

From: [Andy Littlecott](#)
To: [Sue Irons](#)
Cc: [Richard Farmers](#)
Subject: [to save] RE: Request for clarification: EPR/QP3629LV/A001 (Mr Graham Carylton and Mrs R Carylton)
Date: 20 October 2025 12:33:54
Attachments: [image001.png](#)
[image002.png](#)

Hi Sue,

Thanks again for your e-mail of 16th.

We submitted our pre-app in the knowledge that the **Godrevy Head to St Agnes SSSI** may be marginally within the 500m separation distance, and this was confirmed through the habitat screening. A bespoke application was submitted on this basis alone.

We believe (subject to caveat below) that all other conditions laid out in the Introductory Notes to **SR2022 No 1: treatment of waste to produce soil, soil substitutes and aggregate** can be met. The waste codes and volumes are also consistent with SR2022 No1. Although the application was made on the basis of a bespoke permit, we've tried to keep requirements consistent with the SR relevant at the time. With this in mind, I don't know why we've included additional D codes, seems that they are irrelevant to the activities sought and I'd like to discuss with a colleague before removing them. I believe this is erroneous but need to check if there's an explanation.

The only caveat relates to operating techniques. If SR2022 No1 remains an option (?), I would like to confirm with the operator that they can operate in accordance with measures stipulated in Technique 2 operating techniques. They cannot currently operate within an enclosed building, so I need to discuss this with them to confirm.

I trust that answers your queries, and will confirm the above in the next few days.

Kind regards,
Andy

Andy Littlecott



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From: Sue Irons <susan.iron@environment-agency.gov.uk>

Sent: 16 October 2025 19:40

To: Andy Littlecott <andy@groundscape-env.com>

Subject: Request for clarification: EPR/QP3629LV/A001 (Mr Graham Carylton and Mrs R Carylton)

You don't often get email from susan.iron@environment-agency.gov.uk. [Learn why this is important](#)

Hello Andrew,

Further to our chat on 10 October I have looked further into which assessment/management plans are likely necessary; you had not a Noise Impact Assessment (NIA) or noise management plan (NMP). I am aware you had pre-application advice on a Standard Rules, but the site's position meant it was too close to a SSSI habitat.

Please clarify whether the presence of the habitat (SSSI) was the only element of the SR2010 No12 (now SR2022 No1) Standard Rules permit and Risk Assessment the applicant would not have been able to comply with. ([SR2022 No 1: treatment of waste to produce soil, soil substitutes and aggregate - GOV.UK](#)).

If relevant, confirm the other aspects the applicant would not have been able to comply with.

One obvious difference we noticed is the request for extra R and D codes; which may/ not have been intended.

Please be aware that an applicant doesn't have to intend to take all wastes types a Standard Rules presents, but those intended must be identical to ones in the Standard Rules and their proportion must not heighten the environmental risk e.g. by having more dust potential etc. Similarly, the annual throughput or storage figures in a Standard Rules permit may be more than is wanted/ feasible at a given site.

Your answers will help us decide which supporting documents and their scope for the bespoke permit application are required.

Sue Irons
Waste Permitting Officer
Permitting – National Regulation and Monitoring
Environment Agency
susan.iron@environment-agency.gov.uk
Telephone: 07867 328061/ 02030252898

From: Sue Irons
Sent: 09 October 2025 12:53
To: 'andy@groundscape-env.com' <andy@groundscape-env.com>
Subject: Acknowledgement of application: EPR/QP3629LV/A001 (Mr Graham Carylton and Mrs R Carylton)

Operator: *To be confirmed*
Application reference: EPR/QP3629LV/A001
Site name: G A Carylton Haulage & Plant Hire

Dear Andrew Littlecott
Thank you for your new bespoke waste application submitted to us on 7/7/2025.
This application has now been allocated to me to review and conclude if it can be
Duly Made.
I am currently reviewing the documents; I intend to give you a call to discuss the
proposal's scope.

Sue Irons
Waste Permitting Officer
Permitting – National Regulation and Monitoring
Environment Agency
susan.iron@environment-agency.gov.uk
Telephone: 07867 328061/ 02030252898

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