

Naomi Daniel
Environment Agency
Via email

Monday 30 March 2026

Ref: K0419/ENV/LT/008

Re: **Enviroo Plastic Recycling Facility, Ince – CH2 4FP
Request for Further Information Response**

Dear Naomi,

Please find below responses to your Request for Further Information received on 27 March 2026, application referenced EPR/GP3925SF/A001. For ease we have included the information requested below in grey and italics and our response beneath. The submission deadline for the response is 14 April 2026, this submission was made on 30 March 2026.

To make clear your application is for an installation and waste operation permit, and this permit will not cover the package treatment plants on site for domestic effluent. We have advised you on the charging for these applications and provided you with the advice on general binding rules for you to ascertain if you need to apply.

General binding rules: small sewage discharge to a surface water - GOV.UK

You do not need a permit for a small sewage discharge if it can meet the General Binding Rules for small sewage discharges (“the General Binding Rules”).

We will not be assessing, determining or providing further information in relation to the package treatment plants.

The Package Treatment Plants (PTPs) will be operated separately.

Form B2 General new bespoke permit

1: Confirm relevant offences Q3 and Appendix 2 details

You have ticked no relevant offences for Q3, but in Appendix 2 completed a named person with relevant offences. Please confirm which is correct.

The Part B2 form has been updated to remove the named person from Appendix 2.

Form B4 New bespoke waste operation permit

2: Provide an assessment against Appropriate Measures (AM)

Your application indicates in Table 3a Technical standards that AM applies. Provide an Appropriate Measures assessment against Non-hazardous and inert waste for the waste operation and installation activities.

Non-hazardous and inert waste: appropriate measures for permitted facilities – Guidance – GOV.UK

The Technical Standards & Appropriate Measures report (reference: K0419-AYE-R-ENV-00003) has been submitted with the application. This document provides the operating techniques and evidence to demonstrate that the proposed activities at the Plastic Recycling Facility (PRF) will be undertaken in accordance with the following guidance:

- Environment Agency. Non-hazardous and inert waste: appropriate measures for permitted facilities. Dated 8 December 2022.

- Best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council. 10 August 2018.

Form B6 Bespoke point source emission to water from an installation

3: Provide one completed B6 form with the discharges from the installation only.

You have provided 3 B6 forms, each one advising of 0.75m³ discharge from package treatment plant and surface water. Two of the forms have ticked effluent discharge but still refer to package treatment plant sanitary domestic waste. The forms you have provided have not demonstrated why you cannot connect to sewer or described the discharge correctly. We have advised in the last application and our meeting that we will not permit PTP with this application, and they need to be applied for separately.

Your application states the installation has 3 discharges, 2 are for uncontaminated surface water from the yard and roofs and do not require any assessment. The discharge from the WwTW does require an assessment and to be completed on the B6 form.

The Not Duly Made email issued on 19 January 2026 requested a completed B6 for the three new discharges to surface water from the Site. We completed a B6 form for each of the three new discharges to surface water and submitted them with the re-submitted application.

We have now submitted a single B6 form for the WwTP only with this response.

As stated in the H1 Assessment (reference: K0419-AYE-R-ENV-00005), preliminary discussions with the sewage undertaker, United Utilities, confirmed that even if a suitable connection could be made to foul sewer, Helsby WwTW would be the receiving works, and it did not have the process capacity to receive the trade effluent from the plastics recycling plant. Nevertheless, a Trade Effluent Consent application was made in October 2025 which United Utilities refused in December 2025, confirming that the proposed receiving sewer is currently at capacity according to the modelled data and sewer records. Consequently, on-site treatment and discharge to surface water is required.

We have attached the email from United Utilities with this response.

4: Provide H1 tool to accompany surface water assessment and B6 form

You have provided the assessment documents but not the H1 tool with the data used for the assessment. We require the H1 tool to check the data inputs.

Environment Agency guidance (Risk assessments for specific activities: environmental permits - GOV.UK) states:

If you do not want to use this tool you can:

- *follow the steps in the risk assessment guides*
- *use other resources such as emission modelling software – you may be charged for this*

We have not used the H1 tool and have followed the steps in the risk assessment guides for discharges to surface water. As previously stated, the results for the phase 1 screening assessments are attached as Appendix A of the H1 Assessments (reference: K0419-AYE-R-ENV-00005) and phase 2 modelling is not required.

We trust the above is satisfactory. Please do not hesitate to contact us if you require any further information in support of the enclosed documents.

Yours sincerely
For Ayesa,

Emma Greenhalgh
Senior Consultant