

Mrs Joanne Chapman  
Minworth Sewage Treatment Works  
Kingsbury Road  
Minworth  
Sutton Coldfield  
West Midlands  
B76 9DP

**Date: 03/02/2026**

Dear Joanne,

**We need more information about your application**

**Application reference:** EPR/BP3631SW/V013

**Operator:** Severn Trent Water Ltd

**Facility:** Minworth Sludge Digestion & CHP Plant EPR/BP3631SW, Kingsbury Road, Minworth, B76 9DP

Thank you for your application. The following is to confirm our conversation of 03/02/2026.

Unfortunately, the application payment you sent is incorrect. The correct application charge is £26,267 This leaves a balance of £5,463 to pay.

Your charge is 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 – 1.19.12 - £7,930
- Waste activity for the temporary storage, liming and transfer offsite of digested cake – 1.16.17 @ 50% reduction- £4,058
- 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

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following questions.

## 1) Director details

*On review of form 'Part A' you have identified 'Application Report - Appendix C' relating to your director details which we cannot locate in your application.*

**Provide a copy of 'Application Report - Appendix C'**

## 2) Site Plans

*On review of document 'Site location plan' this does not include all of the current permit boundary in V010. It is our understanding that you do not wish to amend your permit boundary as part of this application and as such you will need to re-submit this plan and other documents that do not have the correct site plan.*

**Update and resubmit your 'site location plan' to reflect your current permitted boundary**

## 3) Documents

*Note: As part of your application, you have submitted the following documents which will not be assessed as part of this variation, but may be required for your Regulation 61 response. Please note that we have not assessed these as part of the validation process.*

- *'Appendix N Minworth AQA - We are unclear why this has been submitted and we will not be assessing this as part of your application.*
- *Appendix J Containment Review*
- *Appendix J Containment Review Risks*
- *Appendix I LDAR Local Operating Procedure*
- *BAT Tool*

## 4) Site Layout plan

*On review of your existing permit and revised site layout plan, we have noted the following discrepancies:*

- *Emission point A6 references CHP8, when your current permit advises CHP6*
- *Emission point A9 advises natural gas when your current permit advises dual fuel*
- *Emission points A14a, A14b, and A14c are not included on the site layout plan*
- *The MWth rating of combustion plant in table 2-5 – 'Changes to Combustion Plant Permit Information' does not match your current permitted MWth input for some combustion plant.*

- a) Confirm if the combustion plant has changed at the emission points since V010 was issued.**
- b) If there is no change, provide an explanation of why the above changes have been made and amend any errors identified resubmitting the plans if required.**
- c) If your combustion plant has changed provide an air emission risk assessment in line with our guidance [Air emissions risk assessment for your environmental permit](#)**

- Emission point A13 – Air Virtual Stack
- Emission points A49-A64 – Digester vent tubes
- Emission points A69 – A72 – Gas compressors

**d) Please provide an explanation of the above emission points**

*You have added two new emission points A78 HS2 carbon filters and A79 pressure swing absorbers.*

- e) Provide an explanation of what these emission points are and if required provided an assessment in line with guidance [Air emissions risk assessment for your environmental permit](#)
- f) 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, has been removed from your application. Confirm if this emission point has been removed and if not, please add this emission point back
- g) Current emission points identified as S1 on your existing permit do not reflect your revised emission points identified as T1, T2 and T3. Provide an explanation of how your S1 emission points have been combined into T1, T2 and T3.
- h) We cannot locate your drainage plan, provide a copy of your site drainage plan.
- i) Should the dewatering or temporary cake storage operations have a discharge to sewer then please ensure that these are identified on your emission point plan.

**5) Import and liming of digestate from Alternative STW AD Facilities and the dewatering of digested sludge.**

*You are proposing to add two waste activities to your permit. It is unclear if these are existing activities that have historically been carried out, or new activities that you are proposing to carry out. You will need to demonstrate how you will meet the relevant appropriate measures from the point of permit issue which are [Biological waste treatment: appropriate measures for permitted facilities](#)*

- a) Confirm the how long you have been carrying out the dewatering of digested sludge on site.
- b) Confirm how long you have been carrying out the temporary storage and liming of digested cake onsite.
- c) Confirm if you are carrying out Liming of digested sludge on the cake pad.
- d) For the above activities provide 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.
- e) Provide an updated non-technical summary for both activities that includes:
  - a. Storage arrangements, volumes and timescales for storage
  - b. Waste Handling

## 6) Waste acceptance, pre-acceptance and non-conformance

*You have included documents 'Appendix D3 SOP 03 TTW Non-Conformance', 'D1 SOP 01 TTW Waste Pre-Acceptance, and 'D2 SOP 02 TTW Waste Acceptance'. These seem to be for tankered waste and do not include digested cake.*

- a) Explain why these procedures have been included within the variation application and if this is not relevant confirm that these procedures do not need to be assessed as part of this variation.**
- b) Provide a waste acceptance and pre-acceptance procedure for the import of digested cake for dewatering and temporary storage.**

*Note: In relation to the Regulation 61 response, we have not assessed this as part of duly making and further questions may be required when undertaking our assessments.*

Please reply directly to [sarah.raymond@environment-agency.gov.uk](mailto:sarah.raymond@environment-agency.gov.uk).

You must send us the information and payment by **17/02/2026**.

### **Pay online by credit or debit card**

Pay online at this link [www.gov.uk/payments/permitting-applications-installations/permitting-application-payment-installations](https://www.gov.uk/payments/permitting-applications-installations/permitting-application-payment-installations)

You need to create your own reference number. Your reference number must follow this format: PSCAPPINSTXXXXXYYY. It should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). Email us the reference number and the payment date so we can track your payment.

Details of how to pay by other methods are given in Part F1 of the [application form](#).

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,613. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

Note: Our email system has a file size limit of 25MB, if your information exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions, please phone me on 07557 139052 or email [sarah.raymond@environment-agency.gov.uk](mailto:sarah.raymond@environment-agency.gov.uk).

Yours sincerely

**Sarah Raymond**  
Principal Permitting Officer – Installations