

## Permitting Decisions- Environment Agency Initiated Variation

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We have issued an Environment Agency initiated variation for Axion Polymers operated by Axion Recycling Ltd following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/JP3994CL/V005.

### Permit Review

This Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016 (EPR), regulation 34(1), to periodically review permits. Article 21(3) of the Industrial Emissions Directive (IED) also requires the Environment Agency to review conditions in permits to ensure that they deliver compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

We have reviewed the permit for this regulated facility and varied the permit to make a number of changes to reflect relevant standards and best practice. These changes principally relate to the implementation of our technical guidance for [WEEE treatment and transfer and Treating metal waste in shredders](#), including the relevant requirements of the [BAT Conclusions for Waste Treatment](#) which have been incorporated into our guidance.

In this decision document, we set out the reasoning for the variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the operator in the operation and control of the plant and activities of the installation (operating techniques) against our technical guidance.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

# Purpose of this document

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

- explains how the Environment Agency initiated variation has been determined;
- 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.

Read the permitting decisions in conjunction with the environmental permit and the variation notice.

## Key issues of the decision

### Environment Agency led variation – permit review

We have carried out an Environment Agency initiated variation to the permit following a permit review as required by legislation to ensure that permit conditions deliver compliance with relevant legislative requirements and appropriate standards to protect the environment and human health.

The Industrial Emissions Directive (IED) came into force on 7 January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) Conclusions as described in the Commission Implementing Decision. Article 21(3) of the IED requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

The BAT Conclusions for Waste Treatment (the BREF) was published on 17 August 2018 following a European Union wide review of BAT, implementing decision (EU) 2018/1147 of 10 August 2018. Relevant existing facilities were expected to be in compliance with the BAT Conclusions within 4 years (i.e. by August 2022).

On 13th July 2022 our WEEE (waste electrical and electronic equipment) appropriate measures guidance was published on gov.uk. This guidance includes additional appropriate measures for WTEE (waste temperature exchange equipment).

This technical guidance explains the standards (appropriate measures) that are relevant to regulated facilities with an environmental permit to treat or transfer

WEEE (including WTEE) and incorporates the relevant requirements of the BAT Conclusions.

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 20/04/2022 requiring the operator to provide information to confirm that the operation of their facility currently meets, or how it will subsequently meet, the standards (appropriate measures) described in our technical guidance for treatment of WEEE.

The notice required that where the revised standards are not currently met, the operator should provide information that:

- Describes the techniques that will be implemented to ensure operations meet the relevant standards and by when, or
- Explains why they are not applicable to the facility in question, or
- Justifies why an alternative technique is appropriate and will achieve an equivalent level of environmental protection to the standards described in our guidance

The standards described in our technical guidance are split into 7 chapters:

- General management appropriate measures
- Waste pre-acceptance, acceptance and tracking appropriate measures
- Waste storage, segregation and handling appropriate measures
- Waste treatment appropriate measures
- Emissions control appropriate measures
- Emissions monitoring and limits appropriate measures
- Process efficiency appropriate measures

We have set emission limit values (ELVs) and monitoring requirements for relevant substances in line with our technical guidance and the BAT Conclusions for Waste Treatment, unless a tighter, i.e. more stringent, limit was previously imposed and these limits have been carried forward.

The Regulation 61 notice required the operator to confirm whether they could comply the standards described in each of these chapters. Table 1 below provides a summary of the response received and our assessment of it. The overall status of compliance with the standards (appropriate measures) is indicated in the table as:

NA – Not Applicable

CC – Currently Compliant

FC – Compliant in the future (through improvement conditions set in permit)

NC – Not Compliant

In accordance with Article 22(2) of the Industrial Emissions Directive, the Regulation 61 notice asked the operator to provide a soil and groundwater risk assessment, along with a baseline report or summary report confirming the current state of soil and groundwater contamination, where listed activities are undertaken that involve the use, production or release of relevant hazardous substances.

The Regulation 61 notice also asked the operator to confirm whether they operate a medium combustion plant or specified generator (as per Schedule 25A or 25B of EPR 2016) and whether they had considered how their operations could be affected by climate changes (e.g. through a climate change adaptation plan).

Our assessment of the responses received from the operator regarding soil and groundwater risk assessment, medium combustion plant and specified generators, and consideration of climate change are also summarised in Table 1.

The Regulation 61 notice response from the Operator was received on 03/12/2025 for activities relating to treatment of WEEE.

Although we were able to consider the Regulation 61 notice response generally satisfactory at receipt, we needed more information in order to complete our permit review assessment. We requested this by email and the operator provided further information on (summary of information) on 12/12/2026, 19/02/2026, and 30/03/2026. We made a copy of this information available on our public register.

**Table 1 – Summary of our assessment of the operator’s Reg 61 response**

| <b>Appropriate measures</b>   | <b>Compliance status</b> | <b>Assessment of the installation’s compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator</b>   |
|---|--------------------------|---|
| <b>General management appropriate measures</b>                            | FC                       | <p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of:</p> <ul style="list-style-type: none"> <li>• Measure 2.1 relating to the inventory of emissions to air and water and residue management plan.</li> <li>• Measure 2.3 relating to the Accident Management Plan;</li> <li>• Measure 2.4 relating to the Accident Prevention Measures;</li> <li>• Measure 2.5 relating to the Contingency Plan and Procedures; and</li> <li>• Measure 2.6 relating to Plant Decommissioning.</li> </ul> <p>We have included an improvement condition to address these areas and complete the requirements of the related measures within the appropriate measures guidance.</p> <p>Compliance with the other appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p> |
| <b>Waste pre-acceptance, acceptance and tracking appropriate measures</b> | CC                       | <p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section.</p> <p>Compliance with the other appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>  |
| <b>Waste storage, segregation and handling appropriate measures</b>       | CC                       | <p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section.</p> <p>Compliance with the other appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>  |
| <b>Waste treatment appropriate measures</b>                               | FC                       | <p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of:</p>  |

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|---|----|---|
|   |    | <ul style="list-style-type: none"> <li>Measure 5.2, Point 5 and 6 relating to written treatment activities, abatement and control equipment, and the measures taken during abnormal operating conditions.</li> </ul> <p>We have included an improvement condition to address these areas and complete the requirements of the related measures within the appropriate measures guidance.</p> <p>Compliance with the other appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>  |
| <b>Emissions control appropriate measures</b>               | FC | <p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of:</p> <ul style="list-style-type: none"> <li>Measure 6.3, Point 3 relating to the fate and impact of substances emitted to air; and</li> <li>Measure 6.4, Point 2 relating to the fate and impact of substances emitted to water and sewer.</li> </ul> <p>We have included an improvement condition to address these areas and complete the requirements of the related measures within the appropriate measures guidance.</p> <p>Compliance with the other appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p> |
| <b>Emissions monitoring and limits appropriate measures</b> | FC | <p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of:</p> <ul style="list-style-type: none"> <li>Measure 7.1, Point 1 - 4 relating to the emissions inventory to air; and</li> <li>Measure 7.2, Points 1 - 3 relating to the emissions inventory to water and sewer.</li> </ul> <p>We have included an improvement condition to address these areas and complete the requirements of the related measures within the appropriate measures guidance.</p> <p>Compliance with the other appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>                            |
| <b>Process efficiency appropriate measures</b>              |    | <p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of:</p>  |

|   |  |   |
|---|--|---|
|   |  | <ul style="list-style-type: none"> <li>Measure 8.1 – Energy efficiency</li> </ul> <p>We have included an improvement condition to address these areas and complete the requirements of the related measures within the appropriate measures guidance.</p> <p>Compliance with the other appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p> |
| <b>Reg 61 requirement</b>   |  | <b>Assessment of response received</b>  |
| <b>Soil and groundwater risk assessment</b>   | A Site Condition Report is currently in place (Ref: 416.064681.00001 dated 22/12/2023 Rev 2).  |   |
| <b>Medium combustion plant and specified generators</b>   | N/A – none present on site.  |   |
| <b>Climate change</b>   | Submission of climate change risk assessment is no longer application requirement. It now forms a part of the operator's EMS and will be reviewed within compliance assessment.  |   |
| <b>Summary of other changes made to the permit as a result of our assessment of the Reg 61 response</b> |  |   |
| <b>Change</b>   | <b>Reason for change</b>   |   |
| <b>Removal of AR3</b>   | We have removed the DAA AR3 'Surface water collection and storage'. In a Request For Information response dated 12/02/2026, in response to question 5, the operator has confirmed that no storage of surface water occurs on site. Instead, process water and surface water is channelled and discharged to sewer.   |   |
| <b>Removal of waste codes</b>   | <p>We have removed all but two of the waste codes from the permit. In a Request For Information response dated 12/02/2026, in response to question 1. The operator confirmed that only 19 02 04 is used for AR1 and AR2, and 19 12 04 for AR6.</p> <p>Therefore, we have removed waste codes that are no longer relevant to the operations carried out on site. The full list removed is available below under 'Changes to EWC codes'.</p> |   |

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| <b>Non-inclusion of Table S1.5</b>                     | We have not included Table S1.5 'Specified treatment methods and standards for the treatment of WEEE and components of WEEE' as the operator is only accepting SMW residue for density separation (wet process) and heat extrusion.  |
| <b>Removal of R code</b>                               | We have removed "R02: Solvent reclamation/ regeneration by distillation (regeneration of spent solvents, reclamation from paint and varnishes etc.)" from AR6. The operator has confirmed that this is not relevant to their process.  |
| <b>Inclusion of Directly Associated Activity (DAA)</b> | <p>We have added AR3 'Physical treatment for the purpose of recycling'. This includes the granulation and drying of non-hazardous plastic waste.</p> <p>The operator provided an updated process flow diagram that included a granulation and drying activity after the density separation process. As the feedstock waste is non-hazardous plastic waste, but directly linked to the density separation of hazardous and non-hazardous plastic waste prior, we have included this DAA within the permit.</p>  |
| <b>Inclusion of waste operation</b>                    | <p>A waste operation titled "<b>Plastic pelletising plant</b>" has been added to clarify the activities carried out on site. The operator accepts small mixed WEEE (SMW) residue which is processed to separate plastic fractions from the incoming material. This material is segregated into hazardous and non-hazardous streams.</p> <p>The fraction undergoes treatment through density separation using sink–float tanks, followed by additional mechanical separation processes. Following separation, the non-hazardous plastic fraction is bulked before being transferred for melting, extrusion and pelletising to produce plastic pellets using flakes generated from AR1 and AR6.</p> <p>The previous permit authorised this process under a single waste operation, which did not clearly distinguish the different stages of treatment carried out on site. To provide greater clarity and transparency within the permit, a separate waste operation (AR7) has been included to explicitly identify the pelletising stage of the process.</p> |
| <b>Emission Points</b>                                 | <p>We have amended and added three emission points to the permit (A3, A4, A5). The previous permit contained points A1 and A2 for the stack emission points from the extrusion process.</p> <p>We have received a process flow diagram (Ref: <i>Permit process flow Feb 26 dated 19/02/2026</i>) that confirms A1 and A2 now serve the polymer separation, purification and dry process with dust filters, and A3, A4, and A5 now serve the extrusion process.</p>   |

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|--|--|
|  | Table S3.1 has been amended to reflect these changes along with a new site plan to correctly show the emission points. |
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## **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 Regulation 61 notice response that we consider to be confidential.

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

### **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'.

### **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 S1.2 in the environmental permit.

### **Changes to the permit conditions**

We have varied the permit as stated in the variation notice.

### **Improvement programme**

We have removed IP1 – IP4. These relate to discharges, with the principal concern relating to surface water run-off from storage areas. In discussion with industry, it was concluded that the provision of weatherproof covering for storage areas was an acceptable alternative for surface waters. On this basis, compliance with IP1 – IP4 is no longer required. The WEEE: appropriate measures and the activities table now require the inclusion of weatherproof covering for both hazardous pre-shredded inputs and output fractions that need to be treated as POPs waste.

IP5 has been removed as specified monitoring requirements have replaced the requirement for an improvement condition.

We have added the following improvement conditions to the permit:

- IC6 requires the operator to review and update their management system in relation to Measure 2.1 – 2.6 of the WEEE: appropriate measures. The operator confirmed that this has not yet been completed, therefore an improvement condition has been set for the operator to submit confirmation of compliance.
- IC7 requires the operator to update their management system in relation to Measure 5.2, Point 5 and 6 of the WEEE: appropriate measures. The operator confirmed that this has not yet been completed, therefore an improvement condition has been set for the operator to submit confirmation of compliance.
- IC8 requires the operator to review and update their process efficiency procedures in relation to Measure 8.1 of the WEEE: appropriate measures. The operator confirmed that this has not yet been completed, therefore an improvement condition has been set for the operator to submit confirmation of compliance.
- IC9 requires the operator to submit an emissions inventory and H1 risk assessment in relation to Table S3.1 and S3.2 of the permit. This is required by Measure 6.1, 6.4, 7.1, 7.2, and 7.3 of the WEEE: appropriate measures.
- IC10 requires the operator to review and resubmit their Fire Prevention Plan (FPP). The operator stores combustible non-hazardous waste on site and currently has a draft FPP in place. This has not been approved by the Environment Agency so an improvement condition has been set to ensure the FPP is submitted for approval.

## **Changes to EWC codes**

The operator has confirmed on 12/02/2026 that only 19 12 04 and 19 02 04\* are relevant for activities on site. The following waste codes are no longer relevant and have now been removed from the permit:

| <b>Table S2.2 Permitted waste types and quantities for storage and treatment</b>  |  |
|---|--|
| <b>Maximum quantity</b>   | <b>The total quantity of waste accepted at the site for the above activity shall be less than 30,000 tonnes a year.</b>  |
| <b>Exclusions</b>   |  |
| Notwithstanding the specification of waste types below, wastes shall not be accepted at the site which have any of the following characteristics:                                       |  |
| <ul style="list-style-type: none"> <li>• Consisting solely or mainly of dusts, powders or loose fibres</li> <li>• Wastes that are in a form which is either sludge or liquid</li> </ul> |  |
| Waste code  | Description  |
| <b>15</b>   | <b>Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified</b>  |
| <b>15 01</b>  | <b>packaging (including separately collected municipal packaging waste)</b>  |
| 15 01 01  | paper and cardboard packaging  |
| 15 01 02  | plastic packaging  |
| 15 01 03  | wooden packaging   |
| 15 01 04  | metallic packaging   |
| 15 01 05  | composite packaging  |
| 15 01 06  | mixed packaging  |
| 15 01 07  | glass packaging  |
| 15 01 09  | textile packaging  |
| <b>15 02</b>  | <b>absorbents, filter materials, wiping cloths and protective clothing</b>   |
| 15 02 03  | absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02   |
| <b>17</b>   | <b>Construction and demolition wastes (including excavated soil from contaminated sites)</b>   |
| <b>17 02</b>  | <b>wood, glass and plastic</b>   |
| 17 02 01  | wood   |
| 17 02 02  | glass  |
| 17 02 03  | plastic  |
| <b>17 04</b>  | <b>metals (including their alloys)</b>   |
| 17 04 01  | copper, bronze, brass  |
| 17 04 02  | aluminium  |
| 17 04 03  | lead   |
| 17 04 04  | zinc   |
| 17 04 05  | iron and steel   |
| 17 04 06  | tin  |
| 17 04 07  | mixed metals   |
| 17 04 11  | cables other than those mentioned in 17 04 10  |
| <b>19</b>   | <b>Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use</b> |
| <b>19 01</b>  | <b>wastes from incineration or pyrolysis of waste</b>  |
| 19 01 02  | ferrous materials removed from bottom ash  |
| 19 01 12  | bottom ash and slag other than those mentioned in 19 01 11   |
| 19 01 18  | pyrolysis wastes other than those mentioned in 19 01 17  |
| 19 01 19  | sands from fluidised beds  |
| <b>19 02</b>  | <b>wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)</b>  |

|              |  |
|--------------|--|
| 19 02 03     | premixed wastes composed only of non-hazardous wastes  |
| 19 02 10     | combustible wastes other than those mentioned in 19 02 08 and 19 02 09   |
| <b>19 04</b> | <b>vitrified waste and wastes from vitrification</b>   |
| 19 04 01     | vitrified waste  |
| <b>19 05</b> | <b>wastes from aerobic treatment of solid wastes</b>   |
| 19 05 01     | non-composted fraction of municipal and similar wastes   |
| 19 05 02     | non-composted fraction of animal and vegetable waste   |
| 19 05 03     | off-specification compost  |
| <b>19 12</b> | <b>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>          |
| 19 12 01     | paper and cardboard  |
| 19 12 02     | ferrous metal  |
| 19 12 03     | non-ferrous metal  |
| 19 12 05     | glass  |
| 19 12 07     | wood other than that mentioned in 19 12 06   |
| 19 12 08     | textiles   |
| 19 12 09     | minerals (for example sand, stones)  |
| 19 12 10     | combustible waste (refuse derived fuel)  |
| 19 12 12     | Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11                      |
| <b>19 13</b> | <b>wastes from soil and groundwater remediation</b>  |
| 19 13 02     | solid wastes from soil remediation other than those mentioned in 19 13 01  |
| <b>20</b>    | <b>Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions</b> |
| <b>20 01</b> | <b>separately collected fractions (except 15 01)</b>   |
| 20 01 01     | paper and cardboard  |
| 20 01 02     | glass  |
| 20 01 08     | biodegradable kitchen and canteen waste  |
| 20 01 10     | clothes  |
| 20 01 11     | textiles   |
| 20 01 34     | batteries and accumulators other than those mentioned in 20 01 33  |
| 20 01 36     | discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35                                    |
| 20 01 38     | wood other than that mentioned in 20 01 37   |
| 20 01 39     | plastics   |
| 20 01 40     | metals   |
| 20 01 41     | wastes from chimney sweeping   |
| <b>20 02</b> | <b>garden and park wastes (including cemetery waste)</b>   |
| 20 02 01     | biodegradable waste  |
| 20 02 02     | soil and stones  |
| <b>20 03</b> | <b>other municipal wastes</b>  |
| 20 03 01     | mixed municipal waste  |
| 20 03 02     | waste from markets   |
| 20 03 03     | street-cleaning residues   |
| 20 03 07     | bulky waste  |

## Emission limits

Emission Limit Values (ELV's) and equivalent parameters or technical measures, based on Best Available Techniques – Achievable Emission Levels (BAT-AELS) for Waste Treatment have been added for the following substances:

- Dust - 5mg/m<sup>3</sup>
- Total VOCs – 30mg/m<sup>3</sup>

These substances, listed under the emission points A1-A5 in Table S3.1 of the permit, has been amended in line with the current requirements of BAT.

Emissions limits have been added for indirect emissions to sewer as a result of this variation based on Best Available Techniques – Achievable Emission Levels (BAT-AELS) for Waste Treatment:

- Hydrocarbon oil index – 10mg/l
- Arsenic – 0.05mg/l
- Cadmium – 0.05mg/l
- Chromium – 0.15mg/l
- Copper – 0.5mg/l
- Lead – 0.1mg/l
- Nickel – 0.5mg/l
- Zinc – 1.0mg/l
- Mercury – 0.005mg/l
- Antimony – No limit set
- PFOA – No limit set
- PFOS – No limit set
- Deca BDE - No limit set
- Total Suspended Solids – 60mg/l

The above substances, listed under emission point S1 in Table S3.2 of the permit, have been added in line with the current requirements of BAT.

## Monitoring

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

- Dust – 6 monthly
- Total VOCs – 6 monthly
- Hydrocarbon oil index – Monthly
- Arsenic – Monthly
- Cadmium – Monthly

- Chromium – Monthly
- Copper – Monthly
- Lead – Monthly
- Nickel – Monthly
- Zinc – Monthly
- Mercury – Monthly
- Antimony – Monthly
- PFOA – 6 monthly
- PFOS – 6 monthly
- Deca BDE – 6 monthly
- Total Suspended Solids – Monthly

We made these decisions in accordance with Best Available Techniques for Waste Treatment.

## **Reporting**

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

- Emissions to air
- Emissions to sewer
- Process monitoring – WEEE plastics process efficiency separation
- Process monitoring – WEEE (chemical analysis)

We made these decisions in accordance with Best Available Techniques for Waste Treatment

## **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 100 of that Act in deciding whether to grant the variation of 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.