Mrs Emily Hingston
Unit 5.3 Paintworks
Arnos Vale
Bristol
BS4 3EH

Date: 12/01/2026

Dear Emily,

We need more information about your application

Application reference: EPR/NP3829LW/A001
Operator: Engie Renewable Gases UK Limited
Facility: Home Farm Grange, Low Farm, Sherburn in Elmet, LS25 6FW

Thank you for your application received on 28/11/2025. The following is to confirm our conversation of 08/01/2026.

Unfortunately, the application payment you sent is incorrect. The correct application charge is £17,250. This leaves a balance of £1 to pay.

- 1.16.2.1 - £13,984 - Section 5.4 (b)(i) - non-hazardous waste installation – biological treatment.
- 1.19.2 – £779 - Habitat assessment fee
- 1.19.5 – £1,241 Emissions Management Plan (Relating to the Bioaerosol Risk assessment)
- 1.19.9 - £1,246 – Odour Management Plan

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) **Site Plans**

We cannot locate your site drainage plan within your application.

a) **Provide a site drainage plan that meets the requirements of guidance <u>Develop a management system: environmental permits</u>**

While you have provided a site layout plan, and emissions to air plan we cannot locate an emission point plan that includes all emission points to air and water. For example, this does not include your direct discharge to water, potential emissions identified as not abated by the OCU and PVRV's. Each emission point should be clearly identified i.e. A1 flare 1, A2, Flare 2,(air), W1 (clean and uncontaminated water to Mill dike (water ect).

b) **Provide an emission point plan that includes all emissions to air and water.**

c) **Provide the national grid reference for each emission point.**

2) **Site condition report**

We cannot locate a stage 1-3 assessment within your site condition report, and it is unclear if you will be undertaking the storage, usage, or release of hazardous substances. (note this can include raw materials used within the process)

a) **Provide a copy of your material safety data sheets for the raw materials used on site.**

b) **Update your site condition report to include a stage 1-3 assessment in line with guidance Communication from the Commission — European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions (europa.eu).**

3) **Carbon Capture plant**

You have identified within your application that 'During biogas upgrading, a side stream of clean compressed CO2 is produced. Future operations will include recovery and liquefaction of this stream before being sent offsite to an end user' For us to include this directly associated activity as part of your application we will require the following information:

a) **A non-technical summary of how the carbon capture plant will operate**

b) **Provide a systematic review of the proposed operating techniques against the post combustion carbon capture BAT guidance available at Post-combustion carbon dioxide capture: best available techniques (BAT) - GOV.UK (www.gov.uk), or any subsequent sector specific carbon capture guidance.**

Concentrated or compressed CO2 may be required to be vented routinely or in an emergency. Therefore, there is the potential for acute incident related off-site human health impacts and chronic air quality related human health impacts

c) **Provide an assessment of the impact of venting, that includes the following:**
   i. **A description of the different potential venting scenarios including that the whole inventory is vented;**
   ii. **Information that shows how modelling has been or is intended to be used to inform the process design and management of the risks associated with venting of CO2;**
   iii. **Confirmation that the design is in line with industry best practice such as that from the Energy Institute, or equivalent;**
   iv. **A description of the operating techniques that will be used to minimise the risks;**
   v. **A vent management plan setting out how the risks from venting of CO2 will be managed. (If the design is not finalised, the vent management plan can be developed prior to start of operations and a pre-operational condition will be set.)**

On review of your application, we cannot locate an explanation of how you will store and transfer compressed gas produced from the carbon capture process or how you will manage any accident risk.

d) **Provide an updated site plan that include the storage location of the compressed gas produced as part of the carbon capture process.**

e) **Provide an explanation of how you will safely store and transfer compressed gas.**

f) **Update your accident management plan and environmental risk assessment to include the carbon capture plant.**

g) **If you cannot provide the above information, confirm that the carbon capture plant directly associated activity will be removed from your application, you will need to remove all reference to the carbon capture plant from your application and apply at a later date.**

4) **Flaring of biogas**

You have stated that "The first flare will be utilised for biogas destruction during periods of fluctuation and short term offtake interruptions where biogas would otherwise be vented through PVRV to atmosphere." PVRVs should not be used for routine venting, and the flaring of biogas as a result of biogas not being taken at the biogas upgrading plant would not be considered an emergency, and therefore not BAT. (for further guidance see Biological waste treatment: appropriate measures for permitted facilities)

While you have identified that biogas may be used in the boiler, it is unclear how biogas will be used in the event that heat is not required in the Anaerobic Digestion process and the biogas upgrading plant is not in use.

Update your application to clearly explain how you will manage the re-circulation of biogas when the biogas upgrading plant is offline to meet BAT. If this includes the use of dual fuel combustion plant, ensure that you update any relevant modelling and assessments.

5) **Management of diffuse odour sources in line with BAT and appropriate measures**

You have identified diffuse emissions to air from the delivery of solid feedstock to the concrete apron, displacement of air during the filling of tanks and odour releases from vents surrounding the digestate lagoon are taking place, and have provided not solution to address these key risk in line with BAT14, BAT34 and Biological waste treatment: appropriate measures for permitted facilities). Section 7.3 of this guidance states that "You must cover new lagoons with an engineered, impermeable, rigid or flexible cover. They must have gas collection and extraction to abatement or a gas recovery system. All new lagoons must be constructed in accordance with CIRIA 736.". Section 7.1 of this guidance advises that "you must cover all bulk storage tanks. Where possible you must contain and vent tanks and vessels through suitable abatement, or direct emission to a gas recovery system.". Section 7 of this guidance states that "You must store highly putrescible wastes, including odorous

and ammonia-rich wastes and wastes containing animal by-products, in a contained or enclosed building. The building should be fitted with an appropriately engineered extraction and ventilation system, with the air extracted and directed to a suitable abatement system. You can install localised point source air extraction in buildings to minimise a source emission from that locality. For liquid wastes this is either:

- *a sealed tank fitted with an air control system which may include air circulation*
- *local extraction to a gas recovery plant or engineered abatement system*

a) **Update you application to explain how you will manage the delivery of solid feedstock to the concrete apron to meet the requirements of BAT14, BAT34 and Biological waste treatment: appropriate measures for permitted facilities)**

b) **Update you application clearly identify where the displacement of air during the filling of tanks is being undertaken and explain how you will manage/abate the displacement of air during the filling of tanks to meet the requirements of BAT14, BAT34 and Biological waste treatment: appropriate measures for permitted facilities)**

c) **Update you application clearly identify where the vents surrounding the digestate lagoon are located and explain how you will manage/abate the venting of the lagoon to meet the requirements of BAT14, BAT34 and Biological waste treatment: appropriate measures for permitted facilities)**

d) **Ensure that all emission points to air are included in your emission point plan**

6) Odour control unit and Odour Management Plan (OMP)

On an initial review of your OMP this does not include a description of the odour control abatement plant, and your OMP is missing key information that is required in section 6 guidance Odour management: comply with your environmental permit.

Update and resubmit your OMP to:

a) **Provide a clear explanation of the abatement plant that will be implemented on site**

b) **Includes any solutions identified in question 5**

c) **Ensure that it meets the requirements of section 6 of guidance Odour management: comply with your environmental permit.**

7) Application forms

Your application form responses only include part of your document reference 'Please see SOL_25_P007_ENG'

Update and resubmit your application forms to ensure that you include the relevant document and section that includes the response to the application form question.

8) **Emissions to air**

You have identified document 'SOL_25_P007_ENG Annex O' and 'SOL_25_P007_ENG Annex H' in application from B2.5, however we cannot locate this within your application.

a) **Provide a copy of 'SOL_25_P007_ENG Annex O' the combustion plant list spreadsheet**

b) **Provide a copy of 'SOL_25_P007_ENG Annex H'**

We cannot locate the modelling files for your air quality assessment

c) **Provide a copy of your modelling files**

d) **Should further abatement be provided in response to the above questions, or sources linked to the current abatement. Update your 'Air Quality Assessment S73' to reflect this**

e) **Should you remove the carbon capture element from your application you will need to update your 'Air Quality Assessment S73' to include the emission point from the biogas upgrading plant.**

9) **LDAR**

You have not provided a copy of your LDAR plan.

Provide a copy of your LDAR plan

10) **Noise Impact assessment and Noise Management Plan**

On review of your Noise impact assessment, we have confirmed as part of validation that a Noise Impact Assessment and Noise Management Plan will not be required as part of this application.

Please reply directly to this email with your information and copy in sarah.raymond@environment-agency.gov.uk.

You must send us the information and payment by 27/01/2026.

Pay online by credit or debit card

Pay online at this link 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 07557139052 or email sarah.raymond@environment-agency.gov.uk.

Yours sincerely

Sarah Raymond
Principal Permitting Officer – Installations