

## Decision document variation

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We have decided to grant the variation for Unit 23 Hunt End Industrial Estate operated by Star Brands Limited.

The variation number is [EPR/QP3634DQ/V003](#)

The permit was issued on 29/05/2026

The variation is for:

The Installation has been regulated as a Low Impact Installations (LII) Standard Rules 2009 No2, permitted since 06/01/2017. The applicant has applied for a variation from LII to a Bespoke permit, solely due to an increase in Waste production beyond the current LII.

To increase above any one of the criteria requires a change to Bespoke permit.

Aspects covered by LII permit that have not changed, and where the application does not provide impact assessments to request an increase beyond LII criterion have not changed by this variation and will retain limited to the scope of that LII criterion.

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 to show how the main relevant factors have been taken into account. We have assessed the aspects that are changing as part of this variation, we have not revisited any other sections of the permit.

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**

This variation changes a Low Impact Installation Standard Rules 2009 No. 2 permit because increased production has led to higher waste volumes. All other aspects of the permit remain subject to the Low Impact Installation Standard Rules 2009 No. 2 conditions unless a supporting risk assessment has been provided for a change.

## **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.

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 following organisations:

- Local Authority Environmental Protection Department
- Food Standards Agency
- Health and Safety Executive
- UK Health Security Agency (previously Public Health England) and the relevant Director of Public Health
- Local sewage undertaker, as there is a discharge to sewer

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

## **The regulated facility**

The extent of the facility defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

## **The site**

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

These show the extent of the site of the facility.

The plans show the location of the part of the installation to which this permit applies on that site.

The plan is included in the permit.

## **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, protected species and habitat designations. The application is not within our screening distances for these designations.

## **Environmental impact assessment**

In determining the application, we have considered the Environmental Statement.

## **Environmental risk**

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

The operator's risk assessment is satisfactory.

## **Environmental risk**

## **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 BAT Reference document 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.

## **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 requiring the operator to submit a full Noise Impact Assessment (NIA) within 12 months of the permit being issued.

This is because the application included only a basic NIA, which indicates there may be potential noise impacts. The variation itself does not introduce any noise-related changes; it relates only to an increase in waste activity as the site moves from a Low Impact Installation (LII) Standard Rules 2009 No. 2 permit to a bespoke permit.

## **Management system**

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.

## **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: UK Health Security Agency (previously Public Health England) and the relevant Director of Public Health

Brief summary of issues raised: Based on the information contained in the application supplied to us, UKHSA has no significant concerns regarding the risk to the health of the local population from the installation.

Summary of actions taken: None