

# Permitting decisions

## Bespoke permit

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We have decided to grant the permit for ABP Sturminster Newton operated by Anglo Beef Processors UK. The permit number is EPR/PP3932EB.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

### Purpose of this document

This decision document provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken in to account.

This decision document provides a record of the decision making process. It:

- highlights key issues in the determination
- summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account
- shows how we have considered the consultation responses.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

# Key issues of the decision

## Emissions to water: Impact Assessment.

A H1 assessment of emissions to Chivricks Brook (ultimately the River Stour) has been provided by the applicant which assesses the potential impact emissions of orthophosphate (as total phosphorus) from the on-site Effluent Treatment Plant (ETP):

However, this submission used an incorrect assessment approach by using the H1 tool, therefore the Environment Agency requested (and received) the necessary data from the applicant to carry out the correct 'River Needs Permits' approach and the results of the impact assessment are as follows:

### Input data

The following data was used in a Monte Carlo assessment of the potential impact from the discharge of ammoniacal nitrogen, orthophosphate (reactive as P) and BOD:

#### Chivricks Brook

upstream flow rate (l/s) Chivrick's (Q95)	upstream flow rate (l/s) Chivrick's (mean)	[orthophosphate, reactive as P], annual mean (mg/l) (downstream)	[Ammoniacal Nitrogen as N], annual, mean (mg/l) (downstream)	[BOD], annual, mean (mg/l) (downstream)
12.7	133.4	0.334	0.291	1.9
<b>Standard Deviations</b>		0.26	0.47	0.86

Upstream (of the discharge point) quality data is not available for Chivricks Brook, therefore in line with standard procedure downstream quality data has been used in the modelling.

#### River Stour

upstream flow rate (l/s) Stour (natural Q95)	upstream flow rate (l/s) Stour (natural mean)	[orthophosphate, reactive as P], annual mean (mg/l) (upstream)	[Ammoniacal Nitrogen as N], annual, mean (mg/l) (upstream)	[BOD], annual, 90th %ile (mg/l) (upstream)
543	5690	0.305	0.084	4.5
<b>Standard Deviations</b>		0.134	0.08	-

There is no data for the upstream quality of the River Stour with regards to BOD, therefore in line with standard procedure the quality has been presumed to be mid class of its designated status of 'Good'. The standard deviation used in the modelling was derived using Monte Carlo and a Coefficient of Variation of 0.6.

#### Discharge

discharge flow rate (l/s) (mean)	Standard Deviation	[orthophosphate, reactive as P] mean (mg/l)	[Ammoniacal Nitrogen as N] mean (mg/l)	[BOD], mean (mg/l)
2.78	0.319	3.99	2.53	2.94
<b>Standard Deviations</b>		0.26	7.06	0.42

All averages have been calculated from raw data which contains at least 12 samples. For ammoniacal nitrogen and BOD the data was extracted from SlimWims under the sites current discharge consent. The operator supplied monitoring data for orthophosphates.

## Results and ELVs

### Orthophosphate in Chivricks Brook

%deterioration caused by discharge, no ELV set	ELV required to restrict to <10% deterioration	ELV required to restrict to within class deterioration at downstream monitoring point
61.70%	0.9 mg/l (mean)	12 mg/l (mean)

### Orthophosphates in the River Stour

%deterioration caused by discharge, no ELV	ELV required to restrict to <10% deterioration
1.64%	20.28 mg/l

Analysing sampling data from Chivricks Brook suggests that the brook could currently be classed as 'Poor' for phosphates, however this water body is not classified under the Water Framework Directive and therefore has no objectives for improvement for this parameter. Additionally, the brook does not support any species or habitats that are sensitive to phosphates.

The River Stour is currently classified as 'Poor' for Phosphates, however the impact from the discharge imposes <10% deterioration to the quality.

Imposing an ELV which controls the deterioration of Chivricks Brook to <10% would be very difficult for the operator to achieve and would impose costs that outweigh the Environmental benefit. We have therefore set an ELV which will ensure that Chivricks Brook does not deteriorate below its current 'classification' and the discharge from the site does not cause a significant negative impact, this is in line with current procedure for setting limits for phosphates.

### Ammoniacal N in Chivricks Brook

%deterioration caused by discharge (90th %ile), no ELV set	%deterioration caused by discharge (mean), no ELV set	ELV required to restrict to <10% deterioration of 90th %ile (95th %ile, mg/l)	ELV required to restrict to <10% deterioration of mean (95th %ile, mg/l)
35.4%	44.3%	4.01	2.82

No deterioration for Ammonical Nitrogen is modelled using both mean input data concentrations and 90<sup>th</sup> %ile input data concentrations and setting 95<sup>th</sup> %ile ELVs. The most conservative ELV required to ensure the discharges causes <10% deterioration is 2.82 mg/l, we have therefore set a limit of 2 mg/l in the permit.

### BOD in Chivricks Brook

%deterioration caused by discharge (90th %ile), no ELV	%deterioration caused by discharge (mean), no ELV	ELV required to restrict to <10% deterioration of 90th %ile (95th %ile, mg/l)	ELV required to restrict to <10% deterioration of mean (95th %ile, mg/l)
0.00%	3.7%	8.63	6.5

No deterioration for Biochemical Oxygen Demand is modelled using both mean input data concentrations and 90<sup>th</sup> %ile input data concentrations and setting 95<sup>th</sup> %ile ELVs. The most conservative ELV required to ensure the discharges causes <10% deterioration is 6.5 mg/l, we have therefore set a limit of 6 mg/l in the permit.

### Suspended Solids

In line with standard procedure, a limit which is 1.5 times the limit for BOD has been set for Suspended Solids.

**Effluent Treatment Plant BAT Assessment using BAT Conclusions Document for common waste water and waste gas treatment/management systems in the chemical sector**

**BAT 7. In order to reduce the usage of water and the generation of waste water, BAT is to reduce the volume and/or pollutant load of waste water streams, to enhance the reuse of waste water within the production process and to recover and reuse raw materials**

The abattoir has set itself water usage targets currently half the usage of existing ABP sites. These targets are being currently achieved which has significant water savings. The water usage results for 2013 and 2014 show a total usage of 506.8 litres and 581.6 litres per animal respectively. This is well within the benchmark water consumption limits of 700 – 1000 litres per animal (as required by Technical Guidance Note S6.12: additional guidance for the red meat processing (cattle, sheep and pigs) sector).

**BAT 8. In order to prevent the contamination of uncontaminated water and reduce emissions to water, BAT is to segregate uncontaminated waste water streams from waste water streams that require treatment.**

Uncontaminated surface water goes directly to a surface water ditch at the back of the site, only contaminated water enters the wastewater treatment plant or those waters with the potential for contamination (i.e. the outside yard is prone to contamination).

**BAT 9. In order to prevent uncontrolled emissions to water, BAT is to provide appropriate buffer storage capacity for waste water incurred during other than normal operating conditions based on a risk assessment (taking into account e.g. the nature of the pollutant, the effects on further treatment, and the receiving environment), and to take appropriate further measures (e.g. control, treat, reuse).**

The site has a 'sludge storage tank' which, due to the utilisation of sludge dewatering, is not used for sludge storage. This tank can therefore be utilised as a diversion tank where necessary.

**BAT 10. In order to reduce emissions to water, BAT is to use an integrated waste water management and treatment strategy that includes an appropriate combination of techniques in the priority order given below.**

	Technique	Description	BAT assessment
(a)	Process-integrated techniques <sup>(6)</sup>	Techniques to prevent or reduce the generation of water pollutants.	<ul style="list-style-type: none"> <li>• The blood, fat and manure/lairage removed from each animal is collected separately and rerouted away from the ETP to be treated and/or stored pending off-site processing, use, treatment or disposal.</li> <li>• 'Bunging' (where the top and bottom of the stomach is sealed) is carried out to stop the stomach contents from escaping</li> <li>• Dry pre-cleaning is utilised in all stages before wet cleaning in order to prevent meat solids and blood from entering the ETP</li> <li>• Waste collection trays are installed to</li> </ul>

			<p>collect waste as it falls to the floor</p> <ul style="list-style-type: none"> <li>• Drains are checked regularly to ensure catch pots are in place</li> <li>• Catch pots are emptied and refitted before an area is cleaned</li> <li>• Cleaning hoses are fitted with (flat jet) spray nozzles and utilise an automatic water supply shut off</li> </ul>
(b)	Recovery of pollutants at source <sup>(6)</sup>	Techniques to recover pollutants prior to their discharge to the waste water collection system.	n/a
(c)	Waste water pretreatment <sup>(6)</sup> <sup>(7)</sup>	Techniques to abate pollutants before the final waste water treatment. Pretreatment can be carried out at the source or in combined streams.	<ul style="list-style-type: none"> <li>• A 1mm debris screen is utilised, which has been designed to be efficient at the proposed peak volumetric flow of 10m<sup>3</sup>/hr</li> <li>• A balance tank is utilised, which has sufficient capacity (60-120m<sup>3</sup>) to support an appropriate retention time of 6-12 hours</li> <li>• A Dissolved Air Flotation (DAF) tank is utilised. The surface loading that the tank is operated at is 4m<sup>3</sup>/m<sup>2</sup>/hr which is within the design parameters of the plant.</li> </ul>
(d)	Final waste water treatment <sup>(8)</sup>	Final waste water treatment by, for example, preliminary and primary treatment, biological treatment, nitrogen removal, phosphorus removal and/or final solids removal techniques before discharge to a receiving water body.	<ul style="list-style-type: none"> <li>• An activated sludge (aeration basin) plant is utilised on site. The plant is operated with a loading rate of 0.096kgBOD/m<sup>3</sup>/day which is well within the design parameters (0.48kg/BOD/m<sup>3</sup>/day) of the plant.</li> <li>• A submerged Membrane Bioreactor will be utilised on site</li> </ul>

**BAT 11. In order to reduce emissions to water, BAT is to pre-treat waste water that contains pollutants that cannot be dealt with adequately during final waste water treatment by using appropriate techniques.**

The following pre-treatment techniques are utilised on site:

- A 1mm debris screen is utilised, which has been designed to be efficient at a maximum flow rate of 40m<sup>3</sup>/hr which exceeds the proposed peak volumetric flow of 10m<sup>3</sup>/hr.
- A balance tank is utilised, which has sufficient capacity (300m<sup>3</sup>) to support an appropriate retention time of 6-12 hours and up to 30 hours.

- A Dissolved Air Flotation (DAF) tank is utilised. The surface loading that the tank is operated at is  $4\text{m}^3/\text{m}^2/\text{hr}$  which is well within the design parameters of the plant.

**BAT 12. In order to reduce emissions to water, BAT is to use an appropriate combination of final waste water treatment techniques**

The following final waste water treatment techniques are utilised on site:

- An activated sludge (aeration basin) plant is utilised on site. The plant is operated with a loading rate of  $0.096\text{kgBOD}/\text{m}^3/\text{day}$  which is within the design parameters of the plant.
- A submerged Membrane Bioreactor will be utilised on site

**BAT 13. In order to prevent or, where this is not practicable, to reduce the quantity of waste being sent for disposal, BAT is to set up and implement a waste management plan as part of the environmental management system that, in order of priority, ensures that waste is prevented, prepared for reuse, recycled or otherwise recovered.**

The site has a waste management system which will allow all forms of waste produced to be reused, recycled or otherwise recovered. The breakdown of this is as follows:

- Collected and treated rainwater is used in the on-site truck wash to reduce the amount of potable water used. Research is currently also being undertaken to ascertain whether the recycling of collected 'roof water' could be used as boiler feed would be worthwhile. Treated rainwater may also be used in the lairage if sufficient quantities are available.
- Surplus sludge from the activated sludge and DAF plant is recycled by being used for land remediation under a standard rules (SR2010No4) 'Mobile plant for landspreading' deployment permit (EPR/EB3104ML).
- The site also utilises a reverse osmosis plant which allows the waste water to be treated to a potable standard for reuse on site.

**BAT 14. In order to reduce the volume of waste water sludge requiring further treatment or disposal, and to reduce its potential environmental impact, BAT is to use one or a combination of the techniques given below:**

	Technique	Description	Applicability	BAT Assessment
(b)	Dewatering	Dewatering can be carried out by belt filter presses or plate filter presses.	Generally applicable.	Sludge dewatering is utilised on site by screw press.

Noise Risk Assessment

The application contained a noise impact assessment which was prepared as part of the application for planning permission in 2009 for day time impacts based on the now withdrawn standard BS4142:1997. We did not agree with this approach and we asked the Applicant in our schedule 5 notice dated 14/03/2017 to provide a revised noise risk assessment in accordance with BS4142:2014 and with reference to the Environment Agency's Horizontal Guidance for Noise IPPC H3 (Part 2) Noise Assessment and Control.

The applicant responded on the 24/03/17 by providing a qualitative assessment with reference to our guidance on .GOV Risk assessments for your environmental permit. We sought further clarification on the

location of each noise source, the control measures in place and the inclusion and consideration of vehicle deliveries as a noise source. The applicant responded on 13/06/17 by supplying a revised qualitative noise risk assessment - Attachment No5 – Risk Assessment.

To satisfy the requirements of BAT the operator has proposed the following mitigation measures as specified within Attachment No5 – Risk Assessment to reduce the potential for noise complaints:

- All activities takes place within a building designed with minimum openings and doors.
- Acoustic hoods are fitted to the blowers.
- Vehicle Deliveries only take place during the day, from 8.00am to 5.00pm.

Based upon the revised submission we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise noise and vibration and to prevent pollution from noise and vibration outside the site.

## Decision checklist

Aspect considered	Decision
<b>Receipt of application</b>	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.  The decision was taken in accordance with our guidance on confidentiality.
<b>Consultation</b>	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.  The application was publicised on the GOV.UK website.  We consulted the following organisations: <ul style="list-style-type: none"> <li>• Environmental Health</li> <li>• Local Planning Authority</li> <li>• Director of Public Health</li> <li>• Public Health England</li> <li>• Health and Safety Executive</li> </ul> The comments and our responses are summarised in the <a href="#">consultation section</a> .
<b>Operator</b>	
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.
<b>The facility</b>	
The regulated facility	We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits.  The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.
<b>The site</b>	
Extent of the site of the	The operator provided a plan which we considered to be not satisfactory.



Aspect considered	Decision
facility	After amending the site boundary as part of a Schedule 5 Notice request, the revised site plan now satisfactorily and shows the extent of the site of the facility. The plan is included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports.
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p><b>Special Areas of Conservation</b></p> <p>Fontmell &amp; Melbury Downs (SAC) 7295m  Fontmell &amp; Melbury Downs (SAC) 7350m  Rooksmoor (SAC) 6292m Radial  Fontmell &amp; Melbury Downs (SAC) 7039m</p> <p><b>Sites of Special Scientific Interest</b></p> <p>SSSI Name: Piddles Wood (SSSI) 1907</p> <p><b>Local Nature Reserves</b></p> <p>Butts Pond Meadows, Sturminster Newton (LNR)</p> <p><b>Local Wildlife Sites</b></p> <p>Butts Pond Meadows 1417m  Twinwood Coppice 1801m  Hinton Watermeadows 584m  Northwood Coppice 1199m  Spar/Meatyards Coppice 1817m</p> <p><b>Ancient Woodland</b></p> <p>TWINWOOD COPPICE 1801m  PARK COPPICE 1817m  PIDDLES WOOD 1919m  NORTHWOOD COPPICE 1199m</p> <p><b>Protected Species</b></p> <p>European Eel <i>Anguilla migratory</i> route  Water Vole <i>Arvicola amphibus</i></p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and protected species identified in the nature conservation screening report as part of the permitting process.</p> <p>“The combustion process at the PPC installation is not considered ‘<i>relevant</i>’ for assessment under the Agency’s procedures which cover the Conservation (Natural Habitats &amp;c.) Regulations 1994 (Habitats Regulations). This was determined by referring to the Agency’s guidance ‘AQTAG014: Guidance on identifying ‘<i>relevance</i>’ for assessment under the Habitats Regulations for installations with combustion processes.’ Thus no detailed assessment of the effect of the releases from the installation’s combustion processes on SACs, SPAs, Ramsar, LNR LWS or Ancient woodland sites is required.”</p>

Aspect considered	Decision
	<p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p>
<b>Environmental risk assessment</b>	
Environmental impact assessment	<p>In determining the application we have considered the Environmental Statement.</p> <p>We have also considered the planning permission.</p>
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>There is no potential for fugitive emissions from the facility. All operations, other than blood and paunch storage, are undertaken indoors including animal by-product storage. No abatement is required with respect to solid animal by-product storage. Blood storage has an abatement technology which has a carbon filter on the vent of the waste blood storage tank.</p> <p>The Operator provided an updated risk assessment for the impact caused by pests at the site. The Risk Assessment considered the health and nuisance potential to local residents caused by flies, scavenging birds, rats and mice. The risk assessment considered mitigation criteria which we consider is acceptable.</p> <p><u>Point Source Emissions to Air</u></p> <p>The operator's risk assessment is unsatisfactory and required additional Environment Agency assessment.</p> <p>As part of a response to a Schedule 5 notice requesting additional information, the operator submitted an H1 risk assessment (Tool) for emissions to air from the two gas fired boilers in accordance with our web guidance, 'Air emissions risk assessment for your environmental permit', <a href="http://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit">www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit</a>. The operator ensured a 100% conversion of NO<sub>x</sub> emissions into NO<sub>2</sub> in line with our guidance for the purpose of H1 calculations.</p> <p>The operator however failed to incorporate existing localised background NO<sub>2</sub> levels within the tool which are required to determine total atmospheric impacts against the relevant environmental quality standards (EQS) for NO<sub>2</sub>. This figure was required as the Process contributions alone were calculated initially to be not insignificant with a PC &gt;1% (11.8%) of the Long Term EQS of 40µg/m<sup>3</sup> and &gt;10% (47.5%) of the Short Term EQS. The agency made up for this shortfall by interrogating the Defra air quality backgrounds maps for North Dorset District Council, obtaining an appropriate ambient background NO<sub>2</sub> concentration of 6.68µg/m<sup>3</sup> (Grid Ref 380500 – 115500) and then progressing the NO<sub>2</sub> calculations forward to determine the Process Contributions + existing background levels of NO<sub>2</sub> (PEC) against a Long Term EQS of 40µg/m<sup>3</sup> and Short Term EQS of 200µg/m<sup>3</sup>.</p> <p>Using the H1 tool, Long Term PEC predictions were determined to be approximately 11.4µg/m<sup>3</sup> or 28.5% for Long Term NO<sub>2</sub> emissions when</p>

Aspect considered	Decision
	<p>compared to an EQS of 40µg/m<sup>3</sup> and for Short Term emissions approximately 94.9µg/m<sup>3</sup> or 50.9% of available headroom when compared to an EQS of 200µg/m<sup>3</sup>. Emissions have therefore been assessed as being unlikely to give rise to significant pollution in that the predicted environmental concentrations are well below 100% (taking expected modelling uncertainties into account) of both the long term and short term EQS and we consider that emissions are unlikely to lead to any breach of air quality standards.</p> <p>For these NO<sub>x</sub> (as NO<sub>2</sub>) emissions, we have carefully scrutinised the Applicant's proposals to ensure that they are applying the Best Available Techniques to prevent and minimise emissions of these substances. We consider the Applicant's proposals for preventing and minimising the emissions of these substances to be BAT for the Installation.</p> <p><u>Point Source Emission to Water</u></p> <p>The operators risk assessment is unsatisfactory and required additional Environment Agency assessment.</p> <p>See <u>key issues</u> section for further detail.</p>
<b>Operating techniques</b>	
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The Operator promotes a minimisation of the use of energy and water at the site. Four water temperatures are provided on site ranging from cold water at mains temperature, 45°C, 65°C and 90°C. The hot water is provided by two on site boilers each with a thermal rated input of 1,700 kW, operating on Natural Gas and run at a demonstrated efficiency of 95.4%. The greater use of energy at the site are the various refrigeration systems used to cool all process areas to the necessary 0°C to 4°C to meet food standards requirements. The refrigeration is provided by ammonia/glycol plant which is fully automated and operated on a cooling demand basis. Waste heat generated by the refrigerators is recovered and used to generate hot water for the boilers and office heating.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p>
Operating techniques for emissions that do not screen out as insignificant	<p><u>Emissions to Air</u></p> <p>Emissions of NO<sub>x</sub> cannot be screened out as insignificant. We have assessed whether the proposed techniques are BAT (see risk assessment aspect above for more details) and we consider them to represent BAT for the facility.</p> <p><u>Emissions to Water</u></p> <p>The emission levels for emissions of phosphates, ammonia and BOD do not screen out as insignificant, but are in line with the techniques and benchmark levels contained in the technical guidance and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs, and ELVs deliver compliance with the</p>

Aspect considered	Decision
	Water Framework Directive. See the key issues document for further details.
Operating techniques for emissions that screen out as insignificant	<p>Emissions of carbon monoxide have been screened out as insignificant, and so we agree that the applicant's proposed technique is BAT for the installation.</p> <p>We consider that the emission limits included in the installation permit reflect the BAT for the sector.</p>
Odour management	<p>We have reviewed the odour management plan in accordance with our guidance on odour management.</p> <p>We consider that the odour management plan is satisfactory.</p>
<b>Permit conditions</b>	
Raw materials	<p>We have specified limits and controls on the use of raw materials and fuels.</p> <p>There are no limitations to the use of Raw Materials at the site set in the Permit.</p>
Improvement programme	<p>Based on the information on the application, we consider that we need to impose an improvement programme.</p> <p>We have imposed an improvement programme to ensure that the operator produces a written protocol referenced in condition 3.1.4 for the monitoring of soil and groundwater for approval by the Environment Agency.</p>
Emission limits	<p><u>Point source emissions to air</u></p> <p>We have decided that emission limits are not required in the permit.</p> <p>The operator has an appropriate maintenance procedure in place as part of their EMS</p> <p><u>Point Source emissions to water</u></p> <p>ELVs have been set for the following substances.</p> <ul style="list-style-type: none"> <li>• Orthophosphates (reactive as P) – 12 mg/l (mean)</li> <li>• Ammonical Nitrogen – 2 mg/l (95<sup>th</sup> %ile)</li> <li>• BOD – 6 mg/l (95<sup>th</sup> %ile)</li> <li>• Suspended Solids – 9 mg/l (95<sup>th</sup> %ile)</li> </ul> <p>These limits have been set following the no deterioration principles required by the Water Framework Directive, please see the Key Issues section for further detail.</p>
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p> <p>These monitoring requirements have been imposed in order to ensure compliance with the no deterioration principles of the Water Framework</p>

Aspect considered	Decision
	<p>Directive.</p> <p>We made these decisions in accordance with Environment Agency guidance:</p> <ul style="list-style-type: none"> <li>• TGN 6.01: How to comply with your environmental permit additional guidance for the food and drink sector</li> <li>• M18: Monitoring discharges to water and sewer</li> </ul> <p>Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>
Reporting	<p>We have specified reporting in the permit.</p> <p>Reporting of production throughput, energy usage (both electricity and natural gas) and water usage are to be recorded and reported annually.</p> <p>We made these decisions in accordance with TGN 6.01: How to comply with your environmental permit additional guidance for the food and drink sector</p>
Considerations of foul sewer	<p>We agree with the operator's justification for not connecting to foul sewer.</p> <p>The facility is in a location where it is not reasonable to connect to the foul sewer.</p>
<b>Operator competence</b>	
Management system	<p>There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The Operators Environmental Management System is certified to ISO 14001.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Relevant convictions	<p>The Case Management System has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.</p>
<b>Growth Duty</b>	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to</p>

<b>Aspect considered</b>	<b>Decision</b>
	<p>development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

## Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

### Responses from organisations listed in the consultation section

<b>Response received from</b>
Environmental Hazards and Emergencies Department, Public Health England.
<b>Brief summary of issues raised</b>
The consultee stated "There are not many residential dwellings in the vicinity of the site. Providing the installation is well managed and regulated, activities are unlikely to impact on public health."
<b>Summary of actions taken or show how this has been covered</b>
No action required. The Operators Environmental Management System is certified to ISO 14001.

<b>Response received from</b>
Environmental Protection & Private Sector Housing, North Dorset District Council
<b>Brief summary of issues raised</b>
The council has confirmed that this authority has received one noise and four odour complaints made between April 2012 and September 2014. One of the odour complaints was confirmed and resolved promptly by ABP Sturminster Newton. The remaining complaints were closed as 'unconfirmed'.
<b>Summary of actions taken or show how this has been covered</b>
No action required, odour and noise are addressed in this document and permit conditions set to minimise noise and odour pollution.