

Danny Dunstan

From: Emma Greenhalgh <EmmaGreenhalgh@Ayesa.com>
Sent: 09 April 2026 10:42
To: SM-Defra-RESP-notifications (DEFRA); Naomi Daniel
Cc: John Baxter; Dan King
Subject: RE: EPR/GP3925SF/A001 EPR – Return of Not Duly Made Permitting Application CRM:0831146
Attachments: Part B6 - Outfall 3 V3.pdf; Appropriate Measures Assessment Table.pdf; H1 Tool_v2.78 - Enviroo.zip

Dear Naomi,

Further to the below email, please find attached the H1 tool, B6 Form and an appropriate measures table. We note that this information has been provided before the request for further information deadline of 14 April 2026. We trust this is sufficient to Duly Make the application.

- The H1 tool has previously been requested, and we have explained that it is not required for this application. Nevertheless, we have completed the H1 tool even though it does not provide any additional information to that which has already been provided in the Surface Water Risk Assessment referenced K0419-AYE-R-ENV-00005.
- We understand that the B6 Form has been correctly completed for an 'Effluent and/or contaminated surface water run-off arising from the operation of an installation.' Although not required by Table 1, Question 5b3 has been completed as we have been asked in previous request for further information about connecting to sewer. If there is a specific section of the B6 Form that needs addressing, please let us know.
- The Technical Standards & Appropriate Measures report referenced K0419-AYE-R-ENV-00003 provides an assessment against the appropriate measures. We have produced the attached table showing where the details are contained in the existing documents. Again, none of this information is new.

Kind regards,

Emma Greenhalgh

Senior Consultant

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From: Emma Greenhalgh

Sent: 07 April 2026 16:42

To: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>; Naomi Daniel <naomi.daniel01@environment-agency.gov.uk>

Cc: John Baxter <JohnBaxter@Ayesa.com>; Dan King <DanKing@Ayesa.com>

Subject: RE: EPR/GP3925SF/A001 EPR – Return of Not Duly Made Permitting Application CRM:0831146 [Filed 07 Apr 2026 16:41]

Dear Naomi,

We note that the submission deadline for the request for further information is the 14 April 2026. Therefore, we still have time to send additional information for this application to be duly made. The below email states 'We are still missing H1 tool, correctly completed B6 form and assessment against appropriate measures.' This

information was provided in the request for further information response letter referenced K0419/ENV/LT/008 and submitted on 30 March 2026, and has been expanded on below.

- The risk assessment for the discharge of the treated effluent from the Wastewater Treatment Plant (WwTP) was conducted in accordance with the guidance provided on the Environment Agency's webpage for conducting discharge to surface water risk assessments. The guidance (updated in February 2026) states that "You can complete screening manually or by using the automated H1 screening tool." As the WwTP has yet to be constructed, the effluent quality is not known. As such, no effluent quality data is available to be entered into the automated H1 tool. We therefore opted to do the screening manually, following the instructions on the guidance, and produced a 'back-calculation' to derive the maximum possible concentration of each assessed substance that would allow the discharge to pass the Screening Test 2 (comparing the process contribution with the EQS). These maximum values can be considered emission limits for the discharge. Such a calculation would not have been possible within the automated H1 screening tool, as it only allows forward calculations. As such, we consider we have used the H1 tool appropriately for this assessment.
- We submitted an updated completed B6 form.
- We submitted a Technical Standards & Appropriate Measures report referenced K0419-AYE-R-ENV-00003 which provides an assessment against appropriate measures.

We would request that you do not return the permit application or fee due to the information being provided above. Please can you confirm your team leads contact details. We will be taking this matter further due to the repeated requests for information previously provided and we consider the unjust return of this application.

Kind regards,

From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Sent: 07 April 2026 15:24

To: Emma Greenhalgh <emmagreenhalgh@ayesa.com>

Cc: Naomi Daniel <naomi.daniel01@environment-agency.gov.uk>

Subject: EPR/GP3925SF/A001 EPR – Return of Not Duly Made Permitting Application CRM:0831146 [Filed 07 Apr 2026 15:29]

Dear Emma Greenhalgh

Return of not duly made permitting application.

Application reference: EPR/GP3925SF/A001

Applicant: Enviroo Project Co Limited

Facility: Enviroo Plastic Recycling Facility, Marsh Lane, Ince, CH2 4FP

As just discussed on the phone I am writing to let you know that your application has been "not duly made" so we are returning your application.

We recommend that you talk to us if you wish to re-apply. Please see our information about the pre-application service at the end of this correspondence.

We've looked at the extra information you sent us 30/03/2026. We are still missing H1 tool, correctly completed B6 form and assessment against appropriate measures. Unfortunately, this means we're unable to determine your application and so we must return it to you as 'not duly made'.

We've retained the non-refundable part of your application charge. This is in order to recover the costs of our time reviewing the application.

The amount retained is set in our Charging Scheme at 20% of the specified application charge, capped to a maximum of £1,673.78. We've therefore retained £1,673.78 and will issue your partial refund for £23,372.52 separately.

You can find further information on charging at: <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance>

If you operate a regulated facility without a permit, you would be committing an offence and would be liable to prosecution.

Environment Agency Pre-application Service

We recommend that you talk to us if you wish to re-apply. We offer limited pre-application advice on how to prepare your application at no extra charge. If more help is needed, we also offer a discretionary enhanced pre-application service. This service is chargeable at a rate of £103.80 per hour plus VAT.

For further details and a pre-application request form, please see our website: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

If you would prefer a paper copy of the pre-application request form, please phone our Customer Contact Centre on 03708 506 506.

Yours sincerely,
Naomi Daniel

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