

From: [Sarah Raymond](#)
To: [Joanne Chapman](#)
Cc: [Angela Easton](#)
Subject: RE: Request for information and payment - EPR/BP3631SW/V013 - Minworth Sludge digestion & CHP Plant
Date: 18 February 2026 12:44:00
Attachments: 

Hello Joanne,

Following your response to our request for further information sent on the 03/02/2026 you have not fully answered the questions raised. Please note that our current position is that where questions have not been fully answered we would return your application as 'not duly made'. In light of the acknowledgement that these are existing activities being brought into regulation we will on this occasion provide you with one final opportunity to provide the information requested. As such you will need to provide the below information by the 25/02/2026.

1. Payment

You have stated that "Payment has been raised for the additional funds in order to progress this application, invoice reference PSCAPPSEVER090. Although there is a discrepancy between pre-application advice in that the advice was to 'vary' the permit to remove the 5.3 activity whereas this now says this needs to be 'surrendered'. We request some updated advice on what a 'surrender' process might involve, compared to a variation?"

We would refer you to section 5.1 of guidance [Environmental permits: when and how you are charged](#) which states under section 5 titled 'Surrender a permit' "To remove an activity from your permit that does not have an area of the site associated with it, you need to apply for a minor variation and pay the minor variation charge for that activity

2. Separate charges for dewatering and Liming

You have stated "Clarification is also required on why the dewatering, storage and liming are two separate charges?" Please note that based on the information provided we confirmed this in the e-mail dated 04/02/2026 that the liming of imported digestate cake "is a chemical treatment that would not be able to be carried out under the 1.16.12 activity for the Physical treatment of non-hazardous waste." Currently the IED permits issued clarify the dewatering activity as a 'physical treatment' activity, however following your RFI response you have stated that dewatering will include the "occasional liming for contingency" of the digested cake produced. Therefore, this would now be the 'physical and chemical treatment of waste', under charging code 1.16.14. We would therefore look to permit this as one waste activity; however, you would need to clearly explain how these digested cake imports would be kept separate. As such your charging will be as follows:

- Surrender of activity AR3 for the Section 5.3 Part A(1) (a)(i) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving biological treatment and removal of hazardous waste codes – 1.16.1.1 - Charge £4,800

- Minor variation for Section 1.1 - combustion plant - rated thermal input of 50MWth or more to amend the permit to include the relevant section 1.1 activity – 1.10.1 - £5,731
- Waste activity for the dewatering of digestate – 1.16.14 - £7,930
- Normal variation of existing section 5.4 activity for changes to combustion plant, addition of indigenous tonnage and to undertake to Regulation 61 review – 1.16.2.1 - £6,992

Plans:

- Bioaerosol Risk assessment – 1.19.5 - £1,241
- Odour Management Plan – 1.19.6 - £1,246

Based on the above to date you have paid £26,267, which leaves an outstanding balance of £1,674 to pay.

3. Code 1.19.12

Please note this this code was used in error and this activity was proposed to be charged under 1.16.12 but has now been clarified at 1.16.14

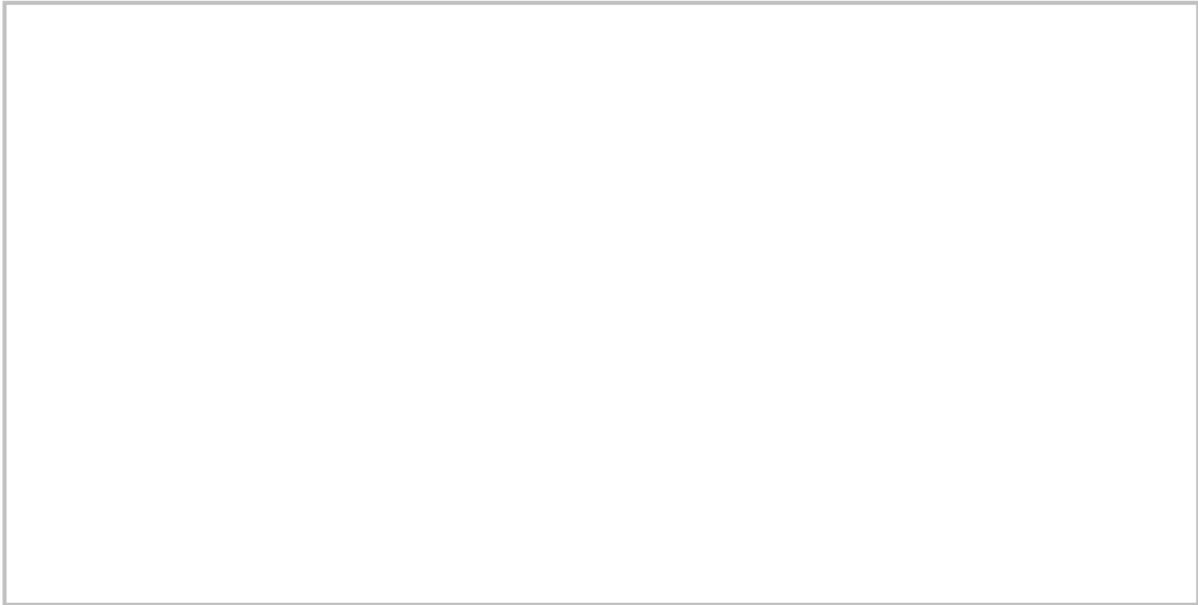
4. Director details

In future, please ensure that you provide the password on the same date that you provide your response to the request for information.

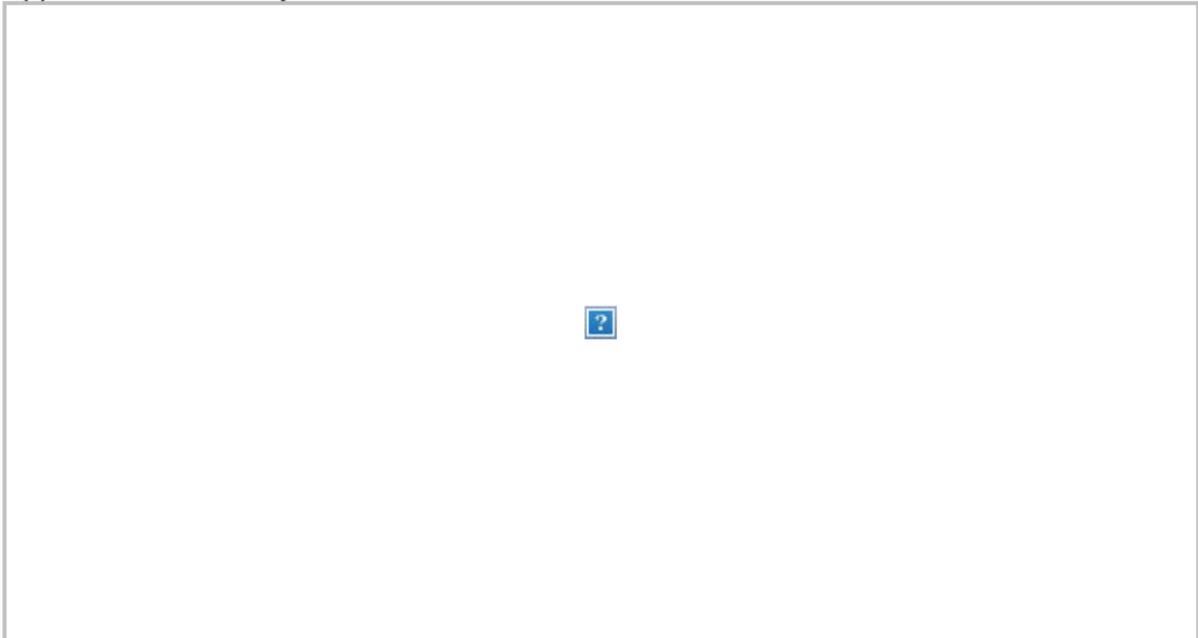
5. Site layout plans

You have stated that “We do not wish to amend the permit boundary as part of this application. There is no change in permitted boundary, it remains as permit V010. Appendix B2 shows the accurate full extent of the boundary, so use this as the definitive installation boundary. Please only refer to the location plan B1 as showing the context of the site and its surrounds only, and not for inclusion in the permit.” Appendix B2 does not reflect the current boundary in V010 and looks to increase the site boundary which you have not applied the relevant documents for. This question has not been addressed, and this boundary plan still needs to be updated.

Current boundary



Appendix B2 boundary



6. Emission point in V010 identified as ‘Surface drainage – discharge from New CHP unit to the River Tame as shown in New drainage plan in EPR/BP3631SW/V005

In response to this question, you have stated that “We are undertaking further drainage investigation as part of BAT containment work, but no changes have yet taken place on site. The Site Layout Plan has been amended to re-include the Surface water discharge point.” On assessment of your revised site layout plans this has not been updated. We can only locate S1 “final release point to head of works”. This question remains outstanding and you will need to re-submit your site layout plan with this emission point included.

7. Explanation of the dewatering and digested cake storage activities being applied for

We requested in response to questions 5 that you provide further details on the activities

being applied for to ensure that we can accurately permit your activities and ensure that there is adequate information to undertake consultation. On review of your response, you have not provided the below;

- A full assessment of how you will meet the requirements of Biological waste treatment: appropriate measures for permitted facilities, and highlight where you currently do not meet the requirements.
- A non-technical summary that includes Storage arrangements, volumes and timescales for storage and waste handling processes.

You have clarified that these are existing activities following your response to the question raised, however we do need the above information to accurately permit the activities requested and consult. Also in light of the above change in activity type we will also require full process flows that identify the activity processes, addition of raw materials and waste inputs and outputs to ensure clarity on what will be undertaken at site. This question remains outstanding and we will need a response to duly make your application. If you fail to provide this information, we will return your variation as not duly made and proceed with the regulation 61 notice.

8. Waste acceptance, pre-acceptance and non-conformance

You have provided document 'SOP Import Dewatering and Storage of Digested Sludge and Digested Cake' in response to question 6. On initial review this does not meet the requirement of a waste acceptance, pre-acceptance and non-conformance procedure. Further guidance on what this should include can be found in guidance [Biological waste treatment: appropriate measures for permitted facilities](#). As such this question remains unanswered and we still require you to submit a Waste acceptance, pre-acceptance and non-conformance procedure.

Should you need any clarification on the above then please do not hesitate to contact me on the number below.

Kind regards

Sarah Raymond

Principal Permitting Officer – Installations



Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5BR
sarah.raymond@environment-agency.gov.uk

Mobile: 07557139052

Working days: Monday to Friday

From: Joanne Chapman <Joanne.Chapman@severntrent.co.uk>

Sent: 16 February 2026 11:55

To: Sarah Raymond <Sarah.Raymond@environment-agency.gov.uk>

Cc: Angela Easton <Angela.Easton@severntrent.co.uk>

Subject: RE: Request for information and payment - EPR/BP3631SW/V013 - Minworth Sludge digestion & CHP Plant

ST Classification: OFFICIAL PERSONAL

Good morning Sarah,

Please find attached answers to your RFI received 3rd Feb, with an amended application report. Also attached is the remittance details of the additional payment sent to the EA on Thursday, which will show as cleared funds tomorrow.

If there are any further questions, do not hesitate to ask.

Kind Regards,

Joanne Chapman

W&I Permits Manager

From: Sarah Raymond <Sarah.Raymond@environment-agency.gov.uk>

Sent: 03 February 2026 14:28

To: Joanne Chapman <Joanne.Chapman@severntrent.co.uk>

Subject: Request for information and payment - EPR/BP3631SW/V013 - Minworth Sludge digestion & CHP Plant

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Hello Joanne,

Thankyou for taking the time to speak to me today. As discussed, please find attached a letter in relation to the further information and payment that we require for the above application.

Should you have any questions, please do not hesitate to contact me.

Kind regards

Sarah Raymond

Principal Permitting Officer – Installations



Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5BR
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Working days: Monday to Friday

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