

## Danny Dunstan

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**From:** Jones, Michael <Michael.Jones2@tetrattech.com>  
**Sent:** 14 May 2026 16:00  
**To:** Jeanette Ringham  
**Cc:** tarak@greenshepherd.co.uk; SM-Defra-RESP-notifications (DEFRA)  
**Subject:** RE: EPR/MP3325SU/V008 BENFLEET SCRAP CO LIMITED We Need More Information About Your Application CRM:0253340  
**Attachments:** 2641-005-02A Vr 2 - Permit Boundary Plan.pdf

Jeanette

Please see the attached, is this sufficient?

I used the previous version as it was the one attached to the current permit, so I assumed that it was suitable.

Thanks

**Michael Jones BSc, FGS, MIAEG** | Technical Director

Mobile +44 7500 072 812 | [Michael.jones2@tetrattech.com](mailto:Michael.jones2@tetrattech.com)

Time Zone: GMT / BST

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**From:** Jeanette Ringham <jeanette.ringham@environment-agency.gov.uk>  
**Sent:** 14 May 2026 14:46  
**To:** Jones, Michael <Michael.Jones2@tetrattech.com>  
**Cc:** tarak@greenshepherd.co.uk; Jeanette Ringham <jeanette.ringham@environment-agency.gov.uk>; SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>  
**Subject:** RE: EPR/MP3325SU/V008 BENFLEET SCRAP CO LIMITED We Need More Information About Your Application CRM:0253340

Hello Michael

Thank you for the information which I am currently working through.

There is currently 1 drawing which is not sufficient for validation/duly making which is the site location drawing you have referenced a s Permit Boundary Plan. As explained in question 5 there are no identifiable features such as named roads etc which can be used to locate the site. The plan provided is not acceptable as previously explained. Appendix 3 of application form C2 gives an example of what your site location plan should contain.

Please can you provide this revised drawing by the deadline of 15/05/2026 as detailed in the original request. I will continue to review your information and once completed will be in touch.

Please note if the information requested does not meet the validation requirements you will only have until close of business on 15/05/2026 to rectify this or your application will be returned.

If you have any queries please contact me.

Thanks

**Jeanette Ringham**

Permitting Officer, Permitting

**Environment Agency** | Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5BR

[jeanette.ringham@environment-agency.gov.uk](mailto:jeanette.ringham@environment-agency.gov.uk)

020 3025 3272

Working days: Monday to Friday

(Jeanette pronounced Gea net) [#Mynameis](#)



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**From:** Jones, Michael <[Michael.Jones2@tetrattech.com](mailto:Michael.Jones2@tetrattech.com)>

**Sent:** Wednesday, May 13, 2026 4:16 PM

**To:** SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>

**Cc:** [tarak@greenshepherd.co.uk](mailto:tarak@greenshepherd.co.uk); Jeanette Ringham <[jeanette.ringham@environment-agency.gov.uk](mailto:jeanette.ringham@environment-agency.gov.uk)>

**Subject:** RE: EPR/MP3325SU/V008 BENFLEET SCRAP CO LIMITED We Need More Information About Your Application CRM:0253340

Jeanette

Further to the below please find attached the following updated documents, application forms and drawings:-

- Non-Technical Summary Version 3;
- Operating Techniques Version 3;
- Dust Management Plan Version 3;
- Noise Management Plan Version 3;
- Environmental Risk Assessment Version 3;
- Site Condition Report Version 3;
- Part A (new);
- Part C2 (new);
- Part C4 (new);
- Part F1 (new);

- 2641-005-02A - Permit Boundary Plan
- 3376-002-03 - Site Layout Plan
- BEN-B072465-REC-01 – Receptor Plan; and
- 2641-005-02B Vr 2 - Dust Monitoring Location Plan.

Which have been altered to answer all your queries. I have kept the changes I've made in blue for your ease.

Please let me know if you have any other queries.

Regards

**Michael Jones BSc, FGS, MIAEG** | Technical Director

Mobile +44 7500 072 812 | [Michael.jones2@tetrattech.com](mailto:Michael.jones2@tetrattech.com)

Time Zone: GMT / BST

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**From:** SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>

**Sent:** 01 May 2026 14:32

**To:** Jones, Michael <[Michael.Jones2@tetrattech.com](mailto:Michael.Jones2@tetrattech.com)>

**Cc:** [tarak@greenshepherd.co.uk](mailto:tarak@greenshepherd.co.uk); Jeanette Ringham <[jeanette.ringham@environment-agency.gov.uk](mailto:jeanette.ringham@environment-agency.gov.uk)>

**Subject:** EPR/MP3325SU/V008 BENFLEET SCRAP CO LIMITED We Need More Information About Your Application  
CRM:0253340

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Dear Michael Jones

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

**Application reference: EPR/MP3325SU/V008**

**Operator: BENFLEET SCRAP CO LIMITED**

**Facility: Benfleet Soil and Aggregate Recycling Facility, FANE ROAD, BENFLEET, SS7 3NH**

Thank you for your application received on 26/02/2026.

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

1. Application form A question 7.2 please provide an email address for Leo Leeman for the receipt of legal correspondence as a director of the company. Please also untick the box saying this contact is the same as in question 7.1 who is your application contact and not the same individual.

*Note: We cannot accept an email address which is not held by the individual or the company they have control of for the legal representative. The details for companies must be a company secretary, clerk or a director. The email address currently provided is for your Technically qualified manager and not for Leo Leeman. Note if you would like the operational contact in question 7.3 to be your Technically qualified managed please complete their full details so operational matters can be discussed with them directly.*

2. Application form C2 question 1d the national grid reference question at the top of page 5 needs completing.
3. Application form C2 question 2b.2 a change in the annual throughput has been suggested since the submission of your application documents. If you wish to change the annual throughput please amend all parts of your application otherwise please respond to this question confirming the annual throughput will be 250,000 tonnes per annum.

*Note: there will be no other references to the change in tonnages per annum through the questions asked so if you do wish to changes the annual throughput it is your responsibility to amend where necessary all references to the correct value in both your application forms and supporting documentation.*

4. Application form C2 question 2b3 needs answering.
5. Application form C2 question 6 b and Appendix 3 please provide a revised site location plan for use in your permit as your current plan does not meet the required guidance as detailed in Appendix 3.

*Note: in addition to the details already contained within the existing permits plan you also need identifiable features such as road names etc to be able to locate where the site is if you only have the permit for reference this is especially used by the public as this document is publicly available.*

6. Application form C4 table 1 a needs completing with the storage details.
7. Application form C4 table 3b needs completing with the correct document reference for the Dust Emissions Management Plan (DEMP).

8. Application form F1 table 3 box for “Total B” needs completing for the total of the additional charges value.
9. Application form F1 question 5 the declaration of the completion of the forms and the submission of your application is not current and has not been changed since application V007 please provide a current declaration.
10. Please amend all relevant parts of your application including the list of wastes to be accepted on site within your Operating techniques document appendix A, as part of our discussions so far for this application you have agreed to remove the following wastes which are either combustible, odorous, Incinerator Bottom Ash (IBA) or Incinerator Bottom Ash Aggregate (IBAA) which are:
  - 03 01 01 Bark and cork.
  - 03 03 01 Bark and Wood.
  - 19 05 03 Compost from source segregated biodegradable waste.
  - 19 09 02 Sludges from water clarification.
  - 19 13 04 Sludges from soil remediation other than those mentioned in 19 13 03.
  - 10 01 01 – Bottom Ash and Slag
  - 10 01 02 – Pulverised fuel ash
  - 10 01 15 - Bottom ash and slag from co-incineration other than those mentioned in 10 01 14
  - 10 20 01 - Blast furnace slag filter bed media free from sewage contamination
12. Provide a revised Operating Techniques document which addresses the following:
  1. on pages 1 and 2 there are 2 references for each which is confusing as you will only have 1 waste table in this permit please amend the details to confirm the annual throughput and the total amount of waste to be stored on site at any time.
  2. Section 4.1.3 does not seem to be consistent with the storage capacity mentioned elsewhere in your application please revise the details so the maximum storage capacity is not exceeded.
  3. As previously mentioned amend appendix A your waste table, by removing the 9 waste codes no longer required.
13. Provide a revised Dust Management Plan document which addresses the following:
  1. on page 1 there are 2 references for each which is confusing as you will only have 1 waste table in this permit please amend the details to confirm the annual throughput and the total amount of waste to be stored on site at any time.
  2. Section 2.9 there are a number of sensitive receptors which have not been identified including 3 travellers sites the nearest being less than 60m from the site boundary, there are also 2 new properties on Fane Road, etc please review the sensitive receptors and include all which are applicable.
  3. Section 3.2 table 4 based on your site layout plan there are no buildings on site, please amend the pathway to correctly reflect the conditions on this site.

4. Section 3.3 is referenced using Best Available Techniques however for waste sites compliance with the relevant appropriate measures is required along with their implementation revise this section in relation to the correct technical standards.
  5. How will buildups of dust on the hardstanding be removed as I am not sure the use of a road sweeper on this surface is very practical?
  6. Provide details of your pile dimensions, site layout, location of dust suppression measures, water storage within this document.
  7. As previously mentioned amend appendix A your waste table, by removing the 9 waste codes no longer required.
  8. Provide a revised dust monitoring location plan which adequately monitors the whole perimeter of the site especially to the East near the protected deciduous woodland and to the north where there is an adjoining other regulated waste site. (please remember to update the date/rev no on the drawing when amending the details)
14. Provide a revised Environmental Risk Assessment document which addresses the following:
1. on page 4 there are 2 references for each which is confusing as you will only have 1 waste table in this permit please amend the details to confirm the annual throughput and the total amount of waste to be stored on site at any time.
  2. Section 2.2 is reference to odour and the receipt and storage of odorous waste. In discussions up to now the potentially odorous wastes have been removed from the application so this section should be revised along with other sections referencing odour to correctly reference the conditions on site.
  3. Section 2.4 there are a number of sensitive receptors which have not been identified including 3 travellers sites the nearest being less than 60m from the site boundary, there are also 2 new properties on Fane Road, etc please review the sensitive receptors and include all which are applicable with particular reference to domestic dwellings.
  4. Appendix A dust and particulate emissions from the treatment of waste has not been included in table A3 please include these details.
  5. Provide Appendix B the Nature and Heritage Conservation Screen.
15. For consistency please amend all parts of your application to the correct details of the initial permit on this site being issued to D C Donovan Group limited on 21/07/2020 and the part of the site currently operated by Benfleet Scrap Co Limited was transferred to them on 03/01/2024. All references to the permit being in placed from 2016 or any other dates mentioned should be changed to the correct details as appropriate.

Please reply directly to this email [RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk) with your information and copy in [Jeanette.ringham@environment-agency.gov.uk](mailto:Jeanette.ringham@environment-agency.gov.uk).

Postal address:  
Integrated Permitting Services  
Quadrant 2  
99 Parkway Avenue

Parkway Business Park  
Sheffield  
S9 4WF

You must send us the information by 15/05/2026.

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>

We have also identified the following missing information, which although it will not prevent us from duly making the application, will be required during determination. You should provide this information as early as possible to avoid delays during determination.

**For confirmation of our discussion I have spoken with the area officer and our noise leads and the decision has been confirmed we do need a Noise Impact Assessment (NIA) and associated data files which are produced by a qualified acoustician and the details to be referenced in your Noise Management Plan (NMP). When submitting a NMP our guidance requires the NIA and data files be provided. Please provide this information within 6 weeks of the date of this letter. The extended time period for the submission of this information outside of the Validation process is based on your request for pre application advice on whether a NIA is required which was not answered according to our records and with the return of V007 application not identifying as part of the return the NMP and NIA would also be required as part of your next submission. Please note any future applications where using the noise screening tool available on gov.uk addresses the requirement to submit a NIA and NMP if these documents are not provided as part of the application package you will only have 10 working days to provide the information when formally requested or your application will be returned.**

You can send us this determination information by replying directly to this email [RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk) with your information and copy in [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk).

Without this additional information we will be unable to issue your permit.

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 phone me on 02030253272 or email [Jeanette.ringham@environment-agency.gov.uk](mailto:Jeanette.ringham@environment-agency.gov.uk).

Yours sincerely,  
Jeanette Ringham

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