

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

ABF Grain Products Limited trading as Speedibake

Cross Lane Bakery - Bradford
6 Cross Lane Industrial Estate
Westgate Hill
Bradford
BD4 0SG

Variation application number

EPR/DP3531SW/V006

Permit number

EPR/DP3531SW

Cross Lane Bakery - Bradford

Permit number EPR/DP3531SW

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.

This variation EPR/DP3531SW/V006 authorises the following changes on site:

- Installation of a new artisan pizza base manufacturing processing line, producing up to 48 tonnes of pizza base within a 24-hour day.
- Addition of two natural gas fuelled burners to heat the pizza oven, each with a maximum thermal input of 0.34 MWth, and associated emission points to air (A64 and A66).
- Four additional emission points to air associated with the pizza oven (A63, A65, A67, A68 venting of warm air from the oven).
- Addition of an ammonia based spiral freezer for pizza base chilling.
- Installation of a new below ground 18,200 litre, glass reinforced plastic tank to contain wastewater from the pizza line.
- Improvement conditions IC3 and IC4 added to Table S1.3 of the Permit.

The main features of the permit:

Cross Lane Bakery is a 4.3 hectare installation operated by ABF Grain Products Limited trading as Speedibake and is located approximately 750 metres north-east of Birkenshaw town centre at national grid reference SE 20753 29449. The installation produces a range of frozen bakery products including garlic bread, muffins and baguettes on eight process lines.

The relevant listed activity is Section 6.8 Part A(1)(d)(iii)(aa) - Treatment and processing, other than exclusively packaging, of raw materials, whether previously processed or unprocessed, intended for the production of food (where the weight of the finished product excludes packaging) – animal and vegetable raw materials (other than milk only) with a finished product production capacity greater than 75 tonnes per day.

The site has a production capacity of 248 tonnes per day.

A variety of flours and pre-mixed concentrates are mixed together with other raw materials which then enter a number of different processing operations, dependent on the final product required. These include proving, baking, addition of fillings or coatings, cooling and freezing. Products are then packaged, labelled and stored prior to dispatch. Other associated activities include storage and handling of raw materials, steam production, chilling, freezing, effluent treatment, waste storage and handling.

The site has an environmental management system in place and operates under a Climate Change Levy agreement.

Water use on site is approximately 160 m³ water per day. The principal uses of water are mixing, proving, cooling and cleaning.

The site has one trade discharge consent to foul sewer. Effluent treatment prior to release to sewer consists of screening, fat/grease trap, settlement tank and pH adjustment. There are three surface water outfalls to Inmoor Dyke, with the main discharge passing through an interceptor.

Emissions to air are from the boilers and ovens. There are two steam raising gas fired boilers with a combined thermal input of 1.5 MW capacity. The ovens on site have a combined thermal input of slightly less than 5 MW.

Any food wastage on site (including raw materials) is recovered and used elsewhere as an animal feed ingredient.

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.

Status log of the permit		
Description	Date	Comments
Application EPR/DP3531SW/A001	Duly Made 04/08/2005	
Response to request for information	25/11/2005, 28/11/2005, 07/12/2005, 08/12/2005, 13/12/2005	Request dated 22/11/2005.
Permit determined EPR/DP3531SW	03/02/2006	Permit determined.
Variation notice EPR/DP3531SW/V002 issued	01/07/2008	Application for a new muffin production line.
Application EPR/DP3531SW/V003 (variation and consolidation)	Duly Made 29/06/2015	Application to make improvements to part of the Muffin 2 line and update the permit to modern conditions.
Variation determined EPR/DP3531SW	29/07/2015	Varied and consolidated permit issued in modern condition format.
Application EPR/DP3531SW/V004 (variation and consolidation)	Duly Made 24/04/2020	Application for amendment to listed activity, changes to emission points to air and removal of muffin line 1, to be replaced with mince pie line.
Variation determined EPR/DP3531SW	03/11/2020	Varied and consolidated permit issued in modern condition format.
Application EPR/DP3531SW/V005 (variation and consolidation)	Regulation 61 Notice response received 03/01/2023	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Additional information requested	12/07/2024	Additional information request regarding BATc 6, BATc 9 and MCP.
	04/11/2024	Additional information request regarding BATc 7.
Variation determined and consolidation issued EPR/DP3531SW	20/11/2024	Varied and consolidated permit issued in modern format.
Application EPR/DP3531SW/V006 (variation and consolidation)	Duly made 21/08/2024	Application for the installation of an artisan pizza base manufacturing processing line, and addition of two natural gas fuelled burners, six new emission points to air, an ammonia based spiral freezer and below ground wastewater tank.

Status log of the permit		
Description	Date	Comments
Additional information requested	08/01/2025	Response to Schedule 5 Notice dated 20/12/2024 regarding emissions to sewer and air.
Additional information requested	16/01/2025	Details regarding chemical usage on site.
Additional information requested	29/01/2025	Revised emission point plan.
Variation determined and consolidation issued EPR/DP3531SW	25/02/2025	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/DP3531SW

Issued to

ABF Grain Products Limited trading as Speedibake (“the operator”)

whose registered office is

**Weston Centre
10 Grosvenor Street
London
W1K 4QY**

company registration number 00079590

to operate a regulated facility at

**Cross Lane Bakery - Bradford
6 Cross Lane Industrial Estate
Westgate Hill
Bradford
BD4 0SG**

to the extent set out in the schedules.

The notice shall take effect from 25/02/2025.

Name	Date
Stacey Tapsell	25/02/2025

Authorised on behalf of the Environment Agency

Schedule 1

The following conditions were varied as a result of the application made by the operator:

- Table S1.1, as referred to in condition 2.1.1, has been varied to include a revised production capacity, and add directly associated activities AR8 and AR9 which were previously removed in error.
- Table S1.2, as referred to in conditions 2.3.1 and 2.3.2, has been varied to include new operating techniques associated with V006.
- Table S1.3, as referred to in condition 2.4.1, has been varied to include IC3 and IC4.
- Table S3.1, as referred to in conditions 3.1.1, 3.5.1 and 3.5.4, has been varied to include emission points A63, A64, A65, A66, A67, A68.
- Schedule 7, as referred to in condition 2.2.1, has been varied to include an updated site plan.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/DP3531SW

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/DP3531SW/V006 authorising,

ABF Grain Products Limited trading as Speedibake (“the operator”),

whose registered office is

Weston Centre

10 Grosvenor Street

London

W1K 4QY

company registration number **00079590**

to operate an installation at

Cross Lane Bakery - Bradford

6 Cross Lane Industrial Estate

Westgate Hill

Bradford

BD4 0SG

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

Name	Date
Stacey Tapsell	25/02/2025

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.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

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.
- 3.1.4 For the following activities referenced in schedule 1, table S1.1 (AR2) the first monitoring measurements shall be carried out within four months of 01/01/2030 of the date when the MCP is first put into operation, whichever is later.

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.

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2, and S3.3 unless otherwise agreed in writing by the Environment Agency.

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 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.

4.3.4 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.

4.3.5 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.3.6 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

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	Section 6.8 Part A1(d)(iii)(aa)	<p>Treating and processing of animal and vegetable raw materials (other than milk only) both in combined and separate products – ready to eat meals.</p> <p>Production of breads, cakes (muffins and pastry products), garlic breads and pizza bases for human consumption with finished production capacity greater than 75 tonnes per day.</p>	<p>From receipt of raw materials to production of finished product including storage and dispatch offsite.</p> <p>Production capacity is limited to 248 tonnes per day.</p>
Directly Associated Activity			
AR2	Steam and electrical power supply	<p><u>Medium Combustion Plants</u></p> <p>Steam Boiler 1 (Natural Gas) – 1.2MWth</p> <p>Steam Boiler 2 (Natural Gas) – 1.2MWth</p> <p>Muffin 2 Thermal Oil Heater (Natural Gas) – 1.1MWth</p> <p>Muffin 3 Thermal Oil Heater (Natural Gas) – 1.1MWth</p>	From receipt of fuel to release of products of combustion to air.
AR3	Raw material storage and handling	Storage and handling of raw materials at the installation	From receipt of raw materials to dispatch of final product.
AR4	Use of refrigerants	Use of refrigerants in cooling, chilling and/or freezing systems at the installation.	From receipt of raw materials to dispatch of final product.
AR5	Storage and use of chemicals and oils	Storage and use of chemicals and oils at the installation.	From receipt of chemicals and oils to disposal of wastes arising.
AR6	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR7	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the site surface water system.
AR8	Effluent treatment	Use of 3 stage weir interceptor and pH adjustment using sodium hydroxide, removal of slurry by specialised waste contractor to landfill.	Storage, handling and treatment of wastewater effluent arising from processing activities, prior to discharge to wastewater

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
			treatment facility for treatment.
AR9	Heat generation - ovens	Baking and proving of bakery goods with ovens having a combined thermal input of <6 MWth.	From receipt of fuel to release of products of combustion to air.

Table S1.2 Operating techniques

Description	Parts	Date Received
Application EPR/DP3531SW/A001	The response to questions 2.1 and 2.2 given in section 2.1 and 2.2 of the Application	04/08/2005
Requested Information	Responses to information request in documents IR DOC 1 IR DOC 3 and 4 IR DOC 5 and 6	25/11/2005 07/12/2005 13/12/2005
Variation Application EPR/DP3531SW/V002	Section C2 of Variation Application dated April 2008	04/04/2008
Variation Application EPR/DP3531SW/V003	The response to question 3a (Technical Standards) given in Part C3 of the Application form	29/06/2015
Variation Application EPR/DP3531SW/V004	Responses to questions in parts C2 and C3 of the application form and referenced supporting information	24/04/2020
Regulation 61 (1) Notice – Responses to questions dated 02/08/2022	All parts	Received 03/01/2023
Variation Application EPR/DP3531SW/V006	Responses to application form Part C2 and Part C3, and referenced supporting documents, including: <ul style="list-style-type: none"> • Appendix 1b – new process layout plan. • Appendix 1c – pizza line drainage plan. • Appendix 2 – oven burners specification. • Appendix 3 – oven and flues diagram. • Appendix 4 – effluent tank specification. • Appendix 5 – effluent overflow alarm specification. • Appendix 6a – updated air quality assessment. • Appendix 6b – 2005 air quality assessment. • Appendix 6a(i) – whole site emissions to air H1 tool. • Appendix 6a(ii) - pizza base burners H1 tool. • Appendix 7 – updated BAT assessment. • Revised main supporting document. 	21/08/2024
Response to Schedule 5 Notice dated 20/12/2024	Response to Parts A and B, including confirmation of the maximum capacity of the effluent treatment plant, and submission of the following documents: <ul style="list-style-type: none"> • Surface water risk assessment. • Materials inventory. • Surface water risk assessment data. • Surface water H1 tool. 	08/01/2025
Response to Request for Information dated 15/01/2025	Submission of Materials Safety Data Sheets (MSDS) for chemicals used on site.	16/01/2025
Response to Request for Information dated 29/01/2025	Submission of revised Appendix 1a - site plan.	29/01/2025

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC1	<p>The operator shall use refrigerants without ozone depletion potential and with a low global warming potential (GWP) in accordance with BAT 9 from the Food, Drink and Milk Industries BATCs.</p> <p>To demonstrate compliance against BAT 9, the operator shall develop a replacement plan for the refrigerant system(s) at the installation. This shall be incorporated within the existing environmental management system by the specified date.</p> <p>The plan should include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • Where practicable, retro filling systems containing high GWP refrigerants e.g. R-404A with lower GWP alternatives as soon as possible. • An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP. 	20/02/2025, or other date as agreed in writing with the Environment Agency.
IC2	<p>The operator shall confirm, achievement of the 'Narrative' BAT conclusions as identified in the Food, Drink and Milk Bref published on 4 December 2019 where BAT is currently not demonstrated or achieved with respect to BATc 7.</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	20/02/2025, or other date as agreed in writing with the Environment Agency.
IC3a	<p>The operator shall submit a written report to the Environment Agency for assessment and written approval.</p> <p>The report must contain:</p> <ul style="list-style-type: none"> • An MCERTS Site-specific protocol for monitoring; <ul style="list-style-type: none"> ○ NOx and other parameters needed for screening and modelling. ○ On stacks A10, A11, A19, A64, A66. • Timescales to complete the monitoring. <p>The operator shall implement the proposals in the report in line with the timescales as agreed in writing with the Environment Agency.</p>	25/05/2025, or other date as agreed in writing with the Environment Agency
IC3b	<p>The operator shall submit a written report to the Environment Agency for assessment and written approval.</p> <p>The report must contain:</p> <ul style="list-style-type: none"> • Monitoring results for stacks tested under IC3a. • A revised H1 air quality risk assessment, considering both human health and ecological receptors, in accordance with Air emissions risk assessment for your environmental permit - GOV.UK <ul style="list-style-type: none"> ○ Using permitted ELVs. ○ Where no ELVs are listed, using stack monitoring results. • Detailed air dispersion modelling, in accordance with Environmental permitting: air dispersion modelling reports - GOV.UK, where the emissions do not screen out within the revised H1 assessment. • Measures to be taken to reduce or abate emissions, with associated timescales for implementation, where detailed modelling does not screen out emissions. <p>The Operator shall implement the proposals in the report in line with the timescales as agreed in writing with the Environment Agency.</p>	25/05/2026, or other date as agreed in writing with the Environment Agency
IC4a	<p>The operator shall submit a written report to the Environment Agency for assessment and approval.</p> <p>The report must contain:</p>	25/05/2025, or other date as agreed in writing with the

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
	<ul style="list-style-type: none"> • A monitoring programme to characterise the effluent discharge to emission point S1 in the site plan in Schedule 7, in accordance with Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK. • Parameters and substances that will be tested for. • Sampling methods and equipment that will be used • Timescales to complete the monitoring. <p>Where a substance known to be in the effluent (for example from dosing/chemicals used in the process) but there is no monitoring method available, concentrations should be calculated from dosing volumes and monitored effluent flows.</p> <p>The operator shall implement the proposals in the report in line with the timescales as agreed in writing with the Environment Agency.</p>	Environment Agency
IC4b	<p>The operator shall submit a written report to the Environment Agency for assessment and approval, following completion of the monitoring programme approved under IC4a.</p> <p>The report must contain:</p> <ul style="list-style-type: none"> • The results from 12 months of sampling and monitoring of effluent discharges to emission point S1 in the site plan in Schedule 7 at a frequency of a minimum of one sample a month. • An updated H1 risk assessment and/or modelling results which take into consideration relevant environmental standards as specified in Environment Agency guidance document Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk) or Predicted No Effect Concentration (for pollutants that have ecotoxic properties but no EQS). • A comparison of the conclusions of the updated H1 assessment and/or modelling results against the conclusions of the H1 assessment submitted in support of variation application EPR/DP3531SW/V006, dated 08/01/2025. • Where the results of the updated H1 assessment show that significant/adverse impact is likely from the emissions of any of the parameters, the operator shall carry out modelling in accordance with rqp-mper/executables/README.md at main · DEFRA/rqp-mper · GitHub and H1 annex D2: assessment of sanitary and other pollutants in surface water discharges - GOV.UK. Where the results of the modelling show that significant/adverse impact is likely from the emissions of any of the parameters, the operator shall provide proposals and timescales on how to manage the effluent to ensure discharges have insignificant impact on receiving waters. <p>The Operator shall implement the proposals in the report in line with the timescales as agreed in writing with the Environment Agency.</p>	25/06/2026, or other date as agreed in writing with the Environment Agency

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
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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 1 Exhaust 1.2MWth (Natural Gas)	Oxides of nitrogen (NO and NO ₂ – expressed as NO ₂)	250 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 14792
		Carbon monoxide	No limit set	Periodic	Every three years	MCERTS BS EN15058
A2 [Point A2 on site plan in Schedule 7]	Boiler 2 Exhaust 1.2MWth (Natural Gas)	Oxides of nitrogen (NO and NO ₂ – expressed as NO ₂)	250 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 14792
		Carbon monoxide	No limit set	Periodic	Every three years	MCERTS BS EN15058
A3 [Point A3 on site plan in Schedule 7]	Mince pie line air vent	--	--	--	--	--
A4 [Point A4 on site plan in Schedule 7]	Emergency vent for ammonia refrigeration plant	--	--	--	--	--
A5 [Point A5 on site plan in Schedule 7]	Mince pie line air vent	--	--	--	--	--
A6 – A9 [Point A6 – A9 on site plan in Schedule 7]	Mince pie line air vent	--	--	--	--	--
A10 [Point A10 on site plan in Schedule 7]	Gouet plant oven burner extract 1	Oxides of nitrogen (NO and NO ₂ – expressed as NO ₂)	No limit set	--	--	--
		Carbon monoxide	No limit set	--	--	--
A11 [Point A11 on site plan in Schedule 7]	Gouet plant oven burner extract 2	Oxides of nitrogen (NO and NO ₂ – expressed as NO ₂)	No limit set	--	--	--

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
		Carbon monoxide	No limit set	--	--	--
A12 – A15 [Point A12 – A15 on site plan in Schedule 7]	Gouet plant oven heat ventilation discharges	--	--	--	--	--
A16 [Point A16 on site plan in Schedule 7]	Mecatherm C oven burner extract	--	--	--	--	--
A17 – A18 [Point A17 - A18 on site plan in Schedule 7]	Mecatherm C oven heat exhausts	--	--	--	--	--
A19 [Point A19 on site plan in Schedule 7]	Mecatherm D oven burner exhaust	Oxides of nitrogen (NO and NO ₂ – expressed as NO ₂)	No limit set	--	--	--
		Carbon monoxide	No limit set	--	--	--
A20 – A21 [Point A20 – A21 on site plan in Schedule 7]	Mecatherm D oven heat exhaust	--	--	--	--	--
A38 [Point A38 on site plan in Schedule 7]	Thermal Oil Plant Flue	--	--	--	--	--
A39 [Point A39 on site plan in Schedule 7]	Muffin 3 Thermal Oil Heater (Natural Gas) – 1.1MWth	Oxides of nitrogen (NO and NO ₂ – expressed as NO ₂)	250 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 14792
		Carbon monoxide	No limit set	Periodic	Every three years	MCERTS BS EN15058
A40 [Point A40 on site plan in Schedule 7]	Rapeseed oil tank vent	--	--	--	--	--
A60 [Point A60 on site plan in Schedule 7]	Muffin 2 Thermal Oil Heater (Natural Gas) – 1.1MWth	Oxides of nitrogen (NO and NO ₂ – expressed as NO ₂)	250 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 14792

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
		Carbon monoxide	No limit set	Periodic	Every three years	MCERTS BS EN15058
A61 [Point A61 on site plan in Schedule 7]	Muffin 2 post oven out-feed	--	--	--	--	--
A62 [Point A62 on site plan in Schedule 7]	Muffin 2 baking chamber ventilation	--	--	--	--	--
A63 [Point A63 on site plan in Schedule 7]	Pizza oven entrance stack	--	--	--	--	--
A64 [Point A64 on site plan in Schedule 7]	Pizza oven burner 1	Oxides of nitrogen (NO and NO ₂ – expressed as NO ₂)	No limit set	--	--	--
		Carbon monoxide	No limit set	--	--	--
A65 [Point A65 on site plan in Schedule 7]	Bake chamber 1 stack	--	--	--	--	--
A66 [Point A66 on site plan in Schedule 7]	Pizza oven burner 2	Oxides of nitrogen (NO and NO ₂ – expressed as NO ₂)	No limit set	--	--	--
		Carbon monoxide	No limit set	--	--	--
A67 [Point A67 on site plan in Schedule 7]	Bake chamber 2 stack	--	--	--	--	--
A68 [Point A68 on site plan in Schedule 7]	Pizza oven exit stack	--	--	--	--	--

Note 1: Emission limit and/or monitoring requirements apply from 1 January 2030, unless otherwise advised by the Environment Agency.

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

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 [Point W1 on site plan in Schedule 7]	Uncontaminated surface water via an interceptor to Inmoor Dyke	--	--	--	--	--
W2 [Point W2 on site plan in Schedule 7]	Uncontaminated surface water to Inmoor Dyke	--	--	--	--	--
W3 [Point W3 on site plan in Schedule 7]	Uncontaminated surface water to Inmoor Dyke	--	--	--	--	--

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

Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 [Point S1 on site plan in Schedule 7] emission to Yorkshire Water's Esholt Wastewater Treatment works	Effluent treatment plant	No parameters set	No limits set	--	--	--

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air parameters as required by condition 3.5.1	A1, A2, A39 & A60	First monitoring undertaken in accordance with condition 3.1.4 to be reported within 3 months, and then every 3 years thereafter	From first monitoring requirements in accordance with condition 3.1.4

Table S4.2: Annual production/treatment	
Parameter	Units
Total product produced.	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Waste	Annually	tonnes
COD loss efficiency	Annually*	COD te/te product
Food waste	Annually	Tonnes

*COD efficiency to be calculated on a weekly frequency, reported annually

Table S4.4 Reporting forms		
Parameter	Reporting form	Form version number and date
Point source emissions to air	Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Point source emissions to water (other than sewer)	Emissions to Water Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Food Waste	Food waste Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1 06/02/2023
Other performance parameters	Other Performance Parameters Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

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/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
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.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
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.

“Food waste” reporting: Reporting of food waste to use a methodology such as the global Food Loss and Waste Accounting and Reporting Standard (FLW standard), WRAP’s Target Measure Act initiative or similar.

“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.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“Pests” means Birds, Vermin and Insects.

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.

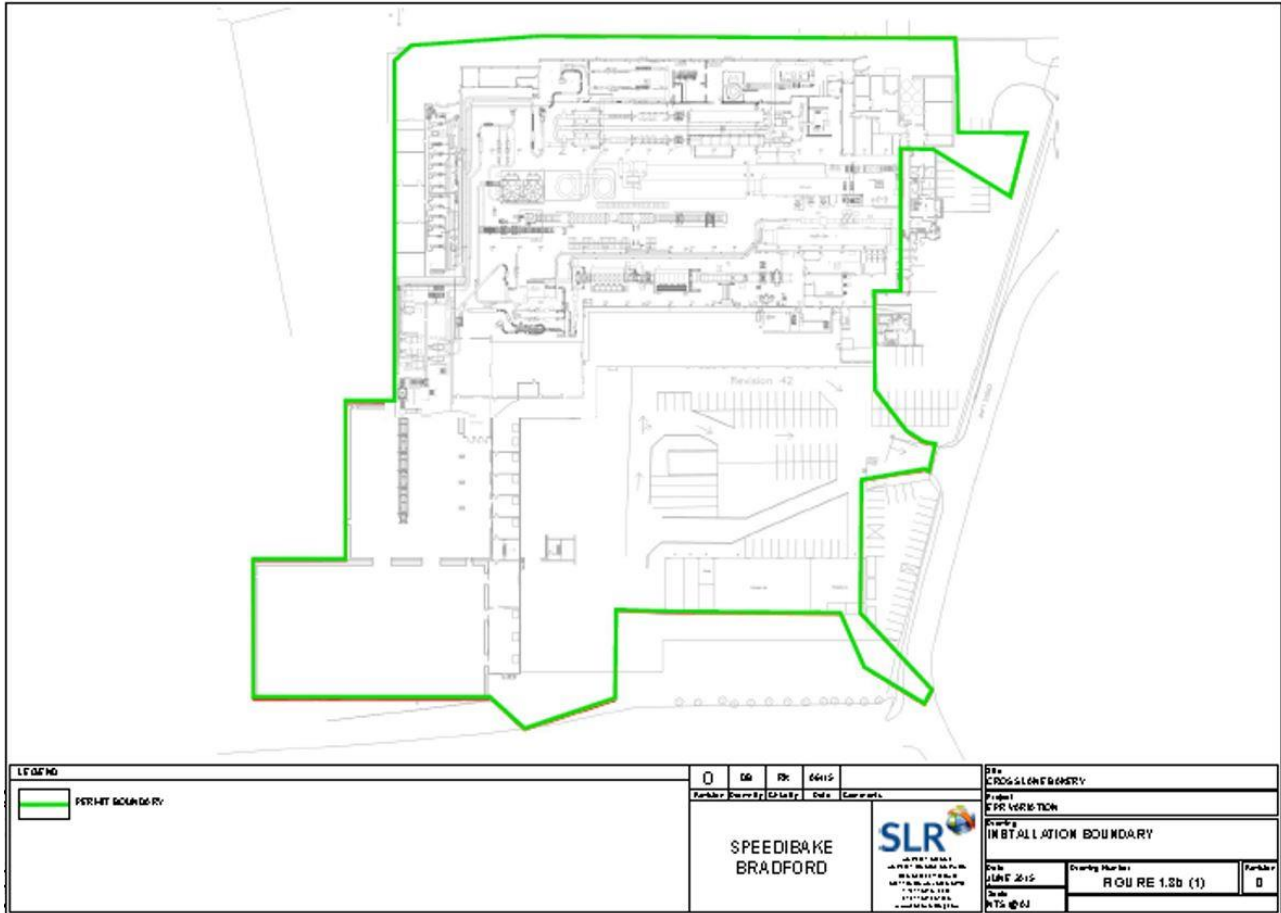
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- 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 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.

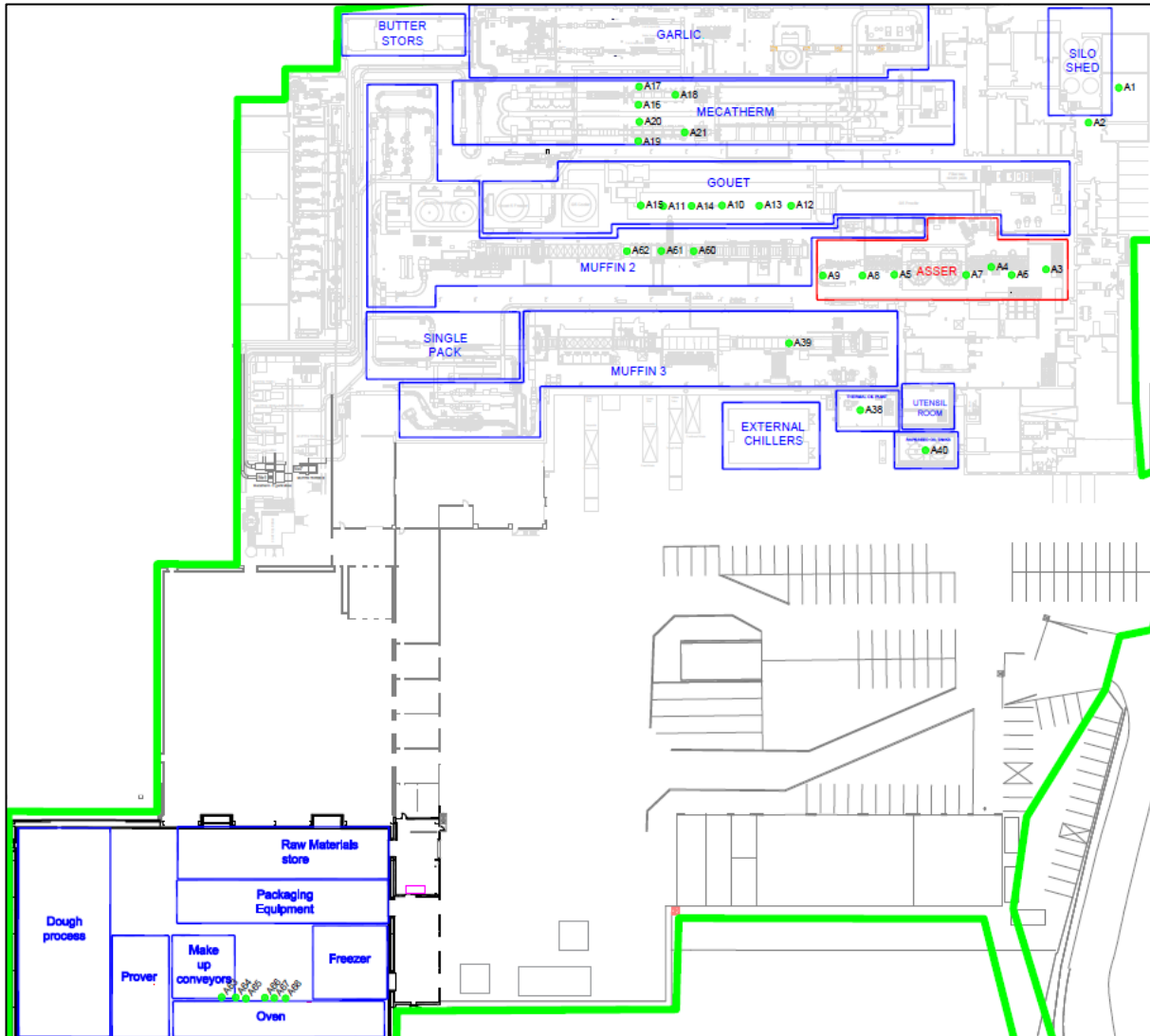
“year” means calendar year ending 31 December.

Schedule 7 – Site plan

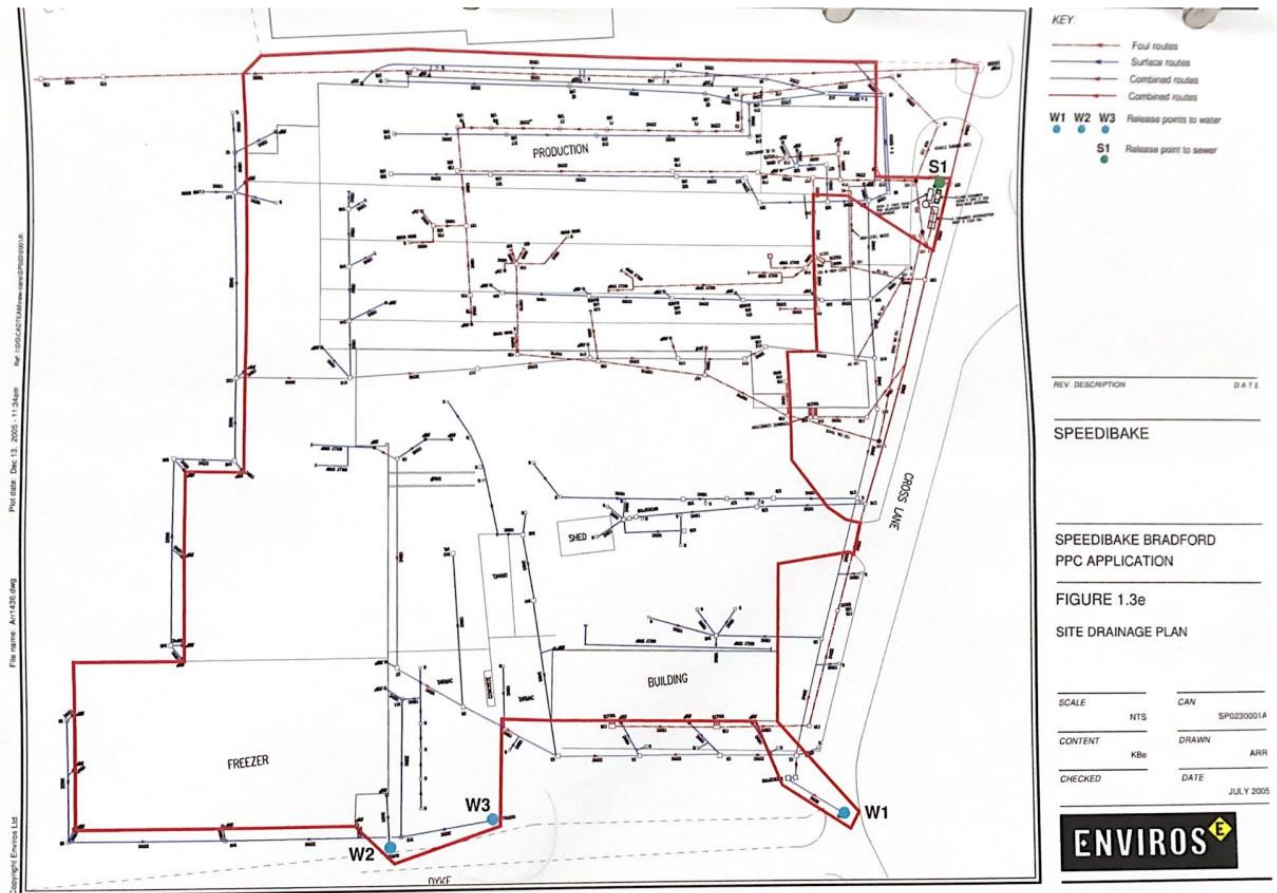
Installation boundary



Air Emission points



Water Emission Points



END OF PERMIT