

From: [Tom Roberts](#)
To: [Tom Roberts](#)
Subject: RE: APP/EPR/636, 651 & 652 - Appeals by FCC Recycling (UK) Ltd and 3C Waste Ltd - Inquiry
Date: 21 March 2024 07:57:19
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image451790.png](#)

Tom Roberts

My Pronouns Are He/Him
Trainee Solicitor
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T:03450305652



Please don't print this email unless you really need to.

From: Emma Conwell
Sent: Friday, February 9, 2024 12:11 PM
To: Appeals_NPS <Appeals_NPS@environment-agency.gov.uk>
Cc: Butler, Paul <paul.butler@environment-agency.gov.uk>; Alison Ogley <Alison.Ogley@freeths.co.uk>; Buntten, James <JAMES.BUNTEN@planninginspectorate.gov.uk>
Subject: RE: APP/EPR/636, 651 & 652 - Appeals by FCC Recycling (UK) Ltd and 3C Waste Ltd - Inquiry

Good afternoon Kerry,

Further to the below email, I am yet to hear back from you.

Is the EA still of the mind that it will not provide its witnesses details until 20 February despite the SOCGs needing to be prepared in advance of the inquiry? As mentioned below, in the interests of ensuring this work is prepared properly and in accordance with the timetable, we consider it necessary to begin working on narrowing the issues without delay.

Kind regards,

Emma

From: Emma Conwell
Sent: Wednesday, January 10, 2024 3:38 PM
To: Appeals_NPS <Appeals_NPS@environment-agency.gov.uk>
Cc: Butler, Paul <paul.butler@environment-agency.gov.uk>; Alison Ogley <Alison.Ogley@freeths.co.uk>; Buntten, James <JAMES.BUNTEN@planninginspectorate.gov.uk>
Subject: RE: APP/EPR/636, 651 & 652 - Appeals by FCC Recycling (UK) Ltd and 3C Waste Ltd - Inquiry

Dear Kerry,

I note your comments that evidence is due by 20 February 2024 and that in light of this the EA will not provide a list of its experts and their contact details. However, please note the attached minutes from the Inspector. These clearly advise that it is strongly suggested that the parties work together to narrow issues and produce topic based SOCGs.

In the interests of ensuring this work is prepared properly and in accordance with the timetable, we

consider it necessary to begin working on narrowing the issues without delay. It is disappointing that the EA has failed to contact us in regards to this and further refuses to begin discussions to narrow the issues. In narrowing the issues and presenting topic based SOCGs, the parties will assist the Inspector and limit time (and costs) on issues which are not in disagreement.

Given the Inspector's minutes (see highlighted sections in the attached), I kindly request that the EA reconsiders its position and seeks to work with the Appellant to narrow the issues in dispute as soon as possible. In order to do so, the appellant requires a list of the EAs experts so that we can begin to arrange meetings between the parties.

Kind regards,

Emma

From: Appeals_NPS <Appeals_NPS@environment-agency.gov.uk>

Sent: Wednesday, January 10, 2024 2:29 PM

To: Emma Conwell <Emma.Conwell@freeths.co.uk>

Cc: Butler, Paul <paul.butler@environment-agency.gov.uk>

Subject: RE: APP/EPR/636, 651 & 652 - Appeals by FCC Recycling (UK) Ltd and 3C Waste Ltd - Inquiry

Dear Emma,

Thank you for your email requesting information on our experts.

I have recently spoken to PINS around supplying our experts, they provided the below information:

'The Inspector has asked me to remind the Agency that it will need to confirm its witnesses well in time to prepare its evidence for the Inquiry. Exchange of evidence will need to take place four weeks before the Inquiry opens (this being by 20 February 2024).'

We will provide our expert witnesses as requested by the planning inspectorate's timeline.

Kind regards

Kerry Sach

Appeals Coordinator, Centralised Services Team

National Permitting Service (Part of Operations – Regulation, Monitoring and Customer)

Environment Agency | Horizon house, Bristol

Email: Appeals_NPS@environment-agency.gov.uk

From: Emma Conwell <Emma.Conwell@freeths.co.uk>

Sent: Tuesday, January 9, 2024 1:56 PM

To: Butler, Paul <paul.butler@environment-agency.gov.uk>

Subject: APP/EPR/636, 651 & 652 - Appeals by FCC Recycling (UK) Ltd and 3C Waste Ltd - Inquiry

You don't often get email from emma.conwell@freeths.co.uk. [Learn why this is important](#)

Dear Paul,

By way of introduction, I am instructing solicitor for FCC/3C Waste in the above appeal relating to the environmental permit at Daneshill Landfill.

Please could you provide confirmation as to which EA expert is dealing with which topic of the appeal? This will allow us to set up meetings for the topic based SOCGs.

Kind regards,

Emma

Emma Conwell

My Pronouns Are She/Her
Senior Associate

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