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SRJ Energy Limited
2 Matamba Terrace
Sunderland
SR4 7AZ

Dear Sirs,

Environmental Works to Satisfy Planning Requirements Associated with PFS Redevelopment

Please find enclosed our comments in response to the Environment Agency's letter, dated 29 August 2025, relating to the above site.

Introduction / Background Information

The site is located at 8-12 Moor Lane in Harton and is to be redeveloped by SRJ Energy Ltd (SRJ Energy) for on-going use as a retail filling station, by combining the existing filling station and adjacent vacant vehicle repair / sales property. The scheme comprises the removal of all above and below ground structures and construction of a new shop, canopy and replacement of the below ground petroleum infrastructure, with two new below ground tanks (and associated pipework) being installed.

We understand that SRJ Energy Limited has applied to South Tyneside Council for the proposed redevelopment (Planning Application ST/0140/24/FUL) and that the Environment Agency (EA) have objected to the application, in accordance with Position Statement D of their 'Approach to Groundwater Protection (AtGP) version 1.2', February 2018, on the grounds that: '*The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed.*'

Position Statement D3, which states that the EA will usually object to any redevelopment scheme involving retention of sub-water table storage unless it can be demonstrated that the risks to groundwater can be adequately mitigated, *potentially* applies to the site. In order to overcome their objection, the EA have requested that the applicant provides various information relating to ground conditions, including: '*Confirmation of groundwater levels within the development area'.*

We have reviewed existing desk-top information and identified site-specific information that strongly suggests that the site's below ground fuel tanks (existing and proposed replacement tanks) *do not* extend below the water table. In this instance, Position Statement D3 would not apply and the EA would be able to remove their objection to the proposed improvements to the petroleum infrastructure. Position Statement D1 would still apply to the development, but we understand that the EA are unlikely to object to the application in this instance, but rather request that any requirements relating to environmental protection are included as conditions within the Decision Notice, if/when the application is approved.

This letter is therefore intended to present the additional site-specific data, which can then be submitted to the EA for review, potentially enabling their objection to be removed in lieu of further works being carried out under pre-commencement conditions.

Your attention is drawn to the Notice to Interested Parties included as Attachment One.

Review of Site-specific Information Relating to Ground Conditions

The report on tank subsidence, provided by the local Petroleum Officer (included within our Phase I report), includes a log for a pit that was constructed in December 1995 to enable an inspection of one of the existing below ground tanks and it's (failing) foundations. This log is reproduced on the following page.

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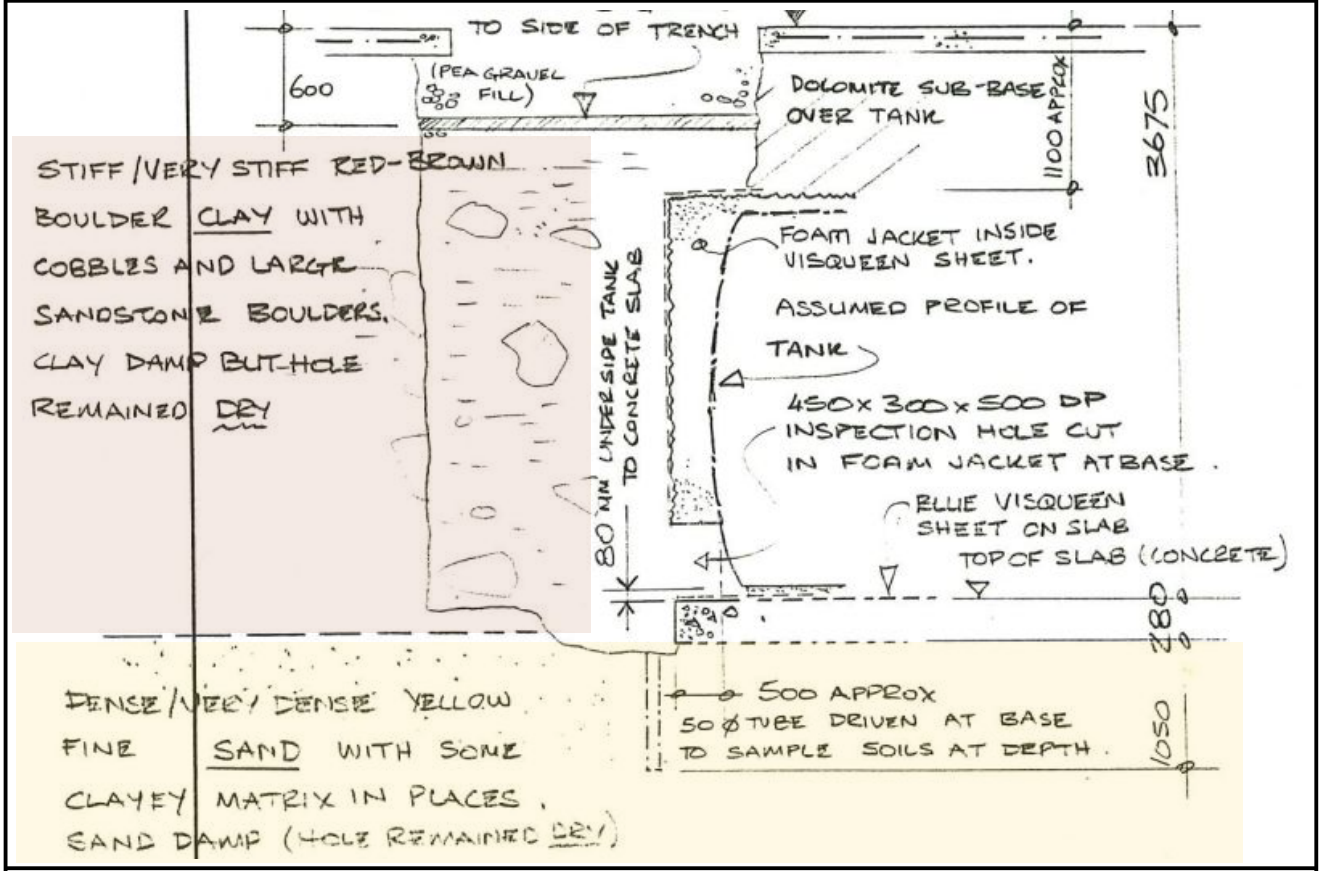


Figure One: Trial Pit Log

This log describes the site geology in the vicinity of the existing tank farm as a thin layer of Made Ground over stiff grading to very stiff clay soils with cobbles and boulders to ~4m, which we interpret as Till (or potentially the Pelaw Clay Member). This then overlies a dense/very dense yellow brown sand, which likely represents the underlying Yellow Sand Formation, and was present to pit termination depth at ~5m.

No groundwater was recorded within the pit and we note that the pit was constructed during the winter, when groundwater levels are likely to be at / nearing their highest.

This log indicates that the existing tanks do not extend below the groundwater table and are installed within stiff clays, rather than the underlying sand. Whilst the Till is classified as a Secondary Aquifer, the log does not report any granular soils and/or the presence of groundwater within the Till.

The new tanks that are to be installed have a capacity of 60,000litres and are likely to have a higher diameter than the existing tanks, so may extend through the clay layer, into the sand. A more detailed assessment will need to be carried out, as part of our Appraisal of Proposed Replacement Tank Installation, once tank dimensions have been confirmed; however, it is highly unlikely that the base of the tank farm installation will extend below 5m below ground level. Based upon currently available site data, the new tanks will therefore *not* extend sub-water table.

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Conclusions

We consider that there is sufficient evidence to indicate a high probability that the proposed / new below ground fuel tanks *will not* extend below the water table at the site. This is based upon the anticipated absence of groundwater to depths exceeding ~5m. In this instance we understand that Position Statement D3 would not apply and the EA would be in a position to remove their objection to the proposed improvements to the petroleum infrastructure.

We acknowledge that the information presented within this letter is unlikely to provide sufficient evidence to confirm, definitively, that the new below ground fuel tanks will sit above the water table. However, we consider there is adequate justification that the necessary information could be provided through pre-commencement conditions included within the application Decision Notice, rather than pre-determination.

In order to provide the Environment Agency with the necessary assurances that SRJ Energy Limited (the applicant) understands the nature and scale of the likely requirements, we have provided (below) a scope of works that will need to be carried out prior to the commencement of the redevelopment:

Environmental Investigation and Risk Assessment	An environmental assessment will be required at the site, irrespective of whether the below ground fuel tanks are sub-water table, in order to verify hydro-geological conditions and also verify the site's historical use as a retail filling station has not led to unacceptable levels of contamination. This assessment must include the following: ➢ Confirmation of ground conditions, with respect to the make-up of shallow soils and the depth to groundwater, in particular in the vicinity of the proposed new tank farm installation. ➢ Groundwater levels must be verified at three locations, in order to enable us to verify groundwater flow direction. Groundwater monitoring events must be carried out on at least three occasions, one of which must be carried out during the wetter winter months when groundwater levels are likely to be at their peak. ➢ The collection of soil and groundwater samples for subsequent chemical analysis, with the analysis schedule focussing (but not limited to) the presence of hydrocarbon compounds associated with automotive fuels*. The analysis schedule must be adequate to determine the extent, scale and nature of contamination beneath the site. ➢ An environmental assessment of the risks to all receptors that may be affected, including those off site, from any contamination that is identified during the course of the intrusive investigation. ➢ If the site investigation scheme and full risk assessment identifies a need for remediation, a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks identified. [Notes: * - The final analysis suite will be determine further to a review of both on- and off-site, past and present, potential sources of contamination, as identified within our Preliminary Risk Assessment report, ref.

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Appraisal of Proposed Replacement Tank Installation	In order to demonstrate to the Environment Agency that the risks to groundwater posed by this development can be satisfactorily managed, an appraisal of the risk of pollution associated with the proposed design, specifically in relation to the environmental sensitivity of the site's location, an 'Appraisal of Proposed Replacement Tank Installation' must be completed. This document must include: ➢ Details of the proposed tank farm installation, specifically including the anticipated depth to the base of the tanks from surface and a comparison of this depth against groundwater levels beneath the site (using information supplied by the intrusive site investigation), to confirm whether the tanks would be above or below the water table. ➢ More generally, provide detailed information about the petroleum infrastructuer design, including mitigation measures of the tanks, tank surround, pipework and monitoring system to be installed, demonstrating adherence to accepted industry standards. ➢ Based on the above information, carry out an assessment of risks to groundwater posed by the development, demonstrating the design of underground fuel storage systems will provide adequate protection of groundwater, considering the nature and volume of the materials stored and hydrogeological regime at the site.

Table One: Proposed Environmental Assessment Works

We trust this informations meets your immediate requirements.

We recommend that this letter be submitted to the local planning authority for review / consultation by the Environment Agency.

Your attention is drawn to the Notice to Interested Parties included as Attachment One.

James Edley

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ATTACHMENT ONE:
NOTICE TO INTERESTED PARTIES

NOTICE TO INTERESTED PARTIES

The purpose of our work Is to provide general information on the environmental and/or geotechnical conditions existing at the site And related to soil and/or groundwater. The Client or others specified the scope of the investigation And the validity of our conclusions Is limited by the scope of work specified. We are not responsible for any such limitations or omissions.

Where stated in this report, we have used information supplied by third parties. While we have evaluated As far as possible the validity Of this information, we cannot guarantee its accuracy In any way whatsoever.

No investigation technique is capable Of completely identifying all Of the contaminants that might be present In the soil or groundwater under a site. Where specified In our report, we have examined the ground by constructing a number of boreholes and/or trial pits. We recovered samples of soil and/or groundwater from available exposures.

The depth And spacing of our sampling locations were selected To ensure With a reasonable probability that they would be representative Of the actual conditions across the whole site. However, safety considerations relating to existing site infrastructure may have restricted our ability To investigate all potential contaminant sources. Specifically, we were unable To investigate the soil And groundwater condition immediately adjacent To the underground structures and/or buried services. These limitations must be borne In mind When considering the conclusions reached In this report.

Soil is intrinsically variable and the spread Of contaminants within the soil is therefore subject to a degree Of non-uniformity. For these reasons no sampling technique can completely eliminate the possibility of obtaining samples that are not representative Of the actual conditions. Our sampling techniques are intended To reduce the possibility to an acceptable level, within the limits imposed by the budget and scope of the investigation.

Groundwater levels and soil vapour levels that we report were accurate at the time of the investigation. Groundwater And soil vapour levels are variable. Long term monitoring may be required to ensure that the levels recorded during our investigation are representative of long term and possible 'worst case' conditions. In accepting our recommendations and/or conclusions the Client acknowledges that further, more detailed investigation could allow a more accurate assessment of site conditions to be made and that this would reduce any consequential risk to the Client.

Our investigation was carried out to assess the significance of contamination resulting from use of the site as identified in this report. Unless we have indicated otherwise, no assessment of the potential impact of any other previous uses has been made. No investigation was carried out to determine whether or not any deleterious or hazardous materials (such as asbestos) have been used in the construction of the buildings present on the site. Unless otherwise stated no investigation or assessment has been made of the presence or otherwise of invasive plant species including but not limited to Japanese Knotweed.

Unless specifically stated otherwise, we have not assessed the effect of any proposed future construction activities on existing structures on or near to the site. Nor, unless stated otherwise, have we assessed the likely effect of trees on existing or proposed structures on or near the site.

We do not accept any responsibility for the cost of remedial works or other costs incurred in whatever way whatsoever as a result of any omissions, errors or other shortcomings in this report unless we have been given reasonable opportunity to verify ourselves that such faults exist and we have been given a reasonable opportunity to carry out works to remedy such faults ourselves using the most practicable means available to us. We do not accept liability for any consequential losses incurred by you while either we or others carry out any remedial works we deem necessary.

This report has been prepared for the Client, as specified on the cover page of this report. We do not accept any liability whatsoever to any other third parties unless explicitly agreed by us in writing. In accepting our recommendations and/or conclusions the Client accepts that the terms of our appointment were as detailed in the Proposal, or Proposals, that we provided to the Client before being appointed and that these terms supersede and have precedence over any other terms and/or conditions set out in any contracts agreed between ourselves and the Client, regardless of when such terms and/or conditions were agreed to by us and/or signed by us even if such contracts contain terms that contradict this.

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