Item	EA comment	Response
1	H1 assessment for air required: The H1 tool (air) provided at application in A002 is the same as what was provided in a request for information (RFI) response during A001 on 08/04/2026. The H1 assessment for air is not complete and there are parameters missing. The assessment shows test failures in what parameters have been set and therefore modelling is required. No modelling files were provided at application and are required. We note that there in an updated air quality assessment (AQA) dated 10/07/2026 however the AQA refers to parameters, data and modelling that have not been provided. Please note, you need to ensure that the stack height which has been entered into the H1 assessment is the actual, rather than the effective stack height requested in the explanatory text in A001. Not all environmental standards have been used. Emission concentrations for risk assessments can be incorporated into the permit if your application is successful. Therefore, basing numbers on actual, measured emission concentrations could cause compliance issues at a later date.	Full dispersion modelling package supporting the 10 July AQA has been attached (zip file ref. FM1566_modelruns). Table 5.1 of the AQA specifically models both stacks at 10 m. For both stacks, coordinates, diameter, temperature, normalised/actual flow and exit velocity are specified. Emission parameters are NOx, PM, SO_2, CO and VOC emission rates are specified, based on ELVs. Modelling uses ELVs, rather than measured concentrations. Human-health AQ objectives/EALs are explicitly identified. Appropriate annual, daily, hourly and 15-minute assessments undertaken depending on pollutant
2	H1 assessment for water required: The H1 tool (water) was not provided at application in A002. The H1 (water) provided in A001 was not fully completed and data is missing. When using estimated data in the tool, we can see predicted both short and long term exceedances. Modelling and the raw data is required for this application and has not been provided. This needs to be done at the requested 400 m3 capacity - You'll also need to confirm that you have the buffer capacity for this increase.	H1 tool provided during discussion following the first submission has been attached (access database file ref. H1TOOL_2.7.9_water effluent_26 06 24). The flow rate used within the tool is 0.0046 m^3/s which corresponds to the 400 m^3/day applied for. The parameters modelled are ammonia, chloride, sulphate, fluoride, phenol, boron, copper, iron, lead, manganese, zinc, pentachlorophenol. The report “K499.2~09~0501 SW Discharge RA” contains summary and interpretation of the risk assessment. Appendix C contains the raw data used, including additional parameters analysed which have not been used in the model due to not having an EQS. Buffer capacity for treated effluent is provided by the wetland and pond system. The system is operated as a closed-loop system, such that effluent can be retained within the pond network and is not required to discharge directly to the receiving watercourse. The report “K499.2~09~0501 SW Discharge RA” has been updated with a description of the wetland system.

		Further detailed description of this system can be found in the document called “H Weston & Sons Ltd - Wetlands Operating Techniques” which was submitted with the application, in Section 11. The wetland system incorporates a series of operational controls that allow flows to be retained, isolated, diverted or recirculated depending on prevailing conditions. Slider gates between individual ponds allow the primary flow routes between ponds to be physically isolated, while manual valves provide additional control over the direction of flow. As an additional contingency, effluent can be pumped to the Top Orchard pond. This pond is fully lined and provides temporary storage with suitable access for road tankers. Pond levels are monitored on a fortnightly basis, with results recorded through the E13 Effluent Analysis Form and reported to the Leadership Team. This provides early identification of increasing water levels, blockages or pump failures and allows intervention before available storage capacity is compromised. The system is additionally subject to annual external engineering checks in accordance with the Reservoirs Act 1975. Overall, the wetland/pond network, recirculation arrangements, isolation controls and lined contingency storage provide a series of barriers to uncontrolled discharge and allow effluent to be retained or redirected where normal discharge is unavailable.

3	Containment and effluent treatment improvement plan required: From a review of your site operations, trade effluent does not meet best available techniques (BAT) with high levels of chemical oxygen demand (COD) which is discharged directly into uncovered ponds before discharging into wetlands. When discharge is not possible, the trade effluent is held in multiple ponds. This is not in line with CIRIA C736 containment standards. The methods in which your effluent discharge is described is more in-line with deployment. In addition, the provided bunding assessment makes no mention of surfacing or the fact that the containment tanks are on top of a hill in which there is a permeable downhill slope immediately next to the tanks. There is no mention of any incident response and pollution mitigation procedures in place that would prevent pollution in the event of a containment leak. We note that historically, tanks have imploded and leaked on-site. You also need to consider the storage containment of product. A plan for a phased containment and effluent treatment improvement plan would be required for assessment.	The COD BAT-AEL is 25-100 mg/l daily average. Analysis of the treated effluent show that the COD is below 100 mg/l meeting BAT requirement, before it is introduced into the reedbed system. The site operates under an established Integrated Management System (IMS), which includes documented procedures for the management of drainage and effluent, spillages and accidental releases, environmental incidents and emergency/crisis situations. These procedures define responsibilities, preventative measures, incident response, escalation and reporting requirements and provide an established management framework for preventing and responding to potential releases to the environment. These have been provided for this response. The site's drainage infrastructure is mapped and managed through the Water, Drainage and Effluent Management Procedure (OP50) and associated Drainage and Effluent Management Map. The drainage system separates trade effluent, surface water and foul drainage. Trade effluent from manufacturing activities is directed through the dedicated trade effluent drainage network to the on-site Effluent Treatment Plant, while the surface water drainage system is intended to receive uncontaminated rainwater only. The site drainage plans identify these networks together with relevant infrastructure including oil interceptors, attenuation features, treatment infrastructure, ponds and associated flow routes. Importantly, the effluent management system provides the ability to contain, isolate and recirculate effluent rather than allowing an uncontrolled release to the environment. The wetland system operates with recirculation arrangements that allow water to be returned from Pond 9 to Pond 3 for further biological treatment or redirected to the WWTP balance tanks for further treatment. Slider gates and manual valves provide additional means of isolating, stopping and redirecting flows. Specific procedures are also in place for spillages and accidental releases. OP49 requires spills to be stopped at source where safe to do so and, importantly, requires action to prevent spillages entering

		the drainage system, including the use of drain covers and spill kits. Any release entering the trade effluent drainage system requires notification to the Effluent Treatment Plant Team so that appropriate mitigation measures can be implemented. Environmental incidents are subject to formal reporting and investigation. The E19 Environmental Incident Investigation Report requires the circumstances, materials involved, immediate actions, investigation/root-cause findings and subsequent actions to be documented, with responsibility for determining whether notification to the Environment Agency is required assigned within the site's management arrangements. For more significant events, OP16 provides an escalation route through the site's crisis management arrangements and specifically addresses environmental incidents, including spills affecting watercourses, soil or groundwater. Taken together, these physical and management controls provide multiple levels of protection against accidental releases: segregation of drainage streams; containment and treatment of trade effluent; intervention at source using spill response equipment; isolation and diversion of flows; recirculation and retention within the effluent/wetland system; and formal incident escalation, investigation and regulatory notification procedures.
4	Confirmation that COD and other Food & Drink (F&D) BAT conclusions (BATc) 4 monitoring is now in place: In both the A001 and A002 BAT assessment, your application recommends that additional characterisation monitoring is undertaken to support the permit application and ensure ongoing compliance, but were unsure if this had been completed.	We can confirm that Daily testing of the following is in place: COD (No EN standard), Total Nitrogen (EN 12260, EN ISO11905-1), TOC (EN1484), Total Phosphorus (EN ISO 6878 or other EN ISO standards as described), TSS (EN872), Monthly samples of the following will be taken for the following: Chloride (Various EN standard). Evidence of Daily Reports has been attached to this submission.

5	Revised drainage system plan: We have reviewed your plan and noted that the irrigation system and orchards were not included. Please can you provide an updated plan which includes these site aspects. This should include fixed and not fixed which again goes partly into the area of deployment.	The “Water Drainage & Effluent Management” document has been attached to this submission to show all site aspect, such as: - surface water drains - trade effluent drains - Emergency overflow route - irrigation drains and ponds The document provides evidence that all the above systems are fixed systems, where treated effluent is pumped to lined ponds and subsequently sent to the orchards via a fixed system of drains.
6	Predicted no-effect concentration (PNEC) assessment required as part of the water quality assessment: Please note that you will also need to assess elements that do not have an EQS but have ecotoxic properties and are released in concentrations high enough to risk harming the surface water environment in which PNEC is used instead of an EQS. PNECs are concentrations of a chemical below which no harmful effects are expected in the environment. Contact the Environment Agency separately from this application for more information on using PNECs. Applications should get the PNEC from the Environment Agency to use in the H1 tool at the point of application. An application with water assessment without this will not be duly made. This guidance applies to both direct and indirect discharges.	The requirement for PNECs was considered during the enhanced pre-application process. The EA advised that, where pollutants do not have an EQS, PNECs could be provided for screening. Subsequent correspondence with Rich Croll on 10 June 2026 (attached) confirmed that, once a compliant H1 was provided, further modelling could be undertaken by the Environment Agency during determination, using the H1 as its basis. Our understanding was therefore that the H1 would provide the initial screening assessment, with PNECs obtained where required and subsequent modelling of substances that do not screen out undertaken by the EA during determination. We would appreciate confirmation that this remains the intended approach, consistent with the enhanced pre-application discussions which are attached Nevertheless, the document provided referenced K499.2~09~0501 (SW Discharge RA Summary) now provides the PNEC assessment in Section 6. This is based on the assessment of Relevant Hazardous Substances undertaken for the installation, which identified the substances used on site carrying ecotoxicity hazard classifications.
7	Further assessment and evidence required regarding the ‘filtration and sorption capacity for residual dissolved contaminants’: While we would expect that the effluent that entered the wetlands to meet BAT, we still need to see further assessment on the clay permeability and the risks to groundwater contamination in all seasons and weather conditions such as drought and flooding. It is noted that while the site is not in flood risk zones 2 or 3, it's only roughly 300m away of the East side of the site boundary	A Groundwater Risk Assessment (Wiser Environment Ltd, Ref. K499.2~09~0502, dated 28 July 2026) was prepared specifically to assess the potential risks to groundwater associated with the Long Meadow Wetlands and was submitted in support of the application. The assessment develops a source–pathway–receptor conceptual site model, with the wetland system identified as the potential source, vertical seepage through the underlying strata as the

	from flood risk zone 2 and 3. It is noted that there is at least one pond that has the potential to connect to a direct water course.	principal potential pathway, and groundwater as the principal receptor. It also considers the local geological and hydrogeological setting, including nearby aquifers, Source Protection Zones and BGS borehole records. The BGS borehole information indicates that the site is underlain by brown/light brown clays and sandy clays, followed by red clay marl/mudstone and sandstone/mudstone sequences at depth. The assessment therefore identifies the clay and clay-marl strata as providing a low-permeability barrier between the wetland system and groundwater. The borehole records also indicate groundwater strikes/artesian conditions at depth, supporting the conceptualisation of groundwater receptors as confined beneath the lower-permeability strata. The potential risk associated with the wetlands should be considered in the context of how the system operates. The wetlands form an actively managed component of the site's wastewater treatment and effluent management system, rather than an uncontrolled disposal route. Wastewater is normally subject to treatment through the site's wastewater treatment plant before entering the reed bed/wetland system. The wetlands themselves comprise a series of interconnected ponds through which water progressively passes, providing further biological treatment and storage. The system incorporates controls that allow flows to be isolated, retained, redirected and recirculated. Slider gates between ponds allow the principal flow routes to be isolated, while manual valves allow water to be redirected according to operational circumstances. Water reaching Pond 9 can be recirculated to Pond 3 and passed through the wetland treatment system again, or redirected back to the WWTP balance tanks for further treatment. Where necessary, flows can also be retained within the system or removed by tanker rather than being released to the environment. The wetlands therefore also provide operational contingency capacity. OP50 specifically provides that, where an unexpected event could overwhelm existing buffer storage, the wetlands can be used to retain excess effluent by closing the valve between Ponds 3

		and 4. Water retained within Ponds 1–3 can subsequently be returned to the WWTP for treatment or removed from site by road tanker. Operation of the system is subject to routine monitoring and inspection. Pond 9 levels are checked daily to prevent spillway overflow, while visual inspections of the reed beds, wetlands and nearby watercourses are undertaken fortnightly. The wetlands are also managed as a reservoir and are subject to statutory supervision and inspection under the Reservoirs Act 1975, including inspection by an appropriately qualified Supervising Engineer. Following discussion with the EA on the 28th August 2026, sampling of the clay lining the wetland ponds has been commissioned to verify the permeability of the ponds and provide evidence regarding the 'filtration and sorption capacity for residual dissolved contaminants'.
8	Further BAT assessment required: In the enhanced pre-application advice provided for EPR/QP3420LA, it was advised that BATc 15, 16, 21, and 38 from the waste treatment BATc also need to be assessed in addition to the F&D sector BATc. Additionally, your BAT assessment does not include the BAT 12 AEL's listed within the F&D sector BATc. Please provide a BAT assessment against these BATc and associated BAT AEL's.	BAT assessment document updated to consider the WT BAT conclusions requested.
9	Effluent treatment plant (ETP) and anaerobic digestion (AD) on-site: There has been communication of potentially including ETP and AD operations on site. In your application it is stated that AD takes place off site, and the wastewater treatment system does not include an ETP. Please can you confirm that there is no ETP or AD operations on-site.	Although there are future plans to introduce an AD process on site, AD is not within the scope of the current permit application. The ETP was part of the application within the last submission. Form B3 was submitted listing both an application for Schedule 1 6.8 A(1), d, (ii) activity as well as Schedule 1 5.4 Waste Water Treatment Activity with 400 m3/day treatment capacity applied for. This is also mentioned in the Non-technical Summary. Form F1 also list these activities with fixed charge amounts applied.

10	Segregation of waste stream: Please provide evidence of how on-site effluent is directed into segregated waste streams. Currently, it is unclear if waste streams are separated on-site but from we have assessed, that does not seem to be the case which is not BAT for the sector.	The submitted drainage information has been reviewed and supplemented by the Water, Drainage and Effluent Management Map, which demonstrates the segregation of the principal drainage and wastewater streams across the installation. The site operates separate drainage systems for trade effluent, surface water and foul/sewage effluent. These are identified through the site's drainage colour-coding system and are managed as separate streams: Trade effluent arising from manufacturing activities is collected through the dedicated trade effluent drainage network and directed to the on-site Effluent Treatment System for treatment. Surface water drainage is maintained separately and is intended to receive uncontaminated rainfall only, with flows ultimately directed towards the local surface water system. Foul/sewage drainage from toilets, sinks and welfare facilities is collected separately and directed to the site's sewage treatment systems. The Water, Drainage and Effluent Management Map identifies these separate drainage networks and their associated infrastructure, providing a site-wide representation of the drainage routes and demonstrating that process effluent is segregated from uncontaminated surface water and foul drainage. The management of these separate streams is formalised through the site's Water, Drainage and Effluent Management Procedure (OP50). This confirms that all trade effluent from manufacturing is directed through the designated trade effluent drainage system to the Effluent Treatment System, while surface water drainage is reserved for uncontaminated rainwater and foul drainage is separately routed to sewage treatment systems. Individual trade effluent streams arising from different manufacturing areas may combine within the dedicated trade effluent drainage network prior to treatment. However, these streams are segregated from uncontaminated surface water and foul drainage and are collectively directed to the WWTP. Trade effluent streams are

		combined only within the dedicated trade effluent system for subsequent treatment.
11	Reedbed treatment: Further assessment is required on how the reedbed would further treat BAT compliant discharged effluent during the autumn period where the trade effluent discharge would be at its most 'nutrient-rich' state at a time where the reedbeds would die back before becoming dormant between November and February.	The effluent discharge is regulated by the discharge consent and the water that reaches the reedbed is already BAT compliant. The reedbed provide benefits to the water quality which are not related to compliance.
12	Please provide an effluent profile report for the site which covers all seasons and different operations within a timespan of five years.	Effluent Analysis for the period 2018-2026 have been submitted to provide an effluent profile that covers the required timespan and different times of the year.