Nestlé Dalston Variation

Environmental Permit Variation Supporting Information

Client:	Nestlé UK Limited
Project/Proposal No:	7280
Version:	2.0
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Document Information

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Revision History

Version	Date	Authored	Reviewed	Approved	Notes
1.0	15/01/2025	T Hatch	G M Bollan	G M Bollan	Final for Client
2.0	15/10/2025	T Hatch K Reader	GM Bollan M Webb	GM Bollan M Webb	Revised to include additional sections on ecological sites and Habitats and nutrient neutrality

Contents

1.1 Non-Technical Summary

1.1.1 Nestlé UK Limited (the "Applicant") (Nestlé Dalston), has engaged ITPEnergised to prepare an Environmental Permit (EP) variation application. The activities that relate to this variation is the relocation of the wet mix process, including an extension to the warehouse facilities and an extension of the installation boundary.

1.1.2 The variation is for land at Nestlé UK Limited, Dalston, Carlisle, Cumbria, CA5 7NH (the "Site"). The term "Site" will be used throughout this report to refer to the to be permitted area subject to the variation. "Existing Site" will be used to refer to area that is covered by the existing permit (EPR/BO9310IB).

1.1.3 Planning permission has been granted for this extension by Carlisle City Council for the "Erection of New Process Building Within Footprint of Existing Factory Building; Warehouse Extension; Despatch Extension And New Lift Enclosure To Dry Mix Tower; Installation Of Externally Mounted HVAC Units" at Nestle UK Limited, Dalston, Carlisle, CA5 7NH. The reference number for this planning permission is 23/0430.

1.1.4 Within the framework of the Environmental Permitting (England and Wales) Regulations 2016, Nestlé Dalston operates a facility dedicated to the production of dairy milk powder, coffee mate, cappuccino, hot chocolate, and various other powdered product variants. Additionally, cream is processed and sold as a by-product.

1.1.5 The proposed development will not introduce any additional air or water emission points and there will be no alterations to core operational activities. Installed capacity will remain unchanged, as the Egron Spray Drier, which dictates production limits, is not changing. The proposed variation primarily pertains to refining the wet mix process and optimising techniques used in the mixing of wet ingredients.

2. Form Question Response Information

2.1 Form A , Question 5c , Please give details of the directors and Appendix, 1 Date of Births

2.1.1 The directors names are as follows:

- Katarzyna Malgorzata Choinska – May, 1972
- Mark Timothy Mckenzie – Feb, 1969
- Andrew Peter Shaw – May, 1966
- Richard Anthony Watson – July, 1970

2.1.2 Nestle are not able supply directors full date of births due to security purposes. Included with this permit application is signatory letters for Jacqueline McConnell (SHE Advisor) and Alice Wright (SHE Manager) to sign off the application on the directors behalf.

2.2 Form C2, Question 3d, Management System Summary

2.2.1 A Environmental Management Summary has not been produced as part of this permit variation application as the activities at the Site and their management strategy are not be altered. No additional techniques or procedures are to be utilised as a result of this variation.

2.3 Form C3, Question 3A Technical Standards, Facility and Operation Description

2.3.1 Activities at the Site and their technical standards, facility and operation description have not changed. A facility description is included in the introduction of this document.

2.3.2 An updated site plan is provided in this permit variation application.

2.4 Form C3, Question 3c, Types of raw materials

2.4.1 A raw materials list has been provided with this application (Nestle Dalston Raw Materials List).

2.5 Form C3, Question 4a, Monitoring Measures

2.5.1 Monitoring measures will not change as a result of this variation application. Monitoring will remain to be undertaken as per the requirements detailed in Schedule 3 (Emissions and monitoring) of environmental permit EPR/BO9310B.

2.6 Form C3, Question 6a, Energy Efficiency

2.6.1 There will be no changes in energy efficiency as a result of this permit variation.

2.7 Form C3, Question 6b, Changes to energy usage and creation

2.7.1 There will be no changes to energy usage and creation as a result of this permit variation.

2.8 Form C3, Question 6c, Climate change levy agreement

2.8.1 Documents demonstrating evidence that Nestle UK Limited are taking part in this scheme are provided (Variation notice (FDF1_T00377).

2.9 Form C3, Question 6d, Explain and Justify raw material usage

2.9.1 There will be no change to raw material usage as a result of this permit variation.

2.10 Form C3, Question 6e, Describe how waste production is avoided in line with Council Directive 2008/98/EC.

2.10.1 There will be no change to waste production as a result of this permit variation.

3. Environmental Risk Assessment

3.1 Introduction

3.1.1 This Environmental Risk Assessment (ERA) has been produced to support an Environmental Permit (EP) variation application. The activities that relate to the variation is the relocation of the wet mix process on Site, including an extension to the warehouse facilities and an extension of the installation boundary.

3.1.2 EP application guidance from gov.uk was consulted to develop an Environmental Risk Assessment (ERA) based on a reasonable set of environmental hazards and associated risks.

3.1.3 The Risk Matrix below (Table 3-1) has been used to score the hazard detailed using the level of probability of the hazard occurring and the consequence if the hazard did occur.

3.1.4 The ERA is presented in Table 3-2.

Table 3-1 Risk Matrix

Consequence	Probability			
	High	Medium	Low	Very Low
High	High	Medium	Low	Low
Medium	Medium	Medium	Low	Very Low
Low	Low	Low	Low	Very Low
Insignificant	Low	Very Low	Very low	Very Low

Table 3-2 Environmental Risk Assessment

Emission Reference/ Activity	Hazard	Receptor	Pathway	Risk management	Probability	Consequence	Overall risk
Permitted Air Emissions							
A1 [Point A1 on site plan in Schedule 7] / Air emissions from steam raising boiler plant	Air pollution - from emissions (Oxides of Nitrogen (NO and NO_2 expressed as NO_x) and carbon monoxide	Local residents, closest c160m west of the Site. Dalston residents, Carlisle road 380m west of the Site. Residents c250m to the south east of the Site. Caldew School 430m north west of the site. Global climate change via increased Greenhouse Gas (GHG) Emissions	Air	Environmental permit (EPR/BO9310IB) details the emissions limits and monitoring requirements for Oxides of Nitrogen. An emission limit is set at 200mg/m^3 (applied from 01/01/2025). Routine maintenance and annual checks are made in order to ensure that emissions limits are not routinely breached. No limit is specified for carbon monoxide. Emissions from combustion processes are generally very minor in comparison to UK health-based criteria.	Low	Medium – possible harm to humans respiratory system. Low - Increased global warming potential	Low

Emission Reference/ Activity	Hazard	Receptor	Pathway	Risk management	Probability	Consequence	Overall risk
A2 [Point A2 on site plan in schedule 7] Egron 1 Spray Drier – Indirect Air Heater Exhaust (1.85MWth)	Air Pollution - Exhaust Gas	As Above	Air	The environmental permit (EPR/BO9310IB) details emissions and monitoring requirements. For air emissions A2 to A3 there are no emissions limits set for any flue gas pollutant. This reflects the low risk due to the small size of these sources.	Low	Medium – possible harm to humans respiratory system. Low - Increased global warming potential	Low
A3 [Point A3 on site plan in schedule 7] Egron 2 Spray Drier – Indirect Air Heater Exhaust (4.27MWth)	Air Pollution - Exhaust Gas	As Above	Air	As Above	Low	Medium – possible harm to humans respiratory system. Low - Increased global warming potential	Low
A4 [Point A4 on site plan in schedule 7] Egron 1 Spray Drier – Bag filter	Air Pollution – Particulate Matter	As Above	Air	Emissions limits within the environmental permit (EPR/BO9310IB) are specified for Particulate Matter (10 mg/m^3). Monitoring is undertaken on an hourly average on a continuous basis to BS13284-1 standards.	Low	Medium - Harm to humans respiratory system.	Low

Emission Reference/ Activity	Hazard	Receptor	Pathway	Risk management	Probability	Consequence	Overall risk
				Routine maintenance and annual check are made in order to ensure that emissions limits are not routinely breached. These include annual changes to the bag filters.			
A5 [Point A5 on site plan in schedule 7] Egron 1 Spray Drier – Bag filter	Air Pollution – Particulate Matter	As Above	Air	As Above	Low	Medium - Harm to humans respiratory system.	Low
A6 and A7 (Points A6 and A7 on the site plan in Schedule 7) – emissions upon startup of Egron 1 and 2 Hot Air Stacks.	Air Pollution – generated upon startup of Egron 1 and 2 Hot Air Stacks.	As Above	Air	The environmental permit (EPR/BO9310IB) details the emissions and monitoring requirements. There are no emissions limits of monitoring requirements for emissions A6 and A7. These emissions are only present upon startup of the hot air stacks and therefore will only be short term in terms of their frequency.	Low – present during start up only	Medium - Harm to humans respiratory system.	Low

Emission Reference/ Activity	Hazard	Receptor	Pathway	Risk management	Probability	Consequence	Overall risk
				Other than start up the hot air stacks are solely realising hot air so not further management required.			
A8 (Point A8 on site plan in schedule 7).	Air pollution generated from the air cooler discharge Ergon 2 Double cyclone (Particulate Matter).	As Above	Air	Emissions limits within the environmental permit (EPR/BO9310IB) are specified for Particulate Matter (10 mg/m^3). Routine maintenance and annual checks are made in order to ensure that emissions limits are not routinely breached.	Low	Medium = Harm to humans respiratory system.	Low
Permitted Emissions to Water (River Caldew)							
W3 – Surface Water discharge	Water pollution	River Caldew	Water / Site drainage system	Not required as the emission has been characterised in the permit as "Uncontaminated".	Low	Low	Low
Permitted - Emissions to Sewer							
S1 (Point S1 on site plan in schedule 7) emission to United Utilities Dalston Waste Water Treatment Works)	Water Pollution	United Utilities Low Mil Waste Water Treatment Works	Water / Sewerage System	Emissions limits are in compliance with United Utilities Water limited discharge consent. No emission limits are set within the environmental permit.	Low	Low – sewerage system is equipped to manage trade effluent from the Site.	Low

Emission Reference/ Activity	Hazard	Receptor	Pathway	Risk management	Probability	Consequence	Overall risk
				This suggests that during determination of the permit application the emissions have been previously characterised by the Environment Agency and no emissions limits imposed. Therefore, the risk of these emissions has been determined to be low and no further risk management			
S2 (Point S2 on site plan in schedule 7) emission to United Utilities Dalston Waste Water Treatment Works)	Water Pollution	United Utilities Low Mil Waste Water Treatment Works	Water / Sewerage System	As Above	Low	Low – sewerage system is equipped to manage trade effluent from the Site.	Low
None permitted Emissions							
-	Routine emissions to groundwater	Ground Water/ River Caldew	Water	Surface water at the site drains to the River Caldew via the surface water drainage network. The overloading and percolation through the site slab area to groundwater are considered unlikely.	Very Low	Low - Uncontrolled loss of storm water to will cause little consequence to groundwater or river quality as it is uncontaminated.	Very Low
-	Emissions to land	Site Infrastructure	None	Non-domestic type solid waste arisings will occur only from routine and	Very Low	Low - Minor build-up of waste material	Very Low

Emission Reference/ Activity	Hazard	Receptor	Pathway	Risk management	Probability	Consequence	Overall risk
				breakdown maintenance and be disposed of off-site			
-	Unplanned emissions to surface water: loss of chemical inventory	River Caldew	Water	No hazardous substances stored at the site.	Very Low	Insignificant – Surface water at the Site is unpolluted	Very Low
-	Unplanned emission to watercourse	Groundwater	Water	Site drainage system will be tested for integrity. Overloading and percolation through the site slab area to groundwater are therefore unlikely. Interaction with site chemical inventory not considered likely given contained storage of chemicals and oils. Furthermore, hazardous chemicals not stored or used at the site.	Very low	Insignificant – hazardous substances not stored at the Site	Very Low
-	Dust, bioaerosols, odour, litter	Nearby residential, commercial, habitat sites	Air	No inherent source of process dust, odour or bioaerosols nor use of any bulk materials which could give rise to any of them. Incidental dust and litter within the site parameter will be controlled through general housekeeping measures.	Very low	Insignificant	Very Low

Emission Reference/ Activity	Hazard	Receptor	Pathway	Risk management	Probability	Consequence	Overall risk
				Bag filters are in place to minimise dust emissions from the manufacturing process.			
-	Noise	Nearby residential, commercial sites.	Air	All processes take place within buildings which ensures that high levels of noise pollution does not travel outside of the Site boundary.	Very Low	Low	Very Low

3.2 Summary of impacts

All environmental hazards considered were assessed as presenting a “low” or “very low” risk after suitable management measures were considered.

3.3 Impact on Local Habitat and Ecological Receptors

The River Eden, designated as both a Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI), is located approximately 95m southeast of the site at its nearest point. Two areas of ancient woodland are also present in the vicinity: Dalston Hall Wood, situated around 930m to the northeast, and Flanders Wood, approximately 185m to the southeast. Additionally, the Local Wildlife Site of Brownelson Wood and Thurman Wood lies approximately 1,000m northeast of the site.

The proposed permit variation relates solely to the relocation of the existing wet mix process and a minor extension of the site boundary to accommodate additional warehousing. Importantly, these changes will not result in any new or increased emissions to air or water, nor will they alter the core operational activities of the site. As such, no adverse impacts on nearby ecological receptors are anticipated.

3.4 Impact on Nutrient Neutrality

The proposed permit variation will have no impact on nutrient neutrality within the local environment. The development does not involve any new or increased discharges of nitrogen or phosphorus to land or water. Specifically, the relocation of the existing wet mix process and the minor extension of the site boundary for warehousing purposes will not introduce any additional sources of nutrient loading. There will be no changes to existing water discharge points, no new connections to foul or surface water systems, and no alterations to the nature or volume of wastewater generated on site. As such, the proposed changes will not contribute to nutrient enrichment of nearby sensitive receptors, including the River Eden.

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