Permitting Decisions- Variation

We have decided to grant the variation for Cross Lane Bakery – Bradford operated by ABF Grain Products Limited trading as Speedibake.

The variation number is EPR/DP3531SW/V006.

The permit was issued on 25/02/2025.

The variation is for:

- 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.

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

Purpose of this document

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

- highlights key issues in the determination
- summarises the decision making process in the decision considerations section to show how the main relevant factors have been taken into account
- shows how we have considered the consultation responses

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

Read the permitting decisions in conjunction with the environmental permit and the variation notice.

Key issues of the decision

Emissions to Air

There are six new emission points to air added as part of this variation (A63, A64, A65, A66, A67, A68), associated with the installation of the new artisan pizza base manufacturing processing line. A64 and A66 are direct flues from the two new natural gas fuelled burners. The burners are used to heat the pizza oven, and each have a maximum thermal input of 0.34 MWth. The remaining new emission points to air are in place for the venting of warm air from the oven.

The operator submitted an H1 risk assessment with their application which considered combustion gas emissions, Nitrogen Dioxide (NOx), from the site. The assessment was in two parts; one considering the whole site (existing boiler and burner air emissions points, as well as the new pizza line burner air emission points); and a second considering the impact of the new pizza line in isolation.

When considering the whole site emissions, emissions of NOx could not be screened out using the H1 methodology. The screening does however show that emissions of NOx from the pizza line screened out as insignificant using the H1 methodology and it can be concluded that the addition of the two new burners will have an insignificant impact on air quality.

As there is no recent exhaust emissions monitoring for the site and the H1 assessments relied on historical monitoring results, previously used for the determination of the original environmental permit, manufacturer data, and estimates based on proxy data, an updated H1 assessment is required (see Improvement Condition section below).

Emissions to water

There are no changes to emissions to water or sewer proposed as part of this permit variation application.

A relatively small quantity of wastewater will be generated as a result of the new pizza line. The majority of cleaning will be dry (wiping and sweeping) for manufacturing purposes. Water will be used for abnormal cleaning operations and for domestic purposes (hand washing etc.,). Due to the location of the new line, it is not practical for the small amount of wastewater that will be generated to be routed to the existing process effluent drainage system. This wastewater will therefore drain to a below ground 18,200 litre, glass reinforced plastic tank, adjacent to the new line. To mitigate the risk of tank overfilling and drains backing up, the tank will be fitted with a float switch that is connected to a Triton LR30 alarm. Once triggered, the alarm will notify relevant representatives who will immediately cease manufacturing to stop any water discharge to the tank.

Site will commission a licenced waste carrier to tanker off the effluent to a permitted waste treatment facility. It is anticipated that this tank will be routinely emptied approximately weekly.

Chilling

A new ammonia based spiral freezer associated with the pizza line has been added as part of this variation. This freezer will be connected to the sites existing ammonia plant by appropriately certified contractors. Overall, due to the decommissioning of cold storage to free up ambient storage for this new installation, the overall mass of ammonia on site will decrease from approximately 20 tonnes to approximately 12 tonnes.

Improvement programme

As we were made aware that the maximum production capacity at the site had increased, from 110 tonnes per day in the current permit to 248 tonnes per day, a revised H1 air quality risk assessment was required to assess the impact of combustion gas emissions to air from the site.

The addition of the pizza base manufacturing processing line accounts for an additional 48 tonnes per day, so only part of the overall increase in production capacity. Furthermore, the H1 air quality risk assessment submitted with the application demonstrated that emissions of NOx resulting solely from the addition of the pizza line can be screened out as insignificant. However, when considering the whole site, emissions could not be screened out using the H1 methodology.

As the H1 assessment submitted with the application was based on historical monitoring results, manufacturer data, and estimates based on proxy data an updated H1 assessment is required to assess emissions of NOx from the whole site, at the current production capacity. As a result, we have included IC3 a) and b) in Table S1.3 of the Permit, requiring the operator to submit proposals for monitoring of combustion gas emissions to air from the site for approval, carry out the approved monitoring and submit a revised H1 assessment based on this monitoring. If emissions do not screen out within the revised H1 assessment, the operator must submit detailed air dispersion modelling.

Similarly, a revised H1 surface water risk assessment is required to assess the impact of the effluent discharge, at the current production capacity, downstream of the water treatment works. As there are no changes to emissions to water or sewer proposed as part of this permit variation, this requirement has been included as an improvement condition (IC4 a) and b)) in Table S1.3 of the Permit.

BAT assessment

We have assessed if the operator's proposal is in-line with the Best Available Techniques by referring to the following guidance:

- Best Available Techniques (BAT) conclusions for the Food, Drink and Milk industries published on 4th December 2019 in the official journal of the European Union.

We consider the proposal to be in-line with BAT; a summary of these decisions is provided in table 1 below.

Table 1 – Food Drink and Milk BAT Assessment	
BAT conclusion	**Assessment of the proposal to ensure they are in line with the BAT Conclusion requirements**
BATc 1 and BATc 2 Environmental Management System (EMS)	The operator has an EMS equivalent to the ISO14001 standard. The operator has confirmed that the site will be risk assessing the new environmental aspects and impacts associated with the new production process and that relevant EMS documentation will be updated to effectively manage risk and adhere to the relevant standards required through environmental permitting. Wastewater associated with the new pizza base manufacturing will be held in a below ground tank prior to tankering away to an appropriately permitted waste treatment facility. This water will routinely be domestic foul water associated with handwashing. Cleaning based effluent may be generated in the event of abnormal cleaning operations. Wastewater within this tank will be quantified and reported in line with existing KPI tracking and reporting procedures. The characterisation of the wastewater will be undertaken in accordance with the document 'Guidance on the classification and assessment of waste - Technical Guidance WM3.' The pizza base line will introduce two small burners (0.68 MWth combined). The emissions from these are small (see relevant H1) in comparison to the existing capacity and their addition will have an insignificant impact on air quality.
BATc 3 Monitoring for emissions to water	The monitoring of emissions to water will not be impacted by the proposed changes, therefore, no further assessment is required.
BATc 4 Monitoring for emissions to water	BATc 4 is not applicable to this Installation as there are no direct discharges to surface water other than uncontaminated surface water.
BATc 5 Monitoring for channelled emissions to air	BATc 5 is not applicable to this Installation as it does not have any of these processes.

BATc 6 Energy Efficiency	While an absolute increase in electricity and natural gas usage will occur as a result of these operations, relative energy usage is not expected to significantly change, or may improve, with respect to current operations. All installed equipment will be modern, processes will be optimised, and the site is committed to continuous improvements in energy efficiency.
BATc 7 Water consumption and wastewater minimisation	A response to outstanding IC2 requiring the operator to demonstrate compliance with BATc 7 is due 20/02/2025. A relatively small quantity of wastewater will be generated. The majority of cleaning will be dry (wiping and sweeping) for manufacturing purposes. Water will be used for abnormal cleaning operations and for domestic purposes (hand washing etc.,). Relative to the wider site, water usage from this production line is not anticipated to significantly increase overall site water usage. Due to the location of the new line, it is not practical for the small amount of wastewater that will be generated to be routed to the existing process effluent drainage system. This wastewater will therefore drain to a belowground tank adjacent to the new line which will be emptied weekly by a licensed waste carrier. The new line will have a water flow meter to assist with monitoring and making future improvements.
BATc 8 Prevent or reduce the use of harmful substances	The cleaning practises at the site will not be impacted by the proposed changes, therefore, no further assessment is required.
BATc 9 Refrigerants	A response to outstanding IC1 requiring the operator to demonstrate compliance with BATc 9 is due 20/02/2025. The new spiral freezer will be ammonia based. This freezer will be connected to the sites existing ammonia plant by appropriately certified contractors. Overall, due to the decommissioning of cold storage to free up ambient storage for this new installation, the overall mass of ammonia on site will decrease from approximately 20 tonnes to approximately 12 tonnes. Ammonia is classified as a suitable refrigerant in line with BATc 9 as it is not an ozone depleting chemical and has a global warming potential of zero.

BATc 10 Resource Efficiency	The majority of waste from the line will be co product (food waste) and be redirected to animal feed. While the total tonnages of food and packaging wastes may increase as a result of the new pizza base manufacturing, the addition of new waste streams or increases in generation of hazardous waste are not anticipated as a result of the installation of the line. Any wastes from the process will be similar to existing waste food and packaging. The waste will be stored in the existing location and disposed of using existing routes.
BATc 11 Wastewater buffer storage	Buffer storage capacity will not be impacted by the proposed changes therefore, no further assessment is required.
BATc 12 Emissions to water – treatment	Effluent treatment will not be impacted by the proposed changes; therefore, no further assessment is required.
BATc 13 Noise Management Plan	An approved Noise Management Plan is not required as the site does not have a history of substantiated noise complaints.
BATc 14 Noise management	No significant change to the noise emissions profile from site is expected to occur as a result of the proposals. The new line will be located entirely within a building. As a consequence of overall increased production, extra deliveries to site are anticipated. All deliveries will be subject to existing procedures and will be made inside normal daytime delivery hours.
BATc 15 Odour Management Plan	Odour is deemed low risk therefore the site does not require an odour management plan. While some low-level baking smell may be generated, this will not significantly change the odour profile of the site.

Decision considerations

Confidential information

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

The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority – Environmental Health/Environmental Protection department – Bradford District Council
- Health and Safety Executive
- UK Health Security Agency (UKHSA)
- Food Standards Agency

The comments and our responses are summarised in the consultation responses section.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 ‘Understanding the meaning of regulated facility’, Appendix 2 of RGN2 ‘Defining the scope of the installation’ and Appendix 1 of RGN 2 ‘Interpretation of Schedule 1’.

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

The site

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

This shows the extent of the site of the facility.

The plan is included in the permit.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

This installation / regulated facility is not considered ‘relevant’ for assessment under the Agency’s procedures which cover the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) and/or the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act (CRoW) 2000). This was determined by referring to the Agency’s guidance ‘AQTAG 14: Guidance on identifying ‘relevance’ for assessment under the Habitats Regulations for installations with combustion processes.’ There are no other emissions from the installation, thus no
detailed assessment of the effect of the releases from the installation on SACs, SPAs and Ramsar sites is required.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

We have not consulted Natural England.

The decision was taken in accordance with our guidance.

Environmental risk

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

The operator’s risk assessment is satisfactory.

General operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

Operating techniques for emissions that do not screen out as insignificant

Emissions of NOx cannot be screened out as insignificant for the whole site.

However, the operator has demonstrated that emissions of NOx from the pizza line being added by this variation can be screened out as insignificant using the H1 methodology and it can be concluded that the addition of the two new burners will have an insignificant impact on air quality.

IC3 a) and b) have been added to Table S1.3 of the Permit, requiring the operator to submit a site-specific protocol for monitoring of combustion gas emissions to air from the site for approval, carry out the approved monitoring and submit a revised H1 assessment and/or modelling.

See key issues section.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

See key issues section.

Emission limits

No emission limits have been added, amended or deleted as a result of this variation.

Monitoring

Monitoring has not changed as a result of this variation.

Management system

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

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

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit variation.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

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

Response received from: UK Health Security Agency (UKHSA) on 02/10/2024.

Brief summary of issues raised: Confirmed UKHSA has no significant concerns regarding the risk to the health of the local population from the installation.

Summary of actions taken: No further action.