

# Notice of variation and consolidation with introductory note

**The Environmental Permitting (England & Wales) Regulations 2016**

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Rathbones Bakeries Limited

Stephenson Way Bakery  
Stephenson Way  
J41 Industrial Estate  
Wakefield  
WF2 0XN

**Variation application number**

EPR/TP3230RP/V004

**Permit number**

EPR/TP3230RP

# Stephenson Way Bakery

## Permit number EPR/TP3230RP

### Introductory note

#### **This introductory note does not form a part of the notice**

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. Only the variations specified in schedule 1 are subject to a right of appeal.

The schedules specify the changes made to the permit.

#### This variation authorises the following changes:

- Retainment and operation of both the existing and new bread roll product manufacturing lines on the installation.
- Air emissions table changes: Removal of table S3.1b from the permit and amendment of table S3.1a to S3.1 (previously this table was effective till 31/12/2023, however this date has now been removed). This is to reflect that emission to air points for the ovens on both the existing and new bread roll product manufacturing lines are to be retained within the installation as a result of this variation.
- Increase of the permitted number of ovens on the installation from 8 to 9 to allow the existing bread roll product manufacturing line to be retained within the installation permit.
- Addition of emissions to air point A29 for the oven on the existing bread roll product manufacturing line that is to be retained within the installation (the emissions to air points for the oven on the new bread roll product manufacturing line will remain as A9a, A9b and A9c).
- Removal of Table S1.3 and improvement condition reference IC1 from the permit due to the existing bread roll product manufacturing line being retained on the installation (IC1 was added in V003 requiring the operator to confirm decommissioning and removal of the existing bread roll product manufacturing line, however this is now being retained on the installation and is therefore no longer required).

Overall production volumes will remain consistent and be based on customer demand however this will not exceed the overall production capacity limit set in the permit (the proposed production capacity is 350 tonnes per day).

The total rated thermal input capacity for plant at this site is 13.449 MWth.

This variation also amends an error in the previous variation application number incorrectly referenced as EPR/TP3230RP/V002. This has now been corrected to EPR/TP3230RP/V003. In addition, it also corrects the emission point references in tables S3.2 and S3.3 to correspond correctly with the site emissions plan in Schedule 7.

#### **The rest of the installation remains unchanged. A description of the site is as follows:**

The site is situated approximately 3.4km north of Wakefield centre. The surrounding area comprises industrial premises to the west, a mixture of residential and wooded areas to the north and to the south and east, mainly residential. National Grid Reference for the site is SE 32201 24234.

The relevant scheduled activity under the Environmental Permitting (England & Wales) Regulations 2016 is;

*Schedule 1, Part 2, Section 6.8 – The Treatment of Animal and Vegetable Matter and Food Industries, Part A (1) (d) – treatment and processing, other than exclusively packaging, of the following raw materials,*

*whether previously processed or unprocessed, intended for the production of food or feed (where the weight of finished product excludes packaging)-*

*(iii) animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than—*

*(bb)  $300 - (22.5 \times A)$  in any other case,*

*where 'A' is the portion of animal material in percent of weight of the finished product production capacity.*

Some of the products do contain animal material. Therefore, based on recipe information and using the calculation expressed in Section 6.8 A (1) (d) (iii) (bb) above, the installation finished product production capacity for the facility following expansion, is:

(284.25 tonnes per day (based on animal content by weight for total site product of 0.7%) ( $300 - (22.5 \times 0.7)$ ) and the proposed production capacity is 350 tonnes per day.

The basic process steps involved are:

- Receipt and storage of bulk and minor raw materials
- Ingredients transfer from storage
- Weighing of ingredients
- Mixing of ingredients
- Dividing and filling of cooking tins
- Baking/cooking of products
- Cooling of products
- Slicing, packing and storage of products
- Despatch of finished products
- Waste handling and despatch

The site has the capability to operate a 7-day week, up to 3 shifts, although time will be allocated to clean down and maintenance periods.

Ancillary to the main process are a number of associated and linked processes:

- Effluent treatment
- Tray wash
- Refrigeration facilities
- Steam raising Boilers
- Waste and by-product storage

The main releases from the site are from the operation of combustion plant; boilers and ovens producing the pollutants, Oxides of Nitrogen (NO and NO<sub>2</sub> expressed as NO<sub>2</sub>), and Carbon Monoxide. Process effluent is discharged via an effluent treatment plant to foul sewer under a trade effluent discharge consent. Uncontaminated roof and surface water is discharged to Lingwell Gate Beck.

There are no Special Protection Areas (SPA) or Ramsar sites within 10km and there are no Sites of Special Scientific Interest (SSSI) within 2km. However, there is one Special Areas of Conservation (SAC) within 10km and two Local Wildlife Sites (LWS) and Local Nature Reserves (LNR) within 2km kilometres, the closest being the Former Lofthouse Colliery LWS and Lofthouse Colliery Nature Park LNR. Emissions from the installation have been assessed and are unlikely to cause significant pollution at the nature conservation sites within the relevant screening distances.

The schedules specify the changes made to the permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

| <b>Status log of the permit</b>                                |                         |  |
|--|-------------------------|--|
| <b>Description</b>   | <b>Date</b>             | <b>Comments</b>  |
| Application<br>EPR/TP3230RP/A001                               | Duly made<br>19/06/2018 | Application for New Bespoke installation.  |
| Schedule 5 response<br>(issued 28/09/2018)                     | 31/10/2018              | Response to Schedule 5 providing BAT assessment, revised site plan and air emissions assessment.   |
| Additional information requested                               | 14/11/2018              |  |
| Additional information requested                               | 21/11/2018              |  |
| Permit determined<br>EPR/TP3230RP                              | 20/02/2019              | Permit issued to Rathbones Bakeries Limited.   |
| Application<br>EPR/TP3230RP/V003 (variation and consolidation) | Duly made<br>01/12/2022 | Application to vary and consolidate environmental permit. Variation includes the replacement of one bread manufacturing line.  |
| Schedule 5 response  | 27/01/2023              | Confirmation of the deadline for decommissioning and removing of the existing bread manufacturing line and air emission point A9.  |
| Variation and consolidation issued<br>EPR/TP3230RP             | 09/02/2023              | Varied and consolidated permit issued.   |
| Application<br>EPR/TP3230RP/V004 (variation and consolidation) | Duly made<br>20/06/2024 | Application to vary and update the permit to modern conditions. Application to retain both the existing bread roll product manufacturing line (now emission point A29) and new bread roll product manufacturing line (emission points A9a, A9b and A9c) on the installation. |
| Variation determined and consolidation issued<br>EPR/TP3230RP  | 23/07/2024              | Varied and consolidated permit issued in modern format.  |

End of introductory note

# Notice of variation and consolidation

## The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

### Permit number

EPR/TP3230RP

### Issued to

**Rathbones Bakeries Limited** (“the operator”)

whose registered office is

**Hilmore House**

**Gain Lane**

**Bradford**

**West Yorkshire**

**BD3 7DL**

company registration number **05417154**

to operate a regulated facility at

**Stephenson Way Bakery**

**Stephenson Way**

**J41 Industrial Estate**

**Wakefield**

**WF2 0XN**

to the extent set out in the schedules.

The notice shall take effect from 23/07/2024.

| Name             | Date       |
|------------------|------------|
| Eleanor Blackeby | 23/07/2024 |

Authorised on behalf of the Environment Agency

## **Schedule 1**

The following conditions, schedules and tables were varied as a result of the application made by the operator:

Conditions 3.1.1 and 3.5.1 to remove reference to Table S3.1b as this has been removed from the permit and rename Table S3.1a to S3.1 as a result of application EPR/TP3230RP/V004.

Table S1.1, AR3, as referenced in condition 2.1.1 to increase the permitted number of ovens from 8 to 9 and remove the following text '1 x 1.68 MWth input (to be decommissioned and removed by 31/12/2023)' as a result of application EPR/TP3230RP/V004.

Table S1.2 as referenced in conditions 2.3.1 and 2.3.2 to remove operating techniques associated with the removal of the existing bread roll product manufacturing line and include operating techniques introduced as a result of application EPR/TP3230RP/V004.

Table S3.1a has been renamed Table S3.1 as referenced in conditions 3.1.1 and 3.5.1 and reference to 'effective until 31/12/2023' has been removed from the table as a result of application EPR/TP3230RP/V004.

Table S3.1 as referenced in conditions 3.1.1 and 3.5.4 to add an emissions to air point (A29) for the older bread roll product manufacturing line that is to now be retained as a result of application EPR/TP3230RP/V004.

The following conditions, schedules and tables are deleted as a result of the application made by the operator:

Conditions 2.4.1 and 2.4.2 are removed due to the removal of Table S1.3 and IC1 from the permit which are no longer relevant as a result of application EPR/TP3230RP/V004.

Table S3.1b has been removed from the permit as a result of application EPR/TP3230RP/V004.

## **Schedule 2 – consolidated permit**

Consolidated permit issued as a separate document.

# Permit

## The Environmental Permitting (England and Wales) Regulations 2016

### Permit number

**EPR/TP3230RP**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/TP3230RP/V004 authorising,

**Rathbones Bakeries Limited** (“the operator”),

whose registered office is

**Hilmore House  
Gain Lane  
Bradford  
West Yorkshire  
BD3 7DL**

company registration number 05417154

to operate an installation at

**Stephenson Way Bakery  
Stephenson Way  
J41 Industrial Estate  
Wakefield  
WF2 0XN**

to the extent authorised by and subject to the conditions of this permit.

| Name             | Date       |
|------------------|------------|
| Eleanor Blackeby | 23/07/2024 |

Authorised on behalf of the Environment Agency

# Conditions

## 1 Management

### 1.1 General management

1.1.1 The operator shall manage and operate the activities:

- (a) 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; and
- (b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

### 1.2 Energy efficiency

1.2.1 The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

### 1.3 Efficient use of raw materials

1.3.1 The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

### 1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
- (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and



- (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

## **2 Operations**

### **2.1 Permitted activities**

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

### **2.2 The site**

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

### **2.3 Operating techniques**

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
  - (b) the composition of the waste;
  - (c) the handling requirements of the waste;
  - (d) the hazardous property associated with the waste, if applicable; and
  - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

## **3 Emissions and monitoring**

### **3.1 Emissions to water, air or land**

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall 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.

### **3.2 Emissions of substances not controlled by emission limits**

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
  - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

### **3.3 Odour**

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
  - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.4 Noise and vibration**

- 3.4.1 Emissions from the activities shall 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,

unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## **3.5 Monitoring**

3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- (a) point source emissions specified in tables S3.1, S3.2 and S3.3;

## **3.6 Pests**

3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.

3.6.2 The operator shall:

- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
- (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

# **4 Information**

## **4.1 Records**

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
  - (i) off-site environmental effects; and
  - (ii) matters which affect the condition of the land and groundwater.

- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

## 4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
  - (b) the annual production /treatment data set out in schedule 4 table S4.2; and
  - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
  - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
  - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

## 4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
    - (i) inform the Environment Agency,
    - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
    - (iii) take the measures necessary to prevent further possible incidents or accidents;
  - (b) of a breach of any permit condition the operator must immediately—
    - (i) inform the Environment Agency, and
    - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
  - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (a) any change in the operator's name or address; and
  - (b) any steps taken with a view to the dissolution of the operator.
- In any other case:
- (a) the death of any of the named operators (where the operator consists of more than one named individual);
  - (b) any change in the operator's name(s) or address(es); and
  - (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
  - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
  - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
  - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

## **4.4 Interpretation**

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made “immediately”, in which case it may be provided by telephone.

# Schedule 1 – Operations

| <b>Table S1.1 Activities</b>        |  |   |  |
|-------------------------------------|--|---|--|
| <b>Activity reference</b>           | <b>Activity listed in Schedule 1 of the EP Regulations</b> | <b>Description of specified activity</b>  | <b>Limits of specified activity</b>  |
| AR1                                 | S6.8 A1 (d) (iii) (bb)                                     | <p>Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of finished product excludes packaging) -</p> <p>(iii) - animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than—</p> <p>(bb)300-(22.5 x A) in any other case,</p> <p>where 'A' is the portion of animal material in percent of weight of the finished product production capacity.</p> | <p>From receipt of raw materials to despatch of finished product.</p> <p>Production capacity is limited to 350 tonnes per day.</p> |
| <b>Directly Associated Activity</b> |  |   |  |
| AR2                                 | Boilers  | Two natural gas fired boilers each with a net rated thermal input of 0.89 MWth.   | From receipt of fuel to release of products of combustion to air.  |
| AR3                                 | Production ovens   | <p>Nine production ovens each with a rated thermal input capacity of the following:</p> <p>Oven 1 (Bread Line 1) – 2.52 MWth<br/>           Oven 2 (Mecatherm Line) – 0.78 MWth<br/>           Oven 3 (Muffin Line) – 0.945 MWth<br/>           Oven 4 (New Rolls Line) – 0.244 MWth<br/>           Oven 5 (Bread Line 2) – 3 MWth<br/>           Oven 6 (Naan/flatbread Line) – 1 MWth<br/>           Oven 7 (Crumpet/pancake Line) – 0.6 MWth<br/>           Oven 8 (Crumpet Line) – 0.5 MWth<br/>           Oven 9 (Rolls Line) – 1.68 MWth</p>  | Production baking ovens.   |
| AR4                                 | Refrigeration Systems                                      | Bread Freezer, process chillers, bakery equipment, ice machines   | From use in production to  |

| <b>Table S1.1 Activities</b> |  |  |   |
|------------------------------|--|--|---|
| <b>Activity reference</b>    | <b>Activity listed in Schedule 1 of the EP Regulations</b> | <b>Description of specified activity</b>   | <b>Limits of specified activity</b>   |
|                              |  |  | storage of products until dispatch  |
| AR5                          | Tray wash  | One tray wash with a net rated thermal input of 0.4 MWth.                        | Heating water for tray wash.  |
| AR6                          | Effluent Treatment   | Treatment of CIP (Cleaning in place) process effluent prior to release to sewer. | pH balancing prior to release to sewer under discharge consent Y/3262/09D.  |
| AR7                          | Waste storage and disposal                                 | Waste storage and disposal   | Provision of dedicated waste storage facilities to house all identified waste streams prior to collection and removal off site. |

| <b>Table S1.2 Operating techniques</b>         |   |                      |
|--|---|----------------------|
| <b>Description</b>                             | <b>Parts</b>  | <b>Date Received</b> |
| Application                                    | P135-R01-F1 and P135-R03-F1 of the application documents provided in response to section 3a – technical standards, Part B3 of the application form.   | Duly Made 19/06/2018 |
| Response to Schedule 5 Notice dated 28/09/2018 | 1.1, Point 1. Accident Management, 1.2 Points 1, 2, 6 and 7 Energy Efficiency, 1.3 Point 1 and 2 Efficient use of raw materials, 1.4 Point 2 Avoidance, recovery and disposal of wastes, 2.2 Point 1, 2 and 3 Process Control, Point 1-4 Emissions and Monitoring - Air releases. Appendix 1 Effluent Treatment plant drawings and Appendix 2 Emission Points Plan. | 31/10/2018           |
| Application variation EPR/TP3230RP/V004        | Responses to application forms Parts C2 & C3 and referenced supporting documentation.<br><br>Additional information received in response to not duly made request for information and receipt of the following documents:<br>EM 07-004 Emission Points Plan v4<br>BAT R61 response – Rathbones v2 June 2024 update  | Duly Made 20/06/2024 |



## Schedule 2 – Waste types, raw materials and fuels

| Table S2.1 Raw materials and fuels |               |
|------------------------------------|---------------|
| Raw materials and fuel description | Specification |
| -                                  | -             |

## Schedule 3 – Emissions and monitoring

| Table S3.1 Point source emissions to air – emission limits and monitoring requirements |  |   |                        |                  |                      |                               |
|--|--|---|------------------------|------------------|----------------------|-------------------------------|
| Emission point ref. & location   | Source   | Parameter   | Limit (including unit) | Reference period | Monitoring frequency | Monitoring standard or method |
| A1 [Point A1 on site plan in Schedule 7]   | Boiler Plant<br>0.89 MWth input<br>Natural Gas | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set           | -                | -                    | -                             |
|  |  | Carbon monoxide   | No limit set           | -                | -                    | -                             |
| A2 [Point A2 on site plan in Schedule 7]   | Boiler Plant<br>0.89 MWth input<br>Natural Gas | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set           | -                | -                    | -                             |
|  |  | Carbon monoxide   | No limit set           | -                | -                    | -                             |
| A3 [Point A3 on site plan in schedule 7]   | Oven – Bread line 1<br>(2.52 MWth input)       | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set           | -                | -                    | -                             |
|  |  | Carbon monoxide   | No limit set           | -                | -                    | -                             |
| A4-A7 [Point A4-A7 on site plan in schedule 7]   | Oven – Mecatherm<br>(0.78 MWth input)          | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set           | -                | -                    | -                             |
|  |  | Carbon monoxide   | No limit set           | -                | -                    | -                             |
| A8 [Point A8 on site plan in   | Oven - Muffin line<br>(0.945 MWth input)       | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set           | -                | -                    | -                             |

**Table S3.1 Point source emissions to air – emission limits and monitoring requirements**

| <b>Emission point ref. &amp; location</b>             | <b>Source</b>  | <b>Parameter</b>  | <b>Limit (including unit)</b> | <b>Reference period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
|---|--|---|-------------------------------|-------------------------|-----------------------------|--------------------------------------|
| schedule 7]   |  | Carbon monoxide   | No limit set                  | -                       | -                           | -                                    |
| A9a-A9c<br>[A9a, A9b, A9c on site plan in schedule 7] | Oven – New rolls line<br>(0.244 MWth input)            | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set                  | -                       | -                           | -                                    |
|   |  | Carbon monoxide   | No limit set                  | -                       | -                           | -                                    |
| A10-12<br>[Point A10-A12 on site plan in schedule 7]  | Oven - Bread line 2 (kaak)<br>(3.0 MWth input)         | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set                  | -                       | -                           | -                                    |
|   |  | Carbon monoxide   | No limit set                  | -                       | -                           | -                                    |
| A13<br>[Point A13 on site plan in schedule 7]         | Tray wash<br>(0.4 MWth input)                          | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set                  | -                       | -                           | -                                    |
|   |  | Carbon monoxide   | No limit set                  | -                       | -                           | -                                    |
| A14<br>[Point A14 on site plan in schedule 7]         | Oven - Naan/ flatbread new line 1<br>(1.0 MWth input)  | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set                  | -                       | -                           | -                                    |
|   |  | Carbon monoxide   | No limit set                  | -                       | -                           | -                                    |
| A15<br>[Point A15 on site plan in                     | Oven – Crumpet/ Pancake new line 2<br>(0.6 MWth input) | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set                  | -                       | -                           | -                                    |

**Table S3.1 Point source emissions to air – emission limits and monitoring requirements**

| <b>Emission point ref. &amp; location</b>           | <b>Source</b>                              | <b>Parameter</b>  | <b>Limit (including unit)</b> | <b>Reference period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
|---|--|---|-------------------------------|-------------------------|-----------------------------|--------------------------------------|
| schedule 7]   |  | Carbon monoxide   | No limit set                  | -                       | -                           | -                                    |
| A16<br>[Point 16 on site plan in schedule 7]        | Oven – crumpet new line 3 (0.5 MWth input) | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set                  | -                       | -                           | -                                    |
|   |  | Carbon monoxide   | No limit set                  | -                       | -                           | -                                    |
| A17-A28<br>[Point 17-28 on site plan in schedule 7] | Flour silo vents – bag filters             | No parameters set   | No limits set                 | -                       | -                           | -                                    |
| A29<br>[Point A29 on site plan in schedule 7]       | Oven - Rolls line (1.68 MWth input)        | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set                  | -                       | -                           | -                                    |
|   |  | Carbon monoxide   | No limit set                  | -                       | -                           | -                                    |

**Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements**

| <b>Location or description of point of measurement</b>   | <b>Source</b>   | <b>Parameter</b> | <b>Limit (incl. unit)</b> | <b>Reference Period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
|--|---|------------------|---------------------------|-------------------------|-----------------------------|--------------------------------------|
| W1 [Point S1 on site plan in Schedule 7] clean yard and roof water via oil/water interceptor and attenuation tank then to Lingwell | Roof and yard surface waters to the South of the process building | No parameter set | No limit set              | -                       | -                           | -                                    |

**Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements**

| <b>Location or description of point of measurement</b>   | <b>Source</b>   | <b>Parameter</b> | <b>Limit (incl. unit)</b> | <b>Reference Period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
|--|---|------------------|---------------------------|-------------------------|-----------------------------|--------------------------------------|
| Gate Beck watercourse  |   |                  |                           |                         |                             |                                      |
| W2 [Point S2 on site plan in Schedule 7] clean yard and roof water via oil/water interceptor and attenuation tank then to Lingwell Gate Beck watercourse | Roof and yard surface waters to the North of the process building | No parameter set | No limit set              | -                       | -                           | -                                    |

**Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements**

| <b>Emission point ref. &amp; location</b>   | <b>Source</b>                                | <b>Parameter</b> | <b>Limit (incl. Unit)</b> | <b>Reference period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
|---|--|------------------|---------------------------|-------------------------|-----------------------------|--------------------------------------|
| S1 [Point E1 on site plan in Schedule 7] process effluent via grease interceptor to sewer                                       | Production processes, and cleaning           | No parameter set | No limit set              | -                       | -                           | -                                    |
| S2 [Point E2 on site plan in Schedule 7] process effluent via effluent treatment (pH balancing) and grease interceptor to sewer | Production processes, tray wash and cleaning | No parameter set | No limit set              | -                       | -                           | -                                    |

## Schedule 4 – Reporting

| Table S4.1 Reporting of monitoring data |  |                  |               |
|---|--|------------------|---------------|
| Parameter                               | Emission or monitoring point/reference | Reporting period | Period begins |
| -                                       | -                                      | -                | -             |

| Table S4.2: Annual production |        |
|-------------------------------|--------|
| Parameter                     | Units  |
| Product baked                 | tonnes |

| Table S4.3 Performance parameters |                         |        |
|-----------------------------------|-------------------------|--------|
| Parameter                         | Frequency of assessment | Units  |
| Water usage                       | Annually                | tonnes |
| Energy usage                      | Annually                | MWh    |
| Total raw material used           | Annually                | tonnes |

| Table S4.4 Reporting forms   |   |              |
|------------------------------|---|--------------|
| Media/parameter              | Reporting format  | Date of form |
| Water usage                  | Form water usage 1 or other form as agreed in writing by the Environment Agency | 20/02/19     |
| Energy usage                 | Form energy 1 or other form as agreed in writing by the Environment Agency      | 20/02/19     |
| Other performance indicators | Form performance 1 or other form as agreed in writing by the Environment Agency | 20/02/19     |

## Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

### Part A

|                                |  |
|--------------------------------|--|
| Permit Number                  |  |
| Name of operator               |  |
| Location of Facility           |  |
| Time and date of the detection |  |

**(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution**

**To be notified within 24 hours of detection**

|  |  |
|--|--|
| Date and time of the event                                       |  |
| Reference or description of the location of the event            |  |
| Description of where any release into the environment took place |  |
| Substances(s) potentially released                               |  |
| Best estimate of the quantity or rate of release of substances   |  |
| Measures taken, or intended to be taken, to stop any emission    |  |
| Description of the failure or accident.                          |  |

**(b) Notification requirements for the breach of a limit**

**To be notified within 24 hours of detection unless otherwise specified below**

|                                     |  |
|-------------------------------------|--|
| Emission point reference/<br>source |  |
|-------------------------------------|--|

| <b>(b) Notification requirements for the breach of a limit</b>                      |  |
|---|--|
| <b>To be notified within 24 hours of detection unless otherwise specified below</b> |  |
| Parameter(s)  |  |
| Limit   |  |
| Measured value and uncertainty  |  |
| Date and time of monitoring   |  |
| Measures taken, or intended to be taken, to stop the emission                       |  |

| <b>Time periods for notification following detection of a breach of a limit</b> |                            |
|---|----------------------------|
| <b>Parameter</b>  | <b>Notification period</b> |
|   |                            |
|   |                            |
|   |                            |

| <b>(c) Notification requirements for the breach of permit conditions not related to limits</b> |  |
|--|--|
| <b>To be notified within 24 hours of detection</b>   |  |
| Condition breached   |  |
| Date, time and duration of breach  |  |
| Details of the permit breach i.e. what happened including impacts observed.                    |  |
| Measures taken, or intended to be taken, to restore permit compliance.                         |  |

| <b>(d) Notification requirements for the detection of any significant adverse environmental effect</b> |  |
|--|--|
| <b>To be notified within 24 hours of detection</b>   |  |
| Description of where the effect on the environment was detected  |  |
| Substances(s) detected   |  |
| Concentrations of substances detected  |  |
| Date of monitoring/sampling  |  |



## Part B – to be submitted as soon as practicable

|  |  |
|--|--|
| Any more accurate information on the matters for notification under Part A.  |  |
| Measures taken, or intended to be taken, to prevent a recurrence of the incident   |  |
| Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission |  |
| The dates of any unauthorised emissions from the facility in the preceding 24 months.  |  |

|           |  |
|-----------|--|
| Name*     |  |
| Post      |  |
| Signature |  |
| Date      |  |

\* authorised to sign on behalf of the operator

## Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“Pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

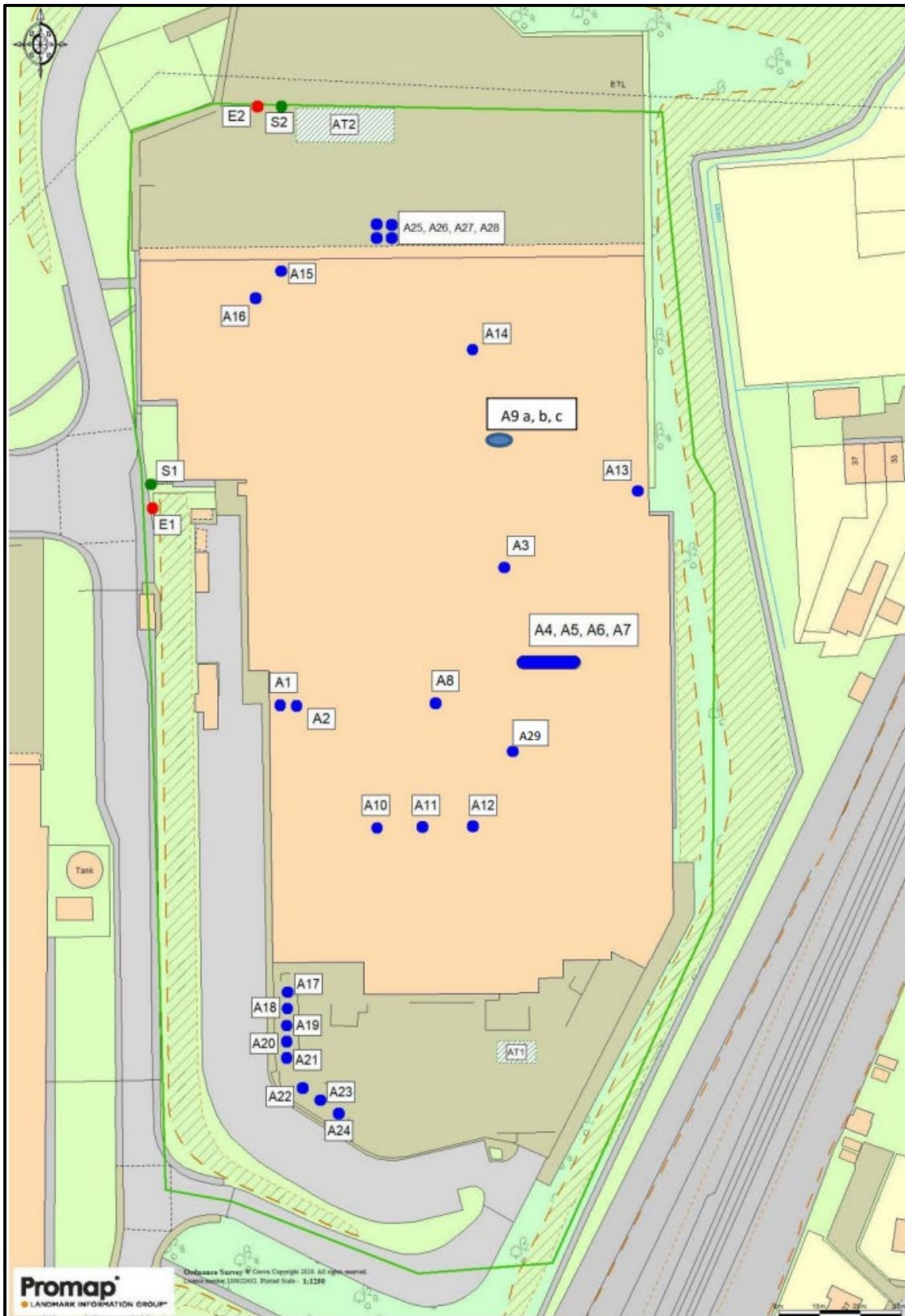
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

“year” means calendar year ending 31 December.

# Schedule 7 – Site plan



END OF PERMIT

Permit number  
EPR/TP3230RP