in .xls format where available.

The groundwater laboratory data collected for the baseline assessment has been converted to an excel format and included in Appendix E

Hydrogeological Risk Assessment and Technical Precautions - Information required - Address the uncertainty in hydrogeological protection beneath and adjacent to the proposed deposit/buttness.

1. Confirm the continuity and adequacy of the basal mudstone relied upon for protection beneath the full footprint of the proposed deposit/buttness, and identify any areas where this horizon is not proven or may be absent.

Updated the HRA to reflect the actual filling sequence and consequences of this for interaction of waste / groundwater. Fill layer 1 and 2 provide a consistent and validated low permeable layer at the base and sides of the quarry void. The WRP states that these natural strata must be compacted to a minimum of 1×10^{-7} m/s. An Earthworks Specification will be produced by Vertase FLI that will set out how this will be validated. While the purpose of these layers is driven by stability assessment and delivering a safe working environment near the steep and unstable quarry faces and no CQA is proposed, the construction will also perform as a low permeable liner.

2. Identify any locations where the waste mass may be placed adjacent to, or in direct contact with, exposed Elland Flags sandstone, including along side slopes (e.g. the eastern edge of the buttness), and confirm how these interfaces have been assessed.

3. Address the identified uncertainty, either by:

See point above regarding clarification on the fill layers 1 & 2, validation of works and waste acceptance criteria and management

Gas Monitoring Plan - Information required - Please provide a clear gas monitoring plan for the site

A gas monitoring plan has been added to section 15 of Permit Management System, this expands on the obligations set out in the gas risk assessment report, considers boundary data and includes in-waste monitoring boreholes to confirm waste acceptance compliance and support surrender.

Application form B4 states that the deposit activity will be done under D1 this is a disposal code not a recovery code so B4 needs updating to include recovery codes for proposed activity.

Form B4 updated to identify the activity as recovery.

Non-technical summary includes the intent for treatment to be included in the deposit for recovery permit application however no fee has been paid for this or documentation provided if you wish for this treatment to be different to the current standard rules on site.

The waste treatment operation will remain separate from the deposit for recovery operation and the waste treatment area has been removed from the DfR boundary.

A dust management plan has been submitted but with no fee paid for this to be assessed.

It was understood that the submitted dust management plan was reviewed with the WRP in 2022, there was no expectation of a need to have this reviewed again. However, the output of the dust management plan has been updated in line with new guidance (allowing for the fact this activity is restoration of a quarry) and this update is reflected in Sections 13 and 14 of the Permit Management System and the stand alone Dust Management Plan.

For information – the noise impact assessment submitted indicates no adverse impact however just to highlight the below guidance does include access to a tool to check whether or not a NMP may be required.

[Noise and vibration: environmental permit application guidance - GOV.UK](#)

While no adverse noise impact is anticipated from the DfR operation as this will operate in the same working hours, with the same highway restrictions as the existing quarry, a Noise Management Plan has been included for completeness.

The waste recovery plan fee has been paid however the previous waste recovery plan that was agreed in 2022 has been submitted as part of the application, if this has changed between the previous approval to now then the fee is required.

No change to the reviewed WRP main report. However, the ESSD, HRA, noise, gas assessments have been updated

Provide evidence of a primary award that is considered suitable for bespoke deposit for recovery activities in accordance with the CIWM Operator Competence Scheme

The TCM has been changed and WAMITAB Certificates have been provided that demonstrate competence.

Provide evidence of continuing competence for the primary award you are relying on to demonstrate technical competence in accordance with the CIWM Operator Competence Scheme

If the certificates provided do not demonstrate competence to the satisfaction of the agency we will ensure that the Technically Competent Manager has these in place prior to activities beginning on site.