

Permitting decisions

Bespoke permit

We have decided to grant the permit for The Winery operated by Kingsland Drinks Ltd.

The permit number is EPR/VP3434YY.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

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

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account
- shows how we have considered the [consultation responses](#).

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

Key issues of the decision

The application submission contains a number of supporting documents that describe the controls and operating techniques at the installation, having regard for Best Available Techniques (BAT) requirements, as specified in our guidance and to ensure compliance with the environmental permit conditions. These key controls and techniques are described in the following sections.

General Management

The installation has a bespoke Environment Management System (EMS) in place which is designed to ensure that environmental management is a high priority within the sites operations. The scope of the EMS includes the activities involved in the receipt of goods through to the dispatching of finished products. The aims, objectives and targets are designed to control the environmental aspects and reduce the environmental impacts of the production/bottling process. The system addresses the training and development of staff and the plants energy efficiency. The site obtained ISO14001 accreditation in 2016.

Odour

Odorous raw materials are consumed in the processes and the installation has the potential to cause odorous emissions through various stages of the process such as receipt of raw materials, processing and

the production of waste. There are human receptors adjacent to the site approximately 12m from the site boundary. There are further commercial/light industrial premises adjacent to the western site boundary.

The applicant employs a range of controls to reduce odorous emissions such as:

- Cleaning in place: as a food and drink site cleaning in place is an ongoing process. Each line has a separate procedure for wash down and flushing of lines, vessels and fillers.
- Raw materials are stored on site in both solid and liquid form. All liquid ingredients are stored in a contained environment with drip trays and spill pallets.
- Waste is segregated at source and stored for minimal times, in this manner until collected for recovery. Hazardous waste streams are collected in dedicated skips, hoppers and bales and stored individually in approved containers before removal of site.

At this time we do not require a site specific Odour Management Plan (OMP), however the permit conditions enable the Environment Agency to require the operator to develop and implement an OMP if deemed necessary.

Noise and vibration

The installation has the potential to cause noise emissions through various stages of the process. There are human receptors adjacent to the site approximately 12m from the site boundary. There are further commercial/light industrial premises adjacent to the western site boundary. Potential sources of onsite noise include noise from equipment and machinery, glass tipping, delivery/dispatch vehicles and employees. Sufficient management and controls are in place to minimise these such as:

- Yards operation Forklift Trucks (FLT) have been fitted with white noise generation movement alarms.
- All FLT's are serviced regularly to improve operation efficiency and noise levels.
- Curfew hours are in place for yards operating FLT's to manage noise annoyance during unsociable hours.
- Tanker deliveries are arranged between the hours of 6:30am-8pm weekdays. Weekend deliveries stop at 12 noon on Saturday, and are not accepted at all on Sundays
- Tipping of glass into the skips for recycled glass storage stops at 7pm each evening.
- The bottling hall is isolated from the external environment by several roller shutter doors and double insulated glass panels. No part of the hall opens directly into the outside instead opening to adjacent warehouses which are also closed to the outside.
- FLT operations are restricted at night time and restrictions are in place for opening external doors.
- Boilers and compressors are located on the side of the site furthest from residential properties. Both are contained within secondary buildings to further reduce residential noise.
- Noise production units are serviced regularly to prevent excess noise.

At this time we do not require a site specific Noise Management Plan (NMP), however the permit conditions enable the Environment Agency to require the operator to develop and implement an NMP if deemed necessary.

Fugitive Emissions

Emissions to air and Water

The installation has the potential to release fugitive emissions to air. The applicant has identified the sources of fugitive emissions and will ensure sufficient management and controls in place to minimise these.

- Refrigerant gases are stored on site and are harmful to the atmosphere if released. Regular inspections and replacement of all air conditioning assets and chillers takes place in accordance with Kingsland's EMS.
- The soils across the majority of the site and in all areas where the permitted process occurs are covered by hardstanding: therefore no pollutant linkage is present.
- There is the potential pathway for leaching and migration of contaminants in unsaturated zone to ground water. However infiltration is limited by the presents of extensive hardstanding in the permitted area and appropriate control measures are in place such as secondary containment of fuels and oils. There is a bund under the gas oil fill point it is permanent, and was placed there because the fill point is outside of the main bund. A rain cover was recently built to protect the capacity of the bund.

- Surface water drains are at a shallow depth and all water is drained via oil/water interceptors/separators before being discharged to the local drainage network and ultimately to Manchester Ship Canal.
- Chemicals and fuels are stored in the correct containers for the material stored.
- All bulk liquids are bund protected to minimum 110%. Gas and oil storage has overflow alarms.

The site has a number of procedures in place to mitigate against fugitive emissions and deal with any leaks and spillages. The relevant procedures form part of the EMS and are referenced in the Site Condition Report.

Point source emissions

Emissions to air

Point source emissions to air arise from the operation of two 5MWth steam raising boilers fired with heating oil: one in operation and one as back-up in case of breakdown or maintenance of the primary unit.

Point source emissions from the boiler comprise of particulates, CO₂, NO_x, and SO_x which are released to atmosphere via a stack with an “effective height” of 26m.

The boiler stack emissions are the main point source and have been evaluated using the H1 Annex F Methodology.

All emissions process contributions can be considered insignificant at screening step 1 as:

- the long term process contribution is <1% of the long term environmental standard;
and
- the short term process contribution is <10% of the short term environmental standard

On the basis of the above, and the fact that the rated thermal input of the combustion plant is less than 20MW, we are satisfied that the emissions are unlikely to have any significant environmental impact and no additional assessment is needed

Emissions to sewer, surface water and ground water

Surface water is drained via oil/water interceptors/separators and is discharged via drains on the eastern site boundary into the surface water network under Fairhills Road, and drains on the southern site boundary into surface water drains running adjacent to the railway embankment, from where it is ultimately discharged into the Manchester Ship Canal. The oil/water interceptors/separators are maintained regularly and are emptied annually. Foul water is discharged via a foul drain at the north of the site, discharging into the foul network under Fairhills Road for treatment at North Bank Wastewater Treatment Works under a trade effluent consent issued by United Utilities Water PLC

Resource efficiency and waste management

Raw materials

Raw materials are stored on site in both solid and liquid form. All liquid ingredients are stored in a contained environment with drip trays where necessary, spill pallets and are separated from foul and surface water drainage. Solid ingredients are stored in locked storage rooms that have no drain access.

Waste Handling

As part of the EMS waste is appropriately handled, segregated and stored on site. The waste areas are appropriately designed and maintained. Waste is segregated at source and stored in this manner on-site until collected. All hazardous materials are stored individually in approved containers in line with Kingsland's waste policy. Waste engineering oil is protected by double skin tank, and bulk caustic liquor protected by 120% capacity bund. The ISO 14001 contains procedures for collection, temporary storage and removal of all sites wastes.

Waste recovery or disposal

All waste produced on site (bulk wastes mainly comprising glass and packaging materials, but including smaller quantities of general waste) is stored temporarily in skips or baled and removed by licensed waste contractors for recycling or disposal, as appropriate.

Energy usage

Kingsland Drinks Limited is subject to the Energy Savings and Opportunities Scheme (ESOS). There are a number of processes in place to ensure that energy is minimised across the site such as:

- Solar panels have been fitted onto southward facing roofs of two large warehouses onsite. These generate approximately 219MWh of electricity annually save 114 tonnes of carbon dioxide and at peak output generate about 70% of the sites usage.
- Low loss voltage transformers have been fitted on site which automatically reduces the sites supply voltage to a lower level. Site measurements indicate annual savings of 16% on electricity cost with annual carbon dioxide savings of 226 tonnes.
- All old fluorescent tubes are being systematically replaced with newer T8 or T5 tubes to reduce the energy demand.
- Kingsland have invested in hybrid vehicles and now have three dual charging points to reduce reliance on fossil fuels.
- It equipment is being upgrade to Thin Client Raspberry Pi units, reducing energy at each work station by 70%.
- Time switches have been installed to reduce wastage from left on lighting and other equipment
- All fillers rinsers and belts are checked hourly to ensure no equipment is left on unnecessarily.
- Kingsland bring large quantities of their bulk wine up the Manchester ship Canal from Liverpool Docks, meaning the road transit element is very short. This reduces carbon emissions significantly and also benefits air quality by keeping HGV traffic off the roads.

Water Use

The site uses 28,000m³ annually of potable water which is supplied by the mains line. The water is used for cleaning and some is used in the finishing product. There is no automated CIP on site to cover all production areas, but each line has a separate procedure for wash down and flushing of lines, vessels and fillers. There is no onsite facility for the treatment of effluent to allow for its recycling in the production process. There are a number of water saving measures in place across the site:

- All hand wash stations are knee operated for hygiene and water saving. The knee pedal has to be depressed to activate the flow, and disengages when knee pressure is released. Removing the potential for taps to be left running.
- All water hoses are fitted with triggers, and cannot be left running to discharge into drains.
- Spray tap valves - Toilet and kitchen hand washing taps are fitted with spray nozzles to reduce usage.
- Manual timers - Several of the Bottling Hall hoses are controlled by timers. Once depressed, the timer will only allow the water to flow for two minutes before cutting out.
- Improvement measures - For vessel cleaning, precisely measured amounts of water are used, rather than operator controlled (i.e. unrestricted) quantities.
- KPI for water used per litre of wine bottled - The water used per litre produced KPI is currently set at 0.12L, although hygiene requirements make reducing this further difficult at this time.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
Consultation	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> • Salford Metropolitan District - Planning and Environmental Protection • Public Health England <p>No responses were received from.</p> <ul style="list-style-type: none"> • Health & Safety Executive • Director of Public Health • United Utilities <p>The comments and our responses are summarised in the consultation section.</p>
Operator	
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.
The facility	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
The site	
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility including the discharge points. The plan is

Aspect considered	Decision
	included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p>
Environmental risk assessment	
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p>
Operating techniques for emissions that screen out as insignificant	<p>Emissions have been screened out as insignificant, and so we agree that the applicant's proposed techniques are BAT for the installation.</p> <p>We consider that the emission limits included in the installation permit reflect the BAT for the sector.</p>
Permit conditions	
Use of conditions other than those from the template	Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.
Improvement programme	<p>Based on the information on the application, we consider that we need to impose an improvement programme.</p> <p>We have imposed an improvement programme to ensure that:</p> <ul style="list-style-type: none"> • Appropriate measures are in place to prevent spillages that may cause pollution. The Operator shall submit a report detailing a proposed impermeable surfaces rolling repair programme. The

Aspect considered	Decision
	<p>details of this program should include, appropriate design & install standards and the reasonable time scale for the repairs.</p> <ul style="list-style-type: none"> • No deterioration of the land during the lifetime of the permit, the operator shall carry out an assessment of the soils on site and consider whether they wish to set baseline reference data for any relevant substances of concern taking into account the condition of pollution prevention measures. • Appropriate measures are in place to ensure that waste is minimised on site and demonstrates that its impact is not significant on site. • Appropriate measures are in place to ensure that spillages that may cause pollution are minimised The operator shall carry out an assessment of the containment to ensure adequate pollution prevention and controls are in place to prevent spillage and loss of containment for waste engineering oil, its potential to cause fugitive emissions to surface water, groundwater and soils. • No unsuitable refrigerants are used on site; the operator is to assess refrigerants used and cease to use unacceptable refrigerants and review suitable substitute. The operator will then replace with an appropriate refrigerant or replace equipment. • Appropriate sub-surface drainage is in place within the installation boundary the operator shall undertake a CCTV survey of sub-surface drainage systems and provide a report to demonstrate the integrity of the systems and demonstrate that the risk of fugitive emissions from the installation are minimised.
Emission limits	We have decided that emission limits are not required in the permit.
Reporting	Reporting is not required beyond the performance parameters as detailed in the permit.
Operator competence	
Management system	<p>There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Relevant convictions	<p>The Case Management System has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.
Growth Duty	
Section 108 Deregulation	We have considered our duty to have regard to the desirability of promoting

Aspect considered	Decision
Act 2015 – Growth duty	<p>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.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“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.”</p> <p>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.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Salford City Council
Brief summary of issues raised
Salford City Council no relevant issues where raised.
Summary of actions taken or show how this has been covered
No further actions

Response received from
Public Health England
Brief summary of issues raised
PHE has no significant concerns regarding risk to health of the local population from this proposed activity.
Summary of actions taken or show how this has been covered
No Further action required.