

Permitting Decisions - Variation

We have decided to grant the variation for Parley Waste Management Facility operated by Eco Sustainable Solutions Limited

The variation number is EPR/GP3793FY/V019

The permit was issued on 13/05/2026.

This variation authorises the following changes:

- Addition of a new listed activity for a solid recovered fuel (SRF) plant regulated under Section 5.4 A(1)(b)(ii) of the Environmental Permitting Regulations 2016. The activity is currently permitted as a waste activity (AR22). This change is to reflect the increase in daily treatment capacity over 75 tonnes and an annual throughput of up to 150,000 tonnes.
- Increase in annual throughput for the anaerobic digestion (AD) plant from 33,000 to 70,000 tonnes, addition of associated emission points, changes to waste stream and change to plant infrastructure (digesters, pasteurisation tanks and CO₂ recovery).
- Removal of the Bedding plant waste activity in Table S1.1.
- Addition of waste code EWC 19 12 12 to the Road Sweepings Recycling Plant waste activity.
- Removal of references to a reed bed system from the permit.
- Amendment of the description of treatment of contaminated process water and contaminated surface water waste activity.
- Extension of the installation boundary to accommodate these changes.

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 commissioning plan

The anaerobic digestion plant, biogas upgrading plant, Road sweepings plant, SRF plant and CO₂ recovery plant will undergo a period of commissioning before becoming fully operational. The IED and the conditions set out in the permit cover the activities once operational – accepting wastes for treatment. At the commissioning stage, operators are required to demonstrate that the plant (including odour abatement system) is working effectively and that appropriate measures are in place to protect the environment and human health during this period (prior to the commencement of operations). As the above-mentioned plants are yet to receive waste for operation, we have included pre-operational condition PO7, PO8, PO9 and PO13 in the permit which requires the operator to submit a commissioning plan to the Environment Agency for approval.

The commissioning plan will include the expected emissions to the environment during the different stages of commissioning, the expected durations of commissioning activities and the measures to be taken to protect the environment and report to us in the event that actual emissions exceed expected emissions. As the impact of odour was a key issue during the determination, we expect the applicant to pay particular attention to this issue in the commissioning plan.

Improvement condition 1 (IC1) in the permit requires the operator to submit a report on the performance of each plant to the Environment Agency for approval, following the completion of commissioning.

Emissions from biogas upgrading plant

The applicant submitted an assessment to consider the impact of air emissions from the biogas upgrading plant in Variation EPR/GP3793FY/V010. The emissions data (H₂S and VOCs) from the biogas upgrading plant were obtained from the manufacturer and not based on real-time operational monitoring data. Our experience of emissions data provided by applicants proposing biogas upgrading plants show that the impact on human health is often insignificant. We have retained the existing improvement condition 2 (IC2) which requires the operator to undertake a monitoring survey following the commissioning and commencement of operations at the biogas upgrading plant to obtain actual (real-time) operational monitoring data.

Improvement Condition 3 (IC3) has also been retained which requires the operator to undertake an air emissions impact assessment (H1 software tool) using the results of the monitoring survey and compare the long- and short-term impacts of pollutants in accordance with the Environment Agency Guidance – *Air emissions risk assessment for your environmental permit*. Following the review of results from the monitoring survey and impact assessment, the Environment Agency shall consider whether or not emission limits are appropriate at emission point A6. We

have used this approach for biowaste treatment facilities proposing to install biogas upgrading plants across England.

Management of odour emissions

As part of the variation, the operator submitted a revised and updated version of their OMP. An inventory of odorous materials forms part of the OMP which sets out the expected characteristics of each incoming waste (by EWC code), its odour potential, and the preferred processing route under normal circumstances. In considering each of the above site activities, the OMP describes material waste acceptance procedures, storage (and transfer) arrangements, processing locations, odour abatement techniques, process monitoring, and procedures to deal with emergencies and incidents such that odour releases are minimised under such circumstances. The OMP also describes the construction philosophy and design details of the air extraction system within the AD facility and the biofilters used to control point source emissions. It also identifies local sensitive receptors and outlines the Operator's approach to engagement with local stakeholders.

The Operator states that the OMP will be reviewed annually as a minimum or following the implementation of any new management measures or a change to work practices at the site.

Compliance with BAT-AELs

The operator reported that the design of the SRF building is not finalised and as such any abatement technologies have not been determined. The operator stated that the feedstocks that may be accepted into the proposed SRF operations indicate that the levels of organic contamination within this commercial and industrial waste stream will be negligible. This is due to the fact that residual waste accepted will no longer include food waste due to the requirements for businesses to now segregate food waste under Simpler Recycling legislation. The operator questioned the need for abatement of odours. The operator proposed that this information is provided for assessment by the Environment Agency through an Improvement Condition.

We did not consider it appropriate to use improvement conditions to address a key issue such as odour abatement. We issued an information notice dated 30/07/2025, which required the operator to provide details of the odour abatement proposed for the SRF Building. The operator reported that the proposed SRF building has been repositioned within the site such that the existing woodchip biofilter (emission point to air A1) will serve the SRF building. Once the Waste Reception Building for the AD plant which will be served by a new woodchip biofilter (emission point A2) is commissioned, food waste bulking will no longer need to be carried out within the existing food waste bulking building. The two pre-storage tanks will be served by new carbon filters.

The applicant reports that both techniques (biofilters and carbon filters) are listed as appropriate in BATc 34 of the Waste Treatment BAT Conclusions and consider it BAT for this installation. We are in agreement with the justification of BAT at this installation. To verify whether the proposed measures will be effective and adequate to prevent and/or minimise emissions released to air, we have retained the existing improvement condition 13a (for the AD facility) and IC13b (for the SRF facility) in the permit in order to determine whether the abatement plant is effective and adequate to prevent and /or minimise emissions released to air. The improvement condition requires the operator to demonstrate via determining the composition of waste gas emissions, monitoring and additional risk assessment that the proposed abatement system effectively treats the emissions to air. Where further improvements are identified, the operator is required to implement these measures.

Our assessment

Overall, we consider that the operator has proposed appropriate odour management measures to minimise any impact on nearby sensitive receptors. In the event that odour emissions are causing pollution, the permit conditions require the operator to comply with the measures proposed in the OMP. The odour conditions in the permit are sufficient to ensure that odour emissions from the facility do not cause annoyance. Process monitoring conditions including daily olfactory tests at the site boundary will also ensure that emissions of odour are not causing annoyance.

We have reviewed and approved the OMP in its current format with the additional information submitted during the determination. We consider that the OMP complies with the requirements of our Technical Guidance H4 – Odour Management and Biological waste treatment: appropriate measures for permitted facilities [Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK](#) (Updated 25 November 2024) . We agree with the scope and suitability of key measures but this should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and sufficient. That remains the responsibility of the operator.

Based upon the information in the Application, we are satisfied that appropriate measures will be in place to prevent or where that is not practicable to minimise odour and to prevent pollution from odour.

Secondary containment

The operator confirms that the proposed secondary containment for the anaerobic digestion facility will be designed in accordance with the relevant guidance (CIRIA C736). The containment capacity is designed in accordance with CIRIA C736, with the calculations demonstrating 110% of the largest tank volume to be a greater volume than 25% of the combined volume. The proposed footprint of the

containment area allows for the walls to be constructed to a minimum height of 1.58 metres, which includes 250 mm freeboard capacity as specified in CIRIA C736. There shall be no pipe penetrating the containment floor or walls. This has been designed in accordance with CIRIA C736 to ensure any potential leakages are visible to onsite, operational staff whilst carrying out daily inspections of the containment bund structure.

We have retained the existing pre-operational condition 3 (PO3) in Table S1.4 which requires the submission of a report confirming the construction and integrity of the proposed secondary containment is fit for purpose and in accordance with industry standards prior to operation of the anaerobic digestion facility. This will ensure that the proposed secondary containment is properly designed to minimise risks to the environment and reduce the risks of accidents and their consequences.

Carbon capture plant

Concentrated or compressed CO₂ may be required to be vented routinely or in an emergency. Therefore, there is the potential for acute incident related off-site human health impacts and chronic air quality related human health impacts.

We asked the operator via an information notice dated 30/07/2025 to demonstrate how modelling has been or is intended to be used to inform the process design and manage risks associated with CO₂ venting and the operating techniques that will minimise the risks associated with venting CO₂ to atmosphere and limit venting scenarios

The operator reported that venting is not expected during normal operation. In the event of shutdown of the carbon capture unit, there will be release of CO₂ through the vent to the atmosphere. When there is venting, it will be diluted through natural ventilation, the vents are located above the roof of the unit.

Under biogas compression and upgrading, CO₂ is vented through the roof vents as per all other operating AD plants. The CO₂ make up will be ~99.6% CO₂ with VOCs, H₂S, NH₃ being removed through carbon filters, desulphurisation systems and membrane separation. Safety monitoring points for CO₂ will be included around the site along with personal gas monitors. Training will be provided by the manufacturer to all applicable staff. The operator reports that venting under liquefaction would not be a standard process.

Although the operator reports that venting under liquefaction will not be a standard process, they have not provided any more information to explain how they will ensure that any venting of CO₂ under pressure will not have an adverse impact on human health. Consequently, we consider it appropriate to include pre-operational condition 13 (PO13) which requires the operator to demonstrate the venting scenarios they have considered for CO₂ stored under pressure and measures taken to ensure no adverse impact on human health.

Decision considerations

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.

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:

- Dorset Council
- Bournemouth, Christchurch & Poole Council environmental protection department
- Food Standards Agency
- Health and Safety Executive
- UK Health Security Agency and the Director of Public Health
- Bournemouth Airport

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

The regulated facility

We considered the extent and nature of the facilities at the site in accordance with RGN 2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 and 'Defining the scope of the installation'.

The site

The operator has provided plans which we consider to be satisfactory. 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 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. 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 consulted Natural England on our Habitats Regulation, SSSI and Marine Conservation Zone assessments, and taken their comments into account in the permitting decision.

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 or similar methodology supplied by the operator and reviewed by ourselves, all emissions may be screened out as environmentally not significant.

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.

Operating techniques for emissions that do not screen out as insignificant

Emissions of nitrogen dioxide, carbon monoxide, sulphur dioxide and benzene cannot be screened out as insignificant. We have assessed whether the proposed techniques are Best Available Techniques (BAT). The proposed techniques/ emission levels for emissions that do not screen out as insignificant 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 enable compliance with relevant BAT reference documents (BREFs) and BAT Conclusions, and Emission Limit Values (ELVs deliver compliance with BAT- Associated Emission Levels (AELs)].

Operating techniques for emissions that screen out as insignificant

Emissions of ammonia and hydrogen sulphide have been screened out as insignificant, and so we agree that the applicant's proposed techniques are Best Available Techniques (BAT) for the installation. We consider that the emission limits included in the installation permit reflect the BAT for the sector.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this 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'.

While we consider that the applicant's proposals represent the appropriate measures to prevent/ minimise odour from the permitted activities, we also consider that it is appropriate to include a specific Emission Limit Value (ELV) in respect of odour emissions to provide additional environmental protection.

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. 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.

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.

Pre-operational conditions

Based on the information in the application, we consider that we need to include pre-operational conditions (see [key issues](#) section).

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme (see [key issues](#) section). Improvement conditions IC5, IC7, IC11 are confirmed as discharged.

Emission limits

We have decided that emission limits are required in the permit. Emission Limit Values (ELVs) and technical measures based on Best Available Techniques (BAT) have been added for the following substances:

Emission points to air

- Nitrogen oxides
- Carbon monoxide
- Total volatile organic compounds
- Ammonia
- Odour concentration

Please refer to Table S3.1 of the permit for further details.

Monitoring

We have decided that monitoring should be carried out for the parameters listed in Table S3.1 to S3.8 in the permit, using the methods detailed and to the frequencies specified.

These monitoring requirements have been included in order to comply with the Waste Treatment BAT Conclusions.

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 added reporting in the permit for the parameters listed in Table S4.1. We made these decisions in accordance with Waste Treatment BAT Conclusions.

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.

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.

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 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 and 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:

We request that the Environment Agency (EA) takes account of the following when considering appropriate permit conditions:

- In our previous response, discrepancies in the number of close receptors between documents were noted, as well as several sections in the Fire prevention plan being left as “TBC”. We recommend that the EA is confident these issues have been addressed.
- The applicant submitted a H1 air emissions assessment and a modelled Air Quality Impact Assessment, assessing the point source emissions of the AD plant. The assessment, which has used conservative assumptions, shows no predicted exceedances of the short- and long-term air quality standards, and are not expected to result in a significant impact on human health from the proposed operation. Whilst the air dispersion modelling results indicate normal operations appear unlikely to adversely impact on local air quality, we recommend that the Regulator is satisfied with the approach adopted for the assessment.
- This consultation response is based on the assumption that the permit holder shall take all appropriate measures to prevent or control pollution, in accordance with the relevant sector guidance and industry best practice.

Summary of actions taken

- We asked the operator to explain the discrepancy in the application documents with respect to the application documents. The errors in the documents have been rectified. The operator submitted a fire prevention plan as part of the application. We required further information from the operator during the determination and we sent an information notice dated 30/07/2025. We have assessed the FPP and the additional information provided in the determination and we consider that the FPP procedures are appropriate.
- We audited the air quality impact assessment during the determination and we are satisfied that emissions from the installation will not have a significant impact on human health and ecological receptors.

- The regulated facility will be operated in accordance with the Waste Treatment BREF /BAT Conclusions 2018 and our technical guidance notes: Biological waste treatment: appropriate measures for permitted facilities and H4 – Odour Management.

No response was received from the following organisations:

- Dorset Council
- Bournemouth, Christchurch & Poole Council environmental protection department
- Food Standards Agency
- Health and Safety Executive
- Director of Public Health
- Bournemouth Airport
- Individual members of the public