

From: [Scott Mackenzie](#)
To: [Hadley, Richard](#)
Cc: [Andrew Lake](#); [REDACTED]
Subject: Re: Umbrella Environmental: EPR/RB3002CW/V004 EPR – Return of Not Duly Made Permitting Application CRM:0822043
Date: 12 March 2024 09:29:25
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Hi Richard

In that case please just go with the documents we have submitted and remove the request for confidentiality as we really must get this variation done urgently.
If you can duly make the application on the above agreement that would be great.

Kind Regards

Scott Mackenzie
Chief Operating Officer



On Tue, Mar 12, 2024 at 9:25 AM Hadley, Richard [REDACTED] wrote:

Morning Andrew

Thank you for the email yesterday, as discuss last week I am now happy with the initial content of the application documents to be classed as 'duly made'. However, as we discussed, before I can move forward with the application I have to assess and determination the request for commercial confidentiality.

Currently I do not believe there is sufficient evidence to justify commercial confidentiality and I have asked you to discuss this with your client. The majority of documents/sections seem standard process/technical information for this type of treatment process, where such information can be obtained from the internet or other similar applications. To be commercial confidential the information must be unique to the operator and give them some commercial gain over other operators. This must be evidenced.

There is no clear list of the documents/sections (with your application submission) you are requesting to be classified as commercially confidential. I currently need to go through each document to final the sections you are requesting. This is prone to missing sections and publicising commercial confidential information.

Therefore, should you wish to progress the commercially confidential request could you place supply a list of each document/section, this request relates to and the justification your you considering that information confidential. Please note this must demonstrate why each document is confidential and how it would impact your business.

Once this has been submitted, assessed and communicated back to yourself, you will need to re-submit redacted copies of each document with any agreed confidential information removed and a statement stating 'information has been removed for confidential reasons' in its place.

I hope this clarifies the current position in respect to your application.

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

Regards

Richard Hadley

Principal Permitting Officer - Installations

Part of Operations – Regulation, Monitoring and Customer.

Aqua House, 20 Lionel Street, Birmingham, B3 1AQ.



Ext Tel 02030252850



Email [REDACTED]

From: Andrew Lake [REDACTED]
Sent: Monday, March 11, 2024 8:47 AM
To: Hadley, Richard [REDACTED]

[REDACTED]
Application CRM:0822043

Duly Made Permitting

Richard

I hope you are well just following up on where we are in the duly making process.

Andy

Andrew Lake BSc (Hons), MCIWM

Managing Director

9 Goldington Road, Bedford, Bedfordshire, England, MK40 3JY

Mob [REDACTED]

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From: Andrew Lake

Sent: Thursday, March 7, 2024 10:30 AM

To: 'Hadley, Richard' [REDACTED]

Cc: 'Scott Mackenzie Mackenzie' [REDACTED]

Subject: RE: Umbrella Environmental: EPR/KB3002CW/V004 EPR – Return of Not Duly Made Permitting Application CRM:0822043

Richard

I hope you are well following on from our conversation yesterday 06/03/2024. Below is a contents list of the permit applications. The documents highlighted in red are those that have been superseded or removed from the application.

Regarding the commercial confidentiality point. The request covers the relevantly labelled flow charts/diagrams in the non-technical summary. We would also like it to extend to official plant drawings or names of our suppliers of the equipment.

Document	Comment
App forms 07/08/2023	
Part A Lincoln Storm Limited FINAL FOR SUBMISSION	
Part C2 Lincoln Storm Limited FINAL FOR SUBMISSION	
Part C2.5 Lincoln Storm Limited FINAL FOR SUBMISSION	
Part 3c Lincoln Storm Limited FINAL FOR SUBMISSION	
Part C6 Lincoln Storm Limited FINAL FOR SUBMISSION	
Part F1 Lincoln Storm Limited FINAL FOR SUBMISSION	Part F update in submission 11/12/2023
MA12 Medium combustion plant and specified generator list FINAL FOR SUBMISSION	No longer required. Mains power.
MA14 Request to Treat Certain Information as Confidential	
MA16 Form 3c Table 1a attachment FINAL FOR SUBMISSION	Form 3c table 1a updated in 07/08/2023
Supporting Info 07/08/2023	
MA0 Pre-application discussion document FINAL FOR SUBMISSION	
MA1 Non Technical Summary FINAL FOR SUBMISSION	
MA2 Best Available Techniques Assessment (BAT) FINAL FOR SUBMISSION	
MA3 Fire Prevention Plan (FPP) V8 FINAL FOR SUBMISSION	
MA4 BCR Appendix 01 Adler and Allan Report FOR FINAL SUBMISSION	
MA4 Base Line Site Condition Report Lincoln Storm Limited FINAL FOR SUBMISSION	
MA4 BCR Appendix 3 - Groundsure Report for Increased Permit Boundary FINAL FOR SUBMISSION	
MA5 Evidence of Competency FINAL FOR SUBMISSION	
MA6 Site Plan FINAL FOR SUBMISSION	
MA7 Sensitive Receptor Plan FINAL FOR SUBMISSION	
MA8 Noise Impact Assessment FINAL FOR SUBMISSION	
MA9 Noise Management Plan (NMP) FINAL FOR SUBMISSION	
MA10 Operating Techniques and Environmental Management System (OTEMS) FINAL FOR SUBMISSION	
MA11 Environmental Risk Assessment (ERA) FINAL FOR SUBMISSION	
MA13 Emissions Analysis for Worle Quarry FINAL FOR SUBMISSION	
MA14 Request to Treat Certain Information as Confidential	
MA15 document references for Form F1 FINAL FOR SUBMISSION	Part F update in submission 11/12/2023
MA16 Form 3c Table 1a attachment FINAL FOR SUBMISSION	
MA17 Supporting data for MA8 Noise Impact Assessment FINAL FOR SUBMISSION	
October Submission 30/10/2023	
020.1 09 001 Additional Permit Boundary REV A	
020.1 09 010 Process Layout (Wet and Dry) REV D	
020.1 09 012 Drainage System REV B	
020.1 09 016 Dust Monitoring Locations REV A	

291023 Responses to EA questions for duly making	Email.
Air impacts	
Data input	
LSL KB2002CW FPP for submission 191023	
MA13 (new) DEMP for LINCOLN STORM LIMITED	
December Submission 11/12/2023	
020.1 09 010 Process Layout (Wet and Dry) REV E	
020.1 09 013 Emissions Points REV B	
020.1 09 016 Dust Monitoring Locations REV B	
0712123 MA13 (new) DEMP for LINCOLN STORM LIMITED	
Lincoln Storm Hazardous Emissions Calculations Dec 2023 V6	
Part F1 Lincoln Storm Limited FINAL FOR SUBMISSION-1	

Andrew Lake BSc (Hons), MCIWM

Managing Director

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From: Andrew Lake

Sent: Friday, March 1, 2024 8:19 AM

To: Hadley, Richard [REDACTED]

Cc: Scott Mackenzie Mackenzie [REDACTED]

Subject: RE: Umbrella Environmental: EPR/KB3002CW/V004 EPR – Return of Not Duly Made Permitting Application CRM:0822043

Richard

I hope you are well. Have you been able to duly make permit application EPR/KB3002CW/V004.

Andy

Andrew Lake BSc (Hons), MCIWM

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From: Andrew Lake

Sent: Friday, February 23, 2024 7:36 AM

To: 'Hadley, Richard' <[REDACTED]>

Subject: RE: Umbrella Environmental: EPR/KB3002CW/V004 EPR – Return of Not Duly Made Permitting Application CRM:0822043

Richard

I hope you are well.

I'm just following up on my email on Monday 19th Feb 2024.

Can I get an update on the progress of the duly making process for application EPR/KB3002CW/V004.

Andy

Andrew Lake BSc (Hons), MCIWM

Managing Director

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From: Andrew Lake

Sent: Monday, February 19, 2024 9:22 AM

To: Hadley, Richard [REDACTED]

Subject: RE: Umbrella Environmental: EPR/KB3002CW/V004 EPR – Return of Not Duly Made Permitting Application CRM:0822043

Richard

I hope you are well. I understand you are on leave today.

Can I get an update on the progress of the duly making process for application EPR/KB3002CW/V004 on your return to work 20/02/2024.

Andy

Andrew Lake BSc (Hons), MCIWM

Managing Director

9 Goldington Road, Bedford, Bedfordshire, England, MK40 3JY

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From: Timney, Daniel [REDACTED]

Sent: Tuesday, February 6, 2024 3:27 PM

To: Andrew Lake [REDACTED]

Subject: RE: Umbrella Environmental: EPR/KB3002CW/V004 EPR – Return of Not Duly Made Permitting Application CRM:0822043

Hi Andy,

Thank you for your email and apologies for the delay in identifying a permitting officer. I have allocated this application to Richard Hadley for the duly making assessment today.

Best regards,
Dan

Dan Timney MSc.
Principal Permitting Team Leader

National Permitting Service – Part of Operations – Regulation, Monitoring & Customer

Aqua House, 20 Lionel Street, Birmingham, B3 1AQ.

Environment Agency

[REDACTED]

External: 02030 232 663 | Mobile: [REDACTED]

Working days: Monday to Friday

Website: www.gov.uk/environment-agency

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Do you operate a medium combustion plant or specified generator?

[Click here to find out if you need to meet the regulations](#)

From: Andrew Lake [REDACTED]
Sent: Thursday, February 1, 2024 1:42 PM
To: Timney, Daniel [REDACTED]

Subject: Umbrella Environmental: EPR/KB3002CW/V004 EPR – Return of Not Duly Made Permitting Application CRM:0822043

Importance: High

You don't often get email from andrew@umbrellaenvironmental.co.uk. [Learn why this is important](#)

Dan

I hope you are well.

Thank you for calling me back in response to my chase on the progress of application : EPR/KB3002CW/V004.

I like to express mine and the clients frustration at the time scales for allocation of this nationally important infrastructure application.

- Although it has been identified as nationally important and fast tracked, as of 30/01/2024 the permit had still not been allocated (permit submitted on 11/12/2023 7 week wait) As I am sure you are aware the operator is receiving pressure by the local EA office to progress this application in turn the local EA officers are referencing the 'national infrastructure, fast track' process as a way to expedite this application.
- The re submission is not a full assessment of re submitted information but merely the extra information that has been

submitted as requested.

Can you provide a timeline for allocation and the assessment of the newly submitted (extra) material leading to a decision of 'Duly made/ Not duly made'

Andy

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