

Mr Mark McAree  
Jacobs UK  
Jacobs House  
Shrewsbury Business Park  
Shrewsbury  
SY2 6LG

**Date: 15/03/2024**

Dear Mark,

**We need more information about your application and Underpayment of application charge**

**Application reference: EPR/YP3430LL/V006**

**Applicant: THAMES WATER UTILITIES LIMITED**

**Facility: Beddington Sewage Treatment Works, Beddington Lane, Croydon, CR0 4TH**

Thank you for your resubmitted application received on 27/11/2023.

Unfortunately, the application payment you sent is incorrect. The correct application charge is £22,008. This leaves a balance of £1,414 to pay as our records show that you have only paid £20,594. Further guidance in relation to application charges can be located at: <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance> The application charge is made up as follows:

**Application Fee**

- £13,984 application fee for - S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.
- £3,965 application fee for the physical treatment of non-hazardous waste relating to Table B3-1b(ii) Waste accepted at the head of the works import point.
- £793 application fee for the physical treatment of non-hazardous waste relating to Table B3-1b(iii) Waste accepted for temporary storage and transfer off site.

**Additional Assessments (see below for further details)**

- Odour management plan – a fixed charge of £1,246
- Habitats assessment – a fixed charge of £779
- Emissions management plan - a fixed charge of £1,241

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

**1) Open Tanks Post AD**

Permitting and Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF  
Customer Contact Centre: 03708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Under BAT conclusion 14 you must ensure that diffuse emissions are contained. This includes techniques such as storing, treating and handling waste and material that may generate diffuse emissions in enclosed buildings and/or equipment, and collecting and directing the emissions to an appropriate abatement system. If digestate is still biologically active, and you are producing combustible biogas you must take steps to collect the biogas. Biogas should not be vented to the environment. If the source does not produce an explosive environment (i.e. less biologically active) you will need to propose plans to enclose, collect and direct the waste gas emissions to an appropriate abatement system.

**For all open tanks post AD, confirm that you will undertake the following:**

- a) **If digestate is still biologically active and you are producing combustible biogas you will take steps to collect the biogas and direct this to your gas collection system in line with BAT 14.**
  - b) **For open tanks that do not produce an explosive environment (i.e. less biologically active) you will enclose, collect and direct the waste gas emissions to an appropriate abatement system in line with BAT 14 and 34.**
- 2) Table C3 – 1b (ii) Waste accepted at the head of the works import point**
- a) **Provide transfer notes to demonstrate that the wastes requested are already accepted on the site.; or if waste is not currently accepted.**
  - b) **Provide an assessment of the fate and impact of the substances emitted to water from this activity following the Environment Agencies [risk assessment guidance](https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities/6-emissions-control) in line with relevant guidance (<https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities/6-emissions-control>)**

Please send the information, quoting the above application reference,  
to:sarah.raymond@environment-agency.gov.uk

Please send the information and payment within 10 working days of this letter. Details of how to pay are given in Part F of the application form.

If we do not receive the information and payment within 10 working days we will return your application.

If we do receive the requested information and payment within 10 working days, we'll 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 letter 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 and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at:

<https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

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  
Senior Permitting Officer - Installations