

**From:** [steve raasch](#)  
**To:** [SM-Defra-RESP-notifications \(DEFRA\)](#); [Alicia Downes](#)  
**Subject:** Re: EPR/TP3536MZ/V007 We Need More Information About Your Application CRM:0163100  
**Date:** 20 April 2026 16:56:23  
**Attachments:** [image.png](#)  
[Upper House Farm Standby Generators.docx](#)  
[Raw M+Inventory .doc](#)

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Hi Alicia

1. The biomass boiler was in operation prior to Dec 2018.
2. No changes to boiler infrastructure layout or fuel storage area.
3. Supplier of the Grade A wood, Sylvagen Ltd, Level 2 Brockbourne House, 77 Mount Ephraim, Tunbridge Wells, Kent. TN4 8BS. (Tillbury Depot)
4. Capacity - Average fuel consumption of biomass boilers are in the range of 3-3.3 kg per kw heat output, dependant on fuel type and moisture content.  
Biomass boiler at Upper House output is 900kw, therefore 900 divided by an average of 3.15 = 285kg per hour.
5. Grade A and virgin woodchip may be mixed at times, dependant on availability.
6. Storage capacity of store remains unchanged at 100t, storage and fire prevention given in biomass document.
7. Risk assessment incorporated into emergency plan.
8. Raw materials document attached.
9. Standby generators document attached.

Regards

Steve

On Mon, 13 Apr 2026 at 15:45, SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)> wrote:

Dear Stephen Raasch

**Environmental Permitting (England and Wales) Regulations 2016**

**Application reference: EPR/TP3536MZ/V007**

**Operator: Stuart Perkins**

**Facility: Upper House Poultry Farm EPR/TP3536MZ, Moreton-on-Lugg, HR4 8AH**

Thank you for your application received on 08/03/2026.

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:

We need to know:

1. Biomass boiler: Please confirm if the biomass boiler was operational by 20th December 2018. *Note: as the thermal input capacity of the biomass boiler is >1MWth, it will be subject to MCPD requirements. These will be added as part of the variation.*
2. Biomass boiler: Please confirm if there will be any changes to the biomass boiler infrastructure as part of the variation (e.g. larger fuel store / change in location of fuel store). If so, please submit an updated site layout plan to reflect any infrastructure changes.

3. Grade A waste wood: Please confirm the source(s) of the wood (we require the company name(s), address(es) and contact details). *Note: We need to know this for the supplier(s) to be used initially, however I can include a caveat in table S1.1 of the consolidated permit, that the operator can use alternative grade A waste wood sources as long as they agree them in writing with the Environment Agency first. The site inspector will confirm the source and how the operator will guarantee that it is grade A waste wood as is required for the initial application. This should avoid the need for additional variations.*
4. Grade A waste wood: The application advises that the capacity of the boilers will be 285kg/hr. Please provide calculations / evidence of how the capacity has been worked out.
5. Grade A waste wood: Confirmation of whether the grade A waste wood is to be the sole type of fuel at any one time or if it will be mixed with the biomass fuel already permitted for. *Note: where grade A waste wood is mixed with virgin biomass fuel then it is all classed as waste.*
6. Grade A waste wood: Details of the type of storage and storage capacity for the grade A waste wood, and if it is kept separate to the virgin biomass fuel.
7. Grade A waste wood: You have submitted a biomass management risk assessment document as part of the application. Please confirm that this risk assessment will be incorporated and updated into the sites accident management plan.
8. Raw materials: Application Form C3.5 refers to an updated raw materials document being submitted as part of the application documents however I cannot see that this has been submitted. Please submit the updated raw materials inventory document confirming the quantity of grade A waste wood to be stored on site at any one time.
9. Standby Generator: Please confirm if there are any standby generators on the installation. If so, please confirm the following details:
  1. Please provide the thermal rated input in MWth for the standby generators;
  2. Please confirm that each standby generator is operated for a maximum of 50 hours per annum for testing purposes.
  3. Please confirm that each standby generator is only for emergency use for power supply where the mains power has gone down and will not be used for more than 500 hours per annum averaged over 3 years.

Please reply directly to this email with your information and copy in [alicia.downes@environment-agency.gov.uk](mailto:alicia.downes@environment-agency.gov.uk).

You must send us the information by **27/04/2026**.

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 correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. 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 returns 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 contact me on the details provided in my signature below.

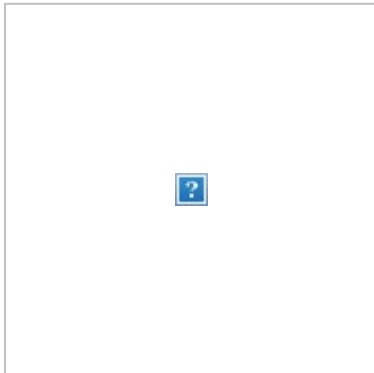
Yours sincerely,

Alicia Downes

**Alicia Downes**

Permitting Officer

Installations Intensive Farming Permitting Team



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Website: [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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