



Clockhouse Quarry Restoration Environmental Permit Application

Non-Technical Summary

SUEZ Recycling and Recovery UK Limited

Prepared by:

SLR Consulting Limited

Treenwood House, Rowden Lane, Bradford on Avon,
BA15 2AU

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Basis of Report

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1.0 Introduction

1.1 Overview

SUEZ Recycling and Recovery UK Limited (SUEZ) has instructed SLR Consulting Limited (SLR) to prepare a deposit for recovery Environmental Permit (EP) application. The application seeks approval for the use of suitable waste in the restoration of Clockhouse Quarry (the Site), located at Horsham Road, Capel, Surrey, RH5 5JL, as a deposit for recovery operation under the Environmental Permitting (England and Wales) Regulations 2016.

This Non-Technical Summary (NTS) provides a summary of the regulated facilities, an explanation of exactly what is being applied for, and a summary of the key technical standards and control measures that will be implemented at the site.

To support this application, the following documentation is submitted in addition to this NTS:

- **Section 2:** Environment Agency (EA) Application Forms (Parts A, B2, B4, B6 and F1) and supporting documentation including WAMITAB Certificates and Certificates of Continuing Competence;
- **Section 3:** Drawings;
- **Section 4:** Waste Recovery Plan (WRP) and EA Approval Letter;
- **Section 5:** Environmental Setting and Site Design (ESSD) Report;
- **Section 6:** Environmental Risk Assessment (ERA);
- **Section 7:** Stability Risk Assessment (SRA);
- **Section 8:** Dust Emissions Management Plan (DEMP);
- **Section 9:** Hydrogeological Risk Assessment (HRA);
- **Section 10:** Operating Techniques (OT);
- **Section 11:** Noise Impact Assessment (NIA), including Noise Management Plan (NMP);
- **Section 12:** Site Condition Report (SCR); and
- **Section 13:** Point Source Emission Supporting Document.

1.2 The Site

Clockhouse Quarry is a former clay pit associated with the dormant Clockhouse Brickworks covering approximately 26.4 hectares (ha) and can be subdivided into three distinct areas referred to as Area 1, Area 2 and Area 3. The location of each of these areas is shown on Figure 1-1 and a description of each is provided as follows:

- **Area 1:** The south-western area includes a closed landfill the subject of Environmental Permit (EP) reference EPR/CP3994HB (EAWML 19674) operated by SITA (now SUEZ Recycling and Recovery Surrey Ltd) under planning permission MO98/1448. The landfill ceased accepting waste in 2004 with the expiry of the planning permission time limit. Restoration was completed in 2008 in accordance with the requirements of planning permission MO98/1448;
- **Area 2:** The south-eastern area and to the east of Area 1 has been quarried and, although included within the expired planning permission MO98/1448 and its restoration landform design, landfilling operations never progressed into Area 2 so it



remains unrestored and unable to achieve the intended restoration landform due to expiry of the landfill planning permission. Area 2 has historically been partially infilled with quarry overburden. A lower level restoration design has recently been agreed with the planning authority under permission MO/2023/0789; and

- **Area 3:** The northern area, directly north of Area 2 and east of the brickworks has been quarried and is an unrestored flooded quarry void. Mineral permission MO02/1072 includes an outstanding requirement to restore and the restoration design has recently been agreed with the planning authority under permission MO/2023/0789.

This EP application relates to Areas 2 and 3 only. The Site's location is illustrated on Drawing 001, and the EP Boundary and Site Layout on Drawing 002.

Figure 1-1 Clockhouse Quarry - Location and Areas



The Site is situated approximately 1400m south of the village of Capel and approximately 10km west of Crawley. The total area of the site to be restored measures approximately 12 hectares. The Site is accessed off Horsham Road (A24) which runs to the west of the site. The National Grid Reference (NGR) for the centred site is TQ 17541 38620.



The majority of the land surrounding the Site is characterised by open/agricultural land. The site is situated within the Clock House Brickworks Site of Special Scientific Interest (SSSI) which extends to the north, and south. The Site is designated as it shows beds in the lower part of the Weald Clay Group, stratigraphically above the strata seen at the GCR SIL at Warnham. Auclaye SSSI is located approximately 610m to the west of the site. The closest residential properties lie approximately 80m to the east.

The surrounding land uses and local receptors within 1km and the ecological, cultural and natural heritage receptors within 2km are identified on Drawing 003.

Table 1-1: Surrounding Land Uses

Boundary	Description
North	Fields and open/agricultural land followed by Rusper Road, and Clark's Green. Clockhouse Brickworks located to northwest.
East	Rusper Road lies immediately to the east followed by open/agricultural land and individual residential properties. Individual commercial/industrial properties including RMV Heating & Plumbing Dorking, and Surrey Hills Bikes – Servicing and Coaching also lie in this direction.
South	Fields and open/agricultural land, the railway line and Ridge Farm.
West	The previously infilled Area 1 of Clockhouse Quarry, and Clockhouse Brickworks followed by the Horsham Road (A24) and the railway line. Beyond this lies open/agricultural land and residential properties.



2.0 Waste Recovery – Environmental Permit Application

2.1 Overview

A planning application for “*the importation of inert materials and soils (waste or non waste) to facilitate the restoration of the quarry workings*” reference (2022/0191) was submitted to SCC in December 2022 and was approved with the issuing of permission MO/2023/0789 on 17 June 2025.

The EP application seeks to authorise the use of suitable imported waste materials, in the restoration of the Site as a waste recovery operation. Approximately 686,000m³ of suitable waste will be required for the restoration.

This will raise the base of the quarry to facilitate a low-level restoration of the mineral workings. The Site will be restored to a mixture of grassland and woodland with a series of attenuation ponds.

The proposed restoration scheme is illustrated on Drawing CH3/1 Landscape Strategy. Cross Sections are shown on Drawing Clh-INF-1223-02.

In accordance with condition 4 of the planning permission MO/2023/0789, infilling activities are expected to take 14 years.

A Waste Recovery Plan (WRP) has been prepared for the activity and was approved by the EA on 12 September 2025. The WRP, supporting documentation and a copy of the EA's approval letter is provided as **Section 4** of the EP application. There have been no changes to proposals since the approval of the WRP.

2.2 Waste Types and Quantities

Only suitable waste material will be used in the restoration of the site. The clean, suitable waste types will come from multiple sources and will consist of materials such as soils, and overburden recovered from local construction projects. The site will accept up to 686,000m³ of waste for restoration purposes, which equates to approximately 1,234,000 tonnes of waste at an assumed density of 1.8 t/m³. The Site will accept up to 500,000 tonnes per annum (tpa) for the purposes of waste recovery.

The waste types which will be used for the development have historically been accepted by the EA as being potentially suitable for recovery (and are listed in the EA's “*Check if Your Waste is Suitable for Deposit for Recovery*” Guidance¹).

All waste accepted will be suitable for the activity, and no contaminated materials will be accepted. Documentation will accompany all waste material accepted, which will be reviewed in accordance with the site's waste pre-acceptance and acceptance procedures, included within the Operating Techniques (OT) document, to ensure any materials used are suitable for use in the restoration operations.

The waste categories which will be accepted, and for what purpose are detailed in the following tables:

- Table 2-1 which lists waste types to be deposited below the water table;
- Table 2-2 which lists waste types to be used as general fill; and
- Table 2-3 which lists waste types for the restoration layer.

¹ [Check if your waste is suitable for deposit for recovery - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/check-if-your-waste-is-suitable-for-deposit-for-recovery)



Table 2-1 Wastes to be accepted for below the water table

Waste Code	Description	Comments
01	Wastes resulting from exploration mining, quarrying and physical and chemical treatment of minerals	
01 01	wastes from mineral excavation	
01 01 02	wastes from mineral non-metalliferous excavation	Restricted to waste overburden and interburden only.
01 04	wastes from physical and chemical processing of non-metalliferous minerals	
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07	
01 04 09	waste sand and clays	
17	Construction and demolition wastes (including excavated soil from contaminated sites)	
17 01	concrete, bricks, tiles and ceramics	
17 01 01	concrete	low contents of other types of materials (like metals, plastic, soil, organics, wood, rubber, etc). The origin of the waste must be known.
17 01 02	bricks	
17 01 03	tiles and ceramics	
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil	
17 05 04	soil and stones other than those mentioned in 17 05 03	To exclude topsoil and peat. To exclude soils and stones from contaminated sites.
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions	
20 02	garden and park wastes (including cemetery waste)	
20 02 02	soil and stones	To exclude topsoil and peat.

Table 2-2 Wastes to be accepted for General Fill

Waste Code	Description	Comments
01	Wastes resulting from exploration mining, quarrying and physical and chemical treatment of minerals	
01 01	wastes from mineral excavation	
01 01 02	wastes from mineral non-metalliferous excavation	Restricted to waste overburden and interburden only.
01 04	wastes from physical and chemical processing of non-metalliferous minerals	
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07	



Waste Code	Description	Comments
01 04 09	waste sand and clays	
10	Wastes from thermal processes	
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products	
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)	
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them	
10 13 14	waste concrete and concrete sludge	
17	Construction and demolition wastes (including excavated soil from contaminated sites)	
17 01	concrete, bricks, tiles and ceramics	
17 01 01	concrete	low contents of other types of materials (like metals, plastic, soil, organics, wood, rubber, etc). The origin of the waste must be known.
17 01 02	bricks	
17 01 03	tiles and ceramics	
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	
17 03	bituminous mixtures	
17 03 02	bituminous mixtures other than those mentioned in 17 03 01	Road plannings only. This material will only be used for the creation of the access track (if required).
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil	
17 05 04	soil and stones other than those mentioned in 17 05 03	To exclude topsoil and peat. To exclude soils and stones from contaminated sites.
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use	
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 09	minerals (for example sand, stones)	Restricted to wastes from treatment of waste aggregates that are otherwise naturally occurring minerals. Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.



Waste Code	Description	Comments
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions	
20 02	garden and park wastes (including cemetery waste)	
20 02 02	soil and stones	To exclude topsoil and peat.

Table 2-3 Wastes to be accepted for the Restoration Layer

Waste Code	Description	Comments
01	Wastes resulting from exploration mining, quarrying and physical and chemical treatment of minerals	
01 01	wastes from mineral excavation	
01 01 02	wastes from mineral non-metalliferous excavation	Restricted to waste overburden only.
02	Waste from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing	
02 04	wastes from sugar processing	
02 04 01	soil from cleaning and washing beet	
17	Construction and demolition wastes (including excavated soil from contaminated sites)	
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil	
17 05 04	soil and stones other than those mentioned in 17 05 03	To exclude soils and stones from contaminated sites. Topsoil and peat will only be used in the top 50cm of the restoration layer.
17 05 06	dredging spoil other than those mentioned in 17 05 05	
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use	
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified	
19 12 09	minerals (for example sand, stones)	Restricted to wastes from treatment of waste aggregates that are otherwise naturally occurring minerals. Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.



Waste Code	Description	Comments
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions	
20 02	garden and park wastes (including cemetery waste)	
20 02 02	soil and stones	Topsoil and peat will only be used in the top 50cm of the restoration layer.

Strict Waste Acceptance Procedures (WAP) will be implemented at the Site to ensure that only uncontaminated materials that are suitable for the recovery operation. Procedures will be in place to inspect imported materials at the weighbridge as they enter the Site, and again when the materials are tipped in the restoration.

2.3 Site Engineering

The Site will be developed as detailed within the WRP and in accordance with the associated gained planning permission. Additional engineering details are included in the ESSD for the Site.

The waste activities will be supervised by technically competent persons who hold the necessary Certificate of Technical Competence (CoTC) under the Waste Management Industry Training and Advisory Board (WAMITAB).

The operations and activities to be carried out will be managed and operated in accordance with the OT document included as **Section 10** of this EP application.

Consequently, operational procedures for the management of the site will ensure that all appropriate pollution prevention and control techniques are delivered reliably and on an integrated basis. The OT assists in maintaining compliance with regulatory requirements and managing environmental impacts.

Restoration operations will be conducted in accordance with an approved method statement and risk assessment, to ensure that the work is carried out to an appropriate standard and in accordance with the requirements set out by the Environmental Permit and Conditions 41 and 42 of the Planning Permission.

This will set out requirements for:

- Material acceptance testing and classification;
- Requirements for placement trials;
- Material placement and compaction requirements (method or end product placement);
- Requirements for in-situ testing during and following placement of materials;
- Procedures to be followed where materials or compaction are deemed not to have met the specification; and
- Requirements for any monitoring of the compaction/engineering works.

There is no basal or sidewall geological barrier proposed. There is no requirement for an engineered cap due to the inherently inert nature of the infill materials.



2.4 Environmental Monitoring

The monitoring of groundwater quality around the perimeter of the Site will be carried out using the network of monitoring boreholes as detailed within the Hydrogeological Risk Assessment (HRA).

One surface water monitoring location exists on site, identified as “OUTLET AND SAMPLE POINT”, regulated by an existing discharge permit operated by Forterra Building Products Ltd., for which SUEZ has an agreement in place to discharge waters collected within the mineral void. As part of this EP application, SUEZ is currently seeking to regulate the discharge of future waters from the site. SUEZ propose to retain the discharge location within the EP, identifying it as “SD1”.

The proposed monitoring schedule for groundwater and surface water is outlined in the HRA (Ref: 402.065294.00001/HRA) and ESSD (Ref: 402.065294.00001/ESSD) prepared for this EP application and included in **Sections 9 and 6** respectively.

Daily monitoring will also be undertaken for amenity issues such as noise and dust, in accordance with the OT Document included as **Section 10** of this EP application.

2.5 Specified Waste Management Activities

The specified waste management activities that will be carried out at the site as part of the waste recovery operations are as follows:

- **R3:** Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)
- **R5:** Recycling / reclamation of inorganic compounds – for the use of waste for the purpose of restoration of land.
- **R10:** Land treatment resulting in benefit to agriculture or ecological improvement
- **R13:** Storage of waste pending any of the operations numbered R3 or R5

2.6 Discharge to Surface Water

In addition to the deposit for recovery and crushing/screening activities, the EP application seeks to permit the discharge of surface water run-off to a tributary of Fylls Brook. The discharge will contain conditions that replicate the conditions an existing discharge consent held by Forterra Building Products Ltd (‘Forterra’). SUEZ has an agreement with Forterra to use the discharge permit for the removal of collected runoff waters from the quarry void. However, it is recognised that operating under another company’s discharge permit is not conducive to SUEZ’s long-term operation and management of the site. SUEZ therefore seek to permit the discharge of surface water as part of the EP application which replicates the conditions outlined in permit P12567/V002.

A “Clockhouse Quarry – Point Source Emission Supporting Document” has been prepared to the support the application and is provided as **Section 13**.

2.7 Crushing and screening

The EP application is for the deposit for recovery to land. It is however noted that there is a requirement onsite to occasionally undertake crushing and screening of minimal volumes of waste in order to make some accepted wastes more suitable for use (e.g. for use in the restoration layer). As such, it is considered necessary to included crushing and screening under the EP. Crushing and screening will be undertaken in the working phase and plant will be kept away from surrounding receptors.



3.0 Application Contents

3.1 Application Fee

This application is for a new bespoke EP to allow the use of waste in the restoration of the site as a waste recovery operation. This EP application includes several components to which the EA application charges apply.

Therefore, under the EA's Environmental Permitting and Abstraction Licensing (England) Charging Scheme 2022, the fee for this EP application is as follows:

- Application for a new bespoke permit for the deposit for recovery, Table 1.17.9 of the charging scheme: **£9,207**;
- Physical treatment (screening and crushing): Table 1.16.12 of the charging scheme (£7,930, but reduced by 50% due to activities being "*reasonably associated with each other*")- **£3,965**;
- Dust and Emissions Management Plan, Table 1.19.5 of the charging scheme: **£1,241**;
- Noise Management Plan, Table 1.19.7 of the charging scheme: **£1,246**;
- Habitats Assessment, Table 1.19.2 of the charging scheme: **£779**; and
- Water discharge, Table 1.3.12 ("*Trade effluent and/or non-sewage effluent and/or rainfall related discharges to surface water or groundwater with a volume greater than 5m³ a day*") of the charging scheme: **£7,829**

Therefore, the total application fee will be: **£24,267**.

3.2 Application Forms

Parts A, B2, B4, B6 and F1 of the EA's application forms have been completed. The forms are accompanied by the following additional information:

- Appendix A: List of Directors and Directors DOB; and
- Appendix B: WAMITAB Certificates and Certificates of Continuing Competence

The application forms are included in **Section 2** of this EP application.

3.3 Drawings

The drawings listed in Table 3-1 are included in this EP application.

Table 3-1 Application Drawings

Title	Drawing Ref.	Dated	Produced for
Site Location Plan	001	September 2024	EP Application
Environmental Permit Boundary and Layout Plan	002	December 2025	EP Application
Local Receptors	003	September 2024	EP Application
Natural and Cultural Heritage	004	-	EP Application
Hydrogeological Conceptual Model	003	August 2025	EP Application – HRA
Restoration Scheme	002	November 2023	EP Application – HRA



Title	Drawing Ref.	Dated	Produced for
Restoration Phasing	DR-0200	October 2025	Phasing
Surface Water Management Diagram	DR-0300 (Version S4-P3)	October 2025	Surface Water Management Plan
Site Location Plan	CH2/1 Rev0	November 2022	Planning Application – MO/2023/0789
Site Plan	CH2/2 Rev1	November 2023	Planning Application – MO/2023/0789
Landscape Strategy Sheet 1 of 2	CH3/1 Rev P09	September 2024	Planning Application – MO/2023/0789
Landscape Strategy Sheet 2 of 2	CH3/1 Rev P01	November 2023	Planning Application – MO/2023/0789
Section A-A Proposed Ponds	CH3/2 Rev P03	14 November 2023	Planning Application – MO/2023/0789
Section B-B At 15 Years Post Planting	CH3/3 Rev P04	31 October 2023	Planning Application – MO/2023/0789
Section C-C At 15 Years Post Planting	CH3/4 Rev P04	October 2023	Planning Application – MO/2023/0789
Section D-D Typical Section through Proposed Access Route	CH 3/5 Rev P02	14 December 2022	Planning Application – MO/2023/0789
Section E-E at 15 Years Post Planting	CH 3/6 Rev P03	14 November 2023	Planning Application – MO/2023/0789
Proposed Site Reception Area	CH 3/7 Rev P02	February 2023	Planning Application – MO/2023/0789
Heatmap for Infill Area	CIh-HMAP-1123-01	November 2023	Planning Application – MO/2023/0789
Proposed Infill Contours	CIh-INF-1223-01a Rev A	July 2024	Planning Application – MO/2023/0789
Sections Showing Proposed Infill Levels	CIh-INF-1223-02	December 2023	Planning Application – MO/2023/0789
Isopachyte Between Sept 2022 Survey & Proposed Infill Contours	CIh-ISO-0824-01	August 2024	Planning Application – MO/2023/0789
Capel Landfill & Clockhouse Quarry – Worked Out Areas	CIh-WOA-1122	November 2022	Planning Application – MO/2023/0789
The Capel Quarry Site Plan	CLK-QREST-0521-02	May 2021	Planning Application – MO/2023/0789

The drawings are included in **Section 3** of this EP application.



3.4 Waste Recovery Plan

A Waste Recovery Plan has been prepared in accordance with the specific requirements laid down in the EA guidance on Waste Recovery Plans and Permits (EA Waste Recovery Guidance)² to evidence that the proposed activity satisfies all principles of recovery. The WRP, alongside supporting information “*Further information on use of waste to create a soil profile/restoration layer*”, was approved on 12 September 2025.

The WRP (reference: 331201414R1i2), supporting information and EA Approval Letter is included in **Section 4** of this EP application.

3.5 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) has been carried out to assess the environmental risk posed by the waste operation on the Site. The assessment has been carried out in accordance with the EA’s Environmental Risk Assessment technical guidance dated January 2025³.

The aim of the assessment is to identify any significant risks and demonstrate that the risk of pollution or harm will be acceptable by taking the appropriate measures to manage these risks.

Operational procedures at the site have been developed to monitor and manage amenity risks from the proposed activities and include provision for the monitoring of scavenging birds, vermin, insects, litter, mud on roads, dust, odour and noise. The potential impact of the proposed development on surrounding human and environmental receptors is assessed in the risk assessment and the receptors illustrated on Drawing 03.

Subject to the implementation of management measures, the conclusion of the assessment is that the proposed activities are unlikely to result in a significant risk to the amenities of the local environment.

The ERA (reference: 402.065294.00001/ERA) is included in **Section 5** of this EP application.

3.6 Environmental Setting and Site Design Report

An Environmental Setting and Site Design Report (ESSD) report has been prepared in support of this EP application. The ESSD defines the site’s conceptual model including the potential source, pathway and receptor linkages. It provides details on the site’s environmental setting, and the proposed design of the site.

The ESSD report has been written in reference to EA guidance⁴ relating to disposal by landfill of inert waste.

The ESSD (reference: 402.065294.00001/ESSD) is included in **Section 6** of this EP application.

The ESSD should be read in conjunction with the Monitoring Management Plan (MMP) and Operational Surface Water Management Plan (SWMP) prepared by SUEZ.

² Guidance: Waste recovery plans and permits; gov.uk; published 18th October 2016.

³ EA Website – Environmental Risk Assessments, <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>, dated 3 January 2025

⁴ Landfills for inert waste - Landfill operators: environmental permits - Guidance - GOV.UK (www.gov.uk)



3.7 Stability Risk Assessment

As part of the EP application, SLR has undertaken a geotechnical Stability Risk Assessment (SRA). This document describes the manner in which the assessment has been carried out and presents the overall findings of the work.

The methodology adopted for the SRA generally follows the principles outlined in the EA R&D Technical Report P-385, volumes TR1 and TR2⁵. Where additional analytical techniques have been used, these are described within the text.

The SRA (reference: 402.065294.00001/SRA) is included in **Section 7** of this EP application.

3.8 Dust and Emissions Management Plan

The EA's guidance⁶ requires that all facilities for the '*recovery of household, commercial or industrial waste by deposit for recovery*' and are located '*within 500m of a sensitive receptor such as a home*', need a Dust and Emissions Management Plan (DEMP) to be prepared in support of an EP application.

It is recognised that waste activities on the Site could lead to the release of fugitive emissions of dust particles and therefore a DEMP (reference: 402.065294.00001/DEMP) has been prepared and is included in **Section 8** of this EP application.

The DEMP will be incorporated into the Site procedures and will be revised as necessary to ensure that it remains appropriate to the activities occurring on site and that any changes in conditions relating to dust management are dealt with as part of those revisions. In particular, the monitoring procedures and compliance actions will be updated as required by the procedures within the DEMP.

3.9 Hydrogeological Risk Assessment

SLR has undertaken a Hydrogeological Risk Assessment (HRA) to assess the risk to surface water and groundwater.

The HRA provides an assessment of the hydrogeological conceptual site model, which has been developed based upon the proposed landfill engineering and environmental site setting detailed within the associated ESSD submitted with this EP application. The HRA provides the following:

- Review of detailed site information, including geology, hydrology and hydrogeology;
- The hydrogeological conceptual site model;
- Associated HRA; and
- Requisite surveillance including surface water and groundwater monitoring requirements.

The HRA modelling results demonstrated that the proposed importation of suitable waste at the site will remain compliant with the Environmental Permitting Regulations 2016 (as amended). The Site should comply with the relevant requirements of Schedule 10 and Schedule 22 (Groundwater Activities) of the Environmental Permitting Regulations 2016 (as amended).

⁵ Environment Agency R&D Technical Report P1-385/ TR1 and TR2, 'Stability of Landfill Liner Systems', March 2003.

⁶ [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit)



The HRA (reference: 402.065294.00001/HRA) is included in **Section 9** of this EP application.

3.10 Operating Techniques

The site will be operated in accordance with the OT document. This document sets out best practice for operating the Site, based on legislation and best available techniques in the industry. SUEZ will also operate its own ISO14001 accredited management system.

The management system and OT will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system and the OT;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The OT (reference: 402.065294.00001/OT) is included in **Section 10** of this EP application.

3.10.1 Waste Acceptance Procedure

The purpose of the Waste Acceptance Procedure (WAP) is to ensure that the Site only accepts waste that is:

- Suitable for the activity;
- Allowed by the EP; and
- Appropriately considered by the ERA.

The WAP will also assist with:

- Ensuring the activities do not cause pollution;
- The waste sourcing decision making process; and
- Preventing the receipt of non-permitted wastes.

The WAP is included as part of the OT in **Section 10** of this application.

3.11 Noise Impact Assessment & Noise Management Plan

The EA's Guidance⁷ requires the submission of a Noise Impact Assessment (NIA) if:

- *"You will be doing any noisy operations such as loading, or unloading, shredding, shearing, grinding, combustion, using trommels conveyors or moving bulk materials; and*
- *Your activities are not contained within buildings."*

It is recognised that the proposed activities on the Site could lead to noise emissions, therefore a NIA and Noise Management Plan (reference: 402.065294.00001/NIAMP) have been prepared and is included in **Section 11** of this EP application.

⁷ Risk assessments for your environmental permit - GOV.UK (www.gov.uk)



3.12 Site Condition Report

A Site Condition Report (SCR) has been completed only for the area of the Site which is not subject to the permanent deposit for recovery i.e. the access road. The report has considered the existing status of the proposed permitted area and describes the measures that will be used to ensure that there is no deterioration of the land throughout the life of the EP. The SCR is enclosed as **Section 12** of the application.

3.13 Point Source Emission Supporting Document

A document titled “Clockhouse Quarry – Point Source Emission Supporting Document” has been prepared as part of the EP application.

A discharge permit (P12567/V002) is presently held for the site in the name of Forterra Building Products Ltd. (‘Forterra’), who operate a brickworks onsite. SUEZ has an agreement with Forterra to use the discharge permit for the removal of collected runoff waters from the quarry void. However, it is recognised that operating under another company’s discharge permit is not conducive to SUEZ’s long-term operation and management of the site. SUEZ therefore seek to permit the discharge of surface water as a point source emission as part of the EP application which replicates the conditions outlined in permit P12567/V002.

As the pumped discharged waters are anticipated to entirely comprise clean rainwater, it is considered that a H1 assessment is not necessary to support the application. Further, the proposed discharge will act as a continuation of the existing discharge permit and it is not proposed that the rate of discharge would be increased, nor would it exceed the greenfield runoff rate. No further assessment of the risk to down-gradient flows is considered to be required beyond the Flood Risk Assessment⁸ completed to support the site’s planning application.

A copy of the Point Source Emission Supporting Document is provided as **Section 13** of the EP application.

This should be read in conjunction with the HRA, included as Section 9 of this submission.

⁸ SLR Consulting Ltd., Clockhouse Quarry Restoration – Technical Appendix 9/1: Flood Risk Assessment and Surface Water Drainage Strategy, November 2023. SLR Ref. No: 403.064433.00001



4.0 Management System and Operating Techniques

The key technical standards laid out in the following documents govern the design and operation of the site:

- Environmental Permitting Regulations: Inert Waste Guidance. Standards and Measures for the Deposit of Inert Waste on Land;
- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- Risk assessments for your environmental permit, EA website, updated 3rd January 2025;
- Environment Agency Guidance on Monitoring of Landfill Leachate, Groundwater and Surface Water; and
- Developing a management system: environmental permits.

The site will be managed and operated in accordance with SUEZ's ISO14001 accredited management system and the OT.

The management system will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

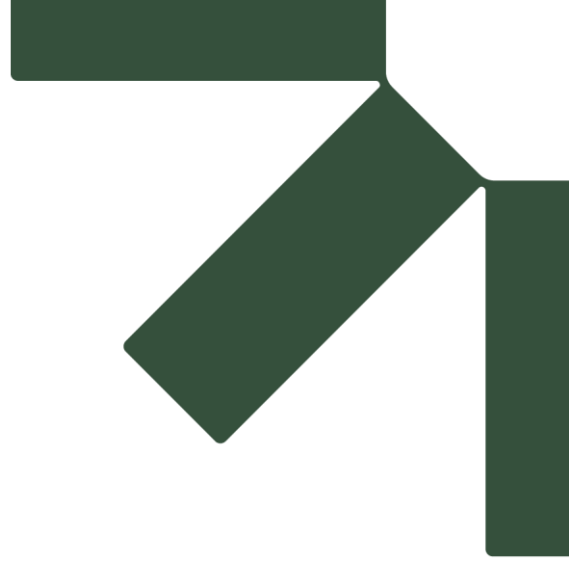
The control measures relevant to the proposed activities are described in the OT Document submitted with this EP application.

The proposals have been assessed against these standards and are all considered to meet the relevant technical standards.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed activities on site.

SUEZ is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the Company's OT and IMS and associated procedures.







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