

From: [Louise Burns](#)
To: [Sue Irons](#)
Cc: [Joseph Craddock](#); [SM-Defra-RESP-notifications \(DEFRA\)](#)
Subject: Re: EPR/JB3005CJ/V003 - Request for chat and information - Environmental Permitting Application CRM:0312433
Date: 25 June 2026 19:56:34
Attachments: [image658511.jpg](#)

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Hi Sue,

I thought I would explain where I can, I just hope it makes sense...

1). Application is for a substantial variation.

- Clarity wanted about whether you propose to add a Household Waste Recycling Centre (HWRC/ Civic Amenity) activity, or a Hazardous Waste Transfer activity, or propose something else.
- It is unclear what the source of the proposed wastes are and how (if applicable) they are going to be treated.
- Clarity which of the permit's waste table(s) the new wastes are to be added to (i.e. which corresponding activity: HCl, MRF, treatment, new other).

Reason: 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). The Form part F1 mentions substantial for HWRC.

None of the current MRF Activities will change these shall remain the same, we are looking to incorporate the activities in the S1 and S2 exemption and requesting to expand our permitted area to include the areas already being used by S1 and S2, as by the site plans the actual permitted area is just the MFF building and some existing bays hence the reason for the S1 and S2 exemptions alongside our current permit.

The source of the waste is derived from household bin collections (general, recyclable, food and garden waste) and fly tipped waste (which could be a number of things) picked up by street care crew, we have recently taken over the 7 cheshire west HWRC and are looking to utilise Canalside for storage of A13 and A11 activities HWRC waste before transfer to an approved facility were appropriate and if required (no treatment of anything outside the MRF activities only storage before transfer).

Environmental Management System summary (EMSs)

- 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 which the permit suggests takes place. Clarity wanted on whether crushing akin to treatment does/ would occur, or just gentle compaction to assist payloads.
- Consequently, clarity wanted on which if any current and proposed wastes is/ will be crushed. Crushing can be a noisy dusty activity, so any potential increase in potential risk needs to be stated.
- Clarity on where the 'streetcare area' is on layout.
- Klargest separator – this indicates 1 interceptor covers an area where waste is stored or treated, but that is only removes oil. We will need clarity on 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.

No crushing shall take place, only tipping and reloading of materials such a cardboard, wood and metals (metals will mainly come in already loaded into a skip or container and will be transferred out for further treatment.

The Street care current area is the located at the bottom right of the yard as you look at the map, this area stores oils, chemicals, gas bottles, fire extinguishers, fridge freezers etc all stored in either containers, bunds, gas cages, zap shelters or skips dependant on the waste type and is outside what we believe is the current permitted area but covered under the S1 and S2

Klargester separators – this indicates 1 interceptor covers an area where waste is stored or treated, but that is only removes oil. We will need clarity on 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 - **I will refer to the drainage maps and site and clarify this**

Environmental Risk Assessment (ERA)

There does not appear to be an 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.

I am more than happy that if this is a requirement to have this done - is this something that only the EA do or is there other companies that can assist?

Site Condition Report (SCR)

- 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. 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.

A little confused with this one as the new boundary should not include any buildings other than the current permitted MRF building as this is an open space with 4/5 newly built covered bays on one side and street care area on the other.

- I noticed the drainage plan suggests surface water drainage in northern/ NE 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".

Additional guidance on the above would be welcomed

- Clarity wanted on which waste activity (HCL, MRF, treatment, other) will occur in the extension area. This will affect the appropriate Normal Variation fee we would apply to overall application in addition to any others.

Storage of loose wood pending transfer elsewhere for further treatment

Storage of loose fibre pending treatment in the MRF (we already have this in the main permit but in a different area, moving it to the new location reduces contamination and fire risk)

Pre-loaded metals, LDA, SDA and other items from HWRC pending transfer elsewhere for further treatment

Storage of batteries, WEEE, Vapes, oils, fire extinguishers, aerosols, gas bottles and other haz wastes brought in by street care or other items derived from HWRC pending transfer elsewhere for further treatment.

Storage of processed cardboard, aluminium, plastic and other bales our current permit allows pending collection for further treatment

All waste is kept in either covered bays, containers, battery boxes, on bunds or stored in line with relevant BAT where applicable - we don't have enough room within the current permit boundary to adequately store the waste, this is why we are using S1/S2 exemptions.

The business was advised consistently during a REG 61 that we would have to submit a variation to include all S1/S2 activities if we wanted to carry on accepting the waste types.

I will respond to points 5 and 6 in the morning but I would still like a chat as I'm eager to make sure we get this right; Sites maps can be redone if needed to make thing clearer.

Whatever is needed we will make happen if we can, I'm more than happy to work with you on this.

Speak soon

Lou

Louise Burns
HSEQ Manager

Email: Louise.Burns@cwrecycling.co.uk

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From: Louise Burns <Louise.Burns@cwrecycling.co.uk>

Sent: Thursday, June 25, 2026 18:06

To: Sue Irons <susan.iron@environment-agency.gov.uk>

Cc: Joseph Craddock <joseph.craddock@Cura-Terrae.com>; SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Subject: Re: EPR/JB3005CJ/V003 - Request for chat and information - Environmental Permitting Application CRM:0312433

Hi Sue

Yes I'm the direct contact for this application, I'm more than happy to discuss in detail I'm available tomorrow (Friday) either tomorrow morning till 12 or after 2pm or anytime next week to suit.

Regards

Lou

Sent from [Outlook for iOS](#)

From: Sue Irons <susan.iron@environment-agency.gov.uk>

Sent: Thursday, 25 June 2026 16:59:29

To: Louise Burns <louise.burns@cwrecycling.co.uk>

Cc: Joseph Craddock <joseph.craddock@Cura-Terrae.com>; SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Subject: EPR/JB3005CJ/V003 - Request for chat and information - Environmental Permitting Application CRM:0312433

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CAUTION: This email originated from outside of your organisation. **Do not** click on any links or open attachments unless you recognise the sender and know the content is safe.

Hello Louise (copied to Joseph),

I understand from Joseph that you are now my direct contact with this application since Maria left the consultancy. Joseph kindly sent me the application forms I hadn't been able to locate. I have cc'ed him into this email in acknowledgement of the new contact arrangement; in future you will be my sole point of contact unless you advise me of an alternative in writing for e.g. extended holiday time cover. I will be unavailable for a short time (Monday-Wednesday next week) but available to chat tomorrow or later next week.

I would welcome a chat with you to discuss the proposal. I have a number of questions and observations arising from reading the forms and supporting documents; I hope a chat will resolve some of my questions. I have detailed these below so you can start to look at them in advance of any formal written request I make for that information.

Points for discussion:

1). Application is for a substantial variation.

- Clarity wanted about whether you propose to add a Household Waste Recycling Centre (HWRC/ Civic Amenity) activity, or a Hazardous Waste Transfer activity, or propose something else.
- It is unclear what the source of the proposed wastes are and how (if applicable) they are going to be treated.
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4). Site Condition Report (SCR)

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- Clarity wanted on which waste activity (HCI, MRF, treatment, other) will occur in the extension area. This will affect the appropriate Normal Variation fee we would apply to overall application in addition to any others.

5). Non-Technical Summary (NTS)

- Clarity sought on how the increased throughput of the site is to be achieved, E.g. more machines, longer hours worked, and which activity (HCI, MRF, other) does this relate to?
- Appendix 11 – Site Layout: Some labels are blurred and not readable.
- PDF pg5 Table 1 Site activities permit table 'extract' doesn't match the Permit Review version issued.
- Statement "... not currently economically practicable for CWR to store food waste and garden waste separately on site"; however, layout suggests separate bays.
- Is there going to be more waste stored.
- The applicant has signed up to the Non-Hazardous Appropriate Measures (AMs) but not mentioned about the other AMs for Chemicals (hazardous waste), WEEE, and WTEE (fridges).

6). We would expect a Dust and Emissions Management Plan (DEMP) to be submitted, or a clear justification of why the operator perceives the additional wastes, potentially treatments and handling outside does not increase the dust risk without mitigation/ measures in place. I am aware some waste has been previously stored under exemptions; however, removing them from exemptions enables quantities etc to increase and hence risk increases.

Regards,

Sue Irons
Waste Permitting Officer
Growth, Permitting and Monitoring

susan.iron@environment-agency.gov.uk

Telephone: 07867 328061/ 02030252898



From: Joseph Craddock <joseph.craddock@Cura-Terrae.com>
Sent: 12 June 2026 08:39
To: Sue Irons <susan.iron@environment-agency.gov.uk>
Cc: Louise Burns <louise.burns@cwrecycling.co.uk>
Subject: COPY_Re: EPR/JB3005CJ/V003 - Application allocated to Permitting officer for Validation checks

Morning Sue,

Please see forms attached. If you need anything else, please let me know. See Part A form for application contact. The client is aware that Maria has left.

Kind regards,

Joe



Joseph Craddock
Senior Environmental Consultant / Team Leader
M: [07731527430](tel:07731527430)
E: joseph.craddock@cura-terrae.com
W: [Visit our website here](#)



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From: Sue Irons <susan.iron@environment-agency.gov.uk>
Sent: 11 June 2026 3:54 PM
To: Joseph Craddock <joseph.craddock@cura-terrae.com>
Subject: FW: EPR/JB3005CJ/V003 - Application allocated to Permitting officer for Validation checks

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Hello Joseph,

I received Maria's autoreply indicating she had left the company; it gave me your name/ email as the first alternative person to contact.

I am the Environment Agency Waste Permitting Officer allocated to review the 'CHESHIRE WEST RECYCLING LIMITED' application. Unfortunately, I cannot see on our file any of the application forms; I believe a 'Dropbox' system was used to submit the application. I am hoping you/ another can please:

- send me the forms (Parts A, C2, C4, F1).
- confirm who my new contact is for this application and their email and phone number.
- confirm the client is aware of the personnel changes.

Thank you in advance.

Sue Irons

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



From: Sue Irons
Sent: 11 June 2026 15:39
To: maria.priestley@cura-terrae.com
Subject: EPR/JB3005CJ/V003 - Application allocated to Permitting officer for Validation checks

Operator: CHESHIRE WEST RECYCLING LIMITED
Application reference: EPR/JB3005CJ/V003
Site: C W & C Canalside Operations Hub, Dockyard Road, Ellesmere Port, CH65 4EF

Dear Maria Priestley

Thank you for your Variation application submitted to us on 7/5/2026.

This application has been allocated to me to review and conclude if it can be Duly Made.

Unfortunately I have not been able to find any of the application Forms (Parts A, C2, C4, F1). As you sent in the application I currently assume you are the 'application contact' and can help resolve this. Could you email these forms to me directly please?

In the meantime I shall review the other documents and I intend to give you a call to discuss the proposal's scope.

Thank you

Sue Irons

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



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