

K Himmler

kristina@kore-compliance.com

Kore Compliance Ltd on behalf of Star Brands Limited

Date: 05/03/2025

Dear Kristina Himmler,

**Pre application advice – Enhanced service**

Pre-application reference EPR/QP3634DQ/P002

Site:

Star Brands Limited

Unit 23,

Hunt End Industrial Estate,

Dunlop Road

Redditch

Worcestershire

B97 5XP

Thank you for your pre application enquiry on 09/01/2025

I am pleased to provide you with your pre-application advice. This advice is based on the information provided on your pre application advice form, submitted briefing documents, and discussion at a virtual meeting on 04/03/2025.

**What this enhanced pre application advice covers**

As part of this service, we have provided you with the following information in answer to your questions in the briefing note:

Q1. Type of variation and application charges

[Environmental permits: when and how you are charged - GOV.UK](#)

Section 3.2.1 of our website charging guidance states that when you need to change your permit from a standard rules to a bespoke permit you must apply for a bespoke permit but this will be charged as either a normal or a substantial variation charge depending on the potential amount of assessment needed and based on the activity/activities you are changing to.

Although the level of technical assessment required in this case for the change to a bespoke permit is not likely to be large you have also indicated you will take this opportunity to increase the installation boundary as well to reflect changes, so a substantial variation fee will be appropriate.

Although the only scheduled activity taking place in the liquid production line is the neutralisation of a sulphonic acid there are a range of sulphonic acids and neutralisation agents used, with potentially differing environmental impacts to be assessed, so this is

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classed as a 1.4.2 Section 4.1 Production of more than one organic chemical charge rather than the 1.4.1 you had suggested.

This charge applies per production line, not to the installation as a whole. You have confirmed there is only one production line anyway, but if there were more doing the same range of products we would most likely consider this as the same charge multiple times under guidance section 3.7.1 and only apply a single charge.

You have stated in the briefing note that no further assessments listed in charging section 1.19 are anticipated. There appears to be a SSSI (Rough Hill and Wirehill Woods) within the 2 km screening distance (plus a number of Local Wildlife Sites, Local Nature Reserves and Ancient Woodlands). If you were submitting any quantitative impact assessment, even if it concluded no significant impact, you would need to include the £779 Habitats assessment charge as well. However, we do not believe a quantitative assessment will be needed in this case – see Question 4.

The application charge in this case is therefore expected to be a substantial variation of a Section 4.1 A(1)(a)(xi) production of surface-active agents activity under 1.4.2 at £14,819.

#### Q2. Relevant technical and BAT Guidance

We confirm that your identification of current main guidance sources as gov.uk; EPR4.02; and the OFC BRef is correct, with the CWW and WGC draft as useful additional supporting information on the criteria the Environment Agency is likely to use to assess your application (for example for Environmental Management System components).

#### Q3. Waste water or liquid waste

Best Available Techniques is to minimise the use of water and reuse/recycle waste water where possible, including for process vessel cleaning. However, we accept this may not be applicable if it will be to the detriment of other factors such as product quality, process control, safety or environmental impact. You should explain in your application what measures you are able to take to minimise the production of waste water and liquid waste and why you are not able to take other measures that might be expected.

#### Q4. Risk assessment: combustion plant

As the only four point source emissions on the installation are from unabated natural gas fired steam raising combustion units aggregating to less than 1MWth you do not expect the emissions to need assessment as they are not above the threshold for the Medium Combustion Plant Directive and will not need monitoring or emission limits.

However, you are seeking confirmation as you have reason to believe the Environment Agency is moving to require quantitative assessment of environmental impact for all combustion plant emission regardless of size of unit.

We reserve the right to require submission of a quantitative assessment in any case but in practice this will not apply to plant aggregating to less than 1MWth unless the emission from the small plant will be in addition to larger emissions of the same substances elsewhere on the installation or where there is significant public interest in the site. In this case we believe we will be able to make a risk-based decision that a quantitative assessment is not required in the application.

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### **Forms required to be submitted**

For a substantial variation you should submit applications forms A, C2, C3 and F1. Provided you do not have emissions to surface water or sewer form C6 is not required.

As discussed at the meeting please ensure Form F1 is signed by an authorised person. That is someone listed as an officer for the company at Companies House or a person who has been authorised to sign on behalf of the company by such a person.

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

### **After you apply**

The information that you need to submit with your application is explained in the application form and its guidance. The Environment Agency will check that you have submitted this information and the correct application charges. This is to ensure we have enough information to start to determine your permit application

We will contact you if information is missing and can feasibly be provided within 10 working days. If we consider information cannot be provided within this time frame we will return your application with a list of what is missing.

We'll retain 20% of the correct application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. This is explained in the environmental permitting charges guidance.

We will not charge this if we return an application after having done very little work – for example, because it contained obvious errors or omissions.

Once we have duly made an application we will start to determine it. This is when we do our technical checks. We may need to ask you for further information or additional documents at this stage.

Once an application is validated and duly made, it is ready to be allocated for determination.

The time it takes us to allocate an application depends on a number of factors, including the complexity of the specific application and the availability of a member of our team with the right skills to assess it.

The amount of time taken to determine your application will vary. It will be impacted by factors such as:

- The quality of the application
- The complexity of the application
- Whether an application is of high public interest
- Whether the application includes novel technologies or techniques

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- Whether the determination requires input from others, both internal and external to the Environment Agency
- Whether modelling and/or monitoring and assessment is required, for example Air Quality modelling and assessment or water discharge or groundwater activity specific substances assessment.

The Permitting Officer determining your application will be able to keep you updated with the progress of your application.

### **What happens next?**

If you submit an environmental permit application then please quote this pre-application reference number: EPR/QP3634DQ/P002

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to:

[psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

Please email applications where possible. If email is not possible you can submit by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue,  
Sheffield, S9 4WF

### **Scope of this advice**

We have only provided the specific advice you requested based on the information provided. We cannot provide advice on all aspects of your application, so it is important you read all available online guidance and the application forms to ensure anything not covered within this advice is considered as part of your application.

It is important to remember:

- this is advice, we are not agreeing anything at this stage
- we have provided this advice based on the limited information we have about your proposals at this time
- we have only provided the advice you specifically requested
- we may need to request additional information when we have a full application

### **Disclaimer**

The advice given is based on the information you have provided and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site-specific requirements and the advice given is to address the specific pre-application request.

This advice covers installations activities] only.

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Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

**Enhanced pre application cost estimate**

At this stage the pre-application advice is expected to cost up to £500 plus VAT. An invoice will be sent separately.

**This pre-application request is now closed.**

We consider this pre application request is now closed however if you have any questions regarding this letter please contact [PreApplicationService@environment-agency.gov.uk](mailto:PreApplicationService@environment-agency.gov.uk).

If you require additional enhanced pre-application advice please complete our [online form](#).

Yours sincerely

Andy Bett  
Principal Permitting Officer – Installations Permitting