

From: [Westoby, Andrew](#)
To: [Mark Smedley](#); [SM-Defra-RESP-notifications \(DEFRA\)](#)
Subject: RE: EPR/MP3625SF/A001 Peace Wood Quarry - We require further information CRM:0183037
Date: 23 October 2024 14:31:00
Attachments: [image001.gif](#)
[image002.gif](#)
[image003.gif](#)
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[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

Hi Mark,

We can confirm, that is correct.

Kind regards

Andrew Westoby

Senior Permitting Officer | Waste Deposit Team

National Permitting Service

Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, NG2 5FA (SATNAV: NG2 5BR)

andrew.westoby@environment-agency.gov.uk

Telephone: 020 3025 3551

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From: Mark Smedley <mark@mpgyorks.co.uk>

Sent: 23 October 2024 14:09

To: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Cc: Westoby, Andrew <andrew.westoby@environment-agency.gov.uk>

Subject: Re: EPR/MP3625SF/A001 Peace Wood Quarry - We require further information CRM:0183037

Hi Andrew,

I've spoken with the third party that carried out the initial slope stability report, and they have asked if I can query something before they produce anything further. They analysed the existing quarry walls because, once materials are emplaced against them, regardless of the materials used etc. the stability will of course increase, and wanted to ensure stability such

that prior to, or during infilling, there was no risk of collapse. They did not consider that modelling the proposed infill would require analysis as it would follow pre-existing topography. Nevertheless, they are happy to produce a model and analysis of the proposed final slope, but just wanted to clarify that this is what is required before proceeding. If you could let us know as soon as possible that would obviously be very helpful in ensuring we meet the deadline.

Kind regards,

Mark
Mark Smedley



Senior Minerals, Waste and Environmental
Consultant

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Mob: 07936 359661

The Mineral Planning Group Ltd.

Office: 01274 884599 / 01274 884699

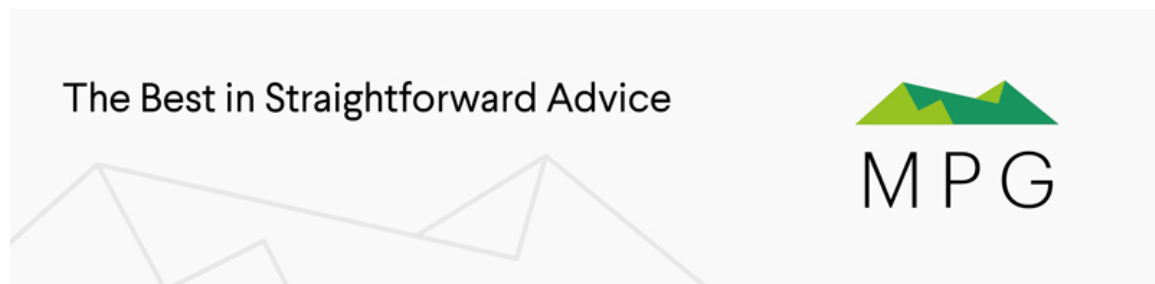
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West Yorkshire BD16 1PE



On Wed, 23 Oct 2024 at 13:33, SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk> wrote:

Dear Mark,

We need more information about your application

Application reference: EPR/MP3625SF/A001

Operator: NAYLOR INDUSTRIES PLC

Facility: Peace Wood Quarry

Thank you for your application received on 08/06/2023.

We are contacting you following an initial review of your application. Please note that your application is still on our work queue and has not yet been allocated to a Permitting Officer for determination. Once allocated, the officer will contact you to let you know.

Unfortunately, the application payment you sent is incorrect. The correct application charge is £10,448.00, this leaves a balance of £1,241.00 to pay. This is because a 1.19.5 Emission

Management Plan assessment is required.

We need to ask you for some missing information before an officer can do any more work on your application. Please provide us with more information regarding the following;

1. Topographical Survey

Information Required: Resubmit the Topographical Survey.

Reason: The applicant's list of documents says the Topographical Survey is in Part B4 – Appendix 2, 1 as drawing SQ/0922-0. However, this has not been included in the application documents.

2. Final Restored Top Surface / Profile Defined

Information Required: Provide maps, plans, drawings, and cross-sections showing the proposed final restoration profile.

Reason: Information is missing or not clear.

3. Borehole Logs

Information Required: Provide borehole logs.

Reason: Information is missing.

4. Gas Monitoring

Information Required: Review the need for in-waste gas monitoring and amend proposals accordingly

Reason: Depending on the clarifications required on waste thickness (>2m), some in-waste gas monitoring may be required.

5. Dust Emissions Management Plan

Information required: Provide a DEMP and pay associated assessment fee. Criteria of where a DEMP is required can be found in guidance [Control and monitor emissions for your environmental permit - GOV.UK](#)

Reason: Information is missing as is payment for its assessment

6. Certificate of continuing competency

Information required: Provide renewed COTC

Reason: Certificate of continuing competency expired

7. Site layout plan

Information required: Provide a site layout plan showing any infrastructure such as weighbridge and office

Reason: Information missing

8. Conceptual Site Model

Information Required: Address the following points and amend your application documents accordingly.

- Clarify the elevation levels of the base of the proposed waste deposit area.
- Clarify the thickness of the proposed wastes (maximum, minimum, average) and how those thicknesses have been calculated.
- Clarify if the waste, or a proportion of it, will be in a below water-table environment during

and/or on completion of the proposal.

- Clarify if waste will be deposited in a 'dry' environment or 'below water', and the justification of which of either of these scenarios will be present during and after the proposed waste deposition.

Reason: Information is missing or not clear.

9. Waste Acceptance Procedures

Information Required: Revise the Waste Acceptance Procedures (WAP) to meet the minimum requirements specified in Needs revision as insufficient information to show it meets the minimum requirements set out in [GOV.UK Waste acceptance procedures for deposit for recovery - GOV.UK](#). In particular, the WAP portrays a retrospective approach rather than specifics about what actual criteria, procedures, sampling and testing is proposed to be used for determining acceptance and/or rejection of wastes at the site.

Reason: Information is missing or not clear.

10. Stability Risk Assessment (SRA)

Information Required: Amend the SRA to include assessments of the proposed waste deposit and the engineering.

Reason: The SRA in the application assesses the stability of the existing quarry and not the proposed waste deposit or engineering.

11. Groundwater Quality Monitoring and Compliance limits

Information Required:

- Review and amend your groundwater monitoring suite to include sulphate, ammoniacal-nitrogen and chloride. Where appropriate, include compliance limits for these parameters;
- Review and amend your compliance limit for arsenic to reflect its current status as a Hazardous Substance;
- Review and amend your compliance limits for non-hazardous substances such as nickel;
- Assess whether or not the springs that form the head waters of the water course 'Nicholas Spring' are suitable as groundwater quality compliance monitoring points and amend your proposals accordingly;
- Provide .xls files for water quality data;
- Provide graphical plots of groundwater quality to show any key trends.

Reasons:

The groundwater quality parameter suite does not include parameters such as sulphate, ammoniacal nitrogen, or chloride which are typical indicators to the waste types.

The groundwater quality compliance monitoring limits need to be adjusted for hazardous substances such as arsenic. For example, these should be based on MRVs or maximum background concentrations (whichever is higher). Limits for non-hazardous substances such as nickel should be based on a percentage deterioration of the background groundwater quality, but which do not exceed the maximum environmental quality standard.

Further consideration of the 'Nicholas Spring' is required to determine the benefits of its inclusion in the monitoring regime.

Water quality data in electronic format is missing.

12. Groundwater Risk Assessment Modelling

Information Required: Consider the following points and review/amend your modelling accordingly.

- Arsenic has been identified as a non-hazardous pollutant, however it is hazardous and will need to comply with a minimum reporting value (MRV). Currently the modelling shows that arsenic concentrations at the receptor may exceed the MRV.
- The WFD standard for Freshwater should be considered for nickel;
- Include an assessment for sulphate;
- Assess the risks to the shallow sandstone unit adjacent to the sidewall;
- Justify the base levels of the site and the corresponding values associated with retardation factors and unsaturated zones;
- Consider whether or not a Tier 2 generic quantitative risk assessment is warranted at this site (as opposed to a Tier 1 risk screening), given the nature of the overall site setting and site conceptual model.

Please reply directly to this email with your information.

You must send us the information and payment by 06/11/2024.

Details of how to pay are given in Part F of the application form.

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, the Permitting Officer will still need to check your application when it is allocated. They'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application, we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions, please let me know.

Yours sincerely,

Andrew Westoby

Senior Permitting Officer | Waste Deposit Team
National Permitting Service

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