HPI Decision Document

Determination of an Application for an Environmental Permit under the Environmental Permitting (England & Wales) Regulations 2016

Decision document recording our decision-making process

The Permit Number is: EPR/GP3930DF

The Applicant / Operator is: Envar Composting Limited

The site is located at: Envar Composting Facility Woodhurst, Huntingdon, PE28 3BS

What this document is about

This is a decision document, which accompanies a Permit.

It explains how we have considered the Applicant's Application, and why we have included the specific conditions in the Permit we are issuing to the Applicant. It is our record of our decision-making process, to show how we have considered all relevant factors in reaching our position. Unless the document explains otherwise, we have accepted the Applicant's proposals.

We try to explain our decision as accurately, comprehensively and plainly as possible. Achieving all three objectives is not always easy, and we would welcome any feedback as to how we might improve our decision documents in future. A lot of technical terms and acronyms are inevitable in a document of this nature: we provide a glossary of acronyms for ease of reference, this can be found in Annex 1 at the end of the document.

Contents

Decision document recording our decision-making process 1
What this document is about 1
Contents 2
Preliminary information and use of terms 4
1 · Our decision 5
2 · How we reached our decision 5
2.1 Receipt of Application 5
2.2 Confidential information 5
2.3 Identifying confidential information 5
2.4 Consultation on the Application 5
2.5 Engagement 6
2.6 Requests for Further Information 7
3 · The legal framework 8
4 · Key Issues in the Determination 8
4.1 Introduction of the biodrying activity (AR2): 8
4.2 Abatement (Key issue) 9
4.3 Consultation responses – a note on incineration and biodrying 10
4.4 Storage of Refuse Derived Fuel (RDF) – variation of activity AR13 11
4.5 Wash-plant activity (AR14 in Table S1.1 of the permit) 11
4.6 Considerations of noise from the varied and new activities 12
5 · The Regulated Facility 12
5.1 Management 12
5.2 The permitted activities 13
5.3 The site's location 14
5.3.1 Proposed site design: potentially polluting substances and prevention measures 14
5.4 Operation of the regulated facility 15
5.4.1 Processes carried out 15
5.4.2 Environmental management system 17
5.4.3 Site security 17
5.5 Management plans 17
5.5.1 Accident management plan 17
5.5.2 Fire prevention plan 17
5.5.3 Environmental risk 18

5.6 Operating techniques 19
5.6.1 General operating techniques 22
5.6.2 Assessment of BAT 22
5.6.3 Assessment of appropriate measures 23
5.6.4 Operating techniques for emissions that screen out as insignificant 24
5.6.5 National Air Pollution Control Programme 24
5.6.6 Waste types 24
6 · Nature conservation, protected species and habitat designations 25
6.1 Sites considered 26
6.2 Assessments 26
7 · Minimising the regulated facility's environmental impact 28
7.1 Emissions to Air 28
7.1.1 Consideration of Local Factors 28
7.4 Odour Management 29
7.5 Fugitive emissions management 29
8 · Permit conditions, competence, monitoring and reporting 30
8.1 Pre-operational conditions 30
8.2 Improvement programme 31
8.3 Updating permit conditions during consolidation 32
8.4 Emission limits 33
8.5 Monitoring 34
8.6 Process monitoring 34
8.9 Reporting 34
8.10 Technical competence 35
9 · Other legal requirements 35
9.1 The EPR 2016 and related Directives 35
9.2 National primary legislation 38
9.3 National secondary legislation 42
9.5 Other relevant legal requirements 43
10 · Consultation Responses 44
10.1 Advertising and Consultation on the Application 44
10.2 Consultation Responses from Statutory and Non-Statutory Bodies 45
10.3 Representations from local MPs, assembly members, councillors and parish/town community councils 47
10.4 Representations from individual members of the public 53

10.5 Representations on issues that do not fall within the scope of this Permit determination 63
11 · Advertising and Consultation on the Draft Decision 63
11.1 Consultation Responses from Statutory and Non-Statutory Bodies 64
11.2 Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils 64
11.3 Representations from Community and Other Organisations 75
11.4 Representations from Individual Members of the Public 78
Annex 1. Glossary of acronyms used in this document 92

Preliminary information and use of terms

We gave the application the reference number EPR/GP3930DF/V006 We refer to the application as "the **Application**" in this document.

The number we have given to the Permit is EPR/GP3930DF. We refer to the proposed Permit as "the Permit" in this document.

The Application was duly made on 23/04/2025.

The applicant is Envar Composting Limited. We refer to Envar Composting Limited as "the **Applicant**" in this document. Where we are talking about what would happen after the Permit is granted (if that is our final decision), we call Envar Composting Limited "the **Operator**".

Envar Composting Limited's proposed facility is located at Envar Composting Facility. We refer to this as "the regulated facility" in this document.

Links to guidance documents

The list below provides links to the key guidance documents referred to in this document. The links were correct at the time of producing this document.

- Waste Treatment BAT Reference document (BREF) and Waste Treatment BAT Conclusions (WT BATc) – The BREF/BAT conclusions appropriate for the activities taking place at the facility.
- Biological waste treatment: appropriate measures for permitted facilities - Guidance – Appropriate measures guidance for biological treatment of waste at permitted facilities.
- Control and monitor emissions for your environmental permit.

  and

- Fire prevention plans: environmental permits.

1 · Our decision

We have decided to grant the Permit to the Applicant. This will allow it to operate the regulated facility, subject to the conditions in the Permit.

We consider that, in reaching that decision, we have taken into account all relevant considerations and legal requirements and that the Permit will ensure that a high level of protection is provided for the environment and human health.

The Permit contains conditions, including the relevant Annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations (EPR) and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the Permit, we have considered the Application and accepted that the details provided are sufficient and satisfactory to make use of the standard conditions acceptable and appropriate.

2 · How we reached our decision

2.1 Receipt of Application

The Application was duly made on 23/04/2025. This means we considered it was in the correct form and contained sufficient information for us to begin our determination but not that it necessarily contained all the information we require to determine the Application: see section 2.6 Requests for Further Information.

2.2 Confidential information

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

2.3 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.

2.4 Consultation on the Application

We carried out consultation on the Application in accordance with the EPR, our statutory Public Participation Statement (PPS) and our own internal guidance RGN 6 for Determinations involving Sites of High Public Interest. RGN 6 was withdrawn as external guidance, but it is still relevant as Environment Agency internal guidance.

We consider that this process satisfies and frequently goes beyond the requirements of the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, which are directly incorporated into the Industrial Emissions Directive (IED), which applies to the regulated facility and the Application. We have also taken into account our obligations under the Local Democracy, Economic Development and Construction Act 2009 (particularly Section 23). This requires us, where we consider it appropriate, to take such steps as we consider appropriate to secure the involvement of representatives of interested persons in the exercise of our functions, by providing them with information, consulting them or involving them in any other way. In this case, we consider that our consultation already satisfies the requirements of the 2009 Act.

2.5 Engagement

We made the Application available online via our Citizen Space page where the public were able to provide comments. This contained all the information required by the IED, including telling people where and when they could see a copy of the Application.

The Application and all other documents relevant to our determination are available to view on our Public Register. Anyone wishing to see these documents could do so and arrange for copies to be made.

We sent copies of the Application to the following bodies, which includes those with whom we have “Working Together Agreements”:

- Local Authority – Environmental Protection Department
- Local Authority – Planning
- Cambridgeshire Fire and Rescue Service
- Health and Safety Executive (HSE)
- Food Standards Agency (FSA)
- United Kingdom Health Security Agency (UKHSA)
- Animal and Plant Health Agency (APHA)

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly. Note, under our Working Together Agreement with Natural England, we only inform Natural England of the results of our assessment of the impact of the regulated facility on designated Habitats sites.

Further details along with a summary of consultation comments and our response to the representations we received can be found in Section 10. We

have taken all relevant representations into consideration in reaching our determination.

2.6 Requests for Further Information

Although we were able to consider the Application duly made, we needed more information in order to determine it and issued an information notice on 21/01/2026. A copy of the information notice was placed on our public register.

In addition to our information notices, we received additional information during the determination from Envar Composting Limited. The information received contained the following:

- Fire Prevention Plan v10 (FPP), document date 17/09/2025 (received 15/05/2026)
- Operational Techniques and Management Plan – V2.0 issue 0 (dated and received 27/03/2026)
- Appendix documents: 1, 3, 4, 5, 7, 8 and 9 supporting the submission of the FPP. (received 15/05/2026)
    - Appendix 1 - Appendix 1 - Existing Site Layout Plan_A3 (received 15//05/2026)
    - Appendix 3 - FPP Layout 2025 (received 15/05/2026)
    - Appendix 4 - Appendix 4 testing of hydrants (received 15/05/2026)
    - Appendix 5 - Envar Composting Hydrant Usage (received 15/05/2026)
    - Appendix 7 - Fire Detection and Fire Alarm System Commissioning Certificate (received 15/05/2026)
    - Appendix 8 – Sensitive receptor detail plan (received 15/05/2026)
    - Appendix 9 - Bale store layout plan (received 15/05/2026)
- Appendix 2 – Waste Acceptance - Materials Acceptance, Inspection, Quarantine and Rejection Procedure – 13/01/2026 (received: 15/05/2026)
- Appendix 6 - Standard Operating Procedures (SOPs) for composting systems operated in accordance with REAL Compost Certification Scheme – issue 10.2, dated 18/07/2025 (received: 15/05/2026)

We made a copy of this information available to the public in the same way as the response to our information notice.

Finally, we have consulted on our draft decision from 24/08/2026 to 06/10/2026. A summary of the consultation responses and how we have considered all relevant representations is shown in Section 11. The final tunnel group references (G3-G6) assigned to carry out activity AR2 were confirmed after the consultation period ended, this is an administrative amendment to the permit only. All references to tunnels G7-G11 are therefore removed from this decision document and amended accordingly in the Permit.

3 · The legal framework

The variation will be issued under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an installation as described by the Industrial Emissions Directive (IED)
- an operation covered by the Waste Framework Directive (WFD)
- subject to aspects of other relevant legislation which also must be addressed.

We address some of the major legal requirements directly where relevant in the body of this document. Other requirements are covered in Section 9 towards the end of this document.

We consider that, in granting the varied Permit, it will ensure that the operation of the regulated facility complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.

4 · Key Issues in the Determination

The key issues arising during determination of the Application were:

4.1 Introduction of the biodrying activity (AR2):

The activity involves the biodrying of wastes for the purpose of recovery (producing a fuel). The new activity is a biological treatment operation that uses the existing in-vessel composting (IVC) tunnels G3-G6. The operation involves the following aspects:

Process

The process involves the blending of sewage sludge with fibrous organic waste materials such as plant tissue, manures, wood and wastes from forestry. Fibrous wastes are first shredded and then blended with sewage sludge to form a consistent feedstock. The material is temporarily held before being fed into the IVC tunnels.

During treatment in the IVC, material is actively aerated and monitored under aerobic conditions, allowing biological activity to generate heat and drive off moisture while stabilising the waste. Process parameters such as airflow,

temperature, and gas concentrations are continuously monitored to ensure effective drying and compliance. Once the required time, temperature, and moisture reduction have been achieved, the material becomes a dried, stabilised output, which is then removed and screened to separate usable product from oversized fractions.

The fine fraction is retained as the biodried fuel product for recovery (e.g. energy use), while the oversized material is recycled back into the process as structural input.

4.2 Abatement (Key issue)

The new process will use the existing IVC infrastructure to carry out the treatment process. However, the waste treatment process (biodrying) also includes aspects of mechanical biological treatment (MBT) and treatment includes waste streams arising from the following sectors:

- Agriculture & food sector: plant material, manures, forestry residues, and food processing wastes;
- Wood and paper industry: untreated timber residues such as bark, sawdust and wood offcuts;
- Packaging waste: limited to clean, virgin timber (e.g. wooden packaging)
- Construction sector: biodegradable, untreated wood only (no coatings or preservatives);
- Waste and wastewater treatment: sewage sludge, digestate, off-spec compost and treated green waste fractions;
- Municipal sources: garden and park (green) wastes.

The abatement techniques currently serving tunnels G3-G6 are applicable for the composting activity but cannot fully abate the pollutants associated with MBT operations. MBT activities have specific abatement techniques that need to be applied and BAT-associated emission levels (BAT-AELs) for Volatile Organic Compounds (VOCs), Odour concentration, ammonia and dust. The waste streams identified above may generate these pollutants during the treatment process, therefore the BAT-AELs must be applied and achieved. For this reason, the Applicant has agreed to install a new abatement plant to achieve these requirements.

Activity AR2, cannot commence until the abatement plant upgrade is installed and can demonstrate compliance with the BAT-AELs and monitoring requirements set out in the permit. Therefore, activity AR2 is subject to a pre-operational condition PO1 in Table S1.4 of the permit. The pre-operational condition specifies the requirements that need to be achieved prior to the operations taking place.

The emission limits as required by BAT are presented in the permit in Table S3.1A and relate specifically to tunnels G3-G6 within which the biodrying activity will be undertaken. Table S3.3 of the permit contains new monitoring requirements that need to be carried out by the Applicant at such time as activity AR2 is commenced and pre-operational condition PO1 is completed.

4.3 Consultation responses – a note on incineration and biodrying

Incineration

During the consultation period, written responses were received in relation to this application and proposed operations. Many of the responses (which are discussed later in Section 10 of this decision document) referred to incineration and the combustion of waste. Before describing how we have determined this application, we thought it necessary to describe the difference between biodrying and incineration. This is important as incineration of waste is not part of this application.

Incineration is described in the Industrial Emissions Directive (IED) Directive - 2010/75 - EN - EUR-Lex under Article 3(40). In summary it means that Incineration plants are dedicated to burning waste with or without energy recovery. This application does not propose any incineration or burning of waste, there is no combustion appliance proposed as part of the application.

Biodrying

The biodrying process differs from incineration in that no waste is burned. Biodrying is a biological treatment process in which waste is prepared (e.g. shredding, blending and mixing) to produce a suitable feedstock.

The material is then treated within IVC tunnels under controlled aerobic conditions, where microbial activity and aeration increase temperature, promoting decomposition and moisture removal. During treatment, waste air from the IVC tunnel is collected and channelled to the air treatment system (see abatement key issue above), where the air is treated before it is released to the atmosphere.

The waste stays in the IVC tunnel for the required residence time and temperature-controlled conditions. When the treatment cycle is complete, the material is removed, screened, and the output material is transferred offsite for recovery at an Energy from Waste (EfW) facility. It is at this stage where it will undergo combustion.

Biomass boilers (existing combustion appliances)

Several consultation responses raised concerns about biomass combustion and air quality. The biomass boilers are existing operations and are unchanged by this variation. Emission limits are specified in both the current permit and the

varied permit (Table S3.1, emission points A1 and A2). The boilers are fuelled solely by Grade A wood fuel and provide heat for the drying processes. The emissions profile of the two 0.9MWth boilers are unchanged. We have included this information for clarity.

4.4 Storage of Refuse Derived Fuel (RDF) – variation of activity AR13

The storage of RDF is introduced as part of this variation. The storage of RDF is a variation of the waste treatment and transfer operation activity (AR13 in Table S1.1 of the permit). The variation adds storage only of pre-wrapped RDF bales in a dedicated area of the facility. There will be no treatment operations associated with this aspect of the variation and storage of loose materials is not permitted. The RDF storage operations are limited to the following:

- The maximum volume per pile shall not exceed 268m^3 with a minimum of 6m pile separation.
- Storage shall take place in a designated area of the site with a maximum storage volume of 6,432m^3 as shown on site plan 3 in Schedule 7 of the permit.
- The transfer station and storage area containment shall be designed and constructed in accordance with appropriate measures and CIRIA C736 design principles and construction standards.
- The transfer station operations and RDF storage area shall be on an impermeable surface within a sealed drainage system.
- Storage may only be of fully wrapped RDF bales only that are free of damage.
- Storage of RDF must be on a first in first out basis and the maximum permitted storage period is 3 months from receipt on site.

4.5 Wash-plant activity (AR14 in Table S1.1 of the permit)

Activity AR14 is added to the permit as part of this variation. This activity is new and takes place in a dedicated location at the facility (See Schedule 7 of the Permit, site plan 2). The purpose of this activity is to wash road sweepings, grits from anaerobic digestion processes and stones from recovered from composting for recovery of separated fractions.

The activity includes the following aspects; receipt, off-loading, temporary storage and processing of waste, followed by the despatch of recovered materials. Waste will be stored within a designated area on an impermeable surface prior to processing. The treatment process uses a series of mechanical separation and washing stages to remove contaminants and recover usable mineral fractions, with recovered materials stored separately and sent off site for appropriate use or recovery. The wash plant is served by an independent sealed drainage system, which collects process water and drains to leachate tanks for reuse, testing and

off-site disposal where required. The activity has a maximum throughput of 40,000 tonnes per annum.

The activity does not have any point source emissions to air, water, sewer or land. Many of the responses received in the consultation referred to emissions from this process including odour, dust, bioaerosols and noise.

We will describe how we determined these issues in greater detail in the body of this document.

4.6 Considerations of noise from the varied and new activities

The facility does not currently have a Noise and/or Vibration Management Plan (NMP), and the existing permitted activities do not require one.

The addition of the biodrying activity (AR2) does not introduce any new noise sources. The activity is carried out using existing infrastructure, with treatment occurring within enclosed in-vessel composting (IVC) tunnels (G3-G6). On this basis, noise impacts from AR2 are not expected to change and do not require further assessment.

The variation also introduces RDF storage (AR13) and a residue washing activity (AR14). These activities have been screened using the Noise and vibration risk assessment: using the noise advisory tool - GOV.UK, which indicates that a Noise Management Plan is not currently required for the facility.

Notwithstanding this, the permit includes conditions requiring the operator to ensure that noise and vibration from site activities do not cause pollution beyond the site boundary. Should this change in the future, the permit conditions allow the Environment Agency to require the development and implementation of a Noise Management Plan.

We will describe how we determined these issues in greater detail in the body of this document.

5 · The Regulated Facility

We considered the extent and nature of the facilities 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’.

5.1 Management

The Applicant is the sole Operator of the regulated facility.

We are satisfied that the Applicant is the person who will have control over the operation of the regulated facility after the issuing of the variation; and that the Applicant will be able to operate the Installation so as to comply with the conditions included in the Permit.

5.2 The permitted activities

The Installation is subject to the EPR because it carries out an activity listed in Part 1 of Schedule 1 to the EPR:

Current (existing installation activities)

- (AR1) Section 5.4 Part A(1)(b)(i) – Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment (In-vessel composting followed by open windrow maturation).

- (AR3) Section 5.4 Part A(1)(b)(i) – Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment (In-vessel composting to produce compost-like output (CLO).

- (AR4) Section 5.4 Part A(1)(b)(i) – Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment (Open windrow composting).

This variation introduces a new installation activity:

- (AR2) Section 5.4 A(1)(b)(i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment (biodrying).

An installation may also comprise “directly associated activities” (DAA), which at this installation include:

- Storage of waste pending recovery or disposal;
- Physical treatment for the purposes of recycling;
- Raw material storage;
- Storage of finished compost and non-composted fraction;
- Process water collection and storage;
- Surface water collection and storage;
- Air treatment.

These activities comprise one installation, because these activities are successive steps in an integrated activity.

The following waste operation activities are also carried out on the regulated facility:

- Drying of waste (activity AR12)
- Treatment and transfer station (activity AR13)
- Wash plant (residue washing activity AR14)

5.3 The site's location

The Operator has provided plans which we consider to be satisfactory.

These show the extent of the site of the facility.

The plans are included in the Permit.

The facility is located at Woodhurst, Cambridgeshire, centred on National Grid Reference TL 3361 75401, and has been operational since 2003.

It is situated within a predominantly rural area approximately ~10km east of Huntingdon, surrounded mainly by agricultural land. The following places that are potential sensitive receptors are located within a radius of approximately 1,000 metres of the facility.

A mushroom farm lies immediately north of the site, with farms and associated farmland to the east. Residential properties are located to both the north and south.

Other nearby sensitive receptors include an animal rescue and rehabilitation centre to the northwest, and a nursery school which is located approximately 800 metres to the north of the facility.

5.3.1 Proposed site design: potentially polluting substances and prevention measures

Under Article 22(2) of the IED the Applicant is required to provide a baseline report containing at least the information set out in paragraphs (a) and (b) of the Article before starting operation.

The Operator did not provide an updated baseline as part of the variation, the new biodrying activities (AR2) and washing activity (AR14) take place within the existing site boundary. The biodrying activity is undertaken within the existing IVC tunnels (G3-G6). The washing plant activity (AR14) takes place on an impermeable surface within a sealed drainage system constructed to CIRIA 736 standards.

The storage of Refuse Derived Fuel (RDF) will take place within the existing northern boundary of the site and forms part of the transfer station activity

(AR13). This area is also located within a sealed drainage system and designed to meet CIRIA C736 containment standards.

The applicant is required to maintain the Site Condition Report (SCR) which is a live document for the full lifecycle of the permit. The permit includes condition (3.1.3) requiring periodic monitoring be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

The Operator is advised that they will be responsible for demonstrating that no pollution has occurred and will be liable for any contamination identified at surrender.

The baseline report is an important reference document in the assessment of contamination that might arise during the operational lifetime of the Permit and at cessation of activities at the site.

5.4 Operation of the regulated facility

5.4.1 Processes carried out

The Envar Composting Facility been operational since 2003. The installation is permitted to treat up to 235,000 tonnes per annum of non-hazardous waste and undertakes a combination of biological treatment installation activities and waste operations at the site.

The activities comprise of in-vessel composting (IVC), open windrow composting, and the production of compost-like output (CLO), all regulated under Section 5.4 Part A(1)(b)(i) of the Environmental Permitting Regulations. These activities involve the recovery of non-hazardous waste through biological treatment exceeding 75 tonnes per day. Waste operations include the drying of waste using two 0.9 MWth biomass boilers, and waste treatment and transfer activities such as sorting, shredding, bulking, and screening.

The variation introduces the following changes:

The new biodrying activity (AR2) utilises existing IVC tunnels (G3-G6) to biologically treat biodegradable, non-hazardous waste streams including plant material, manures, waste wood and sewage sludge. Waste is pre-treated and blended to optimise structure for airflow before undergoing aerobic treatment within the tunnels. Microbial activity generates heat, increasing temperature and driving off moisture through evaporation, while also sanitising the material. Process conditions, including temperature, are continuously monitored to ensure required operating parameters are achieved. Treated material is dispatched off-site for use as a fuel.

This activity is regulated as Activity AR2 under Section 5.4 A(1)(b)(i) and is subject to a pre-operational condition requiring the operator to demonstrate compliance with emission limits prior to commencement. Emissions to air from the reception building and IVC tunnels, including odour, volatile organic compounds (VOCs) and dust, must be controlled at source. Emission limits are set in accordance with the Waste Treatment BREF and BAT conclusions, with additional abatement infrastructure required to achieve BAT-associated emission levels (BAT-AELs).

Refuse Derived Fuel (RDF) storage (AR13) is introduced as part of the variation, providing provision for the storage of pre-wrapped RDF bales only, without treatment. Storage is undertaken within a designated area to the north of the site on an impermeable surface with sealed drainage. Operations are managed on a first-in, first-out basis, with a maximum storage period of three months. Each bale pile is limited to 268 m^3, with a minimum separation distance of 6 metres, and an overall limit of 24 storage piles.

The new residue washing activity (AR14) involves the treatment of street sweepings and grits through mechanical screening, washing and separation processes to recover mineral fractions such as aggregates, sand and soils. The activity includes waste reception, storage, processing and despatch of recovered materials. It operates on an impermeable surface with a sealed drainage system, with process water collected and managed via leachate tanks for testing and off-site disposal. The activity has a maximum throughput of 40,000 tonnes per annum.

The existing parts of facility are designed with the following pollution control infrastructure. All operational areas are located on impermeable surfaces with sealed drainage systems. Leachate from composting activities is treated via an on-site effluent treatment plant (ETP), regulated under a separate discharge consent, with treated effluent discharged or reused on-site. Waste reception, preparation, and in-vessel composting processes are enclosed and operated under negative ventilation systems. Air extracted from these processes is treated through scrubbers and biofilters, with separate abatement systems in place for composting and CLO processes to control emissions of odour, dust and bioaerosols.

The commencement of the new biodrying activity (AR2) is subject to a pre-operational condition requiring the installation of upgraded abatement plant capable of meeting BAT-associated emission levels (BAT-AELs) for:

- Total Volatile Organic Compounds (TVOCs);
- Odour concentration;
- Dust.

Table S3.1A of the permit details the emission limits that must be achieved prior to the commencement of activity AR2. The full list of requirements necessary to complete the pre-operational condition are set out in Table S1.4 of the permit.

The Operator must demonstrate compliance with all requirements specified in the pre-operational condition before the activity can commence.

Note: A summary of the permitted activities can be found above in Section 5.2

5.4.2 Environmental management system

We are satisfied that appropriate management systems and management structures will be in place for this regulated facility, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

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

5.4.3 Site security

Having considered the information submitted in the Application, we are satisfied that appropriate infrastructure and procedures will be in place to ensure that the site remains secure.

5.5 Management plans

5.5.1 Accident management plan

The Applicant has submitted an Accident Management Plan (AMP). After considering the plan and other information submitted in the Application, we are satisfied that appropriate measures will be in place to ensure that accidents that may cause pollution are prevented but that, if they should occur, their consequences are minimised.

An updated version of the AMP was submitted to us during the determination. The updated plan forms part of the permit operating techniques and is referenced in table S1.2 of the permit.

5.5.2 Fire prevention plan

The Applicant submitted an updated Fire Prevention Plan (FPP) during determination of the permit. The updated plan included relevant information regarding the RDF storage activity.

The variation adds RDF bale storage to the permit as part of the waste transfer station activity (AR13 in Table S1.1 of the permit). The addition of RDF storage required us to assess those aspects of the FPP, including specific requirements

for the storage of RDF highlighted in the in the FPP guidance: Fire prevention plans: environmental permits - GOV.UK and the Non-hazardous and inert waste: appropriate measures for permitted facilities - 4. Waste storage - Guidance - GOV.UK

Specific requirements relevant to this activity are as follows:

- RDF piles must be < 450 cubic metres;
- RDF must be wrapped in appropriate HDPE material or their equivalent;
- Procedures to mitigate solar heating during hot weather;
- Separation distances between piles must be maintained at a minimum of 6m.

See section 4 key issues for RDF storage activity for additional information.

We have assessed the fire prevention plan and are satisfied that it meets the measures and objectives set out in the FPP 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 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.

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

5.5.3 Environmental risk

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

The Operator’s risk assessment is satisfactory.

HPI Decision Document

5.6 Operating techniques

We have specified that the Applicant must operate the regulated facility in accordance with the following documents contained in table S1.2 of the Permit:

Table S1.2 Operating techniques		
Description	**Parts Included**	**Reasons we have included**
Variation application EPR/GP3930DF/V006	Document (all): Non-technical summary, v2 Updated with addition of wash plant, dated 02/04/2025	These documents enable the proper regulation of the site activities and include but are not limited to management plans for; fire prevention, dust and odour management. These documents form part of the permit.
	Document (all): Wash Plant Addendum v1, dated 02/2025	
	Document (all): Standard Operating Procedures (SOPs) for bio drying systems, issue 1 dated 30/09/2024	
	Document (all): RDF & WTS Storage Cambridge - Operating Techniques, dated 30/10/2024	
	Document (all): Operational Plan – Including Biodrying – Version 4.6.6, dated September 2024	

Table S1.2 Operating techniques		
Description	**Parts Included**	**Reasons we have included**
	Document (infrastructure layout): Reception bay layout plan - Reception Building For Storage of Organic Wastes	
	Document (infrastructure layout): Waste Treatment and Transfer Building FPP Plan, dated December 2020	
Response to Schedule 5 Notice issued 21/01/2026 (variation V006)	Main response document (all sections): Response to Schedule 5 notice	
	Document (all): Standard Operating Procedure (SOP) - Envar SOP for the Biodrying of Sewage Sludge, V1.1 Issue 2	
	Document (all): Standard Operating Procedure (SOP) - SOP – Tunnel Filling, V3 April 2023	
	Document: (all): Standard Operating Procedure (SOP) - Reception Area Hygiene Protocol, V5 April 2023	
	Document (all): Cambridge Biodrying Overview Layout (site infrastructure plan)	
	Document (all): Materials Acceptance, Inspection, Quarantine and Rejection Procedure, Version 5 03/03/2026	
	Document: MS 2.41 Sampling and Monitoring Plan V2	
	Management plan: Dust Management Plan Version 2.0, dated 11/03/2026	

Table S1.2 Operating techniques		
Description	**Parts Included**	**Reasons we have included**
	Document (all parts): Abatement Improvement Plan Envar Composting – Version 1, dated 13/03/2026	
Additional information received	Document (all parts): Operating Techniques and Management Plan (OTMP) – V2.0, dated 27/03/2026	
Additional information received	Management plan: Fire Prevention Plan – Version 10, dated September 2025	
	Document (all): Standard Operating Procedures (SOPs) for composting systems operated in accordance with Real Compost Certification Scheme, Version 10.2 dated 18/07/2025	
	Management Plan: Accident Management Plan (AMP) v1.0, dated 24/06/2026	

5.6.1 General operating techniques

We have considered the relevant guidance, and we are satisfied that the operating techniques represent the most appropriate techniques for the facility.

We have reviewed the techniques provided by the Operator for the activities added and varied by this variation and compared them against the relevant technical guidance:

- (Activity AR2 for Biodrying in enclosed vessels) - Waste Treatment BAT Reference document (BREF), Waste Treatment BAT Conclusions (WT BATc), Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK and Control and monitor emissions for your environmental permit guidance;

- (Activity AR13 for RDF storage) - Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK, Control and monitor emissions for your environmental permit and Fire prevention plans;

- (Activity AR14 for Residue washing) - Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK, Control and monitor emissions for your environmental permit.

We consider these to be appropriate techniques for the facility. For activity AR2, we have accepted the proposed techniques, subject to completion of abatement plant improvements before the activity can commence. This requirement is secured through pre-operational condition PO1 in Table S1.4 of the permit. The activity may not commence until we are satisfied that the conditions have been completed.

5.6.2 Assessment of BAT

Activity AR2 is a new installation activity involving biodrying to produce a fuel. The Applicant submitted a BAT assessment as part of the application. We have reviewed the techniques used by the operator and compared these with the relevant requirements specified below.

Biodrying is a biological waste treatment process carried out under aerobic conditions, incorporating aspects of mechanical biological treatment (MBT). The applicable techniques are set out in the Waste Treatment BAT Reference

document (BREF) and Waste Treatment BAT Conclusions (WT BATc), alongside relevant aspects of the "Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK".

There is overlap between best available techniques (BAT) for waste installations and necessary measures for waste operations. The Environment Agency uses the term 'appropriate measures' to cover both sets of requirements.

During determination, we informed the Operator that the biodrying activity must comply with the Waste Treatment BREF and BAT Conclusions for MBT. Biodrying is specifically covered under WT BATc, with defined BAT-associated emission levels (BAT-AELs), as waste inputs (including sludges and other biodegradable materials) generate VOCs, odour, ammonia and dust during aerobic treatment.

To achieve these emission limits, the abatement plant serving tunnels G3-G6 will be upgraded prior to commencement of the activity. As set out in the key issues section, this requirement is secured through pre-operational condition PO1 (Table S1.4 of the permit), which must be completed before the activity can commence.

In reaching our decision on BAT, we have reviewed the measures proposed by the Operator alongside those secured through the pre-operational conditions. We are satisfied that these are sufficient to ensure compliance with the BAT requirements specified in the WT BATc.

5.6.3 Assessment of appropriate measures

We have reviewed the techniques used by the Operator for the following activities and compared these with the relevant requirements specified below.

- (Activity AR13) The waste transfer station has been varied to include the storage of Refuse Derived Fuel (RDF). Storage and handling activities (including loading, unloading and on-site movement of waste) must comply with the "Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK" guidance, particularly Section 4 (Waste Storage) and;

- (Activity AR14) The residue washing activity is a new waste operation added as part of this variation, the relevant techniques that apply to this operation are presented in the Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK.

In reaching our decision, we have reviewed the measures proposed by the Operator. We are satisfied that these are sufficient to ensure compliance with the relevant appropriate measures for the proposed activities.

5.6.4 Operating techniques for emissions that screen out as insignificant

We consider emissions to screen out as insignificant when the short term process contribution (PC) is less than 10% of the short term environmental standard or the long term PC is less than 1% of the long term environmental standard.

Emissions of VOCs and ammonia must screen out as insignificant for the pre-operational condition (PO1) to be completed and approval provided. The emission limits have been set for biological treatment and MBT. The limits for activity AR2 can be found in Table S3.1A of the permit.

The Operator will install new three-stage abatement plant consisting of the following techniques:

- Stage 1 - Water scrubbing;
- Stage 2 - Acid scrubbing;
- Stage 3 - Carbon filter.

The activity may only commence once emissions have been demonstrated to screen out as insignificant. If this cannot be demonstrated and a more detailed assessment is required, PO1 cannot be completed, and a permit variation would be necessary to proceed.

We agree that the applicant's proposed techniques (Stage 1-3) are Best Available Techniques (BAT) for the regulated facility.

We consider that the emission limits included in the Permit reflect the BAT for the sector.

5.6.5 National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. Our decision complies with the programme's strategy and aids the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this Permit.

5.6.6 Waste types

Article 45(1) of the IED requires that the Permit must include a list of all types of waste which may be treated using at least the types of waste set out in the European Waste List established by Decision 2005/532/EC, EC, if possible, and containing information on the quantity of each type of waste, where appropriate. The Application contains a list of those wastes, coded by the European Waste Catalogue (EWC) number and so we are satisfied that this requirement is met.

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.

The installation will be operated using best available techniques (BAT). We are satisfied that the operating and abatement techniques (following PO1 completion) are BAT for accepting and treating these waste types.

6 · Nature conservation, protected species and habitat designations

The Conservation of Habitats and Species Regulations 2017, widely known as the Habitats Regulations, covers sites of European importance such as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Ramsar sites, classified under the Ramsar convention of 1971, are classed as having the same protection as European sites. We screen for potential effects on the ecological integrity of a European site when considering any proposal. These regulations enshrine the precautionary principle in law.

We screen for Sites of Special Scientific Interest (SSSI) as covered by The Wildlife and Countryside Act 1981 (WCA81), The Countryside and Rights of Way Act 2000 (CRoW Act) which subsequently amended and strengthened this act, and the Natural Environment and Rural Communities Act 2006 (NERC06). We also screen for Marine Conservation Zones (MCZ).

Screening is also carried out for protected species, National nature reserves (NNR), Local nature reserves (LNR), Local wildlife sites (LWS), and non-statutory sites such as National Landscapes and heritage sites.

Our screening criteria are based on the risks posed by the proposed activities and the sensitivity of the receptor. We have checked the location of the proposed permission to ascertain 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 within our screening distances for these designations.

6.1 Sites considered

The following Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar) sites are located within 10 km of the regulated facility:

- The Ouse Washes Special Protection Areas (SPA);
- Ouse Washes Special Areas for Conservation (SAC); and
- Ouse Washes Ramsar.

There are no Sites of Special Scientific Interest (SSSI) within 2 km of the proposed regulated facility.

The following local nature sites (ancient woodlands, local wildlife sites and national and local nature reserves) are located within 2 km of the regulated facility:

- St Ives - March Disused Railway (The Parks South) Local Wildlife Site;
- Heath Fruit Farm Local Wildlife Site;
- Lawn Orchard Local Wildlife Site; and
- The Pingles Ancient Woodland.

There are no protected species and habitat designations within 500m.

There are no National Landscape and heritage designations within 2km.

6.2 Assessments

6.2. Habitats Assessment

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage, protected species, and habitat designations identified in the nature conservation screening report as part of the permitting process. The following protected sites are located approximately 5.2 kilometres east of the facility:

- The Ouse Washes Special Protection Areas (SPA);
- Ouse Washes Special Areas for Conservation (SAC) and;
- Ouse Washes Ramsar.

The risks identified as relevant from this variation are via aerial pathway from the treated air discharged from the abatement plant for activity AR2.

The treatment processes take place in enclosed vessels (IVC tunnels G3-G6), with waste air collected and channelled to abatement plant prior to release to the atmosphere.

The techniques used at the facility are suitable for abating the relevant pollutants, namely dust, VOCs and odour.

There are no critical loads or levels for VOCs or dust. The treatment process must meet BAT-associated emission levels (BAT-AELs) for odour, dust and VOCs.

The emission limits are as follows:
– Dust: 5 mg/m³;
– TVOCs: 40 mg/m³;
– Odour concentration: 1,000 ouE.

An existing emission limit for ammonia (NH_3) of 20 mg/m³ applies to all air abatement plant carrying out biological treatment (in accordance with BAT) and remains unchanged as a result of this variation.

Based on the information provided in the application, it is not expected that any activities undertaken in this variation will cause any significant effects on the protected features of the Ouse Washes SAC, SPA or Ramsar sites.

Prior to commencement of the new activity (AR2), the facility is required to demonstrate by completion of a pre-operational condition that emission levels for dust, odour including ammonia and VOCs are achieved by the abatement plant.

We have not consulted Natural England. The decision was taken in accordance with our guidance.

6.2.3 Assessment of local nature sites

Conservation sites are protected in law by legislation which provides the highest level of protection for SACs and SPAs, and also important protection for SSSIs. More generalised protection is provided for flora and fauna rather than for specifically named conservation designations. It is under this that we assess other sites (such as ancient woodlands, local wildlife sites and national and local nature reserves) which prevents us from permitting something that will result in significant pollution; and which offers levels of protection proportionate to the designation. However, it should not be assumed that because levels of protection are less stringent for these other sites, that they are not of considerable importance. Local sites link and support EU and national nature conservation sites together and hence help to maintain the UK's biodiversity resilience.

For SACs, SPAs, Ramsars and SSSIs we consider the PC and the background levels / concentrations in making an assessment of impact. In assessing the local nature sites, we look at the impact from the regulated facility alone to determine whether it would cause significant pollution. This is a proportionate approach, in line with the levels of protection offered by the conservation legislation to protect these other sites (which are generally more numerous than Natura 2000 or SSSIs) whilst ensuring that we do not restrict development.

Critical levels and loads are set to protect the most vulnerable habitat types. Thresholds change in accordance with the levels of protection afforded by the legislation. Therefore, the thresholds for SAC, SPA and SSSI features are more stringent than those for local nature sites.

Therefore, we would generally conclude that the regulated facility is not causing significant pollution at these other sites if the PC is less than the relevant critical level or critical load, provided that the Applicant is appropriately controlling emissions.

There are no critical levels or loads for VOCs or dust for any protected feature identified in the assessment. The BAT-AEL for ammonia is currently in place in accordance with BAT for the sector. We are satisfied that the installation will not cause significant pollution at any of the other conservation sites. The Applicant is required to prevent, minimise and control emissions using BAT, this is considered further in Section 5.6.2.

7 · Minimising the regulated facility's environmental impact

Regulated activities can present different types of risk to the environment, these include odour, noise, and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, discharges to ground or groundwater, global warming potential (GWP) and generation of waste and other environmental impacts. Consideration may also have to be given to the effect of emissions being subsequently deposited onto land (where there are ecological receptors). All these factors are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of the emission from the regulated facility on human health and the environment and what measures we are requiring the Operator to take to ensure a high level of protection.

7.1 Emissions to Air

The point source emissions to air that are relevant to this variation arise from the treated air from abatement plant that will treat air collected from the enclosed IVC tunnels G3-G6 undertaking the biodrying activity AR2 at such time that the pre-operational conditions are met. As discussed above in section 5.6.6, emissions from the abatement plant must meet the insignificance criteria to commence under the pre-operational condition PO1.

7.1.1 Consideration of Local Factors

No Air Quality Management Area (AQMAs) have been declared within an area likely to be affected by emissions from the installation. The closest AQMA is

located ~10km west of the facility in Huntingdon and is for emissions relating to NO_2. There are no relevant emissions as part of this variation.

7.4 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. For activity AR2, we have required the Operator to update the odour management plan as part of the pre-operational condition (PO1). This is necessary to ensure that the plan reflects the updated abatement systems and emission point locations associated with the new plant, in addition to those already in place for the existing IVC tunnel operations.

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’.

The plan has been incorporated into the operating techniques table, S1.2 of the Permit.

7.5 Fugitive emissions management

We have reviewed the dust and emission management plan in accordance with our guidance on emissions management plans for dust.

We consider that the dust and emission management plan is satisfactory, and we approve this plan.

We have approved the dust and emission 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.

The plan has been incorporated into the operating techniques table, S1.2 of the Permit.

8 · Permit conditions, competence, monitoring and reporting

8.1 Pre-operational conditions

Based on the information in the application, we consider that we need to include pre-operational conditions. These conditions are set out below and referred to, where applicable, in the text of the decision document. We are using these conditions to require the Operator to confirm that the details and measures proposed in the Application have been adopted or implemented prior to the operation of the regulated facility.

See the abatement section in the key issues section for further explanation regarding the inclusion of the pre-operational condition

Table S1.4 Pre-operational measures	
Reference	**Pre-operational measures**
PO1	Prior to commencement of activity AR2 in Table S1.1 the operator shall submit a written report to the Environment Agency for assessment and written approval. The report must contain but not be limited to: • A technical description completed by competent person(s) confirming that the abatement plant upgrades (serving tunnel group G3-G6) have been implemented and meet the BAT associated emission levels (BAT-AELs) in Table S3.1A for VOCs, odour and dust. And bioaerosol monitoring requirements in Table S3.4 (in accordance with M9 guidance). • Demonstrate that the abatement techniques (water scrubber, acid scrubber and carbon filters) have been installed and commissioned in accordance with manufacturer specifications and include process monitoring capabilities as stated in Table S3.3 of the permit. • Monitoring data and (H1 screening conclusions) verifying that the assumptions made in technical note ETL1036/2026 and application are achieved and emission limits for parameters present in Table S3.1A are met at the point of release from the installation. Process contributions must screen out as insignificant.

Table S1.4 Pre-operational measures	
Reference	**Pre-operational measures**
	• A revised version of the OMP and SSBRA incorporating the new emission point and abatement plant aspects in addition to those already in place at the facility. • Updated emission point plan showing the location of emission point A5. The operator must implement the proposals identified within the report in accordance with the Environment Agency's written approval.

8.2 Improvement programme

Based on the information in the Application, we consider that we need to include an improvement programme. These improvements will be required by conditions, and they are set out below, justifications for this improvement condition are provided below.

In addition to the pre-operational condition (see Section 8.1), we have included an improvement condition requiring the Operator to review the abatement plant following completion of the pre-operational condition and commencement of activity AR2.

The purpose of this condition is to ensure that the abatement plant is operating effectively and continues to provide adequate control of emissions. The Operator is required to assess whether the installed measures successfully prevent, or where this is not possible minimise, emissions to air, including odour, VOCs, dust and ammonia, associated with activity AR2 and emission point A5 (as set out in Table S3.1A).

The detailed requirements of the improvement condition are set out in the table below.

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC10	The operator shall carry out a review of the abatement plant on site, in order to determine whether the measures have been effective and adequate to prevent and where not possible minimise emissions released to air including but not limited to odour, VOCs, dust, ammonia and bioaerosols, in relation to activity A2 and	Within 3 months of completion of PO1 and commencement of activity AR2 or as otherwise agreed in writing with the

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
	emission point A5 in Table S3.1A The operator shall submit a written report to the Environment Agency following this review for assessment and approval. The report shall include but not be limited to the following aspects: • Full investigation and characterisation of the waste gas streams. • Abatement stack monitoring results (not limited to odour, VOCs, dust, ammonia and bioaerosols). • Abatement process monitoring results (not limited to odour, VOCs, dust, ammonia and bioaerosols). • Details of air quality quantitative impact assessment including modelling and a proposal for site-specific “action levels” (not limited to bioaerosols, odour concentration, hydrogen sulphide, VOCs and ammonia). • Odour monitoring results at the site boundary. • Records of odour complaints and odour related incidents. • Recommendations for improvement including the replacement or upgrading the abatement plant. • Timescales for implementation of improvements to the abatement plant. The operator shall implement the improvements in line with the timescales as approved by the Environment Agency	Environment Agency

8.3 Updating permit conditions during consolidation

We have updated permit conditions to those in the current generic permit template as part of the permit consolidation. The conditions will provide the same level of protection as those in the previous permit.

8.4 Emission limits

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on Best Available Techniques (BAT) have been added for the following substances for emission point A5, subject to completion of PO1 and commencement of activity AR2:

Substance	**Emission limit (including unit)**
Ammonia	20 mg/m^3
Odour concentration	1,000 ouE/m^3
Hydrogen sulphide	No limit set
Dust	5 mg/m^3
Total VOCs	40mg/m^3

The emission limits set out above apply to biological treatment and Mechanical biological treatment (MBT) processes, including biodrying. These limits relate to the abatement plant treating waste air generated during the biodrying activity.

These are the BAT-associated emission levels (BAT-AELs) for the sector and are considered appropriate for activity AR2.

8.5 Monitoring

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

Substance	Monitoring frequency	Monitoring standard or method
Ammonia	Once every 6 months	EN ISO 21877
Odour concentration	Once every 6 months	BS EN 13725
Hydrogen sulphide	Once every 6 months	CEN TS 13649 for Sampling NIOSH 6013 for analysis
Dust	Once every 6 months	EN 13284-1
Total VOCs	Once every 6 months	BS EN 12619

These monitoring requirements have been included in order to ensure that they are in line with BAT monitoring frequencies, methods and/or standards**.**

We made these decisions in accordance with the Waste Treatment BAT Conclusions (WT BATC) and the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance notes.

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.

8.6 Process monitoring

We have added process monitoring for the new abatement plant (subject to PO1 completion and commencement of activity AR2). The new process monitoring is for the new abatement plant and requires the Operator to monitor the process and performance of the new plant in accordance with the monitoring standards in Table S3.3 and manufacturers specifications.

8.9 Reporting

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

Emissions to air from odour abatement plant, parameters as required by condition 3.5.1 for (emission point A5 in Table S3.1A on completion of PO1)

We made these decisions in accordance with monitoring requirements for the sector and Waste Treatment BAT conclusions.

8.10 Technical competence

Technical competence is required for the activities that are being permitted.

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

We are satisfied that the Operator is technically competent.

9 · Other legal requirements

In this section we explain how we have addressed other relevant legal requirements, to the extent that we have not addressed them elsewhere in this document.

9.1 The EPR 2016 and related Directives

The EPR delivers the requirements of a number of assimilated and national laws.

9.1.1 Schedules 1 and 7 to the EPR 2016 – IED Directive

We address the requirements of the IED in the body of this document above and the specific requirements of Chapter IV in Annex 1 of this document.

There is one requirement not addressed above, which is that contained in Article 5(3) IED. Article 5(3) requires that “In the case of a new installation or a substantial change where Article 4 of Directive 85/337/EC (now Directive 2011/92/EU) (the EIA Directive) applies, any relevant information obtained or conclusion arrived at pursuant to articles 5, 6 and 7 of that Directive shall be examined and used for the purposes of granting the permit.”

Article 5 of EIA Directive relates to the obligation on developers to supply the information set out in Annex IV of the Directive when making an application for development consent.

Article 6(1) requires Member States to ensure that the authorities likely to be concerned by a development by reason of their specific environmental responsibilities are consulted on the Environmental Statement and the request for development consent.

Article 6(2)-6(6) makes provision for public consultation on applications for development consent.

Article 7 relates to projects with transboundary effects and consequential obligations to consult with affected Member States.

The grant or refusal of development consent is a matter for the relevant local planning authority. The Environment Agency's obligation is therefore to examine and use any relevant information obtained or conclusion arrived at by the local planning authorities pursuant to those EIA Directive articles.

9.1.2 Schedule 9 to the EPR 2016 – Waste Framework Directive

As the regulated facility involves the treatment of waste, it is carrying out a waste operation as defined in EPR 2016, and the requirements of Schedule 9 apply. We must therefore exercise our functions so as to ensure implementation of certain articles of the WFD.

We must exercise our relevant functions for the purposes of ensuring that the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste and that any waste generated is treated in accordance with Article 4 of the Waste Framework Directive. (See also section 4.3.9).

The conditions of the permit ensure that waste generation from the facility is minimised. Where the production of waste cannot be prevented it will be recovered wherever possible or otherwise disposed of in a manner that minimises its impact on the environment. This is in accordance with Article 4.

We must also exercise our relevant functions for the purposes of implementing Article 13 of the Waste Framework Directive; ensuring that the requirements in the second paragraph of Article 23(1) of the Waste Framework Directive are met; and ensuring compliance with Articles 18(2)(b), 18(2)(c), 23(3), 23(4) and 35(1) of the Waste Framework Directive.

Article 13 relates to the protection of human health and the environment. These objectives are addressed elsewhere in this document.

Article 23(1) requires the permit to specify:

- the types and quantities of waste that may be treated;
- for each type of operation permitted, the technical and any other requirements relevant to the site concerned;
- the safety and precautionary measures to be taken;
- the method to be used for each type of operation;
- such monitoring and control operations as may be necessary;
- such closure and after-care provisions as may be necessary.

These are all covered by permit conditions.

The permit does not allow the mixing of hazardous waste, so Article 18(2) is not relevant.

We consider that the intended method of waste treatment is acceptable from the point of view of environmental protection, so Article 23(3) does not apply.

Energy efficiency is dealt with elsewhere in this document, but we consider the conditions of the permit ensure that the recovery of energy takes place with a high level of energy efficiency in accordance with Article 23(4).

Article 35(1) relates to record keeping and its requirements are delivered through permit conditions.

9.1.3 Schedule 22 to the EPR 2016 – Water Framework and Groundwater Directives

To the extent that it might lead to a discharge of pollutants to groundwater (a "groundwater activity" under the EPR 2016), the Permit is subject to the requirements of Schedule 22, which delivers the requirements of EU Directives relating to pollution of groundwater. The Permit will require the taking of all necessary measures to prevent the input of any hazardous substances to groundwater, and to limit the input of non-hazardous pollutants into groundwater so as to ensure such pollutants do not cause pollution and satisfies the requirements of Schedule 22.

No releases to groundwater from the regulated facility are permitted. The Permit also requires material storage areas to be designed and maintained to a high standard to prevent accidental releases.

9.1.4 Directive 2003/35/EC – The Public Participation Directive

Regulation 60 of the EPR 2016 requires the Environment Agency to prepare and publish a statement of its policies for complying with its public participation duties. We have published our public participation statement.

This Application has been consulted upon in line with this statement, as well as with our guidance RGS6 on Sites of High Public Interest, which addresses specifically extended consultation arrangements for determinations where public interest is particularly high. This satisfies the requirements of the Public Participation Directive.

Our decision in this case has been reached following a programme of extended public consultation, both on the original application and later, separately, on the draft permit and a draft decision document. The way in which this has been done is set out in section 2. A summary of the responses received to our consultations and our consideration of them is set out in Section 10 and 11.

9.2 National primary legislation

9.2.1 Environment Act 1995

(i) Section 4 (Pursuit of Sustainable Development)

We are required to contribute towards achieving sustainable development, as considered appropriate by Ministers and set out in guidance issued to us. The Secretary of State for Environment, Food and Rural Affairs has issued The Environment Agency's Objectives and Contribution to Sustainable Development: Statutory Guidance (December 2002). This document; "provides guidance to the Agency on such matters as the formulation of approaches that the Agency should take to its work, decisions about priorities for the Agency and the allocation of resources. It is not directly applicable to individual regulatory decisions of the Agency."

In respect of regulation of industrial pollution through the EPR, the Guidance refers in particular to the objective of setting permit conditions "in a consistent and proportionate fashion based on Best Available Techniques and taking into account all relevant matters…". The Environment Agency considers that it has pursued the objectives set out in the Government's guidance, where relevant, and that there are no additional conditions that should be included in this Permit to take account of the Section 4 duty.

For waste the guidance refers to ensuring waste is recovered or disposed of in ways which protect the environment and human health. The Environment Agency considers that it has pursued the objectives set out in the Government's guidance, where relevant, and that there are no additional conditions that should be included in this Permit to take account of the Section 4 duty.

(ii) Section 5 (Preventing or Minimising Effects of Pollution of the Environment)

We are satisfied that our pollution control powers have been exercised for the purpose of preventing or minimising, remedying or mitigating the effects of pollution.

(v) Section 7 (General Environmental Duties)

This places a duty on us, when considering any proposal relating to our functions, to have regard amongst other things to any effect which the proposals would have on sites of archaeological, architectural, or historic interest; the economic and social well-being of local communities in rural areas; and to take into account any effect which the proposals would have on the beauty or amenity of any rural or urban area or on any such flora, fauna, features, buildings, sites or objects.

We considered whether we should impose any additional or different requirements in terms of our duty to have regard to the various conservation objectives set out in Section 7 but concluded that we should not.

(vi) Section 39 (Costs and Benefits)

We have a duty to take into account the likely costs and benefits of our decisions on the application ('costs' being defined as including costs to the environment as well as any person). This duty, however, does not affect our obligation to discharge any duties imposed upon us in other legislative provisions.

In so far as relevant we consider that the costs that the permit may impose on the applicant are reasonable and proportionate in terms of the benefits it provides.

(viii) Section 81 (National Air Quality Strategy)

We have had regard to the National Air Quality Strategy and consider that our decision complies with the Strategy, and that no additional or different conditions are appropriate for this Permit.

We have also had regard to the clean air strategy 2019 and consider that our decision complies with the Strategy, and that no additional or different conditions are appropriate for this Permit.

We have had regard to the National Air Pollution Control Programme (set under the National Emissions Ceiling Regulations 2018) and consider that our decision complies with the Strategy, and that no additional or different conditions are appropriate for this Permit.

9.2.2 Section 108 Deregulation Act 2015 – Growth duty

We 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 statutory guidance issued by the Department of Business, Energy and Industrial Strategy in March 2017 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 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. It also ensures that any pollution that may arise from the regulated facility does not adversely affect local businesses.

9.2.3 Legislative and Regulatory Reform Act 2006

In accordance with section 21 of this Act, when making this decision we have had regard to the need to be transparent, accountable, proportionate and consistent, and the need to target action where it is needed.

In accordance with section 22 of the Act we have had regard to the Regulators' Code; in particular the need to base our decision on environmental risk, and to support the applicant to comply and grow, so that burdens have only been imposed where they are necessary and proportionate.

9.2.4 Human Rights Act 1998

We have considered potential interference with rights addressed by the European Convention on Human Rights in reaching our decision and consider that our decision is compatible with our duties under the Human Rights Act 1998. In particular, we have considered the right to life (Article 2), the right to a fair trial (Article 6), the right to respect for private and family life (Article 8) and the right to protection of property (Article 1, First Protocol). We do not believe that Convention rights are engaged in relation to this determination.

9.2.5 Countryside and Rights of Way Act 2000 (CROW 2000)

Section 85 of this Act imposes a duty on Environment Agency to seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty (AONB). There is no AONB which could be affected by the regulated facility.

9.2.6 Wildlife and Countryside Act 1981

Under section 28G of the Wildlife and Countryside Act 1981 the Environment Agency has a duty to take reasonable steps to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which a site is of special scientific interest. Under section 28I the Environment Agency has a duty to consult Natural England in relation to any permit that is likely to damage SSSIs.

There are no SSSIs within screening distance of the facility to consider.

9.2.7 Natural Environment and Rural Communities Act 2006

Section 40 of the Natural Environment and Rural Communities Act 2006 has been amended with effect from 1 January 2023 to require consideration as to what action we can properly take, consistently with the proper exercise of our functions, to further the general biodiversity objective, which is to further the conservation and enhancement of biodiversity and having considered, determined such policies and specific objectives as we consider appropriate for taking action to further the general biodiversity objective, and take such action as we consider appropriate, in the light of those policies and objectives, to further that objective.

Section 40(2A) states that in complying with the duty in section 40(1) and (1A) we must have particular regard to any relevant local nature recovery strategy and species protection strategy or protected sites strategy.

We have, also, considered the general biodiversity objective when carrying out our permit application determination and, consider that no different or additional conditions are required in the permit.

9.2.9 Countryside Act 1968

Section 11 imposes a duty on the Environment Agency to exercise its functions relating to any land, having regard to the desirability of conserving the natural beauty and amenity of the countryside including wildlife. We have done so and consider that no different or additional conditions in the Permit are required.

9.2.10 National Parks and Access to the Countryside Act 1949

Section 11A and section 5(1) imposes a duty on the Environment Agency when exercising its functions in relation to land in a National Park, to further the purposes of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas, and of promoting opportunities for the understanding and enjoyment of National Parks by the public.

There is no National Park which could be affected by the regulated facility.

9.2.12 Environment Act 2021

Section 110(10) requires that we must have regard to a protected site’s strategy, which Natural England has prepared and published in relation to improving the conservation and management of a protected site, and managing the impact of plans, projects or other activities (wherever undertaken) on the conservation and management of the protected site, where relevant to exercise of our duties under Conservation of Habitats and Species Regulations 2017, sections 28G to 28I Wildlife and Countryside Act 1981 or Marine and Coastal Access Act 2009.

We have had regard to this in our assessments.

9.3 National secondary legislation

9.3.1 Conservation of Habitats and Species Regulations 2017

We have assessed the Application in accordance with our guidance and concluded that there will be no likely significant effects on any European Site.

The Habitats Regulations Assessment is summarised in greater detail in section 6 of this document. A copy of the Habitats Regulations Assessment can be found on the public register.

We have also considered our general duties under Regulation 9(3) to have regard to the requirements of the Habitats Directive in the exercise of our powers and under Regulation 10 in relation to wild bird habitat to take such steps in the exercise of their functions as they consider appropriate so far as lies within our powers to secure preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds.

We considered whether we should impose any additional or different requirements in the permit in terms of these duties but concluded that we should not.

9.3.2 Water Environment (Water Framework Directive) Regulations 2017

Consideration has been given to whether any additional requirements should be imposed in terms of the Environment Agency's duty under regulation 3 to secure compliance with the requirements of the Water Framework Directive, Groundwater Directive and the EQS Directive through, amongst other things, environmental permits, and its obligation in regulation 33 to have regard to the river basin management plan (RBMP) approved under regulation 31 and any supplementary plans prepared under regulation 32. However, it is felt that existing conditions are sufficient in this regard and no other appropriate requirements have been identified.

We are satisfied that granting this application with the conditions proposed would not cause the current status of the water body to deteriorate.

9.3.3 The Persistent Organic Pollutants Regulations 2007

We have explained our approach to these Regulations, which give effect to the Stockholm Convention on POPs and the EU's POPs Regulation, above.

9.5 Other relevant legal requirements

9.5.1 Duty to Involve

Section 23 of the Local Democracy, Economic Development and Construction Act 2009 require us where we consider it appropriate to take such steps as we consider appropriate to secure the involvement of interested persons in the exercise of our functions by providing them with information, consulting them or involving them in any other way. Section 24 requires us to have regard to any Secretary of State guidance as to how we should do that.

The way in which the Environment Agency has consulted with the public and other interested parties is set out in section 10 of this document. The way in which we have taken account of the representations we have received is set out in section 10. Our public consultation duties are also set out in the EP Regulations, and our statutory Public Participation Statement, which implement the requirements of the Public Participation Directive. In addition to meeting our consultation responsibilities, we have also taken account of our guidance in Environment Agency Guidance Note RGS6.

10 · Consultation Responses

10.1 Advertising and Consultation on the Application

The Application has been advertised and consulted upon in accordance with the Environment Agency's Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our decision is summarised in this Annex. Copies of consultation responses have been placed on the Environment Agency public register.

The Application was advertised on the Environment Agency website from 14/05/2025 to 12/06/2025.

The following statutory and non-statutory bodies were consulted:

- Cambridgeshire Fire and Rescue Service;
- Local Authority – Environmental Health/Environmental Protection department;
- Local Authority – Planning;
- United Kingdom Health Security Agency (UKHSA).

No response was received for the following consultees:

- Food Standards Agency (FSA);
- Animal and Plant Health Agency (APHA);
- Health and Safety Executive (HSE).

The consultation responses received were wide ranging and a number of the issues raised were outside the Environment Agency's remit in reaching its permitting decisions. Specifically, questions were raised which fall within the jurisdiction of the planning system, both on the development of planning policy and the granting of planning permission.

Guidance on the interaction between planning and pollution control is given in the National Planning Policy Framework. It says that the planning and pollution

control systems are separate but complementary. We are only able to consider those issues which fall within the scope of the EPR.

10.2 Consultation Responses from Statutory and Non-Statutory Bodies

Response received from UKHSA

Brief summary of issues raised:

UKHSA raised the potential issue of emissions to air principally those of bioaerosols, dust and ammonia and proximity of operations to nearby sensitive receptors.

Summary of actions taken:

We have considered the proximity of operations as part of our determination, most notably the biodrying activity (AR2), which is the only activity within the scope of this variation that has point source emissions to air. The activity will be undertaken within the existing IVC tunnels and, therefore, the location of the activity and the distance to nearby receptors remain unchanged as a result of the variation.

The biodrying activity is a biological treatment process that shares characteristics with mechanical biological treatment (MBT). Accordingly, we have included the appropriate Best Available Techniques Associated Emission Levels (BAT-AELs) for emissions to air from the air treatment (abatement) plant.

Bioaerosol monitoring remains a requirement of the permit and is unchanged by this variation. Relevant emission limits and monitoring requirements are specified in Tables S3.1A and Table S3.4 of the permit.

We have included a pre-operational condition (PO1 in Table S1.4 of the permit) requiring the Operator to demonstrate, prior to commencement of the activity, that process contributions from emissions to air are insignificant in accordance with the Air emissions risk assessment for your environmental permit guidance.

Response received from Local Authority - Environmental Health/Environmental Protection department

Brief summary of issues raised:

Local Authority Environmental Health raised odour as a potential issue associated with the proposed biodrying activity, including waste reception and post-treatment handling of the biodried output.

Summary of actions taken:

We have included permit conditions requiring all pre and post-treatment activities associated with activity AR2 (via Directly Associated Activity AR6c) to be carried out within the building under negative pressure, with extracted air directed to the abatement system. The abatement plant is subject to emission limits that reflect the BAT-associated emission levels (BAT-AELs) for the sector, including an odour concentration limit. These limits apply to activity AR2 once the pre-operational condition (PO1) has been completed and the activity has commenced. Further details are provided in Table S3.1A of the permit.

Response received from Cambridgeshire Fire and Rescue Service

Brief summary of issues raised:

No issues were raised in regard to the storage of RDF.

Summary of actions taken:

No further actions are required, conditions for fire are included in the permit and we have incorporated an updated version of the Fire Prevention Plan (FPP) in the Operating Techniques Table S1.2 of the permit.

10.3 Representations from local MPs, assembly members, councillors and parish/town community councils

Response received from Member of Parliament (MP)

Brief summary of issues raised: The following issues were raised by the MP;

1. **Odour control, BAT and monitoring:**

Issues were raised regarding the adequacy of the proposed odour control measures, supporting BAT assessment and monitoring arrangements for the biodrying, RDF storage and residue washing activities, including the assessment and management of emissions such as ammonia, VOCs and bioaerosols.

2. **Sensitive receptors and local population:**

Issues were raised in relation to the proximity of residential, agricultural and wildlife sanctuary to the operations with regards to the following risks:

- Increase in nuisance odour risk in addition to existing operations;
- Health impact potential from biodrying in the form of bioaerosols;
- Potential risks to water due to increased leachate from expanded storage areas.

3. **Process control suitability:**

Issues were raised regarding the suitability of existing process monitoring of the In-vessel composting (IVC) with Supervisory Control and Data Acquisition (SCADA) monitoring systems when undertaking the bio-drying activity and ability to meet the necessary Best Available Techniques (BAT) Associated Emission Levels (BAT-AELs).

4. **Impact on land use and pollution prevention controls:**

Issues were raised regarding the adequacy of the proposed pollution control measures for RDF storage, wastewater rag/screenings treatment and residue wash plant activities, including leachate management, dust emissions and noise from increased vehicle movements and mechanical operations.

5. **Application completeness and clarity:**

Issues were raised regarding whether the application documentation and supporting information adequately address the proposed RDF storage and biodrying activities. Specific issues related to the Fire Prevention Plan and monitoring arrangements, the justification and restriction of certain waste inputs (including EWC 99 waste codes), and whether the odour assessment appropriately considers the different characteristics of green waste, sewage sludge and RDF materials.

Summary of actions taken:

In response to point 1: Odour control, BAT and monitoring

RDF bale storage (AR13):

While BAT does not apply to waste operations, the non-hazardous and inert waste: appropriate measures for permitted facilities guidance do have specific points to be addressed for RDF storage.

The RDF bale storage area is for the storage of wrapped RDF only. We have included limits of specified activity for transfer station RDF storage activity AR13 in Table S1.1. These limits require the Operator to store only RDF bales that are wrapped in high-density polyethylene (HDPE) membrane, or equivalent material, and are free from damage in accordance with appropriate measures. The wrapping of the RDF bales is to prevent water entering, access by pests and odour release.

On this basis, we are satisfied that the potential for dust and odour from this activity is low. Standard permit conditions for dust (condition 3.2.1) and odour (condition 3.3.1), together with the emissions management plans listed in Table S1.2 of the permit, require the Operator to prevent dust and odour emissions or, where that is not practicable, to minimise them. The wrapped RDF bales are not expected to be a source of bioaerosols. However, the site is subject to ambient bioaerosol monitoring, this requirement is present in the permit under conditions 3.6 - 3.6.2 and Table S3.4.

Washing residue activity (AR14):

We have considered the release of odour and dust as part of determination, the washing of the waste types specified for treatment in the wash plant are not expected to be odorous. We are satisfied that the activity should not contribute to odour.

In regard to dust and bioaerosols, the treatment plant is an enclosed system, with the storage of materials in bays pre and post treatment. We are satisfied that the control measures including freeboard for storage bays will not increase the dust risk of the facility. As mentioned previously, bioaerosol monitoring in place at the facility. The waste types undergoing treatment are not expected to increase bioaerosol risk at the facility.

Biodrying activity (AR2):

We have considered the emissions from the biodrying activity. Biodrying of sludges and other biowaste materials can generate emissions to air (via abatement plant) during the treatment process. These emissions include; odour, volatile organic compounds (VOCs), ammonia (NH_3) and dust at different phases of treatment.

The Waste Treatment BREF and BAT conclusions describe biodrying as a method of mechanical biological treatment (MBT) that can be used to produce a fuel-like output.

We have set BAT-associated emission levels (BAT-AELs) that are appropriate for biological treatment and MBT. As discussed in sections 4 and 4.2 (Key Issues), the abatement plant must meet the relevant BAT-AELs for biological treatment and MBT at the point of release from the installation. The limits have been included for activity AR2 in Table S3.1A.

Activity AR2 cannot commence until pre-operational condition PO1 requirements (see section 8.1) have been met. PO1 requires the Operator to demonstrate that the relevant BAT-associated emission levels can be achieved before the activity starts.

The pre-operational condition and permit conditions also include the following measures:

- The Odour Management Plan (OMP) to be updated before AR2 commences, so that the plan reflects the introduction of the new abatement plant. The updated OMP will be reviewed as part of the PO1 approval process;

- Quarterly monitoring of bioaerosols for year 1 following commencement of activity AR2 (see Table S3.4 of the permit) and an updated Site Specific Bioaerosol Risk Assessment (SSBRA) must be provided as part of PO1.

The Operator provided a BAT assessment and other supporting documents as part of the application, the assessment and supporting documents explain the techniques used for this activity. We are satisfied that the techniques proposed are BAT on successful completion of pre-operational condition (PO1).

We are satisfied that the limits and conditions in the permit are appropriate to control emissions in accordance with BAT for biological treatment and MBT.

In response to point 2: Sensitive receptors and local population impact

See responses to point 1 (above) addressing odour and bioaerosols. We have covered sensitive receptors within section 10.4 Representations from individual members of the public (below).

We have addressed the potential risks to water due to increased leachate from expanded process areas as part of the determination in the following ways:

- **RDF Bale storage (AR13)** – The RDF bales must be fully wrapped in HDPE or equivalent materials and free from damage for the duration of storage which is a maximum of 3 months (per bale). The storage area is a

designated area, and storage will take place on an impermeable surface. Surface water runoff from the area is to be captured as part of the sealed drainage system of the transfer station. The wrapped bales are not expected to produce leachate. We have included limits of specified activity for RDF storage, the limits can be found in Table S1.1 (activity AR13).

- **Washing residues activity (AR14)** – The washing plant is an enclosed system, operations must take place on an impermeable surface within a sealed drainage system. Process water is collected for reuse in the process and is stored in leachate storage tanks. There is no release to water permitted from the washing process. We have included limits of specified activity for this activity in Table S1.1 (activity AR14). We are satisfied that these limits are appropriate for the activity.

- **Biodrying activity (AR2)** – The biodrying activity is undertaken using the in-vessel composting (IVC) tunnels. The tunnels are sealed during treatment, effluent produced during the treatment process is captured, recirculated within the process for moisture correction or removed for recovery or disposal at a suitably permitted facility. As the process does not emit to land or water, we are satisfied that the biodrying activity does not increase the risk to receptors with regard to leachate generation or discharge.

In response to point 3: Process control suitability

Process control systems are not specifically prescribed in BAT. However, the Operator must ensure *effective process control* procedures as part of their Environmental Management System (EMS). Permit conditions requiring a written EMS can be found in the permit under condition 1.1.

The Operator must manage and operate their activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints. Permit conditions requiring a written EMS can be found in the permit under condition 1.1.

In addition to the above, we have included sector specific process monitoring requirements for the abatement plant serving activity AR2. The process monitoring requirements in Table S3.3 of the permit require key parameters to be monitored using the frequencies and monitoring standards specified in that table.

We are satisfied that these process monitoring requirements of the permit are appropriate for the facility.

In response to point 4: Impact on land use and pollution prevention controls

Leachate / effluent management:

The new RDF storage operations (AR13) and washing residue activities (AR14) must take place on impermeable surfaces within a sealed drainage system.

RDF storage activities form part of the transfer station waste operation; the drainage infrastructure captures and directs water in the storage area to the lagoon where water is reused. Runoff from the storage areas is prevented from reaching the sites surface water drainage infrastructure and leaving the site. We have included limits of specified activity for RDF storage (AR13) in Table S1.1.

The washing residue activity is undertaken in a designated containment system, the effluent produced in the process is captured in an enclosed system and stored within dedicated leachate tanks. The effluent is removed off site for disposal. We have included the requirements for these measures in the permit in Table S1.1 (AR14).

Noise:

We have considered the impacts of noise as part of the determination of the new and varied activities applied for in this variation, see section 4.6 (Key Issues) above and response to public comments in section 10.4 below: *“Comments were received regarding potential health impacts, including emissions and noise, on local residents and other sensitive receptors, such as schools, due to the proximity of the proposed new activities.”*

Odour and dust:

We have considered the impacts of odour and dust as part of determination. We have included BAT-AELs (limits) for biodrying activities (AR2) for odour and dust, these limits are the appropriate emission limits for biological and mechanical biological treatment (MBT). We have discussed the potential impacts of odour and dust in sections 7.4 and 7.5 respectively (above) and in response to public comments below in section 10.4, p.53*: “A significant number of comments were received regarding the risk of odour and dust arising from the new activities in conjunction with existing operations.”*

In response to point 5: Application completeness and clarity

Issues were raised regarding whether the application documentation and supporting information adequately address the proposed RDF storage and biodrying activities. Specific issues related to the Fire Prevention Plan and monitoring arrangements, the justification and restriction of certain waste inputs (including EWC 99 waste codes), and whether the odour assessment

appropriately considers the different characteristics of green waste, sewage sludge and RDF materials.

Fire Prevention Plan (FPP) and Accident Management Plan (AMP):

During determination, the Operator submitted an updated FPP, the plan was updated to include the RDF storage aspects applied for in this variation. We have reviewed the updated plan, (see section 5.5.2 above) and approved the plan. The plan will be reviewed annually.

We are satisfied that appropriate measures will be in place to prevent fires and to minimise the impact from a fire if it was to occur.

The Operator also submitted an updated Accident Management Plan (see section 5.5.1). We are satisfied that appropriate measures will be in place to ensure that accidents that may cause pollution are prevented but that, if they should occur, their consequences are minimised.

Monitoring:

The applicant submitted a Sampling and Monitoring Plan which we reviewed during determination. We have included appropriate monitoring for the new biodrying activity (see section 8.5 above). As mentioned previously we have included, additional; process monitoring and ambient air bioaerosol monitoring in the permit. We are satisfied that these monitoring requirements and associated emission levels are appropriate for the biodrying activity.

European Waste Catalogue (EWC) codes:

We have reviewed the waste codes proposed by the Operator for the activities applied for in this variation. We have not included any “XX XX 99” codes as this would not be appropriate for the facility or the activities applied for. The wastes included are:

- The waste types for the new biodrying activity (AR2) are presented in Table S2.7;
- Washing residues activity (AR14) Table S2.8 and;
- RDF storage (AR13) in Table S2.5.

We are satisfied that the codes proposed are suitable the treatment and storage activities they are associated with.

10.4 Representations from individual members of the public

A total of 230 responses were received from individual members of the public. Many of the issues raised were the same as those considered above. Only those issues additional to those already considered are listed below:

Brief summary of issues raised (see table below):

Brief summary of issues raised	Summary of action taken / how this has been covered:
Emissions to air	
Many comments raised concerns about whether the application involved combustion or incineration, and about the potential emissions and impacts associated with those activities.	The application includes the addition of a biodrying activity, identified as AR2 in Table S1.1 of the permit. Biodrying is a biological treatment process and does not involve combustion or incineration. The difference between biodrying and incineration is explained further in Section 4.3 (Key Issues). As the proposed activity does not include incineration or combustion, no further assessment of those matters is required. However, the relevant air quality impacts associated with the biodrying activity have been considered as part of this decision.
Comments were made in relation to the potential risk of bioaerosol emissions from the new activities namely the biodrying activity and the potential to increase the risk of these emissions from the facility.	We have considered the potential for bioaerosol emissions from the proposed activities. The existing permit and this draft permit require the Operator to take all appropriate measures to prevent, or where that is not practicable minimise, bioaerosol emissions and to comply with specified action levels.

Brief summary of issues raised	Summary of action taken / how this has been covered:
	Monitoring requirements and action levels for total bacteria and Aspergillus fumigatus are set out in Table S3.4 of the permit. These requirements are standard for biological waste treatment facilities where bioaerosol emissions may occur. Due to the addition of the new biodrying activity (AR2), monitoring frequency has been increased to quarterly during the first year of operation to provide additional assurance that the action levels are being achieved. In addition, pre-operational condition (PO1) requires the Operator to review and update the Site-Specific Bioaerosol Risk Assessment (SSBRA) before commencing activity AR2. We consider this to be an appropriate safeguard to ensure that bioaerosol risks associated with the new activity are adequately addressed and controlled.
A significant number of comments were received regarding the risk of odour and dust arising from the new activities in conjunction with existing operations.	We have reviewed the risk of odour from the new activities. **RDF bale storage (AR13):** The RDF bale storage area is for the storage of wrapped RDF only. We have included limits of specified activity for the transfer station RDF storage activity AR13 in Table S1.1. These limits require the Operator to store only RDF bales that are wrapped in high-density polyethylene (HDPE) membrane, or equivalent material, and are free from damage in accordance with appropriate measures. On this basis, we are satisfied that the potential for dust and odour from this activity is low. Standard permit conditions for dust (condition 3.2.1) and odour (condition 3.3.1), together with the emissions management plans listed in Table S1.2 of the permit, require the Operator to prevent dust and odour emissions or, where that is not practicable, to minimise them. **Washing residue activity (AR14):**

Brief summary of issues raised	Summary of action taken / how this has been covered:
	We have considered the release of odour and dust as part of determination, the washing of the waste types specified for treatment in the wash plant is not expected to be odorous. We are satisfied that the activity should not contribute to odour. In regard to dust, the treatment plant is an enclosed system, with the storage of materials in bays pre and post treatment. We are satisfied that the control measures including freeboard for storage bays will not increase the dust risk of the facility. **Biodrying activity (AR2):** We have considered the potential for odour and dust emissions from the biodrying activity. Biodrying of sludges and other biowaste materials can generate odour and dust at different stages of the treatment process. The Waste Treatment BREF and BAT conclusions describe biodrying as a form of Mechanical biological treatment (MBT) that produces a fuel-like output. We have therefore set emission limits that are appropriate for biological treatment and MBT. As explained in sections 4 and 4.2 (Key Issues), the abatement plant must meet the relevant BAT-associated emission levels for biological treatment and MBT of waste at the point of release from the installation. During determination, the Operator confirmed that the abatement plant would be upgraded to meet the required emission limits, including numerical limits for odour concentration and dust. These limits have been included for activity AR2 in Table S3.1A of the permit. AR2 cannot commence until pre-operational condition PO1, set out in section 8.1, has been satisfied. This condition requires the Operator to demonstrate that the relevant BAT-associated emission levels will be achieved before the activity starts. We have also required the Odour Management Plan (OMP) to be updated before AR2 commences, so that it reflects the upgraded

Brief summary of issues raised	Summary of action taken / how this has been covered:
	abatement plant. The updated OMP will be reviewed as part of the PO1 approval process. On this basis, we are satisfied that the limits and conditions in the permit are appropriate to control odour and dust from AR2 in accordance with BAT for biological treatment and MBT.
Comments relating to the release of Volatile Organic Compounds (VOCs).	We received a number of comments relating to the potential release of volatile organic compounds (VOCs) from the proposed activities. Activity AR2 (biodrying) is the only activity within the scope of this variation that may generate VOC emissions as part of the treatment process. We assessed the activity against the Waste Treatment BAT Conclusions. As the biodrying activity involves biological treatment within a mechanical biological treatment (MBT) process, emissions are required to be controlled through BAT-associated emission levels (BAT-AELs). A BAT-AEL for total VOCs has been included in Table S3.1A of the permit and applies specifically to biodrying activities undertaken within IVC tunnels G3-G6. As the activity is subject to Pre-operational Condition PO1, biodrying cannot commence until the upgraded abatement plant has been installed and commissioned. A key requirement of PO1 is that the operator demonstrates that the VOC BAT-AEL can be achieved and that emissions from the new abatement system screen out as insignificant (see Section 5.6.4). We are satisfied that the requirements of PO1, together with the VOC emission limits included in the permit, will ensure that emissions are adequately controlled in accordance with BAT.
Comments were received regarding potential health impacts, including	We received a significant number of comments about potential impacts from incineration because of the facility’s proximity to sensitive receptors. However,

Brief summary of issues raised	Summary of action taken / how this has been covered:
emissions and noise, on local residents and other sensitive receptors, such as schools, due to the proximity of the proposed new activities.	incineration and combustion activities are not included in this application and are outside its scope. Please see section 4.3 above for further information regarding incineration and biodrying. We also received comments about the proximity of sensitive receptors to the facility and potential impacts, including noise, from the proposed new operations: RDF bale storage, biodrying and the washing plant. The proximity of sensitive receptors has been considered during determination in the following ways: **RDF storage (AR13);** RDF activity AR13 is limited to storage only. No treatment will take place under this activity and, as such, it is not expected to give rise to significant emissions. Table S1.1 of the permit includes limits of specified activity requiring RDF bales to be fully wrapped in suitable HDPE, or equivalent material, and to remain undamaged during storage. Each bale may be stored for a maximum of three months from acceptance, and the facility must operate on a first-in, first-out basis. As loose material is not permitted within the designated RDF storage area, we are satisfied that these controls adequately manage the potential for dust and odour emissions. We also assessed the potential for noise from the RDF storage activity. Although the proposed RDF storage area is located closer to some sensitive receptors than other operational areas of the site, it remains within the existing permitted boundary and is limited to storage only, with no treatment activities taking place. Taking account of the nature and scale of the activity, we do not expect the RDF storage operation to give rise to significant noise impacts at sensitive receptors. There is

Brief summary of issues raised	Summary of action taken / how this has been covered:
	currently no requirement for a Noise Management Plan (NMP) at the facility, and this remains unchanged following this variation. The permit also includes conditions requiring activities to be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency. Conditions 3.4.1 and 3.4.2 allow the Environment Agency to require a noise and/or vibration management plan where this is considered necessary. If directed to do so, the operator must prepare and implement such a plan. **Washing residue activity (AR14);** We have considered the potential emissions and proximity of sensitive receptors in relation to the washing activity as part of the determination. The wash plant does not include any point source emissions to air, water or land. The activity will comprise the washing of grits from anaerobic digestion processes, stones from compost screening operations and road sweeping wastes. The wash plant is located within a more central area of the site and is further from sensitive receptors than the proposed RDF storage activity. Taking account of the location of the plant, the nature of the activity and the absence of point source emissions, we are satisfied that the operation is unlikely to result in significant impacts on sensitive receptors. We have also considered the potential for noise impacts. Given the location of the activity, its distance from nearby receptors and the information provided within the application, we do not consider that a Noise Impact Assessment or Noise Management Plan is required for this activity. However, the permit includes conditions requiring activities to be free from noise and vibration at levels likely to

Brief summary of issues raised	Summary of action taken / how this has been covered:
	cause pollution outside the site, as perceived by an authorised officer of the Environment Agency. Conditions 3.4, 3.4.1 and 3.4.2 allow the Environment Agency to require a noise and/or vibration management plan where this is considered necessary. If directed to do so, the operator must prepare and implement such a plan. **Biodrying (AR2);** The proximity of the biodrying activity has been considered as part of the determination. Unlike the RDF storage and washing residue activities, biodrying includes a point source emission to air. However, the treatment process will take place within the existing G3-G6 in-vessel composting (IVC) tunnels, which are already used for enclosed composting and stabilisation under activities AR1 and AR3. As the biodrying process will be undertaken within the existing treatment area, the distance between the activity and sensitive receptors has not changed as a result of this variation. The variation introduces a new emission point, A5, which will discharge treated process air from a new abatement system. The new abatement plant must achieve the BAT-associated emission levels discussed in Sections 4.2, 5.6.4 and 8.4 of this document and which are incorporated into Table S3.1A of the permit. The emissions from the new abatement system must also be demonstrated to be insignificant before the biodrying activity can commence, as required by pre-operational condition PO1 (Section 8.1). We are satisfied that, provided the Operator demonstrates compliance with the requirements of PO1 and subsequently achieves the BAT-AELs specified in Table S3.1A, the controls in the permit are appropriate for the activity and will provide protection for sensitive receptors. The relevant emission limits are:

Brief summary of issues raised	Summary of action taken / how this has been covered:
	• Ammonia: 20 mg/m³; • Odour concentration: 1,000 ouE/m³; • Hydrogen sulphide: No limit set; • Dust: 5 mg/m³; • Total VOCs: 40 mg/m³. Given that the biodrying process will take place within the existing treatment area, with no change in the distance to sensitive receptors, and that the activity cannot commence until compliance with PO1 has been demonstrated, we are satisfied that the activity can operate without causing significant impacts on sensitive receptors.
Comments regarding food safety	
Comments were received in relation to food safety and proximity to food producing crops and farms.	We received comments regarding the potential impact of the proposed activities on nearby food-producing areas. Many of these comments related to incineration and associated pollutants; however, incineration is not included within the scope of this application. Of the activities proposed, only the biodrying activity (AR2) generates point source emissions to air as part of the treatment process. Air extracted from the biodrying process is required to be treated before discharge and is subject to the requirements of the Waste Treatment BAT Conclusions. Appropriate emission limits have been incorporated into Table S3.1A of the permit, and bioaerosol monitoring requirements are included in Table S3.4. Biodrying is also subject to Pre-operational Condition PO1 and cannot commence until the upgraded abatement system has been installed and commissioned. As part of PO1, the operator must demonstrate that emissions can be achieved in

Brief summary of issues raised	Summary of action taken / how this has been covered:
	accordance with BAT and that they are insignificant in line with our guidance (see Section 5.6.4). We are satisfied that the emission limits and monitoring requirements included in the permit, together with the requirements of PO1, will ensure that emissions are appropriately controlled.
Control measures and Best Available Techniques (BAT)	
Comments raised regarding the technical standards used by the Operator for the biodrying activity.	We have reviewed the activities against the appropriate technical standards. The Waste Treatment BREF/BAT conclusions have been used as the basis for the assessment for activity AR2 (biodrying), this is discussed above in section 5.6.2 above. We are satisfied that the controls and emission levels included in the permit are BAT for the activity subject to successful completion of the pre-operational condition PO1.
Consultation on the application	
Comments were received stating that the consultation was not carried out appropriately.	We are satisfied that we took appropriate steps to inform people about the Application and how they could comment on it. How we did this is described in section 2 of this draft decision document.
Comments about impacts at ecological sites	
Concern over the impact at habitat sites and other ecological sites.	Our assessment at ecological sites is described in section 6 of this decision document. We are satisfied that there will not be a significant impact on any of the sites as a result of this variation.

Brief summary of issues raised	Summary of action taken / how this has been covered:
Comments about accident prevention	
Comments were received regarding the risk of fire and accidents from the activities.	The Operator submitted an updated Fire Prevention Plan (see section 5.5.2). We have approved this plan and incorporated this within operating techniques table S1.2 meaning that the site must follow such requirements. We are satisfied that appropriate measures will be in place to prevent fires and to minimise the impact from a fire if it was to occur. The Operator also submitted an updated Accident Management Plan (see section 5.5.1). We are satisfied that appropriate measures will be in place to ensure that accidents that may cause pollution are prevented but that, if they should occur, their consequences are minimised.
During the preparation of this section (10.4), the artificial intelligence tool Microsoft 365 Copilot for Excel was used to assist in sorting, grouping and filtering the 230 responses into categories. The 230 responses we received have been reviewed individually and are unchanged by this process. Content has been checked and approved by the by the author.	

10.5 Representations on issues that do not fall within the scope of this Permit determination

Brief summary of issues raised:	Summary of action taken / how this has been covered
View expressed that this is not the right location for the regulated facility.	Decisions over land use are matters for the planning system. The location of the regulated facility is a relevant consideration for Environmental Permitting, but only in so far as its potential to have an adverse environmental impact on communities or sensitive environmental receptors. The environmental impact is assessed as part of the determination process and has been reported upon in the main body of this document. The location of the regulated facility can have an impact on the ability to recover waste heat for use in nearby residential, commercial or industrial premises and we commented on this in our consultation response to the local planning authority.
Comments about vehicle access to the site and traffic movements on local roads.	These are relevant considerations for the grant of planning permission, but do not form part of the Environmental Permit decision making process except where there are established high background concentrations contributing to poor air quality and the increased level of traffic might be significant in these limited circumstances.

11 · Advertising and Consultation on the Draft Decision

This section reports on the outcome of the public consultation on our draft decision carried out between 24/08/2026 to 06/10/2026.

In some cases, the issues raised in the consultation were the same as those raised previously and already reported in section A of this Annex and so have not been repeated in this section.

Also, some of the consultation responses received were on matters which are outside the scope of the Environment Agency’s powers under the EPR. Our position on these matters is as described previously.

11.1 Consultation Responses from Statutory and Non-Statutory Bodies

Local Authority - Environmental Health/Environmental Protection department:

- No further issues were raised, and no further actions are required.

11.2 Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils

Representations were received from Woodhurst Parish Council who raised the following issues:

Brief summary of issues raised:	**Summary of action taken / how this has been covered**
Many of the points raised have been raised previously and are covered already in this document. The following issues are where additional clarification and specific points are answered. Issues were raised concerning the following: • Biodrying of sewage sludge under activity AR2, including permitted waste types, annual throughput, negative-pressure and storage.	**Biodrying of Sewage Sludge – activity AR2 waste types, annual throughputs negative pressure requirements and storage:** Clarification was requested regarding the permitted types and specific waste codes of sewage sludge that may be accepted. This information is provided in Table S2.7 of the permit and waste types have been discussed in Section 5.6.6 of this document and in response to comments received in Section 11.4 – “Comments were raised regarding throughput and capacities for the new biodrying activity, suitability of waste types for treatment and storage”. The maximum storage at any given time for all activities remains as currently permitted (see directly associated activity AR5 in Table S1.1 of the permit). We have required in the Permit (activity AR6c) that from the receipt of waste to despatch for biodrying under activity AR2 operations must take place in an

Brief summary of issues raised:	Summary of action taken / how this has been covered
• Odour, recent site performance and air-emissions monitoring. • RDF storage under activity AR13. • Washing residues and grit under activity AR14. • On-site pollution controls. • Installation capacity and cumulative environmental impacts. • Fire history and environmental risk. • The missing application file and relevant planning permissions. • Monitoring, compliance and public scrutiny of pre-operational conditions.	enclosed building under negative pressure fitted with appropriate odour/air abatement on an impermeable surface with a sealed drainage system. **Odour, recent site performance and air emissions monitoring:** We have covered odour and site performance aspects in Section 7.4 (Odour Management) and comments under Section 11.4 – *"Existing odour, site performance and incidents" of this document.* We have covered monitoring requirements in this document (see section 8.5/6) and Section 11.4 below: "Best Available Techniques (BAT), emissions levels (limits) including hydrogen sulphide and monitoring". **RDF Storage (activity AR13):** The response raised points relating to enforcement of conditions in the Permit relating to RDF storage. We have limited storage operations for RDF in Table S1.1 limits of specified activity and waste types under (AR13) of the Permit. We are satisfied that the conditions appropriately limit the RDF storage operations. The limits of specified activity in Table S1.1 of the Permit are controlled by conditions "2.1 Permitted activities". **Washing Residues and Grit (activity AR14):** The response raised points relating to contamination risks, including heavy metals, hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), and microplastics. We have added limits of specified activity to activity (AR14) in Table S1.1. The activity

Brief summary of issues raised:	Summary of action taken / how this has been covered
	must take place on an impermeable surface within a sealed drainage system, effluent from the process, where generated, is stored in effluent tanks. Containment must meet the standards set out in the Non-hazardous and inert waste: appropriate measures for permitted facilities - 6. Emissions control - Guidance - GOV.UK and CIRIA 736. The appropriate measures state “You must provide bunds for all tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled. Bunds must meet CIRIA 736 or an equivalent approved standard”. Emissions from the wash plant to surface waters are not permitted. We are satisfied that the Permit conditions are appropriate to control emissions from this activity. **On-site controls in relation to: Airborne emissions of dust, odour migration, contaminated surface runoff, leachate, and wash water; and contaminated firefighting water:** We have considered emissions of dust for the activities applied for in this variation in Section 7.5 of this document and Section 11.4 - Considerations of dust during determination. We have discussed odour in Section 7.4 (above) and below following minded to consultation in Section 11.4 “Existing odour, site performance and incidents” **Contaminated surface runoff, leachate, and wash water** We have considered contaminated surface water, leachate and wash water as part of determination. The new biodrying activity (AR2). The wastewater from this

Brief summary of issues raised:	Summary of action taken / how this has been covered
	process is collected separately where it is used for process moisture correction or removed off-site for recovery at a licenced facility. We have added limits of specified activity requiring the treatment process be undertaken in enclosed vessels on an impermeable surface within a sealed drainage system. There are no discharges of process wastewater from the process, and the output material shall not be spread to land. Activity AR13: The transfer station operations and RDF storage area shall be on an impermeable surface within a sealed drainage system with kerbed edges to capture any potential leachate and contain runoff and prevent it from entering the sites surface water drainage infrastructure. Water collected from the RDF bale storage area will be retained within the contained site drainage system and transferred to contained storage for reuse or disposal as appropriate For activity AR14, wash plant, we have included the limits of specified activity as mentioned above in this response under heading “Washing Residues and Grit (activity AR14)”. There are no emissions of process wash water to surface water or land authorised by this variation. **Firefighting water:** In the event of a fire, any firewater would be directed to the central storage lagoons and held on the site for onward disposal using a suitably licensed company. The site has an approved Fire Prevention Plan (FPP) which details the steps that are to be taken during an incident and management of firewater on-site. The plan includes the capacities of the lagoons that will be used in the event of a fire and

Brief summary of issues raised:	Summary of action taken / how this has been covered
	water required for a reasonable worst-case scenario of the largest waste pile catching fire. We are satisfied that appropriate measures will be in place to prevent fires and to minimise the impact from a fire if one was to occur. **Installation treatment capacity:** The Installation is permitted to treat up to 235,000 tonnes of waste per annum following this variation. The maximum amount of waste permitted across all activities on site at any one time is 60,000 tonnes and is unchanged as a result of this variation. **Cumulative impacts: How cumulative odour, dust, air-emission, fire, and water-pollution risks have been calculated across the whole installation.** We have added the appropriate emissions controls and monitoring to the Permit for the activities that require them. In this variation BAT-associated emission levels (BAT-AELs) have been added for activity AR2. These are the only activities that require specific emission limits for point source release of odour and dust. All other management aspects are controlled by the management plans and conditions set out in the permit. We are satisfied that the limits, Permit conditions and management plans are appropriate to control emissions from the Installation as a whole. We have reviewed the measures proposed by the activities requiring a fire prevention plan (FPP). The FPP has been updated to reflect the activities taking

Brief summary of issues raised:	Summary of action taken / how this has been covered
	place on site. We have approved this plan and incorporated this within operating techniques table S1.2 meaning that the site has to follow such requirements. We are satisfied that appropriate measures will be in place to prevent fires and to minimise the impact from a fire if one was to occur. **Application file absent from the original permit consultation:** We have responded to this aspect in Section 11.4 below under heading: "Application file absent from the original permit consultation "EnVar Noise v1.1 311024" and clarification requested on what assessment has been carried out in relation to noise". **Planning permissions:** We have responded to comments on issues below in Section 11.4. For clarity on the specific point raised in relation to planning permissions. The Operator may require other regulators or public bodies permissions for an activity or for any associated or additional activities in addition to the Environmental Permit. However, this process does not prevent the permit variation from being issues. **Monitoring, compliance, and public scrutiny of pre-operational conditions:** We have responded to this aspect in Section 11.4 below under the heading: "*We received comments regarding the use of the pre-operational condition and validation of the abatement plant emissions under pre-operational condition (PO1) and the use of an improvement condition (IC10)"*

Brief summary of issues raised:	Summary of action taken / how this has been covered
	Publication of bioaerosols assessment monitoring, and emissions monitoring evidence provided through the pre-operational condition (PO1): The operator must monitor emissions of bioaerosols and report the results to us in accordance with M9 environmental monitoring of bioaerosols at regulated facilities - GOV.UK, for pre-operational conditions PO1 and bioaerosol monitoring requirements in Table S3.4 of the permit. We will regularly inspect the Installation, review monitoring techniques and assess monitoring results to measure the performance of the plant, review operating techniques and review management systems and plans. We will carry out on-site audits of operator monitoring. The operator must inform us immediately of any breach of the emissions limits, followed by a fuller report of the size of the release, its impact and how they propose to avoid this happening in the future. The operator's submitted emissions monitoring results will be placed on the public registers. If there is a breach then we will take appropriate enforcement action and/or prosecute. If we receive any complaints we will assess the complaint and investigate it as appropriate. **Unambiguous OMP commitments (avoiding non-binding terms such as "may"):** We agree that the wording in the OMP needs to be clearer on this aspect regarding notification. The guidance: Odour management: comply with your environmental permit - 6. Writing an odour management plan - Guidance - GOV.UK is clear that ambiguity needs to be avoided. Operators must avoid tentative statements such as 'may' or 'will consider' or 'if practicable'. These do not represent commitments.

Brief summary of issues raised:	Summary of action taken / how this has been covered
	As part of PO1 we have required an updated OMP be submitted (for our approval), we will require that these statements be amended to remove ambiguity. As stated in Section 7.4 of this document: 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.

Representations were received from Bluntisham Parish Council who raised the following issues:

Brief summary of issues raised:	Summary of action taken / how this has been covered
Many of the points raised have been raised previously and are covered already in this document. The following issues are where additional clarification and specific points are answered. • Emissions screening and verification under PO1. • Proposed emission limits and management of hydrogen sulphide (H_2S).	**Emissions screening and verification under pre-operational condition (PO1):** We were asked who will undertake or verify the screening assessment for pre-operational condition (PO1) and what would happen if emissions are not insignificant. The applicant must carry out the screening assessment in accordance with Air emissions risk assessment for your environmental permit - GOV.UK. If emissions were not to be insignificant in accordance with the guidance then further assessment would be required. The scope of the pre-operational condition requires that emissions be insignificant, meaning no further action is required. Environment Agency staff will verify the assessment in accordance with the guidance. We are satisfied that the Environment Agency has the skills and experience to assess this information.

Brief summary of issues raised:	Summary of action taken / how this has been covered
• Design, commissioning and verification of the proposed abatement system. • Ongoing monitoring and reporting. • Management of abnormal operations and abatement performance. • Lithium-ion battery risks. • Consideration of the latest incident information in the final determination. • Clear, evidence-based and demonstrable environmental controls for the proposed activity.	On successful completion of PO1, emissions monitoring will be undertaken in accordance with the requirements of the permit (see section 8.4, 8.5 and 8.6 of this document). **Clarification requested on the absence of a hydrogen sulphide (H_2S) emission limit:** We have covered this aspect in Section 11.4 below under heading: "Best Available Techniques (BAT), emissions levels (limits) including hydrogen sulphide and monitoring". **The design, commissioning and verification of the proposed abatement system ongoing monitoring and reporting:** We have covered these aspects in Section 11.4 (below) under heading: "We received comments regarding the use of the pre-operational condition and validation of the abatement plant emissions under pre-operational condition (PO1) and the use of an improvement condition (IC10)". **Monitoring and requirements (activity AR2) - how emissions will be assessed:** We have covered monitoring and emission limits see (section 8.4, 8.5 and 8.6 of this document). Emissions are monitored in accordance with frequencies and the standards specified in the permit. Monitoring must be undertaken using the appropriate monitoring standards set in the permit and analysis undertaken by a United Kingdom Accreditation Service (UKAS) lab. A full list of the monitoring standards, including those set in the permit can be found here: Monitoring stack emissions: techniques and standards for periodic monitoring - GOV.UK. Emissions

Brief summary of issues raised:	Summary of action taken / how this has been covered
	results are reported and compared against the emission limits in the permit. Emission limits, monitoring frequencies/standards and reporting are present in Permit Table S3.1A for point source emissions to air. S3.3 for process monitoring requirements, S3.4 bioaerosols monitoring and S4.1 for reporting requirements. **Management of abnormal operation and abatement performance:** The abatement plant shall be managed in accordance with Permit condition 3.3, the odour management plan and manufacturer's recommendations. Action levels for relevant parameters will be agreed on completion of improvement condition IC10. The improvement condition requires the Operator to review the performance of the abatement plant under actual operating conditions. This review will assess whether the plant is operating effectively and has been appropriately optimised, establish operational action levels as referred to in Table S3.3, and identify any necessary process improvements. An efficacy assessment of the abatement plant must be undertaken by the Operator annually. **Lithium-ion battery risk:** The facility is not permitted to accept waste batteries. The Operator has identified the risk that batteries may be present in waste and have measures to deal with batteries if batteries are found in a waste stream. The measures include identifying, removing and quarantining such wastes and isolating them from other combustible materials, these measures are present in the Operators Fire Prevention Plan (FPP), and we are satisfied that appropriate measures are in place to mitigate this risk. We have included the FPP as part of the Operating Techniques in Table S1.2 of the Permit.

Brief summary of issues raised:	Summary of action taken / how this has been covered
	Compliance matters relating to Biomass boilers NOx emissions (outside the scope of this variation): The boilers form part of the permit in Table 1.1 and are part of the waste operation (AR12). These activities are outside of the scope of this variation. No limits or changes to the plant have been made as a result of this variation. The operator must inform us immediately of any breach of the emissions limits, followed by a fuller report of the size of the release, its impact and how they propose to avoid this happening in the future. A Compliance Assessment Report (CAR) form is used by Environment Agency (EA) officers when assessing compliance with Environmental Permits. The CAR form is used to record the findings of site inspections, audits and monitoring activities, reviews of monitoring and other data/reports. We use CAR forms to notify operators of all permit condition breaches, their Compliance Classification Scheme (CCS) score and what action we are considering. A CCS score is recorded where non-compliance has been identified. We may also use CAR forms to highlight any other observations made during a site inspection. This compliance process is carried out separately to the determination of the Permit. **Existing compliance and increased local odour reports:** We have covered odour and site performance aspects in Section 7.4 (Odour Management) and comments under Section 11.4 – *"Existing odour, site performance and incidents" of this document.*

Brief summary of issues raised:	Summary of action taken / how this has been covered
	Comment regarding the final permit conditions for the proposed activity: Our view is that the permit will ensure a high level of protection is provided for the environment and human health. We are satisfied that the permit conditions and limits will achieve this, and that the Operator has provided sufficient information to demonstrate their commitment to comply with the permit conditions. We will carry out inspection and audits on the Installation and the EMS to ensure that Permit conditions are complied with. Our use of the pre-operational condition (PO1) will ensure that the activity (AR2) starts only once its requirements have been successfully completed.

11.3 Representations from Community and Other Organisations

Two representations were received from People Opposing Woodhurst Incinerator (POWI), who raised the following issues:

Brief summary of issues raised:	Summary of action taken / how this has been covered
Issues were raised regarding existing odour and the ability of the site to adequately control odour following the addition of new activities and the requirement of an updated abatement system;	We have reviewed the proposed odour controls and techniques proposed by the Operator as part of the application. The abatement plant techniques proposed by the Operator are recognised odour treatment techniques in the Waste Treatment BREF/BAT conclusions for the biological treatment of waste. We have included an emission limit in the permit for odour and other appropriate BAT-associated emission levels for NH3 (ammonia), TVOC and dust. The limits are present in Table S3.1A of the permit. Monitoring is undertaken at the frequencies specified which is in accordance with BAT, and the biowaste sector. Process monitoring

Brief summary of issues raised:	Summary of action taken / how this has been covered
	requirements for the new abatement techniques are present in Table S3.3 of the permit. We are satisfied that these limits are appropriate for the activity subject to the successful completion of PO1.
Application file absent from the original permit consultation “EnVar Noise v1.1 311024” and clarification requested on what assessment has been carried out in relation to noise;	This is correct, the file was missing from the original application consultation pack on our citizen space page carried out between 14/05/2025 to 12/06/2025. However, the file is available on the Public Registers on request as it is part of the application. We have considered noise during determination, this is discussed in Section 4.6 of the decision document, a noise management plan is not required based on the changes introduced by this variation. Permit conditions 3.4.1 and 3.4.2 will ensure that noise is controlled and will allow us to take further action should it be required including but not limited to the requirement for the Operator to submit for approval and implement a noise management plan.
Request to carry out additional monitoring during the initial operation of the biodrying activity explain how community reports will inform its ongoing oversight and how the results of relevant monitoring and improvement-condition requirements will be made available to the public.	**Monitoring requirements:** We have included appropriate emission limits and monitoring requirements to the permit (See Table S3.1A) in accordance with the Waste Treatment BAT conclusions and biowaste sector. We are satisfied that these limits and frequencies are appropriate for activity AR2. We have required that bioaerosols monitoring for activity AR2 are increased to quarterly for the first year of operation, then twice yearly. The quarterly requirement is standard for new activities (see permit Table S3.4 Bioaerosols monitoring requirements – ambient monitoring). Condition 3.6.1 and 3.6.2 will ensure that bioaerosol emissions are controlled and will allow us to take further action should it be required. We have added the appropriate abatement system process monitoring requirements and frequencies to permit Table S3.3, we are satisfied that the

Brief summary of issues raised:	Summary of action taken / how this has been covered
	parameters in this table will ensure appropriate monitoring of the system is undertaken in the frequencies specified. The Operator must monitor emissions including bioaerosols and process monitoring and report the results to us (see permit Table S4.1 for reporting). We will regularly inspect the Installation, review monitoring techniques and assess monitoring results to measure the performance of the plant, review operating techniques, management systems and plans. The operator's monitoring results will be placed on the public registers. If there is a breach then we will take appropriate enforcement action and/or prosecute. **Community reports:** If we receive any complaints we will assess the complaint and investigate it as appropriate.
Clarification on planning considerations regarding the RDF storage operations.	We have provided a response to planning points raised in Section 11.4 below.
Considerations of dust during determination	We have considered emissions of dust for the activities applied for in this variation in Section 7.5 of this document. We have applied the appropriate emissions limit (BAT-AEL) for dust for the relevant activity (AR2) as specified in Table S3.1A of the Permit. Exclusions are in place in the Permit that prohibit accepting waste consisting solely or mainly of dusts (except sawdust), powders, or loose fibres. This exclusion extends to the new activities introduced in this variation. The applicant should keep emissions management plans under constant review and revise them annually or if necessary, sooner, if there have been complaints

Brief summary of issues raised:	Summary of action taken / how this has been covered
	arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit. We are satisfied that the emissions controls, monitoring frequencies and conditions in the Permit are appropriate.

11.4 Representations from Individual Members of the Public

A total of 63 responses were received from individual members of the public. These raised many of the same issues as previously addressed. Only those issues additional to those already considered are listed below:

Brief summary of issues raised:	Summary of action taken / how this has been covered
Existing odour, site performance and incidents	**We received a significant number of responses relating to odour and current compliance of the site:** We have discussed odour in the decision document Section 7.4 (Odour Management) and Section 10 (Consultation Responses). In addition to the above, we have reviewed site compliance regarding odour during determination of this permit variation. At the time of writing this decision document, there are no permit compliance breaches that have required remedial or corrective actions to be taken by the Operator, for a permit breach relating to odour. We have reviewed the operating techniques and procedures for receiving waste pending treatment in activity AR2 as part of determination. All vehicles transporting waste are enclosed or covered to minimise emissions during transport. The

Brief summary of issues raised:	Summary of action taken / how this has been covered
	Operator will receive and temporarily store this feedstock in the designated bays in the enclosed reception building. The waste reception building has fast acting roller shutter doors and waste is discharged with the doors shut, whilst the odour abatement system treats emissions prior to release to the atmosphere. We are satisfied that these measures are appropriate and form part of the sites Operating Techniques in Table S1.2. We have set emission limits for activity AR2 in accordance with Waste Treatment Best Available Techniques Conclusions (BATC). The emission limits include an emission limit for odour concentration. This must be achieved from the start of the activity which is subject to pre-operational condition (PO1). We have also included standard conditions in the permit for odour (condition 3.3.1) and the Operator's approved Odour Management Plan (OMP) forms part of the permit Operating Techniques in Table S1.2. We have required that the Operator update the OMP, a part of PO1, and guidance requires the OMP to be reviewed annually in accordance with "Odour management: comply with your environmental permit" Section 6. Based upon the information in the Application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise odour and to prevent pollution from odour. **Responses were also received relating to pests including flies:** At the time of writing, there are no compliance related breaches of the permit that relate to flies, pests or vermin. The waste accepted for treatment under activity AR2 as described above is received in covered vehicles and unloaded inside the enclosed reception building. The waste is stored for a short period and then

Brief summary of issues raised:	Summary of action taken / how this has been covered
	treated in the IVC tunnels. The Operator has set out housekeeping practices in the Application to prevent and minimise the risk of pests and vermin. We have included Permit conditions 3.7.1 and 3.7.2 that provide controls for pests. We are satisfied that the controls in the permit and housekeeping practices undertaken by the applicant will prevent and minimise the risk of pests and vermin.
Best Available Techniques (BAT), emissions levels (limits) including hydrogen sulphide and monitoring	**Additional clarifications on abatement plant and Best Available Techniques (BAT):** Comments were received in relation to the proposed abatement techniques: The Waste Treatment BAT conclusions for emissions to air from biological waste treatment (BAT 34) state that channelled emissions must use one or a combination abatement techniques to abate emissions through: Adsorption, biofilter, fabric filter, thermal oxidation and/or wet scrubbing. The abatement plant techniques proposed by the Operator are described in the Waste Treatment BREF (Section 6.6.1) and BAT conclusions (Section 6.1) as being appropriate for the treatment and waste types proposed by the Operator. We are satisfied that the abatement techniques proposed are suitable for the treatment process. The Operator has proposed a combination of techniques to abate the pollutants in the waste gas stream and to meet emission levels (BAT-AELs) required for biological waste treatment and MBT. We are satisfied that on successful

Brief summary of issues raised:	Summary of action taken / how this has been covered
	completion of pre-operational condition (PO1) that the abatement plant will reduce channelled emissions to air, and that the BAT-AELs will be achieved at the point of release from the Installation. The basis for the emission limits and associated monitoring are based on the Waste Treatment BAT conclusions (BATC). The limits are defined in Section 3.1, (BAT 34) Table 6.7 and associated monitoring frequencies are defined in (BAT 8) of the conclusions that may be found here: Waste Treatment | EU-BRITE **Further clarification on the monitoring requirements set in the permit** **emission monitoring and process monitoring:** We received comments regarding the monitoring frequencies set in the draft permit. The emission monitoring frequencies are set in accordance with sector guidance and with the Waste Treatment BATC. BAT 8 defines the monitoring frequencies required for; - ammonia (NH_3), TVOCs, Hydrogen Sulphide (H_2S), odour concentration and dust. The emission level monitoring frequencies are 6 monthly for all the above parameters (see Table S3.1A). We are satisfied that the frequencies set in the permit draft are in accordance with BAT and biowaste treatment sector. We have included process monitoring for the new abatement plant techniques (water and acid scrubbers and carbon filter) in addition to process monitoring already in place for existing biofilter and water scrubber in accordance with sector requirements. Process monitoring requirements and associated frequencies for each parameter are present in table S3.3 of the permit.

Brief summary of issues raised:	Summary of action taken / how this has been covered
	The Operator must carry out monitoring of the abatement process. Process monitoring is in the permit to demonstrate that key processes within the abatement plant are functioning within expected parameters, prior to the release of the abated waste gas stream to air. Process monitoring requires the Operator to monitor specific key parameters such as but not limited to; abatement inlet and outlet gas temperatures, continuous gas flow rates and continuous pH measurement pre and post abatement. These parameters allow the Operator to ensure the plant is operating in accordance with BAT. All process monitoring data is recorded and submitted to the Environment Agency under condition 3.5.1 and reporting of monitoring Table S4.1. We are satisfied that the process monitoring parameters and monitoring frequencies in the permit are appropriate for the proposed abatement plant. The emission limits and associated process monitoring set in the permit (Table S3.1A and Table S3.3) must be met immediately on commencement of the operation (activity AR2 following successful; completion of PO1). **Clarification on the absence of a numerical emissions limit for H_2S:** We received comments regarding the absence of an emission limit for Hydrogen sulphide (H_2S) in channelled emissions to air Table S3.1A of the permit. The Waste Treatment BREF/BATC do not set an emission level limit for H_2S. However, emissions are monitored in accordance with BATC 8 which requires 6 monthly monitoring of H_2S at the point of release at the emission point. Additionally, we have set process monitoring requirements requiring H_2S to be monitored at the inlet and outlet gas stream of the abatement plant at a frequency of every 6

Brief summary of issues raised:	Summary of action taken / how this has been covered
	months or as agreed in writing by the Environment Agency. Action levels, if required for H_2S are set following completion of IC10, via permit condition 3.2 Emissions of substances not controlled by emission limits and be present in the odour management plan (OMP). The OMP should must be reviewed annually a requirement set out in the guidance: Odour management: comply with your environmental permit - 6. Writing an odour management plan - Guidance - GOV.UK
Comments were raised regarding throughput and capacities for the new biodrying activity, suitability of waste types for treatment and storage.	**Permitted throughputs and capacities:** We received comments regarding the throughput and capacities of the new activity. The annual throughput and capacities for composting (AR1), biodrying (AR2) and sanitisation/stabilisation (AR3) has increased by 10,000 tonnes per annum. The annual throughput for the in-vessel activities is limited to a maximum of 145,000 tonnes across all activities as described in the waste tables S2.2, S2.3, S2.6 and S2.7. **Permitted waste types:** We received comments regarding the suitability of sewage sludge wastes undergoing aerobic treatment (biodrying). These wastes are 19 02 06/19 06 06 (in Table S2.7 of the permit). Sewage sludge wastes can be treated using a number of processes that include but not limited to; biological aerobic treatment, chemical treatment (for example lime stabilisation) and anaerobic treatment. The aerobic treatment process at this facility is biodrying (activity AR2), used to produce a fuel output only. A description of the process is provided in Section 4 of the decision document. The output from the process cannot be spread to land for agricultural land spreading under this activity. The output material does not undergo combustion at this facility and is transferred offsite. (Further information on storage

Brief summary of issues raised:	Summary of action taken / how this has been covered
	is provided below). We are satisfied that the waste codes present can be treated using bioligical treatment process. We have limited to the types of sewage sludge to be treated in Table S2.7 of the permit. **Storage of biodryed material:** Post treatment, biodryed material is removed from the IVC tunnels and stored in the dispatch hall prior to transfer off-site. The process takes place within a fully enclosed building from which air is treated through the abatement system. The vehicle loading process is treated in the same way as unloading feedstock material using the following process; vehicle in the building, doors closed and waste air abated via the abatement system. We are satisfied that these requirements and controls in the permit will prevent uncontrolled emissions to air, land and water.
We received comments regarding the use of the pre-operational condition and validation of the abatement plant emissions under Pre-operational condition (PO1) and the use of an improvement condition (IC10)	**We received comments regarding the use of the pre-operational condition and validation of the abatement plant emissions PO1:** We have included a pre-operational condition as a prerequisite for the commencement of the biodrying activity AR2. We have used a pre-operational condition as we need to confirm assumptions used in an application and require information that can only be gained at a point in the future at detailed design or during commissioning. This is due to the site taking steps to improve to abatement plant infrastructure prior to the start of activity AR2. The abatement plant upgrade is not currently installed at the facility. This means that verification of the plant emissions needs to be completed when this information becomes available. The applicant must submit to the Environment Agency an H1 screening assessment for the release from the plant. The emissions

Brief summary of issues raised:	Summary of action taken / how this has been covered
	must be insignificant in accordance with the Air emissions risk assessment for your environmental permit - GOV.UK and demonstration that the BAT-associated emission level (BAT-AEL) for odour is achieved. The necessary BAT-AELs and associated monitoring frequencies have been included in Table S3.1A and process monitoring for the new abatement techniques are included in Table S3.3. The BAT-AELs must be met immediately on commencement of the activity AR2 and this must be demonstrated via the submitted information and screening required in PO1. **Validation of emissions and compliance:** We will review the information provided by the applicant in PO1 in accordance with the Air emissions risk assessment for your environmental permit - GOV.UK. If the screening verifies that the BAT-AELs can be achieved, emissions are insignificant and all aspects of the pre-operational condition are met, then activity AR2 may commence. Following completion of PO1, the emission limits, monitoring and reporting requirements in the permit are regulated through permit compliance. **We received comments regarding why improvement condition IC10 has been included:** PO1 and IC10 serve different purposes. PO1 requires the Operator to demonstrate, before activity AR2 commences, that the abatement plant can achieve the applicable emission limits and other specified requirements. Following commencement of AR2, IC10 requires the Operator to review the performance of the abatement plant under actual operating conditions. This review will assess whether the plant is operating effectively and has been appropriately optimised, establish operational action levels as referred to in Table S3.3, and identify any necessary process improvements. IC10 provides an operational

Brief summary of issues raised:	Summary of action taken / how this has been covered
	review and optimisation mechanism; it does not duplicate the emission-limit compliance demonstration required by PO1.
We received comments regarding noise considerations and operating hours	**We received comments regarding noise and operating hours:** The Operating hours of the facility have not changed as a result of this variation. Activities AR2, AR13 and AR14 take place under the current permitted operating hours. The IVC tunnels operate 24 hours a day as currently permitted. We considered noise and have discussed this aspect in Section 4.6 above, we considered noise from each of the activities in scope of this variation. A noise and/or vibration management plan is not currently required the time of writing this decision document. Permit conditions 3.4.1 and 3.4.2 will ensure that noise is controlled and will allow us to take further action should it be required. These conditions are included so that the Environment Agency (EA) can require that a noise management plan be submitted by the operator for approval by the EA and implement the plan if required at any time during the lifecycle of the permit.
We received comments regarding human health, bioaerosols and environmental contamination issues	**We received comments regarding the potential of Perfluoroalkyl and polyfluoroalkyl substances (PFAS) releases to water or land due to the activities:** The treatment of sewage sludge through biological treatment (biodrying) is undertaken within the existing enclosed in-vessel composting (IVC) tunnels. During the treatment process, wastewater is generated within the IVC tunnel. The wastewater from this process is collected separately where it is used for process moisture correction or removed off-site for recovery at a licenced facility.

Brief summary of issues raised:	Summary of action taken / how this has been covered
	We have added limits of specified activity requiring the treatment process be undertaken in enclosed vessels on an impermeable surface within a sealed drainage system. There are no discharges of process wastewater from the process, and the output material shall not be spread to land. **We received comments regarding heavy metals contamination to land and water:** As discussed in the point above, the treatment process captures and recirculates process waters. Effluent requiring treatment will be sent for recovery off-site at a permitted facility. The release of heavy metals is prevented as the emissions are contained within the treatment process. The requirement for the treatment process to be undertaken in enclosed vessels, on an impermeable surface within a sealed drainage system means that there are no expected releases to land or water of heavy metals. As stated above, the output material shall not be spready to land. We are satisfied that the control measures in place on the permit and operating techniques described by applicant will prevent and minimise any release in accordance with BAT. **Comments were received regarding bioaerosol monitoring and action levels:** We have required that the bioaerosols monitoring for activity AR2 are increased to quarterly for the first year of operation, then twice yearly. The quarterly requirement is standard for new activities (see permit Table S3.4 Bioaerosols monitoring requirements – ambient monitoring). Condition 3.6.1 and 3.6.2 will ensure that bioaerosol emissions are controlled and will allow us to take further action should it be required.

Brief summary of issues raised:	Summary of action taken / how this has been covered
	Action levels are defined in the table (S3.4) and are appropriate for the sector. Monitoring standards shall be accordance with Technical Guidance Note M9 – Environmental monitoring of bioaerosols at regulated facilities. We are satisfied that the monitoring for bioaerosols is appropriate, and that the monitoring frequency of twice yearly following the initial first year of operation of activity AR2 is appropriate.
Issues were raised regarding a change in vehicle movements on and off-site:	**We received comments regarding a change in vehicle movements on and off-site:** Vehicle movements within the Installation boundary are considered within the remit of the Environmental Permit. However, the emissions from this local area are highly unlikely to be significant on the current background levels. The current restrictions provided for the site for incoming and outgoing vehicle movements are between 05:00-22:00. These remain as described in the application and no vehicles movements take place on a Sunday. As discussed in Section 10.5, movement of traffic to and from the Installation is outside of our remit but will normally be an issue for the planning authority to consider. Our consideration is whether the emissions from traffic could affect the prevailing pollutant background levels which could be a consideration where there are established high background concentrations contributing to poor air quality. In this case a small increase in pollutants from road traffic would not affect the background levels.
Comments were received regarding planning permissions	We received comments on issues that fall outside the Environment Agency's remit in reaching its permitting decisions. Specifically questions were raised which fall within the jurisdiction of the planning system.

Brief summary of issues raised:	Summary of action taken / how this has been covered
	Guidance on the interaction between planning and pollution control is given in the National Planning Policy Framework. It says that the planning and pollution control systems are separate but complementary. We are only able to take into account those issues, which fall within the scope of the Environmental Permitting Regulations (EPR). The Operator may require other regulators or public bodies permissions for an activity or for any associated or additional activities in addition to the Environmental Permit. However, this process does not prevent the permit variation from being issued.
Publication of emissions monitoring data, public consultation on pre-operational condition (PO1)	**Comments expressing concern over how the Environment Agency will regulate the site and publishing of monitoring data:** We will regulate the site carrying out a continual assessment of plant operations and its environmental performance. This will include but not be limited to: • The operator must monitor emissions and report the results to us; • We will regularly inspect the Installation, review monitoring techniques and assess monitoring results to measure the performance of the plant, review operating techniques and review management systems and plans; • We will carry out on-site audits of operator monitoring. The operator must inform us immediately of any breach of the emissions limits, followed by a fuller report of the size of the release, its impact and how they propose to avoid this happening in the future. The operator's monitoring results will be placed on the public registers. If there is a breach then we will take appropriate enforcement action and/or prosecute.

Brief summary of issues raised:	Summary of action taken / how this has been covered
	If we receive any complaints we will assess the complaint and investigate it as appropriate. **We received comments requesting that pre-operational condition (PO1) submissions be the subject of additional consultation:** We are in this instance asking the Operator to confirm the assumptions on which our permit variation determination is based (that emissions are insignificant to air and BAT-associated emissions levels are achieved) in accordance with the screening methodology set out in our guidance Air emissions risk assessment for your environmental permit - GOV.UK. PO1 requires insignificant process contributions (PCs), this means that no further assessment is necessary. Impacts will be the same as or less as those which we have based emissions limits on as part of the determination process. We are using the pre-operational condition to verify those assumptions, and not for the purpose of amending or updating any aspects of the permit after our determination process. The results of that process may then form part of the operating techniques under the permit including the updated Odour Management Plan (OMP) requested as part of PO1. The BAT-associated emission levels, process controls, monitoring requirements and conditions of the permit cannot be changed on completion of PO1. **We received comments on how sewage sludge trial monitoring information was used in the permit determination:** A trial was carried out by the Operator separately to this permit variation. The results are not used in the determination of the permit. See response to issue: “We received comments regarding the use of the pre-operational condition and validation of the abatement plant emissions under pre-operational condition (PO1) and the use of an improvement condition (IC10)” above in this section.

This page is intentionally left blank

HPI Decision Document

Annex 1. Glossary of acronyms used in this document

AAD	Ambient Air Directive (2008/50/EC)
AMP	Accident Management Plan
BAT	Best Available Technique(s)
BAT-AEL	BAT Associated Emission Level
BREF BAT C	Best Available Techniques (BAT) Reference Documents for Waste Incineration BAT conclusions
CCW	Countryside Council for Wales
CROW	Countryside and rights of way Act 2000
DAA	Directly associated activity – Additional activities necessary to be carried out to allow the principal activity to be carried out
DD	Decision document
EAL	Environmental assessment level
ELV	Emission limit value
EMAS	EU Eco Management and Audit Scheme
EMS	Environmental Management System
EPR	Environmental Permitting (England and Wales) Regulations 2016 (SI 2016 No. 1154) as amended
EQS	Environmental Quality Standard
ES	Environmental standard
EWC	European waste catalogue
FPP	Fire prevention plan

FSA	Food Standards Agency
GWP	Global Warming Potential
HPI	High public interest
HRA	Human Rights Act 1998
IED	Industrial Emissions Directive (2010/75/EU)
LADPH	Local Authority Director(s) of Public Health
LNR	Local nature reserve
MBT	Mechanical biological treatment
MCERTS	Monitoring Certification Scheme
MP	Member of Parliament
PC	Process Contribution
PEC	Predicted Environmental Concentration
PHE	Public Health England (now UKHSA – UK Health Security Agency)
POP(s)	Persistent organic pollutant(s)
PPS	Public participation statement
PR	Public register
RDF	Refuse derived fuel
RGN	Regulatory Guidance Note
SAC	Special Area of Conservation
SHPI(s)	Site(s) of High Public Interest
SPA(s)	Special Protection Area(s)
SS	Sewage sludge
SSSI(s)	Site(s) of Special Scientific Interest
UKHSA	UK Health Security Agency
WFD	Waste Framework Directive (2008/98/EC)

END OF DECISION DOCUMENT