

Permitting Decisions- Variation

We have decided to grant the variation for Deep Moor Composting Facility operated by Coastal UK Group Limited.

The variation number is EPR/VP342BE/V004.

The permit was issued on 05/01/2026.

The variation is to vary the current permit (ERP/VP3402BE) from the operation of the in-vessel composting facility (IVC) with an annual throughput of 25,000 tonnes per annum (tpa) to a green waste open windrow composting operation with an increase of 5,000 tpa (total 30,000 tpa), and the operation of a municipal waste transfer station in the building formerly used for the IVC operation.

The green waste composting operation is an “open windrow” process in which the green waste is set out in rows and regular turned to optimise the biological composting process to produce nutrient rich, stable compost product. This is then taken offsite for use as a fertiliser.

The waste transfer station accepts household and commercial waste, mainly delivered to the site through local authority contracts, whereby wastes accepted will be source segregated and stockpiled pending removal for onward processing, at suitably permitted facilities.

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

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision considerations](#) section to show how the main 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 and the variation notice.

Key issues of the decision

Site containment

The operator had existing improvement conditions with respect to primary containment, secondary containment and storage lagoon design (see IC3-5 in the permit), following an Environment Agency Biowaste Treatment sector permit review, 2022.

The operator had not provided any further information leading up the variation application, or within the application with respect to containment systems at the facility.

The operator was requested via a schedule 5 Notice, issued 27/06/2025 to provide site containment information against CIRIA C736 Containment systems for the prevention of pollution or other relevant industry standard.

Following a response from the operator, (Composting Facility Compliance and Condition - Review 0 October 2025 and Lagoon Compliance and Condition Review – Revision A Nov 2025) we assessed the submitted containment assessment reports of which concluded that both primary and secondary containment conformed with the requirements outlined in CIRIA C736, however a number of recommended remediation and maintenance items to be undertaken.

We are satisfied that the facility is in good working condition, however, to ensure the remedial works are completed, we have set an Improvement condition (see IC8 in the permit) to address ongoing improvements recommended at the facility.

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.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Fire and Rescue Services (FRS)
- UK Health Security Agency (UKHSA)
- Local Authority - Environmental Protection Department
- Local Authority - Planning
- Health and Safety Executive
- Foods Standards Agency (FSA)
- Sewerage Authorities

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

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 site

The operator has provided a plan which we consider to be satisfactory.

The permitted boundary has not changed, only the layout of operations. The former In-vessel composting reception hall facility near the centre of the site is now used to facilitate the waste transfer station. The Open windrow composting activity that replaces the In-vessel composting activity is to the north-east of the site. 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.

We have advised the operator what measures they need to take to improve the site condition report.

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 not within our screening distances for these designations.

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.

The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment all emissions may be screened out as environmentally insignificant.

Operating techniques

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

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.

- Biological waste treatment: appropriate measures for permitted facilities, 21 September 2022, GOV.UK
- Best available techniques (BAT) for Waste Treatment as detailed in document reference 2010/75/EU
- Best Available Techniques (BAT) Conclusions for Waste Treatment as detailed in document reference C (2018) 5070
- Non-hazardous and inert waste: appropriate measures for permitted facilities, 12 July 2021, GOV.UK

- Control and monitor emissions for your environmental permit, 1 February 2016, GOV.UK

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, 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'.

The plan has been incorporated into the operating techniques S1.2.

Fire prevention plan

We have assessed the fire prevention plan and are satisfied that it meets the measures and objectives set out in the Fire Prevention Plan guidance.

The operator has demonstrated appropriate fire prevention procedures, water supplies and fire water run-off containment with regards to changes in operations at the facility.

We have approved the fire prevention 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 plan has been incorporated into the operating techniques S1.2.

Raw materials

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

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

We are satisfied that the operator can accept these wastes for the following reasons:

- they are suitable for the proposed activities
- the proposed infrastructure is appropriate; and
- the environmental risk assessment is acceptable

We made these decisions with respect to waste types in accordance with our guidance, *Biological waste treatment: appropriate measures for permitted facilities – Version published 21 September 2022* and *Non-hazardous and inert waste: appropriate measures for permitted facilities, 12 July 2021*, GOV.UK.

Improvement programme

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

Improvement condition for site containment remedial works - IC8

We have included improvement programme to ensure that site containment remedial works are completed (see key issues).

For awareness, Improvement conditions 1-7, have been marked as completed following information provided as part of the variation application.

Improvement conditions 6-7, have been marked as completed/ non-applicable - due to changes to site operations as a result of the variation application.

Emission limits

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on Best Available Techniques (BAT) have been deleted for the following substances:

Emissions to air

- Ammonia - 20 mg/m³
- Odour concentration (no limit set, but included for completeness)

- Hydrogen Sulphide (no limit set, but included for completeness)

The amendments reflect infrastructure changes at the facility, namely closure of the former in vessel composting activity and the associated air odour abatement plant (biofilter).

The collection and treatment of air by biofiltration abatement is not required for this building and future operations, and therefore the biofilter emission points and (ELVS) have been removed as a point source emission to air.

Monitoring

We have decided that monitoring shall be deleted for:

- Odour abatement plant
- Biofilter efficiency

The amendments to monitoring requirements reflect infrastructure changes at the facility, namely the removal of the biofilter- point source emission to air. We made these decisions in accordance with Waste Treatment BAT Conclusions.

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.

Reporting

We have deleted reporting in the permit for the following parameters:

Emissions to air

- Ammonia, Odour concentration, Hydrogen Sulphide, biofilter efficiency - Odour abatement plant -Biofilter

We made these decisions in accordance with Waste Treatment BAT Conclusions.

Technical competence

Technical competence is required for activities permitted.

The operator is a member of the CIWM/WAMITAB scheme.

We are satisfied that the operator is technically competent.

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 variation.

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.

- Fire and Rescue Services (FRS)
- UK Health Security Agency (UKHSA)
- Local Authority - Environmental Protection Department

No concerns were raised from the organisations that responded.

No further responses have been received from the other organisations consulted