

Danny Dunstan

From: Emma Greenhalgh <EmmaGreenhalgh@Ayesa.com>
Sent: 14 April 2026 16:27
To: PSC Land; Naomi Daniel
Cc: Cameron Mills; Matt Williamson; John Baxter
Subject: FW: Duly Made Check - EPR/GP3925SF/A001 - ACTION BY 14/04/2026
Attachments: K0419-LT-009 Enviroo Duly Making Response 14.04.2026.pdf

Good afternoon,

Please find attached a letter answering the questions raised by the Environment Agency on 10 April 2026. We have sent this information to Cameron Mills and Matt Williams as well. The information is also saved in the Dropbox link under the Request for Further Information Response folder. <https://www.dropbox.com/sc/lfo/5ncej9aylm6hv4n7fiec4/AE21Jm7cr7eGlvfTyol-5VA?rlkey=o85osxdmi3aztb3ddkncwqb75&st=bfigpsib&dl=0>

Kind regards,

Emma Greenhalgh
Senior Consultant
Tel.: +44 (0)1925 291 111
Mob.: +44 (0) 759 3526918



[LEGAL NOTICE / Data protection](#)

From: Emma Greenhalgh
Sent: 14 April 2026 14:40
To: Cameron Mills <Cameron.Mills@environment-agency.gov.uk>; John Baxter <JohnBaxter@Ayesa.com>; Matt Williamson <matthew.williamson@environment-agency.gov.uk>; SM-EA-PermittingC&E (EA) <PermittingCandE@environment-agency.gov.uk>
Cc: Dan King <DanKing@Ayesa.com>; Dr. Craig Fannin <CraigFannin@Ayesa.com>
Subject: RE: Duly Made Check - EPR/GP3925SF/A001 - ACTION BY 14/04/2026 [Filed 14 Apr 2026 14:40]

Hi Cameron,

Please find attached a response to your questions raised on 10 April 2026. Also attached is an updated B6 Form, UU email, updated Surface Water Risk Assessment, a H1 tool for the River Mersey and a H1 tool for the Manchester Ship Canal (MSC). The documents have also been added to the Dropbox folder.

We believe this addresses outstanding information requested. Should you require any additional information on this issue please contact me.

Kind regards,

From: Cameron Mills <Cameron.Mills@environment-agency.gov.uk>
Sent: 10 April 2026 13:51
To: John Baxter <JohnBaxter@Ayesa.com>; Matt Williamson <matthew.williamson@environment-agency.gov.uk>; SM-EA-PermittingC&E (EA) <PermittingCandE@environment-agency.gov.uk>
Cc: Emma Greenhalgh <EmmaGreenhalgh@Ayesa.com>; Dan King <DanKing@Ayesa.com>; Dr. Craig Fannin

<CraigFannin@Ayesa.com>

Subject: RE: Duly Made Check - EPR/GP3925SF/A001 - ACTION BY 14/04/2026

Hi John,

Thanks for getting back to me.

If it's been agreed for the domestic effluent discharge to sit outside of this process then happy for this information to be excluded for the time being, though if you can provide any correspondence with UU on connect for the process effluent/TEC (if you haven't already) that would be great.

One additional thing I will highlight is that the provision on connection to sewer will still be a consideration for both General Binding Rules and Standard Rules Permits:

[General binding rules: small sewage discharge to a surface water - GOV.UK](#)

[Discharges to surface water and groundwater: environmental permits - GOV.UK](#)

Something to keep in mind for any subsequent applications.

Kind regards,
Cameron

Cameron Mills

Process and Commissioning Manager – Water Quality – Permitting – Part of Growth, Permitting & Monitoring (GPM)



Environment Agency | Aqua House, 20 Lionel Street, Birmingham, B3 1AQ

Cameron.Mills@environment-agency.gov.uk

External: 020 771 41138 | Mobile: 07767 311365

Working days: Monday to Friday

Website: www.gov.uk/environment-agency

From: John Baxter <JohnBaxter@Ayesa.com>

Sent: 10 April 2026 12:46

To: Cameron Mills <Cameron.Mills@environment-agency.gov.uk>; Matt Williamson

<matthew.williamson@environment-agency.gov.uk>; SM-EA-PermittingC&E (EA) <PermittingCandE@environment-agency.gov.uk>

Cc: Emma Greenhalgh <EmmaGreenhalgh@Ayesa.com>; Dan King <DanKing@Ayesa.com>; Dr. Craig Fannin <CraigFannin@Ayesa.com>

Subject: RE: Duly Made Check - EPR/GP3925SF/A001 - ACTION BY 14/04/2026

Hi Cameron,

Thank you for coming back on these points we will reply by the agreed deadline.

Can you clarify one point please – we agreed early during the discussions that that the PTPs would not form part of this application and would be permitted separately either under the general binding rules or a separate standard rules permit. On this basis do we need to demonstrate that foul sewer connection is not possible as part of this Duly Making process.

Thank you, all the best

John

John Baxter

Technical Director

Tel.: +44 (0)1925 291 111

Dir.: +44 (0)1925 293453

Mob.: +44 (0) 787 2373318



[LEGAL NOTICE / Data protection](#)

From: Cameron Mills <Cameron.Mills@environment-agency.gov.uk>

Sent: 10 April 2026 12:36

To: John Baxter <JohnBaxter@Ayesa.com>; Matt Williamson <matthew.williamson@environment-agency.gov.uk>; SM-EA-PermittingC&E (EA) <PermittingCandE@environment-agency.gov.uk>

Cc: Emma Greenhalgh <EmmaGreenhalgh@Ayesa.com>

Subject: Duly Made Check - EPR/GP3925SF/A001 - ACTION BY 14/04/2026

Afternoon John,

I hope this email finds you well.

Thank you for the continued engagement and for sending the additional documents on 07/04/2026 and 09/04/2026. Having reviewed these, we believe there are still outstanding issues from the request for information dated 24/03/2026 that need to be addressed before an application can be duly made.

1. **B6 Form, effluent information**

As part of the original RFI you were asked to provide information demonstrating why it has not been possible to connect to foul sewer. Within the supporting document provided titled 'K0419-AYE-R-ENV-00005 Envirooo Plastic Recycling Facility Effluent H1 v3' Section 1.2 Site Setting and Description the following was stated:

Due consideration has been given to making a connection to foul sewer, even though there was no suitable foul sewer to connect to on Protos Resource Recovery Park. 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.

However, in section 2.5 Package Treatment Plant Overview you have stated that the two package treatment plants on site; one service effluent from the security office the other service effluent from the primary building – both of these discharging domestic effluent. You have provided the PTP standards, but no explanation as to why connection to sewer for these discharges has not been considered. Whilst Helsby WWTW might not have capacity for effluent from the plastic recycling facility, separated domestic effluent should be considered for connection.

Confirm what discussions have occurred with United Utilities around connection for the domestic effluent from the PTP(s) for this site and following the guidance included on form B6 (Questions 5 – connection to foul sewer), outline the factors for no connecting to public foul sewer.

There are also sections of the re-submitted B6 form that are incomplete. **Please provide the relevant information pertaining to section 1c, 2a, 2b, 2d and 2e.**

2. **H1 tool accompanying the surface water assessment and B6 Form.**

You have provided details of how you have undertaken the H1 assessment within the document titled 'K0419-AYE-R-ENV-00005 Envirooo Plastic Recycling Facility Effluent H1 v3', the statement that the expected influent water quality to the WwTP provided in table 3 has been taken from a similar option at Ellesmere Port. **We require the relevant raw data from the Ellesmere Port operation used to support these assumptions.**

We have also identified that the assessment identifies the Mersey Estuary as the receptor, rather than the WFD Assessed Waterbody Peckmill Brook, Hoolpool Gutter at Ince Marshes. **Provide justification as to why the Mersey Estuary has been chosen as the receptor for the assessment and back calculations, rather than Peckmill Brook, Hoolpool Gutter at Ince Marshes OR Provide an updated H1 assessment utilising the appropriate data for Peckmill Brook, Hoolpool Gutter at Ince Marshes.**

Please can you reply directly to me – copying in Matt Williams (matthew.williamson@environment-agency.gov.uk)

We agree to retain the agreed updated date of **14/04/2026** for the provision of this information, on the understanding that if the outstanding information is provided by this date the refunded fee will need to be returned before the application can be accepted.

We appreciate your patience in this matter – please let me know if you have any questions or further comments, happy to discuss anything further.

Kind regards,
Cameron

Cameron Mills

Process and Commissioning Manager – Water Quality – Permitting – Part of Growth, Permitting & Monitoring (GPM)



Environment Agency | Aqua House, 20 Lionel Street, Birmingham, B3 1AQ

Cameron.Mills@environment-agency.gov.uk

External: 020 771 41138 | Mobile: 07767 311365

Working days: Monday to Friday

Website: www.gov.uk/environment-agency