

**From:** [Braysheer, Caroline](#)  
**To:** [angela.graham \(Guest\)](#)  
**Cc:** [Braithwaite, Caroline](#); [Neil Sumner](#)  
**Subject:** EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Application is duly made  
**Date:** 28 November 2024 14:39:00  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)

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Dear Angela,

**Your environmental permitting application is duly made**

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

**Application reference: EPR/AB3700LS/V006**

**Operator: BIFFA WASTE SERVICES LIMITED**

**Facility: Brookhurst Wood Aggregate Treatment & Recycling Facility, Langhurstwood Road, Warnham, RH12 4QD**

I'm writing to let you know that your application is duly made as of 22/11/2024. I am liaising with the local area officer regarding your WAMITAB query received on 22/11/2024, however as this has clarified your position on this and this is the only thing outstanding, I have taken the decision to duly make this application. 'Duly made' means that we have all the information we need to start determination. Determination is where we assess and make a decision on your application. I will confirm our position on your WAMITAB scenario in due course.

If we do need further information, we'll contact you during determination. We'll explain what information we need and how long you have to provide it.

For further information on the permitting process, please see [Environmental permitting guidance: Core guidance](#).

If your application contained a request for confidentiality, we'll write to you separately about our decision on that.

Do get in touch with me directly if you have any questions.

Yours sincerely

**Caroline Braysheer**

Senior Permitting Officer – Installations, Waste Team, National Permitting Service

Internal: 53720 External: 02030 253 720 Mobile Number: 07920 594545 |  
Environment Agency | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



**Do you operate a medium combustion plant or specified generator?**  
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**From:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>

**Sent:** 22 November 2024 16:20

**To:** Braysheer, Caroline <[caroline.braysheer@environment-agency.gov.uk](mailto:caroline.braysheer@environment-agency.gov.uk)>

**Cc:** angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Not Duly Made

Hi Caroline,

Apologies for coming back to you late on in the week but just picking up on the WAMITAB query. Earlier today I discussed this query with Biffa's Project Team since as the future granting of a planning permission for the OWC facility is currently unknown then we wondered if the provision of the WAMITAB certificates with the additional modules are required at this early stage? To provide some further background I have summarised below the estimated timescales for the potential development of the OWC facility and as this could be 18-24 months away, this would allow sufficient time for Lee Coulson to have completed the relevant modules, and we would provide updated TCM details prior to the commissioning of the OWC facility:

OWC facility – Development Timescales:

- The current planning application has been refused so at this stage the development of the area of the site and construction of the OWC cannot be commenced;
- Should Biffa lodge an appeal against the planning refusal this process could take approximately 12-15 months and is subject to Biffa lodging an appeal before March 2025;
- The preparation of the area of the site where the OWC would be constructed and situated requires the removal of soil and involves reprofiling to make a suitable base for the new facility. As advised by Biffa's in house engineering team these works would take 2 months for removal of the soil and 4-5 months for full construction, none of these works would commence until the planning permission has been granted;
- The estimated start date for operations would be 18 – 24 months.

Taking the above into consideration whilst the OWC permitted activity is likely to be included in the varied permit before the outcome of the planning appeal, this activity cannot become operational, as such we would like to agree with the Environment Agency that updated WAMITAB details for the TCM/site management will be provided prior to operations at the site commence.

I am around on Monday if you need to discuss this over the phone.

Many thanks,

Neil

**On leave: 23<sup>rd</sup> – 27<sup>th</sup> Dec 2024**



**Neil Sumner**  
**Environmental Regulation Manager**

**Mobile** 07703 395 704 | **E-Mail** [neil.sumner@biffa.co.uk](mailto:neil.sumner@biffa.co.uk)  
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**From:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>  
**Sent:** 19 November 2024 11:04  
**To:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>  
**Cc:** Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>  
**Subject:** RE: EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Not Duly Made

Good morning everyone,

I hope you are well. I have tried called Angela and Neil but both are unavailable to speak at the moment.

I'm almost in a position to duly make this application – the only thing which is preventing this is the WAMITAB cover. I have reviewed the qualifications you have provided and cross referenced the modules in them with those required for the open windows composting course (ref MROC3). There are two modules currently not covered by Lee Coulson's certificates but are required under MROC3. Those are Level 4 for OCS30 (managing operations for OWC of non-haz wastes) and OCS61 (managing the transfer and disposal of wastes arising from OWC operations). Here are a couple of links to the WAMITAB website:

[Qualifications search - CIWM \(WAMITAB\)](#) - (I searched under 'compost').'

[CIWM-Purpose-Statement\\_V3\\_MROC3.pdf](#)

I therefore need you to provide me with evidence that you will have this cover by the time this variation is issued. I will duly make this once received. If you could get this to me by 26/11/2024 then I will get the consultations out and begin determination.

I mentioned in my phone message to Angela that there are also a couple of things I should have asked for at duly making but I'm happy to duly make without – as long as you provide me with them within the next couple of weeks. Perhaps a deadline of 29/11/2024 would be acceptable for this? I realised that you have not provided an alternative measures assessments for both biowaste treatment and non-hazardous wastes as is now standard for applications dealing with these activities. Here are the links to the relevant guidance for this:

[Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK](#)

[Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK](#)

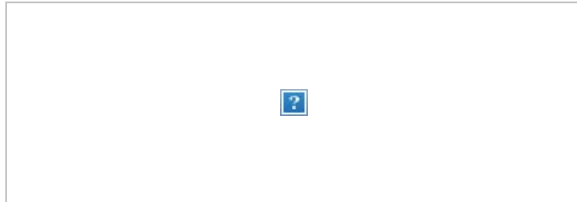
In addition, I need an amended C3 application form with all the technical guidance you will adhere to referenced (Table 3) – BAT and appropriate measures. For ease, here is the link - [Part C3 – Variation to a bespoke installation permit](#) . Again, if you can get this to me by 29/11/2024 that would be great.

Many thanks and best wishes

**Caroline Braysher**

Senior Permitting Officer – Installations, Waste Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |  
**Environment Agency** | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



**Do you operate a medium combustion plant or specified generator?**  
[Click here to find out if you need to meet the regulations](#)

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**From:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Sent:** 07 November 2024 12:54

**To:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>; PSC Land <[PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)>

**Cc:** angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>

**Subject:** RE: EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Not Duly Made

Dear Caroline,

Please see attached the non-duly made response for Biffa Brookhurst Wood OWC. Any issues accessing please let me know.

Kind regards

**Caroline Braithwaite** BSc (Hons) PIEMA MCIWM CRWM  
Principal Environmental Consultant  
Permitting - EHS, UK and Ireland  
[aecom.com](http://aecom.com)

Please note I normally finish work at 3pm.

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**From:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>  
**Sent:** 30 October 2024 10:28  
**To:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>  
**Cc:** Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>  
**Subject:** RE: EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Not Duly Made

Hi Caroline,

Thanks for the quick reply and agreeing to the extension.

I don't envisage there being any difficulties in getting the response to you either before or by the 8<sup>th</sup> Nov, but obviously I'll be in touch if required.

Many thanks,

Neil



**Neil Sumner**  
**Environmental Regulation Manager**

**Mobile** 07703 395 704 | **E-Mail** [neil.sumner@biffa.co.uk](mailto:neil.sumner@biffa.co.uk)  
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[www.biffa.co.uk](http://www.biffa.co.uk)

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**From:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>  
**Sent:** 30 October 2024 10:24  
**To:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>  
**Cc:** Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>  
**Subject:** RE: EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Not Duly Made

Hi Neil,

Yes – an extension to 8<sup>th</sup> Nov is fine. It's unlikely I'll be able to extend further after that date so do let me know as soon as you can if there are any difficulties.

Many thanks and best wishes

**Caroline Braysher**  
Senior Permitting Officer – Installations, Waste Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |  
**Environment Agency** | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



**Do you operate a medium combustion plant or specified generator?**  
**[Click here](#) to find out if you need to meet the regulations**

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**From:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>

**Sent:** 30 October 2024 10:05

**To:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>

**Cc:** angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Not Duly Made

Good morning, Caroline,

Quick update.

AECOM are working on the drafting of the responses, which I hope to receive tomorrow, however a couple of my colleagues in the Brookhurst Wood operational team are unavailable and on leave part of this week and as there are some details I need to get them to approve would it be possible to further extend the submission date to the end of next week, to the 8<sup>th</sup> Nov 2024? We will try and get the response to you earlier if we can though.

Hopefully, this is OK with you.

Many thanks,

Neil



**Neil Sumner**  
**Environmental Regulation Manager**

**Mobile** 07703 395 704 | **E-Mail** [neil.sumner@biffa.co.uk](mailto:neil.sumner@biffa.co.uk)  
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**From:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>

**Sent:** 08 October 2024 08:57

**To:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>

**Cc:** Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Not Duly Made

Good morning all,

Yes – 1<sup>st</sup> Nov is fine. Any problems in the lead-up, just drop me a line.

Many thanks and best wishes

**Caroline Braysher**

Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |  
**Environment Agency** | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



**Do you operate a medium combustion plant or specified generator?**  
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**From:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>

**Sent:** 04 October 2024 16:00

**To:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>

**Cc:** angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>  
**Subject:** RE: EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Not Duly Made

Hello Caroline,

It was good to speak with you yesterday and we all found the meeting really useful.

I had another meeting this morning with Angela to discuss the work involved in responding to all of the not duly queries, taking into considering workflow, resource required to prepare, review and finalise the responses, then we would like to request an extension of 3 weeks, with a revised submission date of Friday 1<sup>st</sup> November 2024. We hope this is acceptable and await your reply.

If you need to discuss anything else related to the application then please do not hesitate to contact me.

Many thanks,

Neil



**Neil Sumner**  
**Environmental Regulation Manager**

**Mobile** 07703 395 704 | **E-Mail** [neil.sumner@biffa.co.uk](mailto:neil.sumner@biffa.co.uk)

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**From:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>  
**Sent:** Friday, September 27, 2024 8:31 AM  
**To:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>; Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>  
**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>  
**Subject:** EPR/AB3700LS/V006 - Biffa - Brookhurst Wood Treatment site - Not Duly Made

Hi Angela and Neil,

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

**Application reference: EPR/AB3700LS/V006**

**Operator: BIFFA WASTE SERVICES LIMITED**

**Facility: Brookhurst Wood Aggregate Treatment & Recycling Facility, Langhurstwood Road, Warnham, RH12 4QD**

Thank you for your application received on 20/10/2023. In lieu of our planned conversation, below is the list of things which I need to duly make this application.

In order to progress this application, I need the following from you:

1. WAMITAB – the current certificate covers physical waste treatment but is out of date. It also doesn't cover biowaste. Please provide us with evidence your TCM has the correct cover for the composting activity and updated waste treatment qualification. This should be both the original certificate and current continuing competency certificate.
2. BAT assessment – amend to provide more description to how the site monitors the composting side which meets BAT36. To include monitoring frequencies, trigger points and actions. As per the charging section below, if the waste wood shredding activity is an installation, the BAT assessment must be amended to also include this aspect under the waste treatment BREF. As the shredding is for both the waste wood and composting green wastes, BAT14d must be adhered to regarding enclosure of the shredding activity. Any deviation away must be fully justified and explained how processes on site provide the same protections against dust exiting the site boundary.

3. FPP – as the waste piles of wood exceed the guidance, the FPP must include additional measures, particular in monitoring, to reduce the risk of self-combustion and heat spots in the piles.
4. 19 12 12 – my understanding is that this code will be used in the existing waste treatment activity. The fact that you have to describe this material (aggregate or glass?) as this waste code suggests that this waste will be contaminated because of where it's come from. Please confirm the origins of this waste type and:
  - a. It would be really helpful to provide a section in the technical plan just concentrating on this waste code. In it, please include the following:
  - b. Describe tonnages and whether it will be subject to further treatment when it arrives on site. If it is washed, describe what happens with these wash waters, what's added to them, how the washing process works, what wastes are produced during this process and how it's dealt with.
  - c. If the aggregate you produce meets a quality protocol, confirm how adding a 19 12 12 waste will meet those requirements. As said above, the expectation is that this waste type is contaminated and is not a code used in the QP.
  - d. Show where this waste still be stored in a plan – both pre and post treatment
  - e. Show where aggregate mixed with this waste type is stored in a plan
  - f. Describe how surface water will not be contaminated with this waste type – where does the water go?
  - g. If waters which are discharged either to sewer or surface water comes into contact with 19 12 12 wastes, provide a H1 risk assessment. The water quality section of the new H1 is still unavailable, so please use the existing excel spreadsheet version and make any necessary adjustments if out of date.
  - h. Describe how surface water from areas storing 19 12 12 wastes are prevented from entering the lagoons and any other water used to irrigate the compost. Any water coming into contact with 19 12 12 wastes could potentially but the compost's PAS100 status at risk.
  - i. Something to consider – if waters which have come into contact with 19 12 12 wastes enters the effluent treatment plant on the other site prior to discharge, then it is likely that the permit for that site will need to be varied accordingly.
5. Site plans – make clear on one of the infrastructure drawings the areas where the mobile crusher will be placed. If it is to move to different parts of the site, then this should be shown clearly on a plan.
6. Site plan ref BA236100 – The surface water storage tanks to the north appear to be within the permit boundary of the landfill – please confirm if this is the case and describe how this is managed between the two permits in an amendment to the technical plan.
7. Site plan – provide a drawing which clearly shows where all water goes (clean roof water, contaminated yard water and process waters) – whether to lagoons, to surface water or discharged to the MBT. Please include the storage of 19 12 12 wastes so we can clearly see where run off which is in contact with this goes.
8. Provide a process flow chart showing relationship between this site and the MBT next door (eg: in terms of water treatment and whether any wastes go from one to the other).
9. Drainage – in the technical plan, describe why this site cannot treat the waters before they exit the site boundary en route to the MBT next door for further treatment. It looks like there are linked between the two sites so we are wanting to understand them better.
10. Lagoons and new water storage – it looks like these are all new infrastructure proposals. Please confirm in the technical plan the standards used to which they will be constructed, and include details of how they will meet containment requirements under CIRIA.

We also need additional fees in order to duly make this application and the amount will depend on your answers to my email dated 12/09/2024 in relation to the waste wood shredding. The additional fee will include:

Waste wood storage and shredding – this will be a new activity, however the purpose behind the shredding will dictate how much is due. The C4 form does say that the site is treating up to 400 tpd waste wood for

recovery. If that recovery is pre-treatment for incineration/co-incineration at over 75 tpd, then this will be an installation. So, this activity fee will either be:

- i. 5.4(a)(iii) and b(iii) – non-hazardous pre-treatment for incineration or co-incineration - £13,288 ([1.16.2.3](#) of the charging guide), or
- ii. If the waste wood shredding remains a waste activity, then the fee to cover this is £7,930 under 1.16.12 physical treatment of non-hazardous waste. This is because it is entirely unconnected with existing activities and the proposed new activities so a full assessment of risk is required.

In addition, due to the nature of 19 12 12 code, we will need to look more closely at this so a fee for a normal variation against the physical treatment of non-hazardous waste activity is required as a minimum. This will be £3,965 as per 1.16.12 of the charging guide.

Please reply directly to this email with your information. You must send us the information and payment by 11/10/2024.

Details of how to pay are given in Part F 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 £1,500. 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.

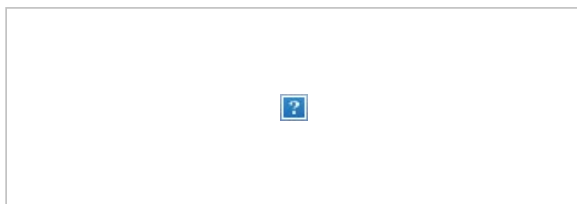
If you have any questions please contact me directly using the details below.

Yours sincerely,

**Caroline Braysher**

Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |  
**Environment Agency** | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



**Do you operate a medium combustion plant or specified generator?**  
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---

**From:** Braysher, Caroline

**Sent:** 25 September 2024 14:02

**To:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>; angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>

**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Hi Neil,



I was going to cover both parts of the site is possible. Chat would include how water is currently managed on site, and proposed changes, a chat about the aggregate processing side (eg: does the treatment on site meet the quality protocol), waste code additions etc...

I will send you my not duly made email so that might help you see the direction of my thoughts – you'll have it by the end of this week.

My availability for next week:

Monday 30<sup>th</sup> Sept – 1-3pm

Weds 2<sup>nd</sup> Oct – morning

It's a bit tight but hopefully you can find a time to suit.

Best wishes

**Caroline Braysher**

Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |  
Environment Agency | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



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**From:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>

**Sent:** 25 September 2024 10:44

**To:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>; angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>

**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Hello Caroline,

Next week might be better, I am hoping to speak with the General Manager in our Organics Dept today/tomorrow. If you could send across some further dates that would be really helpful.

Just in terms of our chat, are we looking to focus more so on the new Open Windrow Composting Facility as opposed to the existing Aggregate Treatment & Recycling Facility (ATRF)? The reason for asking is the ATRF is operated by another dept in Biffa so I want to make sure we have the correct people available.

Many thanks,

Neil



**Neil Sumner**  
**Environmental Regulation Manager**

**Mobile** 07703 395 704 | **E-Mail** [neil.sumner@biffa.co.uk](mailto:neil.sumner@biffa.co.uk)

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**From:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>  
**Sent:** Wednesday, September 25, 2024 10:34 AM  
**To:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>; Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>  
**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>  
**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

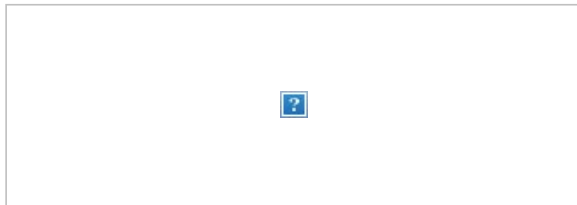
Good morning all,

Any thoughts on when to schedule a chat? If next week is better, do let me know and I'll give you some more dates.

Many thanks and best wishes

**Caroline Braysher**  
Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |  
**Environment Agency** | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



**Do you operate a medium combustion plant or specified generator?**  
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---

**From:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>  
**Sent:** 20 September 2024 11:03  
**To:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>; angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>  
**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>  
**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Hello Caroline,

Thanks for advising on your availability and I agree it is sometimes easier to talk through the proposed activities on a call.

Hopefully when Angela is back, and I have an update from my operational colleague then I can send out a Teams invite for either Thursday or Friday next week.

Many thanks,

Neil



**Neil Sumner**  
**Environmental Regulation Manager**

**Mobile** 07703 395 704 | **E-Mail** [neil.sumner@biffa.co.uk](mailto:neil.sumner@biffa.co.uk)

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**From:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>  
**Sent:** Friday, September 20, 2024 9:14 AM  
**To:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>; Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>  
**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>  
**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

I think that would be a good idea. There's quite a lot going on with this application so I'd like to make sure I have things right in my head.

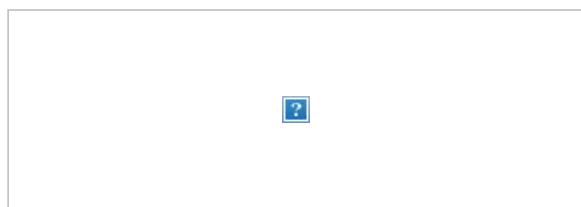
Next week is pretty busy for me. I'm on leave on Monday, and on a training day on Tuesday. Wednesday is backed up with meetings. So either 2.30pm on Thursday or any time before 3pm on Friday?

Best wishes

**Caroline Braysher**

Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |  
**Environment Agency** | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



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**From:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>  
**Sent:** 20 September 2024 09:02  
**To:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>; angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>  
**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>  
**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Hello Caroline,

Thanks for your email, I am awaiting a response from our Organics Team on the wood recycling query which I will follow up again today. I also am wondering if we can aim to have a call next week as I think it might be beneficial to have one of my operational colleagues involved in the discussion, so maybe we can do this via a Teams call?

Does that sound like OK?

Many thanks,

Neil



**Neil Sumner**  
**Environmental Regulation Manager**

**Mobile** 07703 395 704 | **E-Mail** [neil.sumner@biffa.co.uk](mailto:neil.sumner@biffa.co.uk)

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**From:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>

**Sent:** Friday, September 20, 2024 8:35 AM

**To:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>; Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>

**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Good morning Neil,

I've finished going through the documents and would like to speak with someone to clarify how things are set out on site in my mind before I send the not duly made email. It's always good to have that initial chat I think to properly set the scene. As Angela is on leave until next week, would you be able to talk through with me how things currently work on the site and the changes or is it best that I wait for Angela's return?

Many thanks and best wishes

**Caroline Braysher**

Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

Internal: 53720 External: 02030 253 720 Mobile Number: 07920 594545 |

Environment Agency | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



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**From:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>

**Sent:** 13 September 2024 15:40

**To:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>; angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>

**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Hello Caroline,

Thank you for your email, I am just waiting to hear back from operational colleagues on the wood shredding point, so hopefully I can come back to next week.

Kind regards,

Neil



**Neil Sumner**  
**Environmental Regulation Manager**

**Mobile** 07703 395 704 | **E-Mail** [neil.sumner@biffa.co.uk](mailto:neil.sumner@biffa.co.uk)

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**From:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>

**Sent:** Thursday, September 12, 2024 9:33 AM

**To:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>; Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>

**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Good morning everyone,

I'm in the process of duly making this application and have a couple of questions regarding the waste wood shredding activity.

Please can you confirm the purpose behind the shredding of the non-hazardous waste wood? As this is not a DAA to the composting activity nor linked to the existing activity, this will be charged as a new activity in addition to what has already been paid. So the charging question is whether to charge as a new waste physical treatment activity or a new installations activity. However, whether it comes under installations or not in its own right depends on the purpose behind it and treatment tonnages. So, if the wood shredding is pre-treatment for incineration and is over 75 tonnes per day, then it's an installation activity. Similarly, if the shredding is a disposal operation rather than recovery and is over 50 tonnes per day treatment, then it's also an installation activity. If not, it remains a new waste physical treatment activity.

I've been looking through the documentation submitted and haven't yet come across the purpose for the waste wood shredding so thought I'd ask the question now.

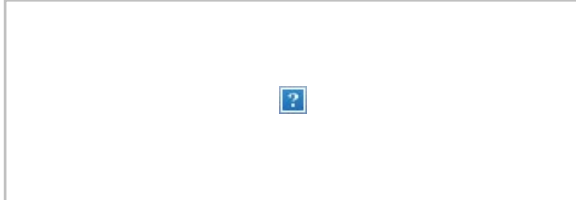
I'm still going through everything so I will send the formal correspondence in due course – it will be a not duly made since at the least we need the extra fee, but I just need to see whether we need more information too.

Many thanks and best wishes

**Caroline Braysher**

Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |  
Environment Agency | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



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**From:** Braysher, Caroline

**Sent:** 16 August 2024 13:17

**To:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>; angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>

**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Thank you both.

Best wishes

**Caroline Braysher**

Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |  
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**From:** Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>

**Sent:** Friday, August 16, 2024 12:04 PM

**To:** angela.graham (Guest) <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>

**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

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Hello All,

I can confirm that there have been no changes to the application proposal.

Kind regards,

Neil



**Neil Sumner**  
**Environmental Regulation Manager**

**Mobile** 07703 395 704 | **E-Mail** [neil.sumner@biffa.co.uk](mailto:neil.sumner@biffa.co.uk)

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**From:** Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>

**Sent:** Friday, August 16, 2024 9:44 AM

**To:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>; Neil Sumner <[Neil.Sumner@biffa.co.uk](mailto:Neil.Sumner@biffa.co.uk)>

**Cc:** Braithwaite, Caroline <[Caroline.Braithwaite@aecom.com](mailto:Caroline.Braithwaite@aecom.com)>

**Subject:** RE: EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Caroline,

Thanks for the update – I have copied my colleague Caroline Braithwaite and the Operator contact Neil Sumner, if you can copy them in on future correspondence that would be appreciated as I will have leave coming up in September and it means any clarifications you may need will get picked up during that period.

In the meantime, I am not aware of anything that has changed with the application proposal - [@Neil Sumner](#) can you just confirm that is correct.

Regards

Angela

**Angela Graham** MSC, BSc, MICWM, MIIRSM

Associate, Permitting - EHS, UK & Ireland

M +44 (0) 7920825530

[angela.graham@aecom.com](mailto:angela.graham@aecom.com)

[Click here to connect with me on LinkedIn](#)

Please note my annual leave dates are:

6<sup>th</sup> – 23<sup>rd</sup> September 2024 inclusive

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Chetwynd Business Park  
Chilwell, Nottingham  
NG9 6RZ, United Kingdom  
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**From:** Braysher, Caroline <[caroline.braysher@environment-agency.gov.uk](mailto:caroline.braysher@environment-agency.gov.uk)>

**Sent:** Friday, August 16, 2024 9:15 AM

**To:** Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>

**Subject:** EPR/AB3700LS/V003 - Biffa - Brookhurst Wood Treatment site

Dear Angela,

**EPR: EPR/AB3700LS/V003 (EAWML 400796)**

**Operator: Biffa Waste Services Limited**

**Site: Brookhurst Wood Aggregate Treatment & Recycling Facility, Langhurstwood Road, Warnham, RH12 4QD**

I have just tried calling you to introduce myself but was unable to speak with you.

I have been allocated the determination of this substantial variation. I've not yet looked at it but will begin to do so today. I'm on leave for a fortnight after today, however will continue my duly making checks upon my return.

In the meantime, as I see this has been on the queue a long time, I would like to ask whether anything has changed in relation to this application? If there is anything you would like to update me on, just drop me a line.

I'll be in touch again once I return from holiday.

Best wishes

**Caroline Braysher**

Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

Internal: **53720** External: **02030 253 720** Mobile Number: **07920 594545** |

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Biffa is a trading name of the companies listed below. The VAT registration number for the companies listed below is 537 911 627.

Biffa Waste Services Limited is registered in England and Wales No. 00946107; Biffa Environmental Municipal Services Limited is registered in England and Wales No. 00905800; Biffa Leicester Limited is registered in England and Wales No. 04602279; Biffa West Sussex Limited is registered in England and Wales No. 06744107; Biffa Municipal Limited is registered in England and Wales No. 04321212; Cressex Insurance Services Limited is registered in England and Wales No. 06848093; Syracuse Waste Limited is

registered in England and Wales No. 13269384; and Biffa (West Sussex) Recycling Limited is registered in England and Wales No. 04939078; each having their registered office at Coronation Road, Cressex, High Wycombe, Buckinghamshire HP12 3TZ. "Skoup@", "Foodplus", "Biffpack@" and "Biffa Polymers" are all trading names of Biffa Waste Services Ltd.

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