



REPORT

Biffa Waste Services Ltd

Eye Landfill, Eastern Extension

Multi-faceted Permit Application Ref. EA/EPR/BP3537PP/V011 for Variation and Partial Surrender - Supporting Document

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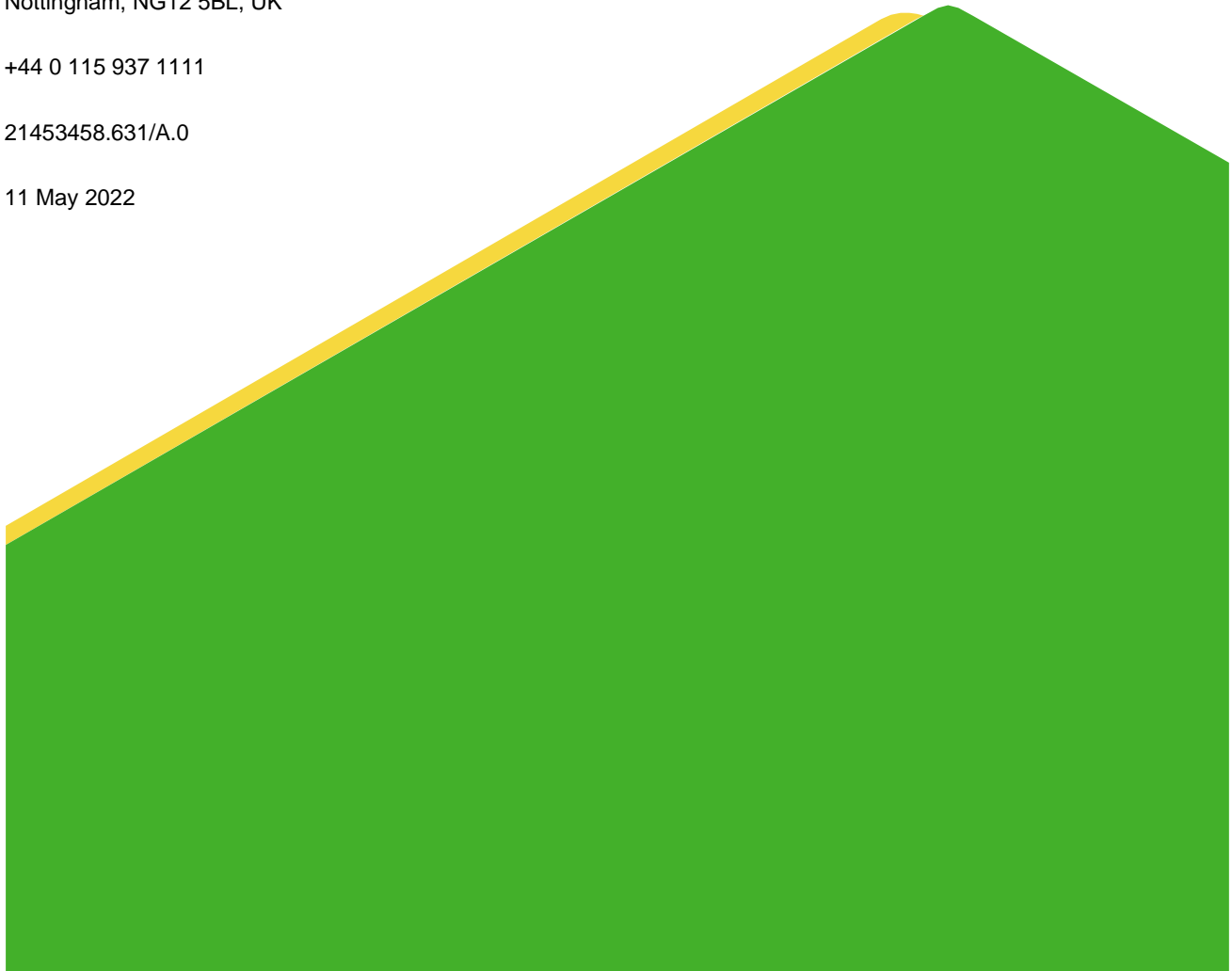
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1.0 INTRODUCTION

1.1 General

Biffa Waste Services Ltd (Biffa) has requested Golder, a member of WSP in the UK (Golder), to prepare a multi-faceted Environmental Permit application for the development of an Eastern Extension at Eye Landfill, Eyebury Road, Eye, Peterborough PE6 7TH. This application is made in accordance with enhanced pre-application advice from the Environment Agency (EA) and includes aspects of variation (extension and consolidation) and partial surrender of existing permits.

The EA has advised that it will determine this application in parallel to separate and subsequent applications to transfer inert landfill and discharge activities from PJ Thory Ltd to Biffa and to then surrender a discharge activity, in order to pursue an overall permitting plan aimed to achieve the requested permitting outcome.

1.2 Project Objectives and Description

Biffa would like to extend its existing landfill operations at Eye Landfill by the development of an Eastern Extension and is applying for planning permission and an Environmental Permit to:

- 1) Develop parts of Willow Hall Farm Quarry and Inert Landfill as a non-hazardous landfill (to be called the Eastern Extension) for continuous and uninterrupted landfilling operations after the current Southern Extension at Eye Landfill is completed.

Willow Hall Farm Quarry and Inert Landfill is located immediately to the east of Eye Landfill and is operated by PJ Thory Ltd (Thory). It is an active sand and gravel quarry which is being restored to a low level, flat lying restoration through the progressive importation of inert waste.

Biffa and Thory have agreed the feasibility of Biffa utilising void space at Willow Hall Farm Quarry and Inert Landfill for the disposal of non-hazardous waste and have been working collaboratively to this effect. Re-development as a non-hazardous waste landfill requires this application to provide a new scheme for the excavation and movement of underlying clay materials, engineered containment, excavation and relocation of inert waste already deposited, and changes to the approved phasing and restoration contours. The new landfill scheme will reduce the overall landfill footprint enabling undeveloped areas to be surrendered from the Environmental Permit. The new restoration scheme will more quickly return some areas to agriculture, enhance some areas of restoration with landscaping along the Green Wheel path, and provide an extension to Biffa's existing Wildlife Corridor.

The Eastern Extension Landfill will be accessed from Eye Landfill and so Biffa is also applying for permission to:

- 2) Replace the existing and now old Site Reception at Eye Landfill with a new Site Reception in an adjacent location. The new Site Reception will be similar and will have car park, office, welfare, weighbridge, wheelwash, car park and leachate storage tank facilities. Biffa will decommission and remove the old facilities.
- 3) Re-route the internal haul road, so it passes from the new Site Reception around the west and north of the existing Recycling Shed by re-opening an old haul route originally used in the 1980s/1990s and passes along the southern edge of the Central Area.
- 4) Create a new crossing over the Cat's Water Drain at the southeast corner of the Central Area to serve the Eastern Extension; and
- 5) Extend pipework so that infrastructure currently used for the management of leachate and landfill gas can also serve the Eastern Extension.

The proposed development is summarised as follows:

- Ongoing mineral extraction operations at Willow Hall Farm Quarry will continue and be completed by Thory to existing timescales; however, the ongoing restoration by the placement of inert waste will cease whilst Biffa's planning and Environmental Permit variation applications are determined.
- With permissions in place, Biffa proposes to commence preparation works in 2022 and landfilling in April 2023. Preparation works will include the new Site Reception and haul road. It will also include backfilling the southeast corner of Willow Hall Farm Quarry closest to residential properties with clay and completing restoration in advance of landfilling.
- Landfilling would commence in the southwestern corner and move anticlockwise and then progressively northwards. The site would receive some 3.23 Mm³ of waste (pre-settlement, pre-restoration) over the period from 2023 to 2038 followed by completion of restoration.
- Inert waste already placed by Thory at the north end of its Inert Landfill would be excavated by Biffa and re-deposited in a dedicated inert landfill area between the transmission line and the Cat's Water Drain. Inert waste would be placed to a low-level and restored to just below surrounding ground level to provide an extension to Biffa's existing Wildlife Corridor.
- Areas to the south of the Green Wheel path would not be filled with waste. Instead, Biffa would excavate Oxford Clay from the base of the quarry and place it, together with sub-soil and top soil, to a low level restoration and return it to agriculture as soon as possible after completion of mineral extraction operations by Thory. This area will be surrendered from the Environmental Permit.

1.3 Existing Environmental Permits

1.3.1 Willow Hall Farm Inert Landfill and Discharge Activity

Willow Hall Farm Inert Landfill is operated by Thory under Environmental Permit EPR/DB3007TZ for inert landfill, which was issued by the EA to TAG Industries Ltd on 4 February 2016 and transferred to Thory on 14 November 2017 (EPR/FB3204MX).

In addition, Thory holds Environmental Permit EPR/EB3091VZ for the discharge of trade effluent composed of quarry void/excavation dewatering, which was issued to TAG Industries Ltd on 10 February 2017 and transferred to Thory on 19 June 2017 (EPR/EB3091VZ/T002).

1.3.2 Eye Landfill North-eastern and Southern Extensions

The North-eastern and Southern Extensions of Eye Landfill are operated by Biffa under Environmental Permit EPR/BP/3537PP issued by the EA in 2005. The EP was last varied and consolidated by the EA in May 2018 (Variation V010). Key conditions/considerations are:

- Table S1.1 activities and directly associated activities:
 - AR1. Section 5.2 Part A(1)(a). Landfill for non-hazardous waste and landfill restoration;
 - AR2. Section 5.2 Part A(1)(a). Landfill for hazardous waste i.e. stable non-reactive hazardous waste;
 - AR3. Section 5.4 Part A(1)(a)(i). Storage and treatment of leachate via Miscanthus Beds in a facility with a capacity of >50 tonnes/day;
 - AR4. Treatment and utilisation of landfill gas;
 - AR5. Storage and pre-treatment of leachate;
 - AR6. Landfill gas flaring;

- AR7. Discharge of pre-treated leachate to sewer;
 - AR8. Discharge of site drainage;
 - AR9. Fuel storage;
 - AR10. Storage of raw materials in bulk storage containers;
 - AR11. Production and storage of waste oils;
 - AR12. Not used; and
 - AR13. D10 Deposition into or on to land.
- Table S1.5 Annual waste input limits. The Site is permitted to accept 400,000 tonnes of non-hazardous waste, 204,999 tonnes of inert waste, 20,000 tonnes of asbestos wastes and 150,000 tonnes of waste for restoration per year up to maximum total 774,999 tonnes per year.

1.4 Permitting Route and Outcomes

This multi-faceted Permit Application (EPR/BP/3537PP/V011) is submitted to vary existing Environmental Permit EPR/BP/3537PP/V010 to:

- Extend Biffa's Permit boundary around the Eastern Extension in accordance with the proposed scheme for non-hazardous waste landfill. Include assessment of financial provision for the North-eastern, Southern and Eastern Extensions.
- Consolidate Thory's Permit EPR/FB3204MX (Inert Landfill) into Biffa's Permit EPR/BP/3537PP/V011.
- Consolidate Thory's Permit EPR/EB3091VZ (Discharge Activity) into Biffa's Permit EPR/BP/3537PP/V011.
- Surrender the unused/undeveloped area to the South of the Green Wheel Path included in EPR/FB3204MX but not required by Biffa.

During determination of the above, Biffa will submit:

- A second separate application to transfer the Inert Landfill Permit from Thory to Biffa in order for the transfer to occur just prior to the determination of EPR/BP/3537PP/V011.
- A third separate application to transfer the Discharge Activity from Thory to Biffa in order for the transfer to occur just prior to determination of EPR/BP/3537PP/V011.

Once, the above has been determined, Biffa will submit:

- A fourth application to Surrender EPR/EB3091VZ (Discharge Activity) once the limits have been consolidated into EPR/BP/3537PP/V011.

2.0 APPLICATION FORMS

In accordance with Enhanced Pre-Application advice, the following forms have been completed:

- Part A: About You.
- Part C2: General - Varying a Bespoke Permit.
- Part C3: Varying a Bespoke Installations Permit.
- Part E2 – Surrender Application.
- Part F – Charges and Declarations.

The applications forms are provided at the front of this Supporting Statement. The forms are the driver behind the application, such that the EA can verify that the regulatory requirements have been met. This Supporting Statement provides responses to the relevant questions on each part of the forms and signposts to supplementary documents (such as risk assessments and management plans) provided as appendices in support of the application.

2.1 Form Part A: About You

2.1.1 Qu.5c and Appendix A: Applications from Companies or Corporate Bodies

Details of the company directors and secretary are presented in **Table 631.1**. The date of birth information for these persons (as required in Part A - Appendix A) is also presented.

Table 631.1: Details of Company Directors and Secretary

Name	Position	Date of Birth
Michael Robert Mason Topham	CEO	
Richard Neil Pike	CFO	
Sarah Parsons	Company Secretary	
Michael Charles Davis	COO	
Maxine Mayhew	COO	
Biffa Corporate Services Limited	Director	

2.2 Part C2: General – Varying a Bespoke Permit

2.2.1 Qu.1a: Pre-Application Consultation

Enhanced Pre-Application Advice was requested by Biffa and provided by the EA in October 2021 (reference EA/EPR/BP3537PP/V011). The Nature and Heritage Screening Report is provided in **Appendix ESID1** and the Pre-Application Advice letter is provided in **Appendix ESID2**.

2.2.2 Qu.2a: Type of Variation

The EA EP (England) Charging Scheme (dated August 2020) defines the different types of application based on the type of variation and the degree of assessment required. In accordance with the definitions provided in Part 1 of the Schedule to this scheme, and the advice provided during pre-application consultation, this application is considered to constitute a *substantial variation* for landfill for non-hazardous waste, a *normal variation* for landfill for inert waste and a *surrender* of unused land.

Please note that the application form only allows one box to be ticked.

2.2.3 Qu.2b: Changes or Additions to Existing Activities and Table 1

As described in Section 1.4 above, this multi-faceted Permit Application is submitted to vary existing Environmental Permit EPR/BP/3537PP/V010 to:

- Extend Biffa's Permit boundary around the Eastern Extension in accordance with the proposed scheme for non-hazardous waste landfill.

Details of proposed changes to EPR/BP5357PP/V010 are presented in **Table 631.2**.

Table 631.2: Proposed Changes to Existing Activities in Permit EPR/BP3537PP/V010

Name of Change	Permit Section Reference	Details of Proposed Change
Financial Provision	1.2.1	Updated financial provision and varied agreement.
Permit Boundary	2.2.1	Drawing ESID2
Asbestos and construction materials containing asbestos	2.7.5	Asbestos to continue to be taken in Southern Extension. No asbestos to be taken in Eastern Extension.
Quantity of waste	2.7.10	This condition refers to Southern Extension and will continue to apply. Add reference to Drawing ESID4B and Drawing ESID5 submitted with this application to also show levels in Eastern Extension.
Activities	Table S1.1	AR1 and AR13 - update to Limits of Specified Activity.
Operating Techniques	Table S1.2	Include this application for Eastern Extension.
Improvement Conditions	Table S1.3	Remove completed improvement programme requirements 1, 2 and 3.
Pre-operational measures	Table S1.4	Remove completed pre-operational measure POM1.
Annual waste input limits	Table S1.5	Add Waste for Restoration in accordance with IC2 in Table S1.3 (150,000 tonnes/year). Rename Table 'Annual waste input limits - Southern Extension'.
Annual waste input limits	Table S1.6	Add new table 'Annual waste input limits - Eastern Extension'. Reference Table 631.3 below.
List of permitted wastes	Schedule 2	No change to list of permitted wastes for Southern Extension, but list will be consolidated with that for Inert Landfill. Construction materials containing asbestos will not be accepted at the Eastern Extension. Reference Permitted Wastes, Deposit and Emplacement (21453458.639).
Leachate	Table S3.1	Addition of limits for Eastern Extension. Reference HRA (21453458.633), LMP (21453458.641) and Drawing HRA3 – MEPP.
Point source emissions to water	Table S3.3	Addition of limits from consolidation of EPR/EB3091VZ, Table S3.1. Outlet 1 in EPR/EB3091VZ to be renamed SW15.
Groundwater	Table S3.4	Addition of limits for Eastern Extension. Reference HRA (21453458.633), GWMP (21453458.640) and Drawing HRA3 – MEPP.
Landfill gas (external)	Table S3.5	Addition of limits for Eastern Extension. Reference GMP (21453458.643) and Drawing HRA3 – MEPP.
Leachate to sewer by tankering	Table S3.6	Leachate Holding Tank at Site Reception.

Name of Change	Permit Section Reference	Details of Proposed Change
Particulate matter	Table S3.7	Add additional EMPs for Eastern Extension.
Leachate (other)	Table S3.11	Changes to monitoring requirements (hazardous substances suite to also specifically include phenol, naphthalene and mecoprop). Reference HRA (21453458.633), LMP (21453458.641) and Drawing HRA3 – MEPP.

The proposed annual waste input limits for the Eastern Extension, to be inserted as Table S1.6 in the Permit, are presented in Table 631.3.

Table 631.3: Proposed Annual Waste Input Limits for the Eastern Extension

Annual waste input limits (tonnes) – Eastern Extension	
Non-hazardous waste*	400,000
Inert waste	204,999
Wastes for restoration**	250,000
Total	874,999

* Including municipal waste only accepted during Energy-from-Waste plant down-time in the region

** Only should a shortfall occur in available material within the Eastern Extension

2.2.4 Qu.2c: Consolidating (combining) or Updating Existing Permits

As described in Section 1.4 above, this multi-faceted Permit Application is submitted to also vary existing Environmental Permit EPR/BP/3537PP/V010 to:

- Consolidate Thory's Permit EPR/FB3204MX (Inert Landfill) into Biffa's Permit Environmental Permit EPR/BP/3537PP/V011; and
- Consolidate Thory's Permit EPR/EB3091VZ (Discharge Activity) into Biffa's Permit Environmental Permit EPR/BP/3537PP/V011.

2.2.5 Qu.3a: Relevant Offences

A document detailing relevant offences for Biffa Waste Services Ltd is included in **Relevant Convictions** (ref. 21453458.650).

2.2.6 Qu.3b: Technical Competence

The technically competent manager for Eye Landfill, Richard Hill, is certified through the Waste Management Industry Training and Advisory Board. His certificates are included in **Technical Competence** (ref. 21453458.647). The environmental permit numbers and site address for all other waste activities that he provides technical competence for are also included in **Technical Competence** (ref. 21453458.647).

2.2.7 Qu.3c Financial Provision

Financial provision for meeting the obligations under the existing permit are set out in the agreement between Biffa and the EA dated 9 June 2005 as varied most recently on 2 November 2017.

A copy of the Expenditure Plan updated in support of this application for the Northern Extension, Southern Extension and Eastern Extension is provided in **Expenditure Plan** (ref. 21453458.648).

2.2.8 Qu.3d: Management Systems

Biffa operates its facilities in accordance with an Environmental Management System (EMS) (called the Integrated Management System, IMS), which is certified to ISO 14001. The IMS includes a set of procedures that covers all day-to-day operations of the Site. Biffa will continue to implement the existing IMS at Eye Landfill and will include the Eastern Extension. A summary is provided, along with a copy of the certificate, in **Management Systems** (ref. 21453458.646).

Details within the management system (and its appended plans and supporting documents) may change as part of planned reviews, but Biffa will maintain an EMS and IMS that provide the framework for management of the Site. All work will be carried out as per the most recent version of the EMS and IMS.

2.2.9 Qu.5a: Site Plans

An **Environmental Setting and Installation Design** (ESID) (ref. 21453458.632) is submitted in support of this variation application.

The Eastern Extension is located in Willow Hall Farm Quarry which is distinct from the Northeastern and Southern Extensions although infrastructure and internal haul roads will be shared. For this variation application, the ESID has been prepared to describe the proposed Eastern Extension which will be engineered and managed in accordance with the principles already established at the existing Site.

This ESID report therefore updates previous ESID Reports only so far as to reflect the current *operational status* of the Site or where there is considered to be a *material change* to the conceptual model. It is not intended to fully update non-material changes or summarise aspects of engineering, construction quality assurance, environmental monitoring or annual review that are fully considered by the EA elsewhere in accordance with the Permit.

The following drawings are provided in the ESID report:

- Drawing ESID1 – Site Location Plan;
- Drawing ESID2 – Environmental Site Setting;
- Drawing ESID3 – Cultural and Natural Heritage;
- Drawing ESID4A – Site Layout and Waste Deposition;
- Drawing ESID4B – Pre-Settlement Pre-Restoration;
- Drawing ESID5 – Restoration;
- Drawing ESID6A – Installation Plan;
- Drawing ESID6B – Engineering and Containment;
- Drawing ESID7A – Leachate Management Layout;
- Drawing ESID7B – Leachate Management Details;
- Drawing ESID8 – Landfill Gas Management;
- Drawing ESID9A – Regional Geology;
- Drawing ESID10 – Regional Hydrogeology;
- Drawing ESID11 – Local Hydrogeology and Hydrology;
- Drawing ESID12 – Hydrogeological Conceptual Site Model; and
- Drawing ESID13 – Monitoring and Extraction Point Plan.

2.2.10 Qu.5b: Site Report

The variation application seeks to consolidate the existing Permit for Biffa's Eye Landfill (Northeastern and Southern Extensions) (EPR/BP3537PP/V010) with the existing permit for Thory's Willow Hall Farm Inert Landfill (EPR/FP3204MX), thereby increasing the permit boundary beyond that currently approved for Eye Landfill. As such, a site report has been produced to provide detail on the state of the land that is to be included.

A Site Condition Report was prepared for Willow Hall Farm Quarry and Inert Landfill which will become the Eastern Extension, as part of Thory's EP application (GP Planning Ltd, 2015). A copy of this, and the HRA that it references are included in **Site Condition Report** (ref. 21453458.651) of this variation application.

Further information is also provided in Section 4.0 of the ESID Report (ref. 21453458.632).

2.2.11 Qu.5c: Non-Technical Summary

A non-technical summary is provided in support of this variation application in **Non-Technical Summary** (ref. 21453458.645).

2.2.12 Qu.5f: Baseline Report

The variation application does not seek to add an installation to the existing EP; as such a baseline report is not required.

2.2.13 Qu.6: Environmental Risk Assessment

The existing Environmental Risk Assessment (ERA) has been updated to take into account the increase to the boundary in which the existing permitted activities will be extended. The risk assessment is provided in support of this variation application and provided as an appendix to the **Nuisance and Health Management Plan** (ref. 21453458.636).

2.3 Form Part C3 – Variation to a Bespoke Installation Permit

2.3.1 Qu.1: Activities to be Varied

The purpose of this variation application is set out in detail in Sections 1.2 to 1.4 above and details of the proposed activities to be varied are detailed in Section 2.2.3.

The non-hazardous waste already accepted at Biffa's Southern Extension will continue to be accepted at the Eastern Extension. The inert waste already accepted at Thory's Willow Hall Farm Inert Landfill will also continue to be accepted at the Eastern Extension.

Construction materials containing asbestos (stable non-reactive hazardous waste) will continue to be accepted at Biffa's Southern Extension but will not be taken at the Eastern Extension. No stable non-reactive hazardous waste will be accepted at the Eastern Extension.

2.3.2 Qu.2: Emissions to Air, Water and Land

Schedule 3 of EP EPR/BP3537PP/V010 gives details of existing emissions and monitoring for the Site, including monitoring locations, source, parameter, quantity and units, and includes:

- Table S3.1 Leachate level limits and monitoring requirements;
- Table S3.2 Point source emissions to air – emission limits and monitoring requirements;
- Table S3.3 Point source emissions to water (other than sewer) – emission limits and monitoring requirements;
- Table S3.4 Groundwater – emission limits and monitoring requirements;
- Table S3.5 Landfill gas in external monitoring boreholes – limits and monitoring requirements;

- Table S3.6 Point Source emissions to sewer, effluent treatment plant or by tankering or other transfer off-site – emission limits and monitoring;
- Table S3.7 Particulate matter in ambient air – monitoring requirements;
- Table S3.8 Landfill gas emissions from capped surfaces for cells that have accepted non-hazardous biodegradable waste – monitoring requirements;
- Table S3.9 Groundwater – other monitoring requirements;
- Table S3.10 Landfill gas – other monitoring requirements;
- Table S3.11 Leachate – other monitoring requirements;
- Table S3.12 Surface water – other monitoring requirements;
- Table S3.13 Process limits and monitoring requirements – Leachate; and
- Tables S3.14 Process limits and monitoring requirements – Soils.

The following reports are submitted in support of this variation application for the Eastern Extension which consider the emissions from the Site, and propose some additions and/or amendments to the Permit emission limits and monitoring requirements within the tables listed above:

- **Hydrogeological Risk Assessment** (ref. 21453458.633).
- **Landfill Gas Risk Assessment** (ref. 21453458.635).

Procedures are also in place to assess (on a qualitative basis) and record the emissions of dust, odour and noise from the Site.

2.3.3 Qu.3a, 3b: Technical Standards and General Requirements.

The following technical guidance documents will be referenced while continuing the Schedule 1 activity and Directly Associated Activities at the Site:

- “How To Comply With Your Permit” (.gov.uk website);
- “Environmental Permitting: Landfill Sector Technical Guidance” (.gov.uk website);
- “Landfill Developments: Groundwater Risk Assessment for Leachate;
- “Landfill: Monitoring Frequencies and Non-Compliance Recording” (.gov.uk website);
- LFTGN 02 Monitoring of Landfill Leachate, Groundwater and Surface Water;
- LFTGN 03 Management of Landfill Gas;
- LFTGN 04 Monitoring Trace Components in Landfill Gas;
- LFTGN 05 Monitoring Enclosed Landfill Gas Flares;
- LFTGN 07 Monitoring of Landfill Gas Surface Emissions; and
- LFTGN 08 Monitoring Landfill Gas Engine Emissions.

As part of the original PPC permit application process, Biffa was required to demonstrate that Best Available Techniques (BAT) were to be implemented to prevent, and, where this was not possible, to minimise, risks of pollution to all environmental media. As Eye Landfill has been issued with a PPC Permit and, more recently, an Environmental Permit, this indicates that Biffa has demonstrated that it is able to operate in accordance with BAT for landfill. These operational techniques will be carried forward to operation of the proposed Eastern Extension.

The objectives of this variation application are described in Section 1 above. To this end, this variation application includes the following documents presented *in addition* to those already presented for the existing site:

- **Environmental Setting and Installation Design** report (ref. 21453458.632);
- **Hydrogeological Risk Assessment** (ref. 21453458.633);
- **Stability Risk Assessment** (ref. 21453458.634);
- **Landfill Gas Risk Assessment** (ref. 21453458.635); and
- Environmental Risk Assessment (Appendix 1 to **Nuisance and Health Management Plan**, ref. 20148978.636).

The following management plans are provided:

- **Nuisance and Health Management Plan** (ref. 21453458.636);
- **Accident Management Plan** (ref. 21453458.637);
- **Dust Management Plan** (ref. 21453458.638);
- **Groundwater Management Plan** (ref. 21453458.640);
- **Leachate Management Plan** (ref. 21453458.641);
- **Surface Water Management Plan** (ref. 21453458.642); and
- **Landfill Gas Management Plan** (ref. 21453458.643).

2.3.4 Qu.3c: Types and Amounts of Raw Materials

Eye Landfill Eastern Extension is proposed to occupy part of Willow Hall Farm Quarry and Inert landfill. It is designed on the basis of material balance of site materials including top soil, sub soil and Oxford Clay.

Leachate drainage blanket materials will comprise recycled materials.

Some new raw materials will be required including gas and leachate pipework, joints and valves, borehole installation materials, concrete manholes and covers, etc. These are considered small in quantity, non-hazardous and are not individually itemised.

2.3.5 Qu. 3d: Sector Specific Information (Appendix 4)

Information required by Appendix 4 is provided below.

This variation application includes the following documents presented *in addition* to those already presented for the existing site:

- **Environmental Setting and Installation Design** report including outline engineering plan (ref. 21453458.632);
- **Hydrogeological Risk Assessment** (ref. 21453458.633);
- **Stability Risk Assessment** (ref. 21453458.634);
- **Landfill Gas Risk Assessment** (ref. 21453458.635); and

Upon disposal of the last waste to be received at the Site restoration will be completed, and the Site will enter the post operational period, as follows:

- Closure Date – the *date* at which active waste disposal operations stop (i.e. the ‘gate shuts’).
- Post-Operational Period - the *period* between the Operational Period and the Aftercare Period;
- Definitely Closed Date - the *date* at which the EA agrees that the site can enter the Aftercare Period;
- Aftercare Period - the *period* between Definitely Closed Date and permit Surrender Date; and
- Surrender Date - the *date* at which EA accepts that the site no longer presents a risk to the environment and the Permit is handed back.

During the Post-Operational period, environmental monitoring will continue in accordance with the Permit and during the Aftercare Period, environmental monitoring will continue in accordance with a Closure Plan.

Some infrastructure *may* be dismantled soon after completion of active landfilling operations e.g. offices. The landfill gas utilisation plant will be decommissioned after the Gas Cessation Year, i.e. the last year that landfill gas will be available in sufficient quantity and quality to continue to utilise the gas for the generation of electricity. The flare will be decommissioned after the End of Flaring Date, i.e. the last year that landfill gas will be available in sufficient quantity and quality to continue to flare. Leachate management systems will be decommissioned and dismantled after Permit Surrender, or when a Surrender Report and risk assessment has identified that these do not need to continue.

A method statement for the decommissioning of the landfill gas extraction system, the landfill gas utilisation plant, leachate treatment systems, leachate extraction systems and any repair of penetrations through the landfill cap will be submitted to the Agency for approval prior to the works being carried out.

At this stage, it is envisaged that all the components of the gas and leachate extraction systems below the landfill cap will be left in the waste. All headworks, pipework, manifold chambers etc. above the capping system will be removed, as required, as part of the decommissioning such that they do not interfere with the Restoration Plan.

Wells within the waste are subject to damage due to waste settlement and all infrastructure will have a finite operational life due to material decay or attack by external processes. Irrespective of this, all infrastructure which is required during the post closure period to prevent a significant adverse impact upon the environment will be maintained and replaced as necessary.

2.3.6 Qu.4: Monitoring

The emissions and monitoring for the existing Site are included in Schedule 3 of EP EPR/BP3537PP/V010. The changes required to the monitoring schedule as part of this variation are detailed in Section 2.3.2.

No changes are proposed to the existing landfill gas utilisation plant and flare.

2.3.7 Qu.5a: Environmental Impact Assessment

On 22 April 2022, Biffa submitted a full planning application to Peterborough City Council (PCC), including an Environmental Statement, to develop the existing operations as described in Section 1.2, above.

The application is subject to validation by PCC and no reference number has yet been provided. The Application and Environmental Statement will be available from the PCC planning portal.

2.3.8 Qu.6: Resource Efficiency and Climate Change

The existing landfill gas utilisation plant and flare serves the whole of Eye Landfill and the Eastern Extension will be connected to this system; however, no changes are proposed to the existing landfill gas utilisation plant and flare.

2.4 Form Part E2 – Surrender Application

2.4.1 Qu.1a: Pre-application Consultation

Please refer to Section 2.2.1.

2.4.2 Qu.2a and 2b: Low Risk Surrender

In enhanced pre-application advice, the EA identifies:

- The Environment Agency's Area Regulatory Team must agree the type of surrender. If the land can be confirmed as unused i.e. no activities have taken place, then a standard fee of £770 will be required.
- Part 2 Application Charges, Section 9(7)(b), Charge for surrender of unused land - £770.

In accordance with the guidance, this surrender application is proposed as a low-risk surrender application as follows:

- A 'low risk' surrender application is where you are applying to surrender a permit for an activity where the evidence burden to demonstrate that the site is in a satisfactory condition is small or non-existent. This will include permits where the operation never started.
- Low risk landfill surrender will include an intrusive investigation. If the EA confirms that the criteria for low-risk landfill surrender are met, a different reduced fee will apply.
- If the EA confirms that the facility you wish to surrender is low risk because operations have not started and the EA does not have to carry out an intrusive investigation, a different reduced fee will apply.

The area to the south of the Green Wheel path, at the southern end of the site, has not yet been developed for either quarry or inert landfill activities. Inert waste already deposited at the site is at the north end of the site. The area to be surrendered remains in agricultural use as described in the Statement of Site Condition within the **Environmental Setting and Installation Design** report (ref. 21453458.632).

2.4.3 Qu. 3a: Parts of Permit you want to Surrender

The area to the south of the Green Wheel path is subject to partial surrender in this application. It is shown in the key as 'Partial Surrender from EPR/FB3204MX (Inert Landfill)' on **Drawing ESID2 – Environmental Site Setting**.

The area to be retained within the Permit is also shown on **Drawing ESID2 – Environmental Site Setting**, shown in the key as 'Proposed Biffa Environmental Permit Boundary EPR/BP3537PP/V011'.

2.4.4 Qu. 4a: Site Report

A Site Condition Report was prepared for Willow Hall Farm Inert Landfill which includes the area proposed for surrender, as part of Thory's EP application (GP Planning Ltd, 2015). A copy of this, and the HRA that it references are included in the **Site Condition Report** (ref. 21453458.651) of this variation application.

Further information is also provided in Section 4.0 of the **Environmental Setting and Installation Design** report (ref. 21453458.632).

2.4.5 Qu. 4b: Pollution Risks

The area to be surrendered was in agricultural use at the outset, remains in agricultural use, and is otherwise undisturbed to date. No plant machinery, equipment or activities that are sources of pollution risk have been introduced into this area during the lifetime of the Permit.

No mineral extraction has taken place south of the Green Wheel Path. Thory will continue mineral extraction operations in accordance with existing planning permission. The Area will be restored with natural Oxford Clay, overburden and top soil materials in accordance with the revised scheme and current application for planning permission.

No landfilling for inert waste has taken place south of the Green Wheel Path.

2.5 Form Part F1 – Charges and Declarations

Fees and charges were advised by the Environment Agency in its enhanced pre-application advice. Since then, the charging scheme have been withdrawn (1 April 2022) and revised (Charging Scheme 2022, version 1.0), as follows:

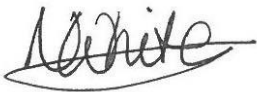
Table 631.4: Charging Scheme Comparison

Item (from EA's enhanced pre-application advice)	Reference (Withdrawn 1 April 2022)	Charge (£)	Reference (2022)	Charge (£)
Section 5.2 – landfill for non-hazardous waste with a separate cell for stable non-hazardous waste, asbestos or gypsum; including assessment of odour management plan (substantial variation)	1.17.1	20,637	1.17.1	20,637
Landfill for inert waste (normal variation – consolidation fee)	1.17.7	6,602	1.17.7	6,602
Surrender of Unused Land	Part 2 9(7)(b)	770	Part 2 9(6)(e)	770
Habitats Assessment	1.19.2	779	1.19.2	779
Pest Management Plan	1.19.4	1,241	1.19.4	1,241
Emissions Management Plan	1.19.5		1.19.5	1,241
Noise Management plan	1.19.7	1,246	1.19.7	1,246
Dust and bioaerosol Management Plan	1.19.9	620	1.19.9	620
Total				33,136

Payment has been made by BACS, ref: PSCAPPBIFFA002 dated 25 May 2022.

Signature Page

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