

Permitting Decisions- Bespoke Permit

We have decided to grant the permit for Pattemore's Dairy operated by Pattemore's Transport (Crewkerne) Limited.

The permit number is [EPR/NP3127SX/A001](#)

The permit was granted on 11/12/2025.

The application is for:

- An existing dairy site coming into our regulation for the treatment and processing of cow's and goat's milk with non-hazardous, treated effluent waste disposal to a receiving water body.

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 considerations](#) section to show how the main relevant factors have been taken into account
- highlights [key issues](#) in the determination
- 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.

Key issues of the decision

Best available techniques (BAT) assessment

| BAT ref. | Indicative BAT | Key measures proposed |
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| 1 | Environmental management system (EMS) | <p>The operator has provided information to support compliance with BATc 1. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 1.</p> <p>The operator provided an overview of their EMS and detailed the contents to demonstrate compliance with each aspect of BATc 1.</p> |
| 2 | EMS – inventory of inputs & outputs to increase resource efficiency and reduce emissions. | <p>The operator has provided information to support compliance with BATc 2. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 2.</p> <p>As detailed above, the operator provided an overview of their EMS, demonstrating that each aspect of BATc 2 is complied with.</p> |
| 3 | Emissions to water – monitor key process parameters | <p>The operator has provided information to support compliance with BATc 3. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 3.</p> <p>The operator provided evidence and that the effluent is monitored for flow and pH at the point it leaves the installation, this is monitored daily.</p> |
| 4 | Monitor emissions to water | <p>The operator has provided information to support compliance with BATc 4. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 4.</p> <p>The operator does not currently monitor the effluent to the frequency given under BATc 4 however new monitoring frequencies have been imposed within the permit (table S3.2) and the operator is aware that this is required to ensure compliance.</p> |
| 5 | Monitor channelled emissions to air | <p>BATc 5 sets out air emissions monitoring requirements applicable to specific FDM sub-sectors. None of these monitoring requirements are applicable to this site as the activities undertaken are not specified in the sector and specific processes set out in BATc 5.</p> <p>We are therefore satisfied that BATc 5 is not applicable to this site.</p> |
| 6 | Energy efficiency | <p>The operator has provided information to support compliance with BATc 6. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 6.</p> <p>An energy efficiency plan has been provided and is incorporated into the site EMS. Furthermore, the operator is using the following techniques:</p> <ul style="list-style-type: none"> Boiler burner regulation and control carried out through emissions monitoring and tracking of data Economiser on Boiler 2 and heat exchangers on pasteurisers |

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| | | <ul style="list-style-type: none"> • Boiler blowdown is limited where possible • Steam distribution is manifolded with double isolations. Steam leaks reported and dealt with straightaway • Hot well tanks preheat feed water for boilers • Manual process control systems • Compressed air leaks checked daily • Compressor is captured on planned maintenance schedule • Pipework and buildings hot water ring main are all insulated • Multiple effect evaporation – in place • Renewable energy from solar generation on-site, which provides 60% of the electricity required to operate the Site. |
| 7 | Water and wastewater minimisation | <p>The operator has provided information to support compliance with BATc 7. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 7.</p> <p>The operator is using the following techniques:</p> <ul style="list-style-type: none"> • Recovered water from condensate process is used where possible instead of mains water or abstracted water. For example, for cleaning and washing of plant and mixing with polymers for the Dissolved Air Flotation (DAF) Plant. • (b) Key water streams are sub-metered. • (c) automated processes ensure optimum flow control using valves, all hoses have spray guns and trigger controls. • (d) Segregated clean and dirty drainage systems. Clean roof water is segregated where possible. Clean water from the Upper Yard segregated and discharged to the tributary of the River Parrett via Emission Point W2. • (g) High pressure cleaning techniques are used for: <ul style="list-style-type: none"> - Box washes – this involves the cleaning of used Pallecon cream storage containers - high pressure cleaning undertaken at 200 bar. - Lorry and tanker high pressure cleaning undertaken at 200 bar. - High pressure cleaning of the ETP. Undertaken at 120 bar. When silos and tanks are cleaned, spray balls are used to increase the water spraying pressure to the contact surface. • (h) Cleaning chemical use is optimised. The hygiene team are actively procuring environmentally friendly cleaning substances. • (i) Chemical foam cleaning is undertaken within the Dairy Building itself post-production. • (j) The design and construction of equipment and process areas is optimised to assist cleaning where possible. • (k) There is a cleaning schedule in place. Equipment is washed when off production, ready for next production run. |
| 8 | Use of harmful substances | <p>The operator has provided information to support compliance with BATc 8. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 8.</p> <p>The operator uses the following techniques on site:</p> <ul style="list-style-type: none"> (a) The selection of cleaning chemicals is process specific and ensures optimum cleaning of plant. The types of chemicals used are determined through working with chemical suppliers to meet onsite requirements. The chemicals are essential to ensure cleanliness of the plant for food safety. Less harmful substances are used where possible. |

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| | | <p>(b) Chemical dosing is controlled via conductivity meters and where possible chemical is returned for reuse via return to the detergent tank.</p> <p>(d) The design and construction of equipment and process areas is optimised to assist cleaning where possible.</p> |
| 9 | Use of refrigerants | <p>The operator has provided information to support compliance with BATc 9. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 9.</p> <p>The operator provided details on all existing refrigerants currently used in the process. A number of these have high global warming potential (GWP) and as such are not deemed BAT compliant, however the operator has a replacement plan in place to ensure all high GWP models are replaced with lower GWP model as soon as practicable.</p> |
| 10 | Resource efficiency | <p>The operator has provided information to support compliance with BATc 10. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 10.</p> <p>The operator is using the following technique:</p> <ul style="list-style-type: none"> (a) sludge is recovered from the effluent treatment plant and sent for anaerobic digestion off site. (c) Residues are separated using various techniques within the effluent treatment plant. (d) Resus of cream from the pasteuriser is used when appropriate. (f) Wastewater is sent once a week for land spreading off-site. |
| 11 | Emissions to water – wastewater buffer storage | <p>The operator has provided information to support compliance with BATc 11. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 11.</p> <p>The operator declared that raw effluent from the dairy is stored in the concrete ring balance tank prior to treatment. Under normal operating conditions the balance tank operates a 225 m³ working capacity. The maximum capacity of the balance tank is 250 m³ and there are an additional six No. 'back tanks', each with a capacity of 60 m³. This provides a combined contingency volume of 610 m³. Production of raw effluent is in the region of 230 m³ per day and therefore the combined contingency storage represents in excess of 2.5 days wastewater production. There are also two No. additional contingency storage tanks for untreated effluent; Emergency Pit (10 m³) and Emergency Silo (40 m³).</p> <p>The 6 No. Back Tanks also function as temporary storage of any concentrated spillages within the dairy. An emergency divert switch situated on the outside of the ETP has the capacity to divert spillages from the Dairy directly into the back tanks from where the contents can be slowly added to the ETP to reduce the risk of overwhelming the system.</p> <p>Improvements for contingency storage capacity are planned with the proposed addition of further effluent storage which will be constructed to the relevant industry standard. The existing balance tank would be repurposed as an activated sludge tank, building further treatment contingency within the ETP system. There is a contingency plan in place which forms part of the EMS, specifically covering the storage and treatment of liquid waste. Any excess high strength effluent beyond which the ETP can treat is collected by an authorised contractor and spread to land in accordance with a SR2010 No 4. mobile plant land spreading permit. This is typically within the region of 1 load per week.</p> |

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| 12 | Emissions to water - treatment | <p>The operator has provided information to support compliance with BATc 12. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 12.</p> <p>The operator uses the following techniques to treat their process effluent:</p> <ul style="list-style-type: none"> (a) Equalisation (b) Neutralisation (c) Physical separation (d) Aerobic and/or anaerobic treatment (e) Nitrification (j) Coagulation and flocculation (m) Flotation |
| 12 - AELs | Emissions to water – Associated emission limits (AELs) | <p>We consider that the operator will be future compliant with BATc 12- AELs from 01/01/2028 which is reflected in table S3.2.</p> <p>All parameters are met to the BAT standards except for Total Nitrogen (TN), the site are reporting an average of 57.26mg/l.</p> <p>They are currently investigating potential solutions, including the incorporation of an additional dosing station within the ETP.</p> <p>The site is investing in ensuring they can be compliant with BAT by the start of 01/01/2028 and will ensure future compliance and any changes made to the ETP are permitted accordingly.</p> <p>All parameters and limits have been included in table S3.2 of the permit.</p> |
| 13 | Noise – management plan (NMP) | <p>We are satisfied that BATc 13 is not applicable to this Installation.</p> <p>A noise management plan is only required where noise nuisance at sensitive receptors is expected or has been substantiated. There has been no substantiated noise nuisance from the site therefore an NMP is not a requirement for this site.</p> |
| 14 | Noise minimisation | <p>The operator has provided information to support compliance with BATc 14. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 14.</p> <p>The operator is using the following techniques:</p> <ul style="list-style-type: none"> (a) Appropriate location of equipment and buildings (b) Operational measures: Preventative maintenance, fully trained staff operating equipment, reduce speed on site for vehicles, doors are kept closed where possible, operational times. (d) all noisy equipment is stored within building to reduce noise impact. |
| 15 | Odour – management plan (OMP) | <p>The operator has provided information to support compliance with BATc 15. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 15.</p> <p>An odour management plan has been submitted with the application, and this has been formally approved by the Environment Agency.</p> |

| Dairy sector BAT conclusions | | |
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| 21 | Energy efficiency | <p>The operator has provided information to support compliance with BATc 21. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 21.</p> <p>In addition to the evidence provided for BATc 6, the operator uses the following techniques:</p> <ul style="list-style-type: none"> (b) Use of continuous pasteurisers (c) Regenerative heat exchange in pasteurisation |
| 22 | Waste reduction | <p>The operator has provided information to support compliance with BATc 22. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 22.</p> <p>The operator declared that they use the following techniques on site:</p> <ul style="list-style-type: none"> (a) Optimised operation of centrifuges |
| 23 | Emissions to air | <p>We are satisfied that BATc 23 is not applicable to this Installation.</p> <p>None of the techniques used on site result in channelled dust emissions and as such the BATc is not applicable.</p> |
| EPL - Water | Environmental Performance Level – Energy consumption for the dairy sector. | <p>The operator has provided information to support compliance with BAT-EPL. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT-EPL.</p> <p>The operator has a yearly average specific energy consumption of 0.034 MWh/tonne of milk produced. This falls below the lower end of the BAT target. The operator also undertakes monthly reviews to ensure they are meeting energy targets.</p> |
| EPL - Energy | Environmental Performance Level – Specific wastewater discharge for the dairy sector | <p>The operator has provided information to support compliance with BAT-EPL. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT-EPL.</p> <p>The operators currently have a Specific wastewater discharge of 0.85 m³/tonne of milk processed (yearly average). This demonstrates that they are within the BAT target. In addition to this they undertake monthly reviews.</p> |

Impact on habitats sites

A Habitats Risk Assessment (HRA) stage 1 was carried out for the statutory sites in a 10km vicinity of the installation. The following sites required assessment:

Bracket's Coppice SAC (UK0030095)^

West Dorset Alder Woods SAC (UK0030299)^

HRA 1 assessment conclusion:

This is an existing installation which has been operating for several years and has discharged to water under an EA permit to the River Parrett via Notch at Emission Point W1. Limits for chlorine and aluminium are not included within the trade effluent consent, therefore the Environment Agency has assessed the impact of these substances to the eventual discharge location using the H1 software tool. The installation has not been identified as posing a risk to the designated sites. We are satisfied that the proposed installation will not cause a likely significant effect on the identified designated sites alone and/or in combination.

Natural England was not consulted.

A HRA stage 2 was not required as it was concluded in HRA stage 1 that there is no effect to any of the above listed statutory sites.

We conclude there is no likely significant effect.

Nutrient Neutrality

With a view to the restrictions introduced by the Nutrient Neutral designation of the Parrett catchment, the discharge to water is not new therefore, it cannot be considered for the scope of assessing its effect on the NN catchment. The relevant SAC is also not screened in on the GIS report. The discharge will not be amended, its characterisation and volume remaining unchanged.

The primary source of emissions impacting this site are the combustion gases from burning fuels in medium combustion plants releasing nitrogen.

The pathway through which nitrogen reaches the protected site involves both atmospheric and hydrological processes through two mechanisms, wet and dry deposition. Wet deposition occurs when nitrogen compounds are washed out of the atmosphere by precipitation, while dry deposition involves the direct transfer of nitrogen particles and gases to the soil surface. The receptors, primarily composed of plants, can experience the effects of eutrophication and increase in phytoplankton, which are the results of nitrogen enrichment.

Based on the AQA results, the nutrient nitrogen deposition PC contribution can be considered insignificant, the value being 0.003 keN/ha/yr, representing 0.03% of the CLo therefore, this emission screens out as insignificant. As such, we conclude that there is no likely significant effect.

Hazardous chemical use and storage

The operator carried out a H1 screening assessment to identify potentially harmful chemicals to the environment. The site condition report (SCR) considers relevant externally stored hazardous substances in a stage 1-3 assessment. Where hazardous substances are stored internally on hard standing at the site and the risk of pollution of soil and groundwater as a result of accidental release is considered to be negligible, these substances are not considered further in the assessment.

The operator has identified other potential ecotoxicological substances which screened out of the H1 assessment such as, Chlorofoam, Sodium Hypochlorite, Mixed oxidants (0.75%) (Hydrus 75) containing Hypochlorous Acid and Sodium Hypochlorite, Aluminium Chloride Hydroxide Sulphate (Poly Aluminium Chloride (PAC18)), Cationic polyacrylamide oil in water emulsion (Trufloc® COEX88 Polymer) containing: 20-30%- Hydrocarbons, C12 – C15, nalkanes, isoalkanes, cyclics, < 2% aromatics and <5% - Isotridecanol, ethoxylated, Urea (kept in solid form in a dry environment), Kerosene, Diesel, Engine oil and diesel exhaust fluid (32.2% urea and 67.5% deionised water).

The site hydrogeology is vulnerable to pollutants released at ground level across the entire site for the following reasons:

- The soil surface is high leaching class with an infiltration value of >70%.
- The site bedrock geology has well connected fractures and puts the Principal aquifer at high vulnerability risk.
- There is an area of superficial aquifer along the southern boundary of the site corresponding to superficial drift deposits of secondary undifferentiated superficial aquifer also classified as high vulnerability.

There is a low risk for contamination of soil or groundwater due to the relatively low quantities of the hazardous substances used and produced at the installation and the site construction and drainage design. In addition, there are management and mitigation control measures in place to further decrease the risk.

We believe the operator has adequately assessed potential environmental impact to the environment and is currently operating in such a way that poses low risk.

Bulk storage containment

The Operator provided an internal assessment of the containment measures on site which stated the following:

Milk is stored within silos on-site which have automatic shut-off valves to prevent overfilling, the area is bunded on three sides with breeze blocks and the open side would direct any spillages to the ETP.

Fuel is stored within two bunded areas within fuel tanks, these are fitted with high- and low-level sensors which trigger an alarm to alert staff to potential issues.

Chemicals are stored within a designated area, they are kept in barrels which are housed on bunded pallets, within intermediate bulk containers (IBCs). The chemicals storing area is located on concrete surfacing and any spillages would be directed to the ETP.

In the event of a spill a notification board displayed in the area provides clear directions as to how to open and shut valves to divert and direct the spillage to the Emergency Pit, preventing contamination of the Ponds and ultimately the watercourse. As a further contingency, should any spillage reach the pond system, each of the three Ponds can be individually closed off and contents diverted to the ETP for treatment, preventing accidental discharge into the stream.

During an Environment Agency inspection of the containment during determination, the following was assessed in contrast to the Operator assessment:

No secondary containment was identified around the main silo sites. In the event of a worse-case-scenario primary containment failure, current emergency containment methods in place on-site will not be sufficient to contain effluent and prevent contamination. Additionally, the hill slopes in a downwards direction to a water receiving body to further make emergency clean-up methods difficult to implement effectively. Most tertiary containment in the area is also directed downhill. The environment under some of the containment silos were identified as unmade ground with cracked concrete and deemed permeable.

The site has not completed a CIRIA 736 assessment on the containment on-site and from initial assessments and observations does not meet CIRIA 736 standards, as such we have included improvement condition 1 (IC1) in the permit to ensure this is completed and that all containment meets the requirements.

Due to the nature of the on-site containment, we have opted to adapt to a more stringent timeframe of 9 months, compared to a standard 12 months for this containment IC. A timeframe of 6 months was evaluated with the Operator but

was not deemed feasible due to on-site projects and the availability of a qualified engineer to assess on-site containment to CIRA 736 standards.

Odour Management Plan

The operator has submitted an odour management plan (OMP) as part of the application (A001) in line with our guidance - [Control and monitor emissions for your environmental permit - GOV.UK](#). This outlines the possible sources of odour, the prevention and mitigation controls in place to prevent odours from the site as well as the monitoring in place to limit the impact on sensitive receptors. The operator highlights all receptors within the vicinity of the site; consideration was given to these receptors when analysing the odour management plan.

An OMP was deemed warranted due to the steam cooking used in the production process, this process does not vent to atmosphere however an OMP was still deemed necessary to prevent fugitive odour emissions. Furthermore, the on-site ETP can be potentially odorous and as such an OMP would prevent fugitive emissions.

We have reviewed the revised OMP for compliance in respect of our guidance H4 Odour Management, How to comply with your environmental permit. The OMP is referenced within Table S1.2 of the permit as it forms part of the Operating Techniques.

We consider that the conditions in the permit are sufficient to ensure that the risk of odour pollution beyond the site boundary is low. In the event that odour emissions cause pollution beyond the site boundary, the permit conditions require the Operator to comply with the measures specified in the site's operating techniques and odour management plan.

Discharge to water

There is an on-site Effluent Treatment Plant (ETP), designed to treat effluent produced from:

CIP (Clean in Place) systems which serve production lines and equipment and the Tanker and Box Wash Stations.

Water from the first stage evaporation process; Boiler blowdown water

Yard run off water; and

Under abnormal operating conditions, any spillages within the dairy itself, via the 6 No. Back tanks (each with a capacity of 60m³). This temporary buffer storage allows the controlled input of concentrated spills into ETP, at a rate that would not adversely impact its operation.

Effluent streams entering the ETP are treated by Dissolved Air Flotation (DAF) within the DAF Tank and then undergo secondary treatment within either the Membrane Bioreactor (MBR) or the secondary Biomass DAF (BIO DAF).

Within the DAF Tank, most solids are removed through a combination of adding Poly Aluminium Chloride (PAC), Sulphuric Acid and Polymer in conjunction with the white-water system and paddles which scrape off the sludge that has risen to the surface. The partially treated liquid component of the effluent is directed to the Anoxic Tank and subsequently the Activated Sludge and Aerobic Tank (AS Tank) before undergoing secondary treatment within either the MBR or the BIO DAF.

Within the MBR, 400 filter screens allow the flow of liquid across the membranes to filter out the Mixed Liquor Suspended Solids (MLSS) which are directed to the Anoxic Tank, with the clean water then discharged to the Ponds.

The BIO DAF system operates in parallel to the MBR, receiving liquid MLSS from the Activated Sludge and Aerobic Tank (AS Tank) and by adding Polymer in conjunction to the white-water system, separating the MLSS from the liquid. The clean liquid can then be discharged to the Ponds and the majority of the MLSS sent back to the AS tank. The Sludge Tank receives the sludge from the Main DAF but also a percentage of the Bio DAF scrapings. Material from the Sludge Tank is sent to the Screw Press whereby adding Polymer and then forcing it through a helicoid rotating screw and pressing it against the filter plates, the liquid is removed from the solid. The liquid is in turn fed into the Main DAF tanks under controlled conditions (as slowly as possible) and the solids are dispatched from Site to an Anaerobic Digestion (AD) plant for treatment and recovery.

All treated trade effluent is discharged from the pond to the tributary of the River Parrett via V-Notch at Emission Point W1 in the permit table S3.2.

Emission limit values (ELVs) have been retained from the previous water discharge permit (SW/EPR/ZB3799NK) and are in table S3.2 of the permit to protect the watercourse, unless the corresponding BAT limit is lower and provides better protection of the watercourse in which case the BAT limit has been implemented.

These ELVs will be implemented from date of permit issue. The operator has declared that they will be unable to meet the required ELV for total nitrogen however they will be future compliant by 01/01/2028 by ensuring improvements take place to enable the ETP to meet the ELV.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

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.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

We consulted the local authority.

The comments and our responses are summarised in the [consultation responses](#) section.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority - Environmental Health/Environmental Protection department
- Health and Safety Executive
- UK Health Security Agency
- Local sewerage undertaker and/or local water

The comments and our responses are summarised in the [consultation responses](#) section.

Operator

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.

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 RGN2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1'.

The operator has provided the grid reference for the emission points from the medium combustion plants.

The extent of the facility is defined in the site plan and in the permit (see The Site section below for further comments).

The activities are defined in table S1.1 of the permit.

The site

The operator has provided two plans with the application, these however have mismatching boundary lines, and the primary site plan's boundary line encroaches on a water pathway to the south. The boundary line also does not accurately incorporate the expansion into the solar farm as discussed with the regulatory officer for the site therefore we consider these plans to not be satisfactory as such we have included an improvement condition (IC2) to ensure a satisfactory plan is submitted.

The current plans are included in the permit and will be replaced with the subsequent site plan once submitted by the operator.

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 and baseline reporting under the Industrial Emissions Directive.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

As part of the application, we carried out a habitats assessment of the site and the surrounding area.

Please see the 'Impact on habitats sites' sub-section under 'Key issues of the decision' for a summary of the assessment.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

We have not consulted Natural England.

The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator's risk assessment is satisfactory.

General operating techniques

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.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

Odour management

We have reviewed the odour management plan in accordance with our guidance on odour management.

We consider that the odour management plan is satisfactory and we approve this plan.

We have approved the odour management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

Raw materials

We have specified limits and controls on the use of raw materials and fuels.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

We have included an improvement programme (IC1) to ensure that the Operator is future compliant with on-site containment as per CIRIA 736.

We have also included an improvement programme (IC2) for the operator to submit a new site plan, clearly identifying the site boundary and all emission points.

Emission Limits

Emission limit values (ELVs) have been retained from the previous water discharge permit (SW/EPR/ZB3799NK) and are in table S3.2 of the permit to protect the watercourse, unless the corresponding BAT limit is lower and provides better protection of the watercourse in which case the BAT limit has been implemented. ELVs have been included for the following parameters:

- Flow
- Maximum rate of discharge
- pH
- Suspended solids (measured after drying at 105°C)
- Total suspended solids (TSS)
- Allylthiourea (ATU)- Biochemical Oxygen Demand (BOD) as O₂
- Chemical oxygen demand (COD)
- Ammoniacal nitrogen (as N)
- Total Nitrogen (TN)*
- Total Phosphorus (TP)

*It is noted that the operator is unable to meet the BAT ELV for total nitrogen and as such a temporary limit has been included in the permit until 31/12/2027. The compliant BAT ELV will be met by 01/01/2028 ensuring the operator improves their on-site ETP and the BAT ELV is met.

We have included a limit of 15 l/s (for each point) on the volume of the maximum rate of discharge for W1 and W2 point source emission to water.

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on the medium combustion plant directive (MCPD) have been added for the following substance:

- Oxides of Nitrogen (NO and NO₂ expressed as NO_x)

The limit is set at 200 mg/m³ for boilers 1, 2, and 4. The limit set for generator 1 is 250 mg/m³.

Monitoring

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 for the following parameters when discharging directly to water:

- Flow
- 15-minute Instantaneous rate of discharge
- pH
- Suspended solids (measured after drying at 105°C)
- Total suspended solids (TSS)
- BOD
- Chemical oxygen demand (COD)
- Ammoniacal nitrogen (as N)
- Total Nitrogen (TN)*
- Total Phosphorus (TP)
- Oils and grease

*These monitoring requirements have been included in order for the Operator to comply with BAT.

We made these decisions in accordance with BAT for this sector and to retain ELVs from SW/EPR/ZB3799NK.

We have decided that monitoring should be added for the following parameters, using the methods detailed and to the frequencies specified:

- Oxides of Nitrogen (NO and NO₂ expressed as NO_x) - Periodic reference period and a monitoring frequency of three-yearly under monitoring standard/method BS EN 14792.
- Carbon Monoxide - Periodic reference period and a monitoring frequency of three-yearly under monitoring standard/method BS EN 15058.

These monitoring requirements have been included to comply with the MCPD.

Reporting

We have specified reporting in the permit.

Management System

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

We only review a summary of the management system during determination. The applicant submitted their full management system. We have therefore only reviewed the summary points.

A full review of the management system is undertaken during compliance checks.

Previous performance

We have assessed operator competence. There is no known reason to consider the applicant will not comply with the permit conditions.

No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.

Financial competence

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

Growth duty

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.

Paragraph 1.3 of the guidance says:

“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 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.”

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.

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.

Consultation Responses

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:

Response received from: UK Health Security Agency

Brief summary of issues raised:

- Emissions to air of nitrogen oxides (NO_x) and sulphur dioxide (SO₂) are the main concern however, consultee has modelled and assessed the emissions as low risk.
- The applicant states that emissions to air from the boilers are monitored once or twice a year and it's requested for the EA to clarify the monitoring regime and confirm it is appropriate to ensure emissions do not have an adverse impact on local air quality and human health.

Summary of actions taken:

- We have applied the medium combustion plant directive (MCPD) to our determination and carried out an air quality assessment (AQA) with our internal AQMAU team. Monitoring frequencies and limits have been set in the permit for each boiler in addition to sulphur content limits for the diesel fuel used for the back-up generator on-site.