

The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

One Glass Wharf
Bristol BS2 0ZX
Tel: +44 (0)117 939 2000
Fax: +44 (0)117 902 4400
email@burgess-salmon.com
www.burgess-salmon.com
DX 7829 Bristol

Direct Line: +44 (0)117 902 7794
simon.tilling@burgess-salmon.com

By Email only to wales@planninginspectorate.gov.uk

Our ref: ST04/58586.1/TILLI

Your ref:

16 September 2020

When telephoning please ask for: Simon Tilling

Dear Planning Inspectorate

Appeal under the Environmental Permitting (England and Wales) Regulations 2016 ("EPR 2016")

Appellant: The Treatment Hub Limited

Respondent: Natural Resources Wales

Permit number: EPR/ZP3933NJ

We act for the Appellant.

Pursuant to Regulation 31 EPR 2016 we are writing to appeal against a Suspension Notice served by the Respondent on the Appellant on 17 July 2020.

Accordingly we enclose an appeal bundle comprising:

- (a) Notice of appeal;
- (b) Grounds of appeal;
- (c) Environmental Permit EPR/ZP3933NJ;
- (d) Suspension Notice dated 17 July 2020; and
- (e) Relevant correspondence between the Appellant and the Respondent.

We are submitting this appeal by email and, noting the restriction on attachment sizes, have split this bundle over two emails.

In our notice of appeal we have requested that this matter be dealt with by the inquiry procedure. This matter involves complex technical issues relating to the treatment of waste and operations by the Appellant at its facility. We anticipate that technical evidence, including expert evidence, will be required. We also anticipate that the evidence of both parties (and experts) will need to be tested through cross-examination.

This matter involves a Suspension Notice that has required our client to suspend its revenue-generating operations (the breadth of the Suspension Notice has, in effect, stopped the business from operating). This has had, and continues to have, a severe impact on our client's business, and upon the waste disposal requirements of its customers.

WORK\37887905\v.2

Classification: Confidential

We therefore request that, to the extent possible, the appeal process and timetable be expedited. We would be happy to discuss this with the Inspectorate and the Respondent but as an initial suggestion ask for assignment of the earliest possible start date, for exchange of appeal statements within **4 weeks**, and an additional **2 weeks** for Respondent and Appellant to comment on the other's statement, with an inquiry listed as soon as possible afterwards.

Yours faithfully

A handwritten signature in dark ink, reading "Burges Salmon LLP". The script is cursive and fluid, with the letters "B", "S", and "L" being particularly prominent.

BURGES SALMON LLP

cc. Jane Chapman at Natural Resources Wales - Jane.Chapman@cyfoethnaturiolcymru.gov.uk