

Wayne Clark

From: Andrew Wright <andywright@mjca.co.uk>
Sent: 19 December 2025 16:04
To: SM-Defra-RESP-notifications (DEFRA)
Cc: Simone Cumberbatch; 'lbaker@titanamerica.com'; 'Goce Serafimov'; Leslie Heasman
Subject: Fiddlers Ferry – Environmental Permit application reference EPR/ZP3831DX/V005 – Further Information Response
Attachments: Figure A - ticff25331.pdf

19 December 2025

Dear Simone

Fiddlers Ferry – Environmental Permit application reference EPR/ZP3831DX/V005 – Further Information Response

We are pleased to provide our response to the request for information (RFI) in your email dated 17 December 2025 in respect of the application to vary Environmental Permit number EPR/ZP3831DX for the Ash Processing Plant (APP) to be operated by Titan Cement UK Limited (Titan) at Fiddlers Ferry (the site). For clarity we have reproduced each of the questions in your email dated 17 December 2025 in *blue italic font* below and then provided our responses.

1. ***Provide a drainage plan that includes the water tank.***

Your application states that water will be stored within a tank; however, the site plan does not show the location of this tank.

As explained in the application documentation, Titan are proposing to install new plant and equipment at the site to facilitate the storage and processing of Coal Derived Fly Ash (CDFA) at the site. The water tank has not yet been installed at the site. The exact location of the water tank will be determined and confirmed as part of the Commissioning Plan, however, please find attached Figure A (drawing reference TIC/FF/12-25/25331) which shows two potential locations for the water tank, one inside the APP building and one to the east of the APP building.

2. ***Provide a site or drainage plan that identifies where the water will be discharged and specify the exact point of release (for example, to a surface watercourse or a sewer).***

Your application states that water from the dryer will be discharged, but it does not include the location of the discharge. This information is required so that we can assess and ensure that all pathways are appropriately controlled.

As explained in the application any excess captured condensed water will be discharged to the existing surface water drainage system at the site together with any rainfall runoff. The existing surface water drainage system comprises a collection sump at the location marked D1 on Figure A (drawing reference TIC/FF/12-25/25331) which collects uncontaminated surface water including roof water at the APP. The collected water is pumped via existing pipework to an existing pumphouse at location D2 on Figure A from where it is discharged as part of the existing wider site surface water drainage system to the River Mersey.

3. ***Confirm that only clean, uncontaminated water will be discharged.***

From our phone conversation and from reviewing your Application Report, water will be generated although the amount is unknown. You have completed the C6 form as a precaution. Confirmation will, however, be required through the trial/Local Enforcement Position (LEP) or the Commissioning Plan.

My understanding is that any contaminated water arising from the activity would be removed from site by tanker, as a foul sewer connection is not available at this stage. The operator may consider applying for a future variation if a connection to the foul sewer becomes possible.

If this understanding is correct, the requirement to complete the H1 risk assessment for contaminated water would not apply. Please confirm whether this is the case, and that only clean, uncontaminated water will be discharged.

We confirm that your understanding set out above is correct and that only clean, uncontaminated water will be discharged from the site.

4. **Confirm if we can combine two or more permits into a single consolidated permit?**

Your Form C2, question 2c states that you do not wish the permit to be consolidated as you believe this has already been completed. However, the most recent consolidated version available on our system is the 2017 (V002) permit, and we do not hold a more up-to-date consolidated version. We are therefore able to consolidate all current variations/transfers into a single updated permit at no additional charge, should you wish us to proceed.

It is our understanding that the permit was not fully consolidated in 2017, hence conditions within the 2015 permit (EPR/BP3698SZ/V003) also are relevant. Notwithstanding this, we confirm that we would like all current variations/transfers to be consolidated into a single updated permit.

We trust that the information provided with this email satisfies the request for further information and will be sufficient for the application to be Duly Made. Should you have any queries please do not hesitate to contact us. As discussed on the phone, my final day in the office prior to the Christmas break is Monday 22 December, however, my colleague Leslie Heasman (who was also present at the enhanced pre-application meeting earlier in 2025 and is knowledgeable on the project) is working until 24 December if you have any queries. We would be grateful if the application is able to be Duly Made prior to the Christmas break.

Kind regards

Andy

Attachments: Figure A (drawing reference TIC/FF/12-25/25331)

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TIC_FF32878



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We extend to all our clients and colleagues our best wishes for a Merry Christmas and a Happy New Year.

Our offices will be closed from 5pm on Wednesday 24 December 2025 and will reopen at 8.30am on Monday 5 January 2026. An emergency telephone response service (on main landline number) will be in operation for 29, 30 and 31 December 2025 and Friday 2 January 2026.