

Permitting Decisions- Variation

We have decided to grant the variation for Dial Lane Meat Packing Facility operated by 2 Sisters Food Group Limited.

The variation number is EPR/JP3433WU/V003.

The permit was issued on 08/01/2026.

The variation is to make the following changes to the site:

- The addition of automated systems on the production lines, with the rearrangement of the plant layout to accommodate these changes. The new automated production lines have led to an increase of 167.9 tonnes/day, from 93.5 tonnes/day to 261 tonnes/day. This changes the production capacity per week from 654.5 tonnes/week to 1,830 tonnes/week.
- The addition of 6 external refrigeration/chiller unit compressors to support the main refrigeration system
- The replacement of the existing boilers 1 x 0.55 MWth natural gas fired medium pressure hot water boiler (emission point A1) and 2 x 0.03 MWth hot water boiler (emission points A4 & A5) with new plant, the thermal input of these is below 1 MWth. Removal of reference to 4 domestic hot water boilers from the permit
- Addition of a tray wash unit for sterilisation with gas fired air drying
- Updates to the cleaning processes
- Additional waste handling bulking activities
- Update to Category 2 and 3 waste handling procedures

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

Odour

Some of the proposed changes such as the additional production lines and bulking of animal by product waste have the potential to generate odour on site, due to the nature of the material being handled.

The operator has confirmed there are controls in place to minimise the potential of odour from these changes, these include that the new automated production lines are fully enclosed with roller shutter doors on the site which should minimise potential odours. For the bulking of animal by product waste the main potential for odour generation is when the trailer is uncovered during the loading of waste. The operator has stated that this is a temporary activity which is undertaken quickly to minimise the presence of waste in the yard. The trailer is then covered once waste is loaded and removed from site straight away.

The Environment Agency requested an Odour Management Plan (OMP) via schedule 5 notice dated 15/08/2024 during the variation application. The operator provided an updated OMP document reference [410.066248.00001] dated 14/10/2024, this plan was produced in accordance with the H4 guidance. The OMP provides an overview of the site process and covers the appropriate topics for an OMP these include:

- A complete inventory of odorous materials
- Management of odorous materials
- Emissions points and receptors
- Monitoring procedures
- Contingency measures

We have reviewed the OMP and are satisfied that it reflects the site and the changes implemented in this variation appropriately. The OMP is a “live” document which will be under regular review and revision through the life of the permit. This will form part of the compliance audits which we routinely undertake.

Noise

The new automated production lines have been installed within the main factory building and are already operational. Roller door shutters are utilised to minimise impact of noise at nearby receptors.

The variation includes six temporary refrigerant plants with external compressors which have the potential to generate noise. We issued a Schedule 5 request dated 15/08/2024 for a Noise Impact Assessment (NIA). We received a response on 22/11/2024. We also issued two further Schedule 5 requests (dated 26/06/2025 and 19/08/2025) for revisions to the NIA, with responses received on 07/08/2025 and 18/09/2025, respectively.

The NIA submitted to the Environment Agency identified unacceptable levels of noise and significant adverse affect at two receptors.

AQMAU issued a noise audit report which reviewed the first revision of the consultant’s NIA. The outcome of this was that the variation was likely to lead to an increase in existing impacts (prior to the installation of chiller units), leading to a significant adverse noise impact during both the daytime and nighttime. Within this audit, substantial uncertainty was noted with the noise modelling approach that the consultant utilised to quantify specific sound levels from the site, particularly in relation to sound breakout.

Following AQMAU’s assessment, an Environment Agency area officer visited the site and noted that during typical daytime operations, site sound emissions with the chillers in operation were imperceptible at the northern site boundary, adjacent to the nearest noise sensitive receptors on Ebenezer Street. Therefore, it is likely that the consultant’s noise modelling, in conjunction with AQMAU’s sensitivity checks to account for uncertainty, overpredicts sound emissions from the site.

Following this previous audit, it has been clarified that a key part of context was not presented in the initial NIA, nor in subsequent revisions. The chiller system, which forms part of the variation and is already operational onsite, is only a temporary solution to meet internal refrigeration requirements. The operator intends to replace these temporary chillers in the long term, with a timescale to be approved following a capital expenditure process. In addition, the operator has stated that they intend to install temporary sound barriers around the three operational chiller units that are located in the northern car park to further mitigate emissions from the refrigeration systems covered by the permit variation in the meantime.

In light of the above, AQMAU considers that a significant adverse impact is unlikely, especially when considering favourable context with further proposed

mitigation to dominant sources. In the absence of an accurate assessment of noise impacts, a definitive noise impact in line with BS 4142 cannot be defined. When considering onsite observations, the temporary nature of the chillers and the further proposed mitigation, it is likely that the site will remain in compliance with the standard permit condition for noise, even when considering the uncertainty associated with reduced residual/background sound levels during the nighttime when compared to the daytime onsite observations from the area officer.

As a result, AQMAU recommends that sound emissions from the site should not prevent the permit from being issued provided the site demonstrates compliance with Best Available Techniques.

Two improvement conditions have been included in the permit to:

- ensure that the operator demonstrates and confirms compliance with BAT 14, Food, Drink and Milk Industries, Directive 2010/75/EU (IC7)
- for the submission of a plan for the long term replacement of the sites refrigeration system, for assessment and approval by the Environment Agency (IC8).

See permit variation V003 for full text of the Improvement conditions in Table S1.3.

Best Available Techniques (BAT) Assessment

The operator is required to meet the requirements of the Food, Drink and Milk (FDM) BAT conclusions. We have assessed the proposed changes against the FDM BAT conclusions.

BAT1 and BAT2 – Environmental Management System (EMS)

The operator has an existing EMS on site, they have updated the EMS to include the automated process lines, waste buking activities, temporary refrigerant compressors, new boilers, and updated cleaning chemicals.

BAT3 and BAT4 – Water Emissions Monitoring

The site has a discharge of process effluent to sewer, the discharge to sewer has not changed as part of the variation.

BAT 5 – Air Emissions Monitoring

There are no new process air emissions from the variations which are relevant to BAT5.

BAT 6 – Energy Efficiency

The site has an Energy Efficiency Plan in place on site and considers the energy efficiency when introducing changes on site. During this variation the new boilers

are considered energy efficient, the operator has confirmed they have 91% thermal efficiency.

BAT 7 – Water consumption and wastewater discharge

The operator has confirmed the proposed changes will not result in a significant increase in water consumption. The automated lines are cleaned in the same manner as existing site lines via jet washers.

BAT 8 – Harmful substances

The operator has provided information on the cleaning chemicals used on site, there are no changes proposed a part of this variation. The operator also uses appropriate techniques as listed in BAT 8 on site.

BAT 9 – Refrigerants

The operator has advised the original permit indicated ammonia was used as a refrigerant however, this was an error the site uses F-Gas R449a as a refrigerant. The site maintains an F-Gas register, the site has also installed an F-Gas leak detection system within the factory.

The operator has installed 6 additional external refrigerants each plant as a capacity of 160kW with internal F-Gas compressors.

F-Gas R449a is considered an acceptable F-Gas refrigerant as it has a lower global warming potential (GWP) than other F-Gases (GWP - 1397).

BAT 10 – Resource efficiency

The operator has confirmed there are no changes to the nature and techniques used on site in relation to resource efficiency. The new automated lines increase the efficiency of process resulting in less animal bypass waste generated per carcass. Category 3 poultry waste is sent for use in the production of animal feed.

BAT 11 – Prevention of uncontrolled emissions to water

The changes proposed in the variation will not increase the volume of wastewater generated by the site, therefore, no further assessment required.

BAT 12 – Effluent treatment

No changes to effluent treatment on site as part of the variation.

BAT 13 – Noise Management Plan (NMP) and BAT 14 – Noise Minimisation

See the 'Noise' section of the Key Issues above and section on Improvement Conditions, in Decision Considerations, below.

BAT 15 – Odour Management Plan (OMP)

See the ‘Odour’ section of the Key Issues above, we have reviewed the OMP provided by the operator in support of this variation. We are satisfied with the OMP, this has been integrated into the operating techniques table S1.2 of the permit.

Air Emissions

The operator has removed two 0.4MWth hot water boilers from the site. They have installed three new hot water boilers with a total thermal input of 70 kW, details of the combustion plants are included in the table below.

Combustion Plant	Size	Fuel Type	Emission Point
Hot Water Burner	550 kW	Natural Gas	A1
Hot Water Boiler	30.5 kW	Natural Gas	A4
Hot Water Boiler	30.5 kW	Natural Gas	A5

The operator provided a full air emissions risk assessment in the original application, the removal of the two existing boilers has reduced the emissions from the site. Therefore, we are satisfied no further assessment of the new boilers are required.

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
- Director of Public Health
- UK Health Security Agency
- Health and Safety Executive
- Animal and Plant Health 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.

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 not within our screening distances for these designations.

We consider that the application will not affect any site of nature conservation,

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.

Operating techniques

We have reviewed the techniques proposed by the operator and compared these with the relevant technical guidance 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.

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.

Odour management

We have reviewed the odour management plan in accordance with our guidance on odour management.

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

We have approved the odour management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary, sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

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

Noise and vibration management

We have reviewed the noise and vibration management plan, submitted on 03/01/2024, in accordance with our guidance on noise assessment and control.

We have not approved this plan or any subsequent plans, received as part of this variation and have included two Improvement Conditions related to noise. Please see section on noise in the Key Issues section above for full details.

Updating permit conditions during consolidation

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

Improvement programme

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

We have included an improvement programme to ensure that the operator demonstrates and confirms compliance with BAT 14, Food, Drink and Milk Industries, Directive 2010/75/EU (IC7) and that they submit a plan for the long term replacement of the sites refrigeration system, for assessment and approval by the Environment Agency (IC8). See permit variation V003 for full text of the Improvement conditions in Table S1.3.

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.

Responses from organisations listed in the consultation section

Response received from: UK Health Security Agency

Brief summary of issues raised:

The main emission of potential concern is odour from the poultry processing facility. However, the UKHSA was satisfied that the control measures proposed by the applicant should ensure that there are no significant impacts on public health.

The variation application lacks information on accident management and fire prevention.

Summary of actions taken:

The Environment Agency requested an Accident Management Plan via a Schedule 5 Notice, dated 15/08/2024. The applicant provided an Accident

Management Plan (received 07/01/2025) which we consider to be satisfactory and has been incorporated in Table S1.2 - Operating Techniques, of the permit.