

From: [Louise Burns](#)
To: [Sue Irons](#)
Cc: [SM-Defra-RESP-notifications \(DEFRA\)](#)
Subject: Re: EPR/JB3005CJ/V003 We Need More Information by close 5 August 2026 CRM:0392144
Date: 05 August 2026 13:26:22
Attachments: [image001.jpg](#)
[image002.png](#)
[image915634.jpg](#)
[Appendix 13a - I RQA CMS Cert FI1 Skills.pdf](#)
[Appendix 13b - Louise Burns WAMITAB L4 Waste Management.pdf](#)
[Appendix 13c - Louise Burns Continuing Competence Certificate ex 07.11.2026.pdf](#)
[Appendix 30 - Treatment of Waste.pdf](#)
[Appendix 31 - Clarification of Existing and Proposed Activities.pdf](#)
[Appendix 32 - CWR drainage report.pdf](#)
[Appendix 9 - E10 -CS- UU Discharge Consent.pdf](#)
[Appendix 11 - Site Layout.pdf](#)
[Appendix 22 - Document List.pdf](#)

Hi Sue,

Apologies for the last-minute deadline response, I just wanted to make sure all involved had been consulted accordingly and the information is correct, Please responses below:

Evidence of Technical competence (TCM) qualification suitable for Hazardous Waste Transfer activity, or evidence of a named individual registered on a relevant course(s) to gain the qualification(s).

Reason: The qualification required for a Household, Commercial and Industrial (HCI) activity which accepts some hazardous wastes (MROCI) is not sufficient. - Please see attached (a.) CMS united skills Cert (b.) Wamitab level 4/COTC in transfer of haz and non haz

2). I also noticed you included the following which we had not requested to be altered and therefore we have not reassessed. Please could you confirm the reason for sending:

- Fire Prevention Plan (FPP)
- Odour Management Plan (OMP)

The Fire Prevention Plan (FPP) and Odour Management Plan (OMP) were submitted as both documents had recently undergone their scheduled annual review and update as part of our wider management system review in preparation for our ISO recertification.

During this review, the documents were updated to accurately reflect current site operations, infrastructure and management controls, ensuring they remain representative of how the site is operated in practice. As these revised documents were available at the time of submitting the additional information, we considered it appropriate to include the most up-to-date versions for completeness as this is what we follow.

3). From the Not Duly Made responses about treatment of proposed hazardous and non-hazardous wastes we have interpreted that they will not be subjected to 'treatment', i.e. no mechanical sorting/ separation, crushing and compaction which the permitted HCI with Treatment activity (AR1) currently allows.

- please confirm that the intent is to only transfer and bulk-up the proposed wastes to be added to the permit, or readvise us.
- please clarify whether baling to be done on any of the new proposed wastes. If it will be, please confirm which EWCs and descriptions would be affected.

Apologies for the misunderstanding, when we had the consultancy company do the application we asked for the following - Repair, refurbishment and dismantling of WEEE – equivalent to T11 activity and Treatment of waste aerosol cans – equivalent to T15 activity - Please see attached Appendix 30 - Treatment of Waste

Our 3 questions (under Q3d) relating to treatments on existing wastes appear to have not been answered; however, as these relate to existing practices it is not a matter that needs resolving/ clarifying now; it can be covered at a later stage in the assessment process, if it is Duly Made. - *Please see Appendix 31 - Clarification of Existing and Proposed Activities*

4). In the Not Duly Made responses about drainage you confirmed "All permitted waste activities are undertaken on impermeable hardstanding served by a sealed drainage system designed in accordance with the relevant requirements of CIRIA C736".

We do not assess drainage plans submitted in depth until (if) the application is Duly Made; however, if we discover it appears any waste contaminated run-off or leachate from operational areas (including inside covered shelters and buildings) is not ending up in foul sewer or a sealed sump we may require you to include a Water Discharge Activity or amend your drainage plans or containment methods.

- Please confirm that your understanding is that all waste contaminated run-off or leachate from operational areas (including inside covered shelters/ buildings) does ending up in foul sewer, and not in surface water drains, nor runs offsite. *I can confirm that all waste contaminated run-off or leachate from operational areas (including inside covered shelters/ buildings) does end up in foul sewer*

Please note that the external washing of vehicles is not an activity that requires a Waste Permit; therefore, we will not be further scrutinising the use of interceptors for such activities.

We would need to know about any interceptors used to treat 'waste derived' contamination that discharges to surface waters. - *Please see the attached report from Lanes Group and the attached UU Discharge Consent, any recommendation from lanes group will be completed in phase 2 and 3 of proposed works to site.*

Site Layout has been updated to reflect proposed haz waste location

If you require any other information or clarification then please get in touch..

Regards

Lou

Louise Burns
HSEQ Manager

Email: Louise.Burns@cwrecycling.co.uk

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From: Sue Irons <susan.iron@environment-agency.gov.uk>
Sent: 24 July 2026 16:28
To: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Cc: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Subject: EPR/JB3005CJ/V003 We Need More Information by close 5 August 2026 CRM:0392144

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Thank you for your reply.

How the proposed storage locations of specific wastes relate to the site drainage arrangements is certainly a matter we would assess. If your forthcoming amended drawings clarify this it is most welcome.

Sue Irons
Waste Permitting Officer
Growth, Permitting and Monitoring
susan.iron@environment-agency.gov.uk
Telephone: 07867 328061/ 02030252898



From: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Sent: 24 July 2026 14:38
To: Sue Irons <susan.iron@environment-agency.gov.uk>
Cc: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Subject: Re: EPR/JB3005CJ/V003 We Need More Information by close 5 August 2026 CRM:0392144

Hi Sue,

Thank you for your email, I will get the required information over next week, just to keep you in the loop that Appendix 11 - Site Layout is being amended due to drainage in one area, we have had Lanes Group PLC in today who are doing us a report as to what drains to which Interceptor and any additional works required if any, this report will be an added appendix so I will update the main page of appendixes and also resend this along with the other information required.

Regards

Lou

Louise Burns
HSEQ Manager

Email: Louise.Burns@cwrecycling.co.uk

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From: Sue Irons <susan.iron@environment-agency.gov.uk>
Sent: Wednesday, July 22, 2026 18:05
To: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Cc: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Subject: EPR/JB3005CJ/V003 We Need More Information by close 5 August 2026 CRM:0392144

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Hello Louise,

Thank you for your extensive submission, which we've now reviewed.

I realise my error in not asking you for information on Technical Competent Manager qualifications; I have not been able to locate it in the original or Not Duly Made reply e.g. Appendix 13 or other.
Please send to me:

1). Evidence of Technical competence (TCM) qualification suitable for Hazardous Waste Transfer activity, or evidence of a named individual registered on a relevant course(s) to gain the qualification(s).
Reason: The qualification required for a Household, Commercial and Industrial (HCI) activity which accepts some hazardous wastes (MROCI) is not sufficient.

2). I also noticed you included the following which we had not requested to be altered and therefore we have not reassessed. Please could you confirm the reason for sending:

- Fire Prevention Plan (FPP)
- Odour Management Plan (OMP)

3). From the Not Duly Made responses about treatment of proposed hazardous and non-hazardous wastes we have interpreted that they will not be subjected to 'treatment', i.e. no mechanical sorting/ separation, crushing and compaction which the permitted HCI with Treatment activity (AR1) currently allows.

- please confirm that the intent is to only transfer and bulk-up the proposed wastes to be added to the permit, or readvise us.
- please clarify whether baling to be done on any of the new proposed wastes. If it will be, please confirm which EWCs and descriptions would be affected.

Our 3 questions (under Q3d) relating to treatments on existing wastes appear to have not been answered; however, as these relate to existing practices it is not a matter that needs resolving/ clarifying now; it can be covered at a later stage in the assessment process, if it is Duly Made.

4). In the Not Duly Made responses about drainage you confirmed "All permitted waste activities are undertaken on impermeable hardstanding served by a sealed drainage system designed in accordance with the relevant requirements of CIRIA C736".

We do not assess drainage plans submitted in depth until (if) the application is Duly Made; however, if we discover it appears any waste contaminated run-off or leachate from operational areas (including inside covered shelters and buildings) is not ending up in foul sewer or a sealed sump we may require you to include a Water Discharge Activity or amend your drainage plans or containment methods.

- Please confirm that your understanding is that all waste contaminated run-off or leachate from operational areas (including inside covered shelters/ buildings) does ending up in foul sewer, and not in surface water drains, nor runs offsite.

Please note that the external washing of vehicles is not an activity that requires a Waste Permit; therefore, we will not be further scrutinising the use of interceptors for such activities.

We would need to know about any interceptors used to treat 'waste derived' contamination that discharges to surface waters.

Thank you

Sue Irons
Waste Permitting Officer
Growth, Permitting and Monitoring
susan.iron@environment-agency.gov.uk
Telephone: 07867 328061/ 02030252898



From: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Sent: 13 July 2026 08:11
To: Sue Irons <susan.iron@environment-agency.gov.uk>
Cc: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Subject: COPY_Re: EPR/JB3005CJ/V003 We Need More Information and fees by close 13 July 2026 CRM:0392144

Good Morning Sue,

As per your request for additional and updated information, please see attached this and the next few emails, if you require any other information, please let me know.

Regards

Lou

Louise Burns
HSEQ Manager

Email: Louise.Burns@cwrecycling.co.uk

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From: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Sent: 07 July 2026 13:24
To: Sue Irons <susan.iron@environment-agency.gov.uk>
Cc: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Subject: Re: EPR/JB3005CJ/V003 We Need More Information and fees by close 13 July 2026 CRM:0392144

Hi Sue,

Please find attached evidence of payment sent to cover the additional cost.

Regards

Lou

From: Sue Irons <susan.iron@environment-agency.gov.uk>
Sent: 07 July 2026 11:08
To: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Cc: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Subject: EPR/JB3005CJ/V003 We Need More Information and fees by close 13 July 2026 CRM:0392144

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Hello Louise,

If you could email me and copy in psc@environment-agency.gov.uk, please.

We do have a 20MB limit I believe on incoming emails, so if that is likely to be exceeded you can send several emails with the different attachments.

If the contact details on Form Part A are to change please also amend and resubmit these. Please send evidence the applicant is happy with the proposed new contact arrangements and the consultancy is to no longer be involved.

I'm aware the payment is due this week, so if you have evidence to support when it was/ is made (e.g. screen shot/ remittance note) that'll help us track and find it.

Thank you

Sue Irons
Waste Permitting Officer
Growth, Permitting and Monitoring
susan.iron@environment-agency.gov.uk
Telephone: 07867 328061/ 02030252898



From: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Sent: 06 July 2026 21:29
To: Sue Irons <susan.iron@environment-agency.gov.uk>
Subject: Re: EPR/JB3005CJ/V003 We Need More Information and fees by close 13 July 2026 CRM:0392144

Hi Sue,

What's the best way for me to send the revised application documents?

I've carried out a comprehensive review of the application and have amended a number of the supporting documents. This has included updates to the Odour Management Plan (OMP), and the development of a comprehensive Dust and Emissions Management Plan (DEMP) using the Environment Agency's guidance, tailored specifically to the Canalside site's operations. The DEMP is now around 35 pages. I've also amended Parts C4 and F1 to reflect the proposed variation.

I just need to complete a final review of the Environmental Management System (EMS), the Fire Prevention Plan (FPP) and the Non-Technical Summary to ensure they fully reflect the proposed operations. I also have several supporting documents to submit, together with a written response addressing the remaining queries raised by the Environment Agency.

I've decided to step away from the consultancy and complete the application myself to ensure the submission accurately reflects how the Site operates.

Please let me know the best way to send everything across once it's complete.

Thanks,

Lou

Louise Burns
HSEQ Manager

Email: Louise.Burns@cwrecycling.co.uk

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From: Sue Irons <susan.iron@environment-agency.gov.uk>
Sent: Thursday, July 02, 2026 11:22
To: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Subject: EPR/JB3005CJ/V003 We Need More Information and fees by close 13 July 2026 CRM:0392144

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Hello Louise,

Please update/ amend the relevant 'originals' and resubmit those. No need to resubmit and parts of the application (e.g. forms/ supporting docs) if they haven't been changed.

It makes it clearer to only have one version of a form/ supporting document rather than create an addendum or erratum tagged onto an original.

Thank you

Sue Irons
Waste Permitting Officer
Growth, Permitting and Monitoring
susan.iron@environment-agency.gov.uk
Telephone: 07867 328061/ 02030252898



From: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Sent: 29 June 2026 18:31
To: Sue Irons <susan.iron@environment-agency.gov.uk>
Cc: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Subject: Re: EPR/JB3005CJ/V003 We Need More Information and fees by close 13 July 2026 CRM:0392144

Hi Sue,

Sorry to be a pain I just need you to clarify, do you want me to include required information in the already submitted documentation and return or just give a written formal response.

Sorry for being a pain I just want to get it right.

Regards

Lou

Louise Burns
HSEQ Manager

Email: Louise.Burns@cwrecycling.co.uk

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From: Louise Burns <Louise.Burns@cwrecycling.co.uk>
Sent: 29 June 2026 18:16
To: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Cc: Sue Irons <susan.iron@environment-agency.gov.uk>
Subject: Re: EPR/JB3005CJ/V003 We Need More Information and fees by close 13 July 2026 CRM:0392144

Hi Sue,

The following Payment will be sent to make up the difference below

£4,714.60 with Payment Reference PSCAPPWASTECRESH05 to the account below, you shall receive Payment by end of day 10th July

Regards

Lou

From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Sent: 26 June 2026 20:26
To: Louise Burns <louise.burns@cwrecycling.co.uk>
Cc: Sue Irons <susan.iron@environment-agency.gov.uk>
Subject: EPR/JB3005CJ/V003 We Need More Information and fees by close 13 July 2026 CRM:0392144

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Dear Louise Burns

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/JB3005CJ/V003

Operator: CHESHIRE WEST RECYCLING LIMITED

Facility: C W & C Canalside Operations Hub, Dockyard Road, Ellesmere Port, CH65 4EF

Thank you for your application received on 07/05/2026. The following is to confirm our conversation of today, 26 June.

We need to ask you for some missing information and fees before we can do any more work on your application. Please provide us with more information to the following questions by the deadline:

Form Part C2:

Q3d) Environmental Management System summary (EMSs)

- Clarify whether crushing akin to treatment does occur at the HCI, or just gentle compaction to assist payloads.
- Specify the waste that is crushed and the reasons it is done.
- Clarify what, if any other mechanical treatment is to be done on the proposed wastes.

Reason: This refers to "facility for the storage, treatment (sorting and baling), and transfer of household commercial and industrial waste materials from..." . This does not mention crushing or mechanical treatment which the permit suggests takes place in the HCI activity.

Q4) Environmental Risk Assessment (ERA)

- Include assessment of risk of dust pollution on habitats. We would need to do a Habitats Assessment (and the fee will be required) for extending site and having new potentially dusty or polluting in other ways wastes outside for either/ both storage and/or treatment.

Q5a) Site Condition Report (SCR):

- Drainage:
 - Check the map reflects the drainage arrangement of the proposed site.
 - Clarify what wastes are stored and treated in the various drainage areas of the site, and hence potential for pollution to drain to either interceptor, surface water sewer, foul sewer, or any surface water run-off.

Reasons:

Klargester separators – this indicates 1 interceptor covers an area where waste is stored or treated, but that is only removes oil.

The drainage plan suggests surface water drainage in areas where waste to now be stored; but the drainage plan potentially also not reflect new proposed waste storage and treatment areas. That would appear to contradict a statement in the Non-Technical Summary that "All permitted wastes...be stored and treated on an impermeable surface with a sealed drainage system that meets ... (CIRIA) 736 or an equivalent approved standard required.

- The new boundary appears to omit western/SW section of existing boundary that includes a building; clarity sought whether this is an error or if operator wants to surrender this part of the site. (Relates to question to site layout too.)

Reason: If a separate Surrender application is required the operator must approach Area Compliance Team for information on the appropriate surrender risk level, which attract different fees and supporting documents

Q6a) Non-Technical summary (NTS)

- Explain how the increased throughput will be achieved (e.g. more machinery, increased hours, etc) and which activity/ies this covers (MRF, Hazardous Waste Transfer, both).

Confirm that no new wastes are to be associated with the MRF activity.

Confirm whether the amount stored onsite at any one time will increase. Confirm current and proposed maximum tonnages.

- Clarify whether the new hazardous and non-hazardous wastes to be accepted under the permit under the new Hazardous Waste Transfer station activity are for:
 - treatment or transfer.
 - if any are for treatment please confirm which wastes are affected and what treatment they will be subjected to.
 - Clarify what, if any other mechanical treatment is (to be) done on the existing permitted wastes.

Reasons:

- *The list of proposed wastes to add include hazardous wastes that are not typical to be accepted by a Household Commercial Industrial (HCI) activity or MRF (activities the permit indicates currently exist); due to the source of the wastes we perceive the existing HCI with treatment activity should be upgraded to a Hazardous Waste Transfer Station.*
- *Limited specific handling techniques ('treatments') are allowed under the Transfer activity; other types of treatment are likely to require a Physical Treatment activity.*

Appendix 11 – Site Layout:

- Show clearly location of 'streetcare area'.
- Some labels are blurred and difficult to read; please address.
- This should show all the existing and proposed permitted area.

Form Part C4:

Table 2- Emissions:

- Please confirm whether all surface water run-off that drains to either surface water drains or the Manchester Ship Canal are clean and uncontaminated.
- If you consider it clean and uncontaminated please confirm whether this is because it is rainfall that has: a) not run through any waste, (b) it has run through waste but has been treated. Confirm the method of treatment prior to discharge.

Reason: There is potential a Water Discharge Activity could be required if run-off has been contaminated.

Table 3a – Please confirm you will agree to comply with the relevant parts of the Appropriate Measures (AMs) on WEEE, WTEE, and Chemicals.

Reason: You have only listed the Non-hazardous and inert AMs.

Table 3b – Include plans: OMP, NMP and DEMP. Submit DEMP (plan template attached).

Form Part F1

Unfortunately the application payment you sent is incorrect. The correct application charge is £12,122.81. As I believe you have already paid £7,408.21 this leaves a balance of **£4,714.60** to pay. ([Environmental permits and abstraction licences: tables of charges - GOV.UK](#))

Substantial variation fee for Hazardous Waste Transfer station: £ 7,444.54

Fire Prevention Plan (FPP): £1,288.16

Odour Management Plan (OMP): £1,293.35

Dust and Emissions Management Plan (DEMP): £1,288.16

Habitats Assessment fee: £808.60

Total = £12,122.81

Please reply directly to this email with your information and copy in susan.iron@environment-agency.gov.uk or post to:

Integrated Permitting Services

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

S9 4WF

You must send us the information and or payment **by close 13 July 2026.**

Pay online by credit or debit card

Pay online at this link www.gov.uk/payments/permitting-applications-waste/permitting-application-payment-waste. You need to create your own reference number. Your reference number must follow this format: PSCAPPWASTEXXXXXYYY. It should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). Email us the reference number and the payment date so we can track your payment.

Details of how to pay by other methods are given in Part F1 of the [application form](#).

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

We have also identified the following missing information, which although it will not prevent us from duly making the application, would be required during determination. You should provide this information as early as possible to avoid delays during determination.

- Site boundary plan - the plan/ map showing the extension appears to omit part of the current area permitted relating to an office building and road; therefore a new site boundary map would be required, preferably now. You advised me over the phone today there is no intention to decrease the existing permitted area.

You can send us this determination information by replying directly to this email with your information and copy in psc@environment-agency.gov.uk.

Without this additional information we would be unable to issue your permit.

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions please phone or email me Thursday 2nd July onwards.

Yours sincerely,
Sue Irons

Waste Permitting Officer
Growth, Permitting and Monitoring
susan.iron@environment-agency.gov.uk
Telephone: 07867 328061/ 02030252898

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Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.