

## Permitting Decisions – Variation

---

We have decided to grant the variation for Wright's Pies operated by Wrights Pies (Shelton) Limited.

The permit number is EPR/TP3903PE/V002.

The permit was granted on 09/01/2026.

The application is for:

- Incorporation of a new effluent treatment dissolved air flotation (DAF) plant into the existing permitted activities, converting one of the ETP activities from a directly associated activity (DAA) to a regulated Section 5.4 activity. One ETP will remain as a DAA.
- Medium Combustion Plant Directive (MCPD) review.
- Change of registered company address.
- Updated site plan (to include re-location of E1 sewer emission point).

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:

- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account
- highlights [key issues](#) in the determination
- 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.

# Key issues of the decision

## Effluent Treatment Plant (ETP):

The operator will be installing a new ETP and dissolved air flotation (DAF) for the Savoury Ready Meals factory production, following continuous breaches of its discharge consent with United Utilities, as an end of pipe solution.

The new plants have been incorporated into the permit under scheduled activity AR2 – S5.4 Part A(1)(a)(ii) – Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment. The discharge of process effluent resulting from the main factory operations to foul sewer was originally listed on the permit as a DAA under AR10, however this was restricted to a capacity not to exceed 50m<sup>3</sup> per day. As the new threshold will be exceeded, DAA activity is to be replaced with a Section 5.4 Part A(1)(a)(ii) activity.

There is a second ETP on-site for treatment of process effluent from the sweet bakery (cakes) building via a DAF plant and this will remain a DAA.

The plant has a maximum capacity of 7m<sup>3</sup> per hour. The process is automated, and the facility is located on hardstanding. Wastewater from the factories is pumped through a sieve to remove all solids before being collected in a 179m<sup>3</sup> balancing tank, which is then pumped to a chemical dosing tank and then through the DAF tank. The sludge is then removed and stored in a 30m<sup>3</sup> sludge tank that is tankered away to an anaerobic digestion (AD) plant once a week. The treated process effluent is then discharged to drain where a sample is taken through a flow proportionate composite sampler.

The site has a discharge consent in place with sewerage undertaker, United Utilities. During the process the conductivity is monitored, and chemicals are dosed accordingly to bring the levels discharge to sewer to concentrations below the discharge consent.

The Savoury Ready Meals factory discharges approximately 4077m<sup>3</sup> (FY25) of effluent discharged directly to the mains sewer through a monitoring emissions to air, land and water (MCERT) flow meter each month where it is processed at the Crewe Waste water Treatment Works (WwTW), before it is released to surface water. The eventual receiving water body is identified as the River Weaver.

Chemical dosing substances are stored in intermediate bulk containers (IBCs) in chemical bunds which are on hardstanding in the location of the ETP. Chemicals are replenished as necessary, and volumes monitored on a daily basis. Chemicals comprise of:

- Caustic – Watermark Caustic 32%
- Coagulant - Watermark 830 Ferric Chloride
- Polymer – Watermark N223 Polymer

Historically, Wrights Pies Ltd has only been required to monitor their effluents for the following substances as per their consent to discharge with United Utilities:

- PH 6 – 10 Range
- Total Suspended Solids (TSS) – 2144 mg/l Limit
- Chemical Oxygen Demand (COD) – 5000 mg/l Limit
- Fats, Oils & Greases (FOG) – 350 mg/l Limit
- Iron FE (Ferric) – 20000 ug/l Limit

Discharges to water are assessed based on the relevant substance classification of pollutants in the effluent. As there are no specific environmental assessment levels for the above (excluding pH) it is not possible to assess the impacts using the H1 assessment tool.

#### Best Available Techniques (BAT):

A BAT assessment was undertaken for the new savoury ready meal's effluent treatment plant installation as an end of pipe solution. This was to ensure the site complied with United Utilities consent to discharge.

The operator provided a H1 assessment for the new chemicals associated with the DAF unit, which concluded that they would not have any significant environmental impact. We reviewed the assessment and agree with the overall conclusion.

The odour management plan (OMP) has been updated by the operator to incorporate the addition of the new ETP and DAF plants. An OMP was submitted with the application, but we have decided not to assess it. This is because the facility is an existing site with no known odour issues reported to date.

We consider the design and control measures to be in line with BAT for the Food and Drink Sector.

#### Improvement Conditions:

The original permit was issued with 9 improvement conditions. After consultation with the area team, only IC3 and IC7 were deemed to have been completed. Therefore, the remaining ICs have been left in the permit.

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	The Operator shall review the design, method of construction and integrity of the site's secondary containment surrounding all above and below ground bulk storage vessels on-site. This review shall be carried out by a qualified civil or structural engineer. The review shall compare the constructed secondary containment against the standards set out in CIRIA C736 – Containment Systems for the Prevention of Pollution – secondary, tertiary and other measures for industrial and commercial	01/03/2022 (EPR/ TP3903PE/ A001) or other date as agreed in writing with the

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>premises or other relevant industry standard or such other subsequent guidance as may be agreed in writing from the Environment Agency.</p> <p>The review shall include:</p> <ul style="list-style-type: none"> <li>• The physical condition of the secondary containment;</li> <li>• The suitability for providing containment when subjected to the dynamic and static loads caused by catastrophic tank failure;</li> <li>• Any work required to ensure compliance with the standards set out in CIRIA C736 or other relevant industry standard;</li> <li>• Timescales for any improvement necessary; and</li> <li>• A preventative maintenance and inspection regime.</li> </ul> <p>The written report of the review shall be submitted to the Environment Agency for approval including timescales for the implementation of any remedial works proposed. The Operator shall implement the improvements to the approved timescales.</p>	Environment Agency
IC2	<p>The Operator shall submit a report to the Environment Agency on establishing an appropriate environmental management system, having regard to each of the twenty features listed under BAT 1 of the Best Available Techniques conclusions for the Food, Drink and Milk Industries (dated: 04/12/19) and Environment Agency web guidance: "Develop a management system: environmental permits," (<a href="https://www.gov.uk/guidance/develop-a-management-system-environmental-permits">https://www.gov.uk/guidance/develop-a-management-system-environmental-permits</a>). The report shall include time-scales to implement such a system.</p> <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.</p>	01/10/2021 (EPR/TP3903PE/A001) or other date as agreed in writing with the Environment Agency
IC3	<p>The Operator shall establish an inventory of water, energy and raw materials consumption as well as of wastewater and waste gas streams, that incorporates each of the six features listed under BAT 2 of the Best Available Technique Conclusions for the Food, Drink and Milk Industries (dated: 04/12/2019).</p> <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the inventory.</p>	Complete
IC4	<p>The Operator shall submit a written energy efficiency plan, as required under BAT 6a of the Best Available Technique Conclusions for the Food, Drink and Milk Industries (dated: 04/12/2019), to the Environment Agency. This plan shall incorporate an appropriate combination of the common techniques listed under BAT 6b.</p> <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.</p>	01/03/2022 (EPR/TP3903PE/A001) or other date as agreed in writing with the Environment Agency
IC5	<p>The Operator shall submit a written plan on achieving BAT 7 "to reduce water consumption and the volume of wastewater discharged", of the Best Available Techniques Conclusions for the Food, Drink and Milk Industries (dated: 04/12/2019), to the Environment Agency. This plan must incorporate BAT 7a "water recycling and/or re-use" and one or a combination of the techniques listed under BAT 7b to 7k.</p> <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.</p>	01/03/2022 (EPR/TP3903PE/A001) or other date as agreed in writing with the Environment Agency

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC6	<p>The Operator shall submit a written plan on achieving BAT 8 “to prevent or reduce the use of harmful substances,” of the Best Available Techniques Conclusions for the Food, Drink and Milk Industries (dated: 04/12/2019), to the Environment Agency. This plan must incorporate one or a combination of the four techniques listed under BAT 8.</p> <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.</p>	01/03/2022 (EPR/TP3903PE/A001) or other date as agreed in writing with the Environment Agency
IC7	<p>The Operator shall submit a written report to the Environment Agency for approval, detailing the results of a survey of all existing drainage systems on-site.</p> <p>Where appropriate, the report shall contain dates for the implementation of any remedial measures required.</p> <p>Any improvement works identified by the report shall be implemented by the Operator from the date of approval by the Environment Agency subject to such amendments or additions as notified by the Environment Agency.</p>	Complete
IC8a	<p>The operator shall submit to the Environment Agency for approval:</p> <ul style="list-style-type: none"> <li>An updated Stage 1 – 3 assessment within the ‘Site Condition and Baseline Report’ prepared by Enviro Solutions, dated: 25th January 2021 (Ref: CL1002) Version 3, to include relevant information from the reports produced to comply with IC1 and IC7, as well as assess the potential risks posed to soil and groundwater from hazardous and non-hazardous substances; and</li> <li>An updated ‘Site Condition Report on H5 Template,’ dated: 02/02/2021, to include a summary of the findings of the Stage 1 – 3 assessment detailed within the updated ‘Site Condition and Baseline Report’ under ‘Baseline soil and groundwater reference data’ in section 2.0 within the ‘Site Condition Report on H5 Template’.</li> </ul> <p>Where the Stage 1 – 3 assessment concludes that baseline reference data is required, the Operator shall submit proposals to the Environment Agency for approval detailing the proposed locations of boreholes, proposed analytical suites and timescales to undertake intrusive works.</p>	01/09/2022 (EPR/TP3903PE/A001) or other date as agreed in writing with the Environment Agency
IC8b	<p>If, on completion of IC8a, it is determined that baseline reference data is required then the Operator shall submit the following to the Environment Agency for approval, within six months of the completion of IC8a:</p> <ul style="list-style-type: none"> <li>An updated ‘Site Condition and Baseline Report’ prepared by Enviro Solutions, dated: 25th January 2021 (Ref: CL1002) Version 3, to include details of the baseline established for soil and groundwater and a monitoring plan to comply with the requirements of condition 3.1.3 for periodic monitoring of relevant hazardous substances and any other monitoring that is proposed for non-hazardous substances;</li> <li>A monitoring plan shall be prepared with reference to the information detailed within the SCR and shall include details of proposed monitoring locations, analytical suites and the proposed frequency of monitoring. The monitoring plan shall include details of the information to be included within the monitoring reports produced for the site,</li> </ul>	Within 6 months of the completion of IC8a (EPR/TP3903PE/A001) or other date as agreed in writing with the Environment Agency

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>which shall include an interpretation of the results and action to be taken should any increasing trends be identified; and</p> <p>An updated 'Site Condition Report on H5 Template,' dated: 02/02/2021, to include reference to the relevant sections of the 'Site Condition and Baseline Report,' which detail soil and groundwater baseline reference data established for the site under 'Baseline soil and groundwater reference data' in section 2.0 within the 'Site Condition Report on H5 Template'.</p>	

#### MCPD review:

The permit has been reviewed against the requirements of the MCPD for 2030 and despite emission limit values (ELVs) already present in the permit, relevant conditions have now been added. Size and commissioning dates of all MCPs has also been confirmed.

#### Registered Company Address:

The Operator confirmed a new registered company address, as per Companies House. The company is now part of the Compleat Food Group but still trade as Wrights Pies (Shelton) Ltd.

#### Site Plan:

An updated site plan has been submitted and added to the permit, displaying all emission points and effluent discharge points.

## Decision considerations

### Confidential information

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

### Identifying confidential information

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

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.

No consultation was necessary for this application.

## **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 operator has provided the grid reference for the emission points from the medium combustion plants.

The extent of the facility is defined in the site plan 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.

These show the extent of the site of the facility including the discharge points.

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, 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, protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

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 BAT Reference document and guidance notes and we consider them to represent appropriate techniques for the facility.

The operator has provided information to support compliance with the BAT reference document. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc.

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

## **Fire prevention plan**

We haven't requested a Fire Prevention Plan at this time, but we will request one in the future if we consider the site poses a risk of fire.

## **Operating techniques for emissions that screen out as insignificant**

Emissions of oxides of nitrogen, carbon monoxide and emissions to sewer have been screened out as insignificant, and so we agree that the applicant's proposed techniques are BAT for the installation.

We consider that the emission limits included in the installation permit reflect the BAT for the sector.

## **National Air Pollution Control Programme**

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.



## **Odour management**

An OMP was submitted with the application, but we have decided not to assess it. This is because the facility is an existing site with no known odour issues reported to date.

Should odour become an issue after the issue of the permit, then condition 3.3.2 of the permit will allow the Environment Agency to request an OMP from the operator for future implementation.

## **Raw materials**

We have specified limits and controls on the use of raw materials and fuels:

- Sodium hydroxide (cleaning chemicals): <0.03 ppm mercury content

## **Improvement programme**

The original permit stated improvement conditions. IC3 and IC7 have been completed, but the remaining have not, therefore remain in place in this permit variation.

## **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 permit.

## **Emission Limits**

ELVs have been added for oxides of nitrogen.

The site's three natural gas fired boilers are considered existing medium combustion plant as they were commissioned before 20/12/18. Therefore, the boilers won't need to comply with the MCPD until 01/01/30, as the plant are each <5 MWth input. Based on this, we have decided to include ELVs based on the NO<sub>x</sub> concentrations modelled for in the applicant's air quality assessment. This is to ensure nearby human health and habitat receptors are adequately protected.

We made this decision in accordance with the MCPD.

## **Monitoring**

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

These monitoring requirements have been included in order to ensure emissions from the site's three boilers comply with the emission concentrations accounted for in the air quality assessment submitted in support of this application.

We made these decisions in accordance with MCP technical guidance:  
<https://www.gov.uk/guidance/medium-combustion-plant-and-specified-generator-permits-how-to-comply>.

Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

## **Reporting**

We have specified reporting in the permit.

We made these decisions in accordance with the MCP technical guidance:  
<https://www.gov.uk/guidance/medium-combustion-plant-and-specified-generator-permits-how-to-comply>.

## **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.

## **Financial competence**

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

## **Growth duty**

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.

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.