



Environment Agency National Permitting Service

Your Ref: EPR/YP3424LH/A001

Our Ref: UK0042157-9205

23 April 2026

Dear Simone Cumberbatch,

EPR/YP3424LH/A001 We Need More Information About Your Application CRM:0889127

Thanks for your email on 15th April 2026 with regards to the missing payment and request for further information on the application we submitted to the Environment Agency on 23rd December 2025.

Please see below for the answer to question 13 **only**. Answers to the remaining questions will be sent on or before 29th April but we are providing this answer in advance as feel that it has already been answered within the application submitted on December 23rd 2025. If additional monitoring is still required, we will need to request additional time to complete this modelling.

13. Submit a H1 Risk Assessment, evaluate and assess discharges to sewer. This must: use proxy data where monitoring data is currently unavailable, include all substances present in the discharge and include screening of all hazardous substances.

Your application mentions your discharge is sent to the sewer. You must complete a H1 risk assessment, depending on the chemical composition of your discharge. Refer to the relevant guidance [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](#) and [Surface water pollution risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](#). You must calculate the concentration of pollutant in the discharge when discharging to a sewer. Refer to BAT 3, 6, 7 and 20; refer to the relevant guidance: [Implementing decision - 2018/1147 - EN - EUR-Lex](#).

Answer 13:

In developing the environmental permit application we have referred to and followed the relevant guidance as referenced above. As you will be aware, GOV.UK guidance 'Risk assessments for specific activities: environmental permits' details that you can use the H1 risk assessment tool to complete and submit any assessment of risks for your specific activity. However, the H1 risk assessment tool, which is hosted on ADMLC's website, contains a warning and confirms that the water impacts assessment aspect of the tool is under maintenance and is disabled / unavailable.

2 London Square
Cross Lanes
Guildford, Surrey
GU1 1UN
Tel: +44 148 352 8400
wsp.com



We have therefore followed the GOV.UK guidance 'surface water pollution risk assessment for your environmental permit' in order to undertake the risk assessment to evaluate and assess the proposed discharge to sewer from the site.

The Surface Water Pollution Risk Assessment (SWPRA) is provided in Appendix 10 of the environmental permit application and re-attached. For completeness we have also attached the SWPRA Excel Workbook which contains the calculations performed (Screening Tests 1-4 and Significant Load Assessment) when undertaking the risk assessment. We have used the same approach that has been accepted for other sites that are not yet operational.

Please note:

As the site is not yet developed / operational, monitoring data is currently unavailable. The guidance says that 'If you do not have discharge monitoring data (for example for new discharges that are not yet discharging), use estimated data for the screening tests. You could use manufacturer specification data or data from a proxy site'. CWR does not operate any similar sites (i.e. a similar sized site with a process which is likely to have a similar discharge) and therefore proxy monitoring data is not available. Therefore, the SWPRA that has been submitted to support the permit application has calculated the maximum allowable release concentrations that could be discharged from the site and still pass the H1 risk assessment / SWPRA (without Phase 2 modelling being required). This is explained fully in Section 2 (Methodology) and Section 5 (Conclusions and Recommendations) of the SWPRA.

The SWPRA has been undertaken for all substances which are anticipated to be present in the effluent / discharged, as informed by the operator, CWR. This is explained in Section 2.4 (Determinands Considered) of the SWPRA.

The results presented in Section 4 (Table 4.1) identify the proposed emission limits for the site. The SWPRA has determined (using screening tests 1-4 from the guidance) that at these limits, the discharge is insignificant and not liable to cause pollution.

The operator, CWR, has confirmed that it can comply with these limits. Furthermore, as detailed in Section 5 (Conclusions and Recommendations) of the SWPRA, CWR proposes to maintain an inventory of waste water in accordance with BAT 3 and monitor in accordance with BAT 6 and BAT 7. Once the site is operational, the wastewater inventory of hazardous chemicals and elements will be used to refine the results of the SWPRA.

Based on the above explanation, we are of the opinion that an H1 Risk Assessment to evaluate and assess discharges to sewer has already been undertaken and submitted to the Environment



Agency, and that this is in line with the relevant guidance. Should you wish to discuss this further, or if you have any specific questions on the SWPRA submitted, we would be happy to answer your queries.

Yours sincerely

James Killick
Associate - Permitting and Compliance