[redacted]
Drakelands Restoration Limited

Date: 24/08/2026

Dear [redacted]

Pre application advice – Enhanced service

Pre-application reference EPR/AP3203ML/P001

Site: Drakelands, Plympton, Devon, PL7 5BS

Thank you for your original pre application enquiry on 27/06/2025.

I am pleased to provide you with your pre-application advice. This advice is based on the information provided on your pre application advice form and conversations/emails recorded on the following dates:

- Email on 05/08/2026
- Teams meetings on 17/07/2026 and 20/08/2026 attended by:
  - [redacted] (Drakelands Restoration Limited)
  - [redacted] (Environment Agency)
  - [redacted] (Sol Environment)

In your support document submitted on 05/08/2026 you described the proposed changes to your permit, for the inclusion of:

1. 'Inline Pressure Jig Circuits' (IPJs);
2. Extending the sites Installation boundary to incorporate the ROM Pad extension and Mobile Front End operations;
3. The Mobile Front End (MFE);
4. Inpit crushing and screening; and
5. Detailed design for the screen enclosures (noise abatement).

What this enhanced pre application advice covers

As part of this service, we have provided you with the following information (your questions (in italics) and our response are included below):

1. *Confirm if the variation would be a substantial variation*

We believe some of your proposed changes (in particular items 2-5 of the above list) may have significant negative effects on human beings or the environment and therefore constitute a substantial variation. The Environment Agency will likely need to carry out

significant assessment of your proposed changes as described in section 3.3 of our charging guidance for substantial variations - Environmental permits: when and how you are charged - GOV.UK. If you disagree and submit as a normal variation a final decision will be made on the basis of the submitted application at validation and we may request the additional fee before proceeding.

If the changes you have listed only affect the Section 3.5B crushing and screening activity in your permit (i.e. no effect on the Part A(1) activities) then the charge will be for a normal variation as there is no substantial variation charge for Part B activities.

Although substantial variations will always require consultation and normal variations may not, if we decide your application has High Public Interest we will carry out public and other body consultation even if it is a normal variation. We decide whether an application is of high public interest on a case-by-case basis, and our decision will depend on the nature of your proposed changes. See Environmental permits: when and how we consult - GOV.UK for more information.

In a High Public Interest Application case we will inform you if the work has exceeded the initial fee and it will continue on an incrementally billed Time and Materials basis.

You may choose to make separate applications for proposed changes mentioned above.

2. *Confirm that the EA are satisfied with changes made to the permit as detailed in Table S3.1 of your support document (received 05/08/2026)*

We consider that the addition of IPJs into your permit will constitute a new DAA. You will need to provide relevant risk assessment and supporting documents with your application.

The changes you have proposed to activity reference AR10 will need to be assessed as part of your variation application.

3. *Confirm the permitting route for the Mobile Front End*

Crushing and screening is already included within the permit, and the primary purpose of which is to provide the MPF with tungsten ore. As such, the MFE (and associated changes to the site boundary) should be included within the permit.

4. *Confirm the permitting route for the ROM Pad*

The ROM Pad is currently included within the permit as a directly associated activity with the potential for emissions (runoff, dust, noise) and so an extension to the ROM Pad should also be included within the permit.

5. *Confirm the permitting route for the inpit crushing*

Inpit crushing or other size reduction will be S3.5 Part B(a) activities, forming part of the MPF Part A(1) installation. An application to vary the installation permit to include inpit crushing or other size reduction should be submitted for this change.

6. *Confirm what information in addition to that included in Section 4 of your support document (received 05/08/2026) is needed in relation to the screen enclosures*

The information listed appears to include the correct application forms and associated documents required for this variation. You will also need to include any modelling files associated with the updated noise impact assessment (NIA).

During our call on 20/08/2026 you asked us to consider the possibility of an AQMAU audit of the NIA taking place as part of the pre-app process, allowing for a minor technical variation to the permit (assuming AQMAU agreed with your findings). Given that the application to change the screen enclosures will likely constitute a high public interest normal variation, we will need to consult the public. We suggest this variation is submitted in full with an audit by AQMAU completed during determination.

7. *Confirm the correct application fee*

See below section on application charge required.

8. *Confirm the documents listed on Section 4 of your support document (received 05/08/2026) are correct*

The information listed appears to include the correct application forms and associated documents required for this variation.

9. *Confirm the applicable BREF/BAT conclusions for each variation*

As per your original application

10. *Confirm the likely timescales for permit allocation and determination with prioritisation.*

We aim to validate (either duly make or return) all applications within 6 weeks of submission. You may request prioritisation to reduce these timescales further when you apply. If duly made, your application would then be allocated to a determining officer. We cannot provide timescales for determination as this will depend on a number of factors. Where consultations are required, this is usually for a period of 4 weeks. If the application is of high public interest we may consult for longer.

Application charge required

Expected fees (changes to Part B activity only):

- Part B activity - £1,712.70
- Noise impact assessment/Noise Management Plan - £1,293.35
- Dust Management Plan - £643.56
- Habitats assessment - £808.60
- Advertising (for HPI status) – £557.93

If changes are being made to either of your Part A(1) activities then you may also be required to pay the substantial variation fee for the associated activity, as shown below:

- S2.1 A(1) - £13,643.47
- S5.4 A(1) - £12,558.76

As mentioned above, in a High Public Interest Application case we will inform you if the work has exceeded the initial fee and it will continue on an incrementally billed Time and Materials basis.

Forms required to be submitted

- Form Part A
- Form Part C2
- Form Part C3
- Form Part F1

Annual charge increases

Our charges increase with inflation every year on 1 April based on the Consumer Prices Index, see https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance.

After you apply

The information that you need to submit with your application is explained in the application form and its guidance. The Environment Agency will check that you have submitted this information and the correct application charges. This is to ensure we have enough information to start to determine your permit application.

We will contact you if information is missing and can feasibly be provided within 10 working days. If we consider information cannot be provided within this time frame we will return your application with a list of what is missing.

We'll retain 20% of the correct application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,673.78. This is explained in the environmental permitting charges guidance.

We will not charge this if we return an application after having done very little work – for example, because it contained obvious errors or omissions.

Once we have duly made an application we will start to determine it.

Once an application is validated and duly made, it is ready to be allocated for determination. Determination is when we do our technical checks. We may need to ask you for further information or additional documents during determination and it is important you send anything requested as quickly as possible.

The time it takes us to allocate an application depends on a number of factors, including the complexity of the specific application and the availability of a member of our team with the right skills to assess it.

The amount of time taken to determine your application will vary. It will be impacted by factors such as:

- The quality of the application
- The complexity of the application
- Whether an application is of high public interest
- Whether the application includes novel technologies or techniques
- Whether the determination requires input from others, both internal and external to the Environment Agency
- Whether modelling and/or monitoring and assessment is required, for example Air Quality modelling and assessment or water discharge or groundwater activity specific substances assessment.

The Permitting Officer determining your application will be able to keep you updated with the progress of your application.

What happens next?

If you submit an environmental permit variation application then please quote this pre-application reference number: EPR/AP3203ML/P001.

If the advice above details using the online digital application form see https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit, your application can be submitted using this method. If not, please send your completed application documents via email to:

psc@environment-agency.gov.uk

Please email applications where possible. If email is not possible you can submit by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

Scope of this advice

We have only provided the specific advice you requested based on the information provided. We cannot provide advice on all aspects of your application, so it is important you read all available online guidance and the application forms to ensure anything not covered within this advice is considered as part of your application.

It is important to remember:

- this is advice, we are not agreeing anything at this stage
- we have provided this advice based on the limited information we have about your proposals at this time
- we have only provided the advice you specifically requested
- we may need to request additional information when we have a full application

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers installations only.

Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

Enhanced pre application cost estimate

At this stage the pre-application advice is still within the original £5,000 plus VAT maximum estimate. Any invoices will be sent separately. This will include a link to pay online. You can also pay your application charges online but this is a different link so please ensure you are using the correct one when you apply.

We have agreed that this pre-application will remain open for ongoing advice.

Yours sincerely

[redacted]

Principal Permitting Officer