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Site Condition Report

1.1 Introduction

TRC Companies Limited (TRC) was engaged by EHS Projects Limited, the environmental, health and safety advisor to Arla Foods Ltd (the 'Client'), to prepare a Technical Note summarising the site condition for land permitted under the Environmental Permitting Regulations (EPR) within the Client's facility located at Taw Valley, North Tawton, Devon, EX20 2DA (the 'Site'). This document should be read in conjunction with the appended H5 form in Annex B.

The purpose of the SCR is to support the variation of an EPR permit (EPR/NP3638NN/V005) for addition of an area located along the western boundary of the current permitted area. The area to be added to the permit is presented as Figure 01 in Annex A.

Permitted activities at the Site include the following:

- Treating and processing milk with the quantity of milk received being more than 200 tonnes per day (average value on annual basis);
- Biological treatment of non-hazardous wastewater;
- Medium combustion plants: 26.8 MWth combined power, natural gas-fired;
- Storage and handling of raw materials at the installation;
- Use of refrigerants in cooling, chilling and/or freezing systems at the installation;
- Storage and use of the chemicals and oils at the installation;
- Operations of 4 cooling towers; and,
- Collection of uncontaminated site surface waters.

An SCR is required for any facility where the EA regulate an area of land under the Environmental Permitting Regulations where there may be a significant risk to land or groundwater. An SCR is necessary to satisfy the requirement of the Industrial Emissions Directive (IED). Therefore, this SCR is a requirement for both new applications and existing operations. Specifically, the following request was specified by the Environment Agency (EA):

> "*Site Condition Report (SCR) – We require a site condition report in line with the H5 Site Condition Report guidance… The site condition must also encompass a partial surrender and you will need to refer to the RGN9 Surrenders guidance to help with this aspect of the SCR. This should include a description of the pollution control measures in place on site, along with pollution incidents which have occurred on site during the life of the permit and how they were rectified".*

1.2 Background Information

Several phases of desk studies and intrusive investigations have been undertaken by TRC and other contractors prior to compiling this SCR. The previous investigations used to prepare this SCR are as follows:

- CGL (2023), Arla, Taw Valley – Phase 1 Desk Study (ref no. CGN/05188)
- CGL (2024), Arla, Taw Valley – Geotechnical & Geo-Environmental Interpretative Report (ref no. CGN/05188);
- TRC (2024), Baseline Report and Geotechnical Site Assessment (ref no. 601050.0000.0000)
- TRC (2025), Intrusive Geoenvironmental and Geotechnical Site Assessment (ref no. 601050.0005.000).

The above investigations are investigations for the wider Site area and include the appraisal of the permitted area subject to EPR permit variation. TRC has selected data from the archive reports that best meets the requirements of this SCR.

Site Overview

The Site comprised an irregular shaped plot of land centred on National Grid Reference Easting 265354 , Northing 101407 and is approximately 9.0 hectares (ha). The Site is on land owned by the Client and has been operating as a creamery facility from 1973 to the present day. The main Site features of the creamery facility are:

- Main production building – located across the northern part of the Site containing the main production lines, cooling plant, offices, staff welfare, associated milk silos and electricity substation.
- Effluent Treatment Plant – located in the southern part of the Site. The plant comprises two lagoons, and associated offices. The plant is designed to receive effluent from the production lines and associated effluent drainage network for treatment in advance of discharge to a series of treatment lagoons.

Recently, the Client has leased a new area of land which will be referred to as ‘New Lease Land’ (NLL), which is part of a plot of land located along the western boundary of the Site in a space that is south of the main production facility and north of the effluent treatment plant. The NLL is currently part of a larger agricultural field. The NLL is part of the variation of the permit that is being proposed.

The following table provides a historic timeline of the significant operations at the Site, prior to the Client leasing the Site to the present day. Whilst the following table details the wider Site area, specific reference has been made to the permitted area, where applicable:

Table 1: Summary of historical land uses at the Site

Land use feature	Date	Comments
Unspecified structures	1886 – 1972	Seven unspecified structures present on the mapping from 1886 to 1973 listed as "South Week". All are within the northeastern portion of the Site. There is a woodland to the south of South Week.
Factory	1973 – present	Factory with various structures across the general Site area and hardstanding.
Road	1886 - present	A road is noted to be running alongside the north of the Site, in a west/east direction from the earliest historical mapping until the present day.

Table 1 Notes:

I. TRC have utilised information contained within Phase 1 Desk Study report prepared by CGL (ref no. CGN/05188).

II. Google Earth archive images have been used to inform the information associated with the stockpiles

As detailed in Table 1, there was no significant land use associated with the Site prior to the Client taking ownership of the Site. It is assumed that the Site was operated for agricultural purposes.

The Site is in an area of predominantly agricultural and residential land use, with field space on all sides of the Site. The Site is located adjacent to the River Taw which runs in a north to south orientation approximately 175m from the eastern boundary of the Site.

There are no pollution incidents listed on the Site or NLL. Three pollution incidents are noted northeast of the Site. The first involved "suspended solids" and was a minor impact to water located 135m northeast in December 2002 (no impact to land and air). The second involved "grey water" and was a minor impact to water located 239m northeast (no impact to land or air was recorded). The third involved "soils and clays" and was a minor impact to water located 259m northeast (no impact to land or air).

Environmental Overview

The following section presents an overview of the Site's environmental setting based upon the aforementioned references. The following table is based upon data from the wider Site.

Geological conditions:

Table 2 presents a summary of findings from previous phases of ground investigation.

Table 2: Summary of ground conditions from TRC's intrusive investigations

Strata	Description	Environment Agency Aquifer Status	Maximum Depth Observed (m)
Made Ground	Slightly sandy slightly gravelly SILT, clayey sandy GRAVEL, sandy gravelly CLAY or gravelly SAND. Medium to high cobble content of sandstone and	N/A	4.00

Strata	Description	Environment Agency Aquifer Status	Maximum Depth Observed (m)
	mudstone. Some anthropogenic material in the southern area of the Site.		
Superficial Deposits: Taw River Terrace Deposits	Slightly sandy, slightly gravelly SILT, silty sandy gravelly CLAY or clayey very gravelly SANDY. Variable cobble content of mudstone and sandstone.	Secondary (A) Aquifer	3.20
Bedrock: Bow Breccia Formation	Sandy gravelly CLAY or clayey silty sandy GRAVEL/ gravelly SAND becoming SANDSTONE or CONGLOMERATE at base	Secondary (A) Aquifer	15.21

The maximum thickness of Made Ground was encountered along the embankment that supports the effluent treatment plant lagoons and is not considered to be reflective of the general Site condition. A variable thickness of Made Ground was encountered in the northern and centrals areas to a maximum depth of between 1.20 and 2.00m bgl.

The proposed NNL has not been specifically investigated as part of any previous phases of investigation, and as such no detailed information has been collected for this area. The following table present a geological overview of boreholes drilled or trial pits excavated within the general area of the NLL.

The exploratory hole locations are presented as Figure 02 in Annex A.

In summary, exploratory locations across the Site proved there is a variable thickness of Made Ground related to previous developments on the Site, as well as any activities that are currently present. The NLL has never been developed and subsequently is unlikely to have any Made Ground present.

From TRC's knowledge of the wider Site area, it is expected that the Made Ground soils will be underlain by superficial deposits of Taw River Terrace Deposits to a maximum depth of 3.2m bgl. The Taw River Terrace Deposits are variable in nature and comprise granular and cohesive layers. TRC has also encountered bedrock of Bow Breccia Formation.

Hydrogeology and Groundwater

There are two surface water features on the Site, both of which are part of the effluent treatment plant. These lagoons are both lined and are not in hydraulic connection with any deposits underlying the Site.

The nearest surface off-site water feature is the River Taw located approximately 175 to 220m east of the Site. There are no surface water features within the NLL.

Previous investigations at the Site show that the Site is underlain by a variable thickness of the Made Ground which is underlain by Taw River Terrace Deposits (silt, clay and sand) and Bow Breccia

Formation (clay, gravel and sand becoming sandstone and conglomerate). EA records show that the Taw River Terrace Deposits and Bow Breccia Formation are both designated as Secondary (A) Aquifers.

An investigation around the effluent treatment plant at the Site conducted by TRC encountered levels of copper and nickel in excess of the Environmental Quality Standard (EQS) in groundwater. As no source was identified, it was considered that the levels of heavy metals found were likely linked to natural variation in the underlying stratum at the Site.

Environmental Sensitivity

The NLL is considered to be of a low to moderate sensitivity based on the following:

- No previous development on the NLL;
- The proximity to the River Taw in the east; and,
- The underlying Secondary (A) Aquifers in the superficial deposits and bedrock geology.

There is a chance that any farming activities that have occurred on the NLL have resulted in some contamination coming from agricultural practices. The variable nature of the underlying geology of the Site and surrounding area also provides a pathway for contamination to migrate laterally through the underlying stratum to the NLL. As such, any contamination related to the current permitted on-site activities is likely to have permeated to the NLL. Groundwater underlying the NLL may by in direct contact with any contamination underlying the Site which may also be in hydraulic connection with the local River Taw.

The NLL is proposed to be an area of electrical infrastructure for the renovations of the on-site activities. The electrical infrastructure is considered to pose a low risk, however any maintenance works within this area may present a potential contaminated land risk to superficial or near surface soils. The following sections present a summary of environmental data for the wider Site to determine risk posed to the NLL.

Assessment of Soil and Groundwater Conditions

Historical baseline condition

There is no available historical data for soil and groundwater within the NLL. However, TRC considers that there were potential contaminant sources within the NLL associated with the agricultural operations.

Permit Baseline Condition

There is no available SCR prior to the current permit and as mentioned above there is no historical data for within the NLL. However, it is considered that the current Site use as a food production facility near the NLL may be a potential contaminant source.

Permit Operation

Potential sources and contaminants of concern that may have been present within the Permit Application Area (PAA) during the operation of the permit are summarised below in Table 3.

Table 3: Conceptual Site Model

Potential contaminant sources	Contaminants of concern	Potential pathways	Potential receptors
Human Health			
Baseline of contamination in soils from historical land uses prior to permitted operations (i.e. agricultural land).	Pesticides and biocides	Ingestion/ dermal contact/ inhalation Direct contact with contaminated ground	Future site users
Controlled Waters			
Contamination in the groundwater underlying the current Site including historical contamination from agricultural land use.	Heavy metals, pesticides and biocides	Vertical and lateral migration	Groundwater and off-site receptors

As there is no available data for the NLL, the following section reviews laboratory data available for the areas closest to the NLL and the general Site area.

Summary of current soils and groundwater conditions

CGL– 2024

The CGL investigation was conducted in January 2024 in the northern portion of the Site as part of the redevelopment of the northern area. The report highlighted some previous development in the northern portion, but no other industrial land use was identified for the Site.

The investigation found a variable thickness of Made Ground in the east, and the Bow Breccia Formation across the rest of the Site. Sampling of 14No. soil samples and 2No. leachate samples found all potential contaminants to be below the human health generic assessment criteria (GAC) for a commercial development. It also did not find any potential risk to any other receptors, including controlled waters.

TRC– 2024
The first TRC investigation was conducted in April 2024 in the southern area surrounding the effluent treatment plant. The report was commissioned to collect baseline reference data for soil and groundwater in the area of the existing lagoons at the effluent plant to satisfy Environmental Permitting (England and Wales) Regulations 2016 (EPR).

The ground investigation found a variable thickness of Made Ground on all sides of the effluent lagoons, with the Bow Breccia Formation underlying. Sampling of 10No. soil and 2No. groundwater samples were collected. The soil samples were not screened against any human health Generic Assessment Criteria (GAC). The groundwater samples were analysed and a groundwater model was produced to assess the local hydrogeology of the southern area of the Site.

TRC– 2025
The second TRC investigation was conducted in May 2025 in the central area of the Site, between the main production facility and the effluent treatment plant. The report was commissioned as part of the redevelopment of the effluent treatment plant.

The ground investigation found a variable thickness of Made Ground, with superficial of the Taw River Terrace Deposits and bedrock of the Bow Breccia Formation. Sampling of 17No. soil were collected and found all potential contaminants to be below the human health GACs for a commercial development. 2No. groundwater samples were collected and found all potential contaminants to be below the UK Drinking Water Standards (DWS) and 2No. exceedances of the EQS for copper and nickel. Additional parameters for contaminants linked to the effluent treatment plant were also tested, and found to be below or marginally above the laboratory limits of detection.

Factual Summary of the Baseline Condition (New Lease Land)
As noted previously, the NLL has not been specifically investigated. TRC has extracted the most appropriate data from the existing reports to provide an assessment of the environmental conditions within the NLL. The following table presents a summary of the information available within the NLL and those locations within close proximity of the NLL, which TRC have selected to provide an overview of the likely environmental quality within the NLL.

Table 4: NLL Application Area Exploratory Locations

Exploratory Hole Location	Company	Chemical Data available for Soil (Y/N)	Chemical Data available for Groundwater (Y/N)
TP04	CGL	Y	N
TP05	CGL	Y	N
TP09	CGL	Y	N

Notes:

I. Only the information provided by CGL in the aforementioned reports has been included to inform this assessment. In the reports provided to TRC not all annexes were included in the CGL reports, therefore TRC has only been able to utilise the information provided.

All exploratory hole locations are presented as Figure 02 in Annex A.

The available information for the soil quality within the PAA and those exploratory locations in close proximity have been summarised in Table 5. Table 5 displays the range of contaminant concentrations, indicating a worst-case and best-case scenario of the soil quality for the PAA. No groundwater information was available for the PAA or in close proximity.

In order to appraise the significance of the concentrations report by laboratory testing, TRC has assessed each contaminant species that is elevated above the laboratory limit of detection against published screening criteria referred to as GAC. The GAC are derived from the following reference material:

- Land Quality Management Limited and Chartered Institute of Environmental Health (November 2014) the LQM/CIEH S4ULS for Human Health Risk Assessment (document reference: S4UL3435)
- Development of Category 4 Screening Levels for assessment of land affected by contamination – SP1010 (September 2014);
- LQM S4Uls: evaluation of 2017USEPA Toxicological Review of Benzo(a)pyrene; and,
- LQM/CIEH S4Uls for Nickel according to land use (Revised August 2015).

Table 5: Summary of Soil Analytical Results for the Permit Application Area

Analytical Parameter	Units	Screening Criteria for a Commercial End Use	Minimum Concentration	Maximum Concentration
Asbestos				
Asbestos Quantification	%	ND	ND	ND
Speciated PAHs				
Naphthalene	mg/kg	190	0.4	0.85
Acenaphthylene	mg/kg	83000	<0.05	0.24
Acenaphthene	mg/kg	84000	<0.05	0.11
Fluorene	mg/kg	63000	<0.05	0.56
Phenanthrene	mg/kg	22000	<0.05	3.2
Anthracene	mg/kg	520000	<0.05	1.1
Fluoranthene	mg/kg	23000	<0.05	5.2
Pyrene	mg/kg	54000	<0.05	4.4
Benzo(a)anthracene	mg/kg	170	<0.05	2.4
Chrysene	mg/kg	350	<0.05	2.2
Benzo(b)fluoranthene	mg/kg	44	<0.05	2
Benzo(k)fluoranthene	mg/kg	1200	<0.05	1.3
Benzo(a)pyrene	mg/kg	36	<0.05	2.2
Indeno(1,2,3-cd)pyrene	mg/kg	500	<0.05	0.94
Dibenz(a,h)anthracene	mg/kg	3.5	<0.05	0.21
Benzo(ghi)perylene	mg/kg	3900	<0.05	0.90
Heavy Metals / Metalloids				
Arsenic	mg/kg	640	12	14
Boron	mg/kg	240000	0.5	1
Cadmium	mg/kg	190	<0.2	<0.2
Chromium (hexavalent)	mg/kg	33	<1.2	<1.2
Chromium (III)	mg/kg	8600	19	20
Copper	mg/kg	68000	15	23
Lead	mg/kg	2300	17	45
Elemental Mercury	mg/kg	58	<0.3	<0.3
Inorganic Mercury	mg/kg	1100	-	-
Methyl Mercury	mg/kg	320	-	-
Nickel	mg/kg	980	19	22
Selenium	mg/kg	12000	<1.0	<1.0
Zinc	mg/kg	730000	61	85
Benzene	µg/kg	27000	<5.0	<5.0
Toluene	µg/kg	56000000	<5.0	<5.0
Ethylbenzene	µg/kg	5700000	<5.0	<5.0
p & m-xylene	µg/kg	12100000	<5.0	<5.0
o-xylene	µg/kg	6600000	<5.0	<5.0
MTBE (Methyl Tertiary Butyl Ether)	µg/kg	3340000	<5.0	<5.0
TPH-CWG - Aliphatic >EC5 - EC6	mg/kg	3200	<0.020	<0.020
TPH-CWG - Aliphatic >EC6 - EC8	mg/kg	7800	<0.020	<0.020
TPH-CWG - Aliphatic >EC8 - EC10	mg/kg	2000	<0.050	<0.050
TPH-CWG - Aliphatic >EC10 - EC12	mg/kg	9700	<1.0	<1.0
TPH-CWG - Aliphatic >EC12 - EC16	mg/kg	59000	<2.0	<2.0
TPH-CWG - Aliphatic >EC16 - EC21	mg/kg	1600000	<8.0	<8.0

Analytical Parameter	Units	Screening Criteria for a Commercial End Use	Minimum Concentration	Maximum Concentration
TPH-CWG - Aliphatic >EC21 - EC35	mg/kg	1600000	<8.0	11
TPH-CWG - Aromatic >EC5 - EC7	mg/kg	26000	<0.010	<0.010
TPH-CWG - Aromatic >EC7 - EC8	mg/kg	56000	<0.010	<0.010
TPH-CWG - Aromatic >EC8 - EC10	mg/kg	3500	<0.050	<0.050
TPH-CWG - Aromatic >EC10 - EC12	mg/kg	16000	<1.0	2.1
TPH-CWG - Aromatic >EC12 - EC16	mg/kg	36000	<2.0	6.2
TPH-CWG - Aromatic >EC16 - EC21	mg/kg	28000	<10	13
TPH-CWG - Aromatic >EC21 - EC35	mg/kg	28000	<10	15

Notes:

I. ND – Not Detected.

II. Only analytical parameters included within TRCs commercial screening criteria have been used to inform this assessment.

III. Samples Included in Table 6 – CGL (TP04, TP05 and TP09)

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Table 5 provides a summary of the soil contaminant concentrations associated with the samples collected in the nearby proximity of the NLL.

No asbestos in soil was identified within the soil samples analysed. Minor concentrations of heavy metals and hydrocarbons were detected in the soil samples analysed. However, none of the concentrations exceeded the GAC and are therefore not considered to present a significant risk to a light industrial / commercial end use.

Summary

In the absence of a baseline condition report for the entire Site prior to the commencement of permitted activities, TRC has utilised the existing understanding of the Site history to develop an understanding of probable baseline conditions in the NLL.

Given the historical agricultural land use of the area, the potential for soil and groundwater contamination cannot be discounted. The nearby investigations conducted by the NLL have identified some Made Ground soils. Activities at the food production facility could also be a source of contamination.

Ground investigations performed at the Site have not identified significant contamination at the Site. This indicates that the historical land uses and permitted operations have not significantly impacted environmental conditions at the Site. None of the contaminant concentrations exceed generic screening values for an ongoing commercial / industrial type land use.

The groundwater sampling undertaken in the southern area of the Site encountered some minor exceedances of the EQS for nickel and copper, although these are considered to be reflective of natural variations in the underlying strata. There are no deep installation currently at the Site, and it is unclear whether the groundwater sampling that has been undertaken is reflective of perched groundwater at the Site.

The Site is within an area of predominantly agricultural land use and there is potential for abstraction to occur within the farm lands. Groundwater abstraction is also undertaken as part of the current Site activities.

Future Risk and Remediation

The following section discusses the future risks associated with ongoing light industrial / commercial land usage, with particular reference to the environmental risks.

Soil Quality Discussion

As detailed in Table 5, no soil exceedances have been identified when screened against the GAC for commercial end use. Whilst minor concentrations have been identified these are not considered indicative of gross contamination and it is unlikely that significant remediation will be required in the NLL.

The shallow geological composition observed across the wider Site comprised Made Ground deposits underlain by the Taw River Terrace Deposits, underlain by the Bow Breccia Formation. The Taw River Terrace Deposits are variable in composition and the granular layers will allow the mobility of contaminants. Despite this, there is no clear source of contaminants with the exception of localised contamination from agricultural activities. Any tanks on the Site are in close proximity to all the soil samples tests, and based on the evidence collected, no contaminants linked to the contents of these tanks have been found within the soil samples.

Groundwater Quality Discussion

The Site is underlain by Secondary (A) Aquifer in both the superficial deposits and bedrock. The Site is not within a groundwater source protection zone (SPZ), as such it does not have increased sensitivity. Whilst no groundwater samples were collected within the NLL, groundwater samples were collected in the northern and southern portions of the Site.

The minor heavy metal concentrations detected within the groundwater samples around the effluent treatment plant in the south are unlikely to present a significant risk to the future light industrial / commercial end use. It is also assumed that the NLL is going to be covered by a thickness of concrete hardstanding to allow the area to be developed into electrical infrastructure. The presence of hardstanding will limit any potential infiltration of contaminants.

Summary

Factual Summary

The most significant historic land use associated with the NLL is the agricultural land use. Prior to the Client's proposed permit application, the NLL was utilised as agricultural land. This has been the land use for the entirety of the recorded history of the area.

The previous CGL and TRC investigations found the Site comprised a variable thickness of Made Ground to a maximum depth of 4.0m bgl in the south of the Site, with a maximum depth of 1.20 to 2.00m bgl encountered in the northern and central areas. In turn, this was underlain by superficial deposits comprising the Taw River Terrace Deposits to a maximum depth of 3.20m bgl, and bedrock of the Bow Breccia Formation to a maximum depth of 15.21m bgl. The base of the Bow Breccia Formation was not established. No excavations were conducted within the NLL, and assumptions have been made as to the

composition of the ground conditions underlying this section based of local borehole records. The NLL is considered to be of a low to moderate environmental sensitivity, based on the following:

- No previous developments on the NLL;
- The proximity to the River Taw in the east; and,
- The underlying Secondary (A) Aquifers in the superficial deposits and bedrock geology.

Based upon the historic information, pesticides and biocides were identified as a contaminant of concern for the NLL. The impact of this contamination will be dependent upon the migration of the contaminants, water movement, biodegradation and soil absorption. The extent and duration of the contamination will be dependent on how impacted the NLL has been.

Soil and groundwater summary

CGL and TRC performed investigations of the wider area of the Site during previous assessments. The NLL is not part of these investigations, but is very close and assumed that any data for the Site will likely also cover conditions found at the NLL.

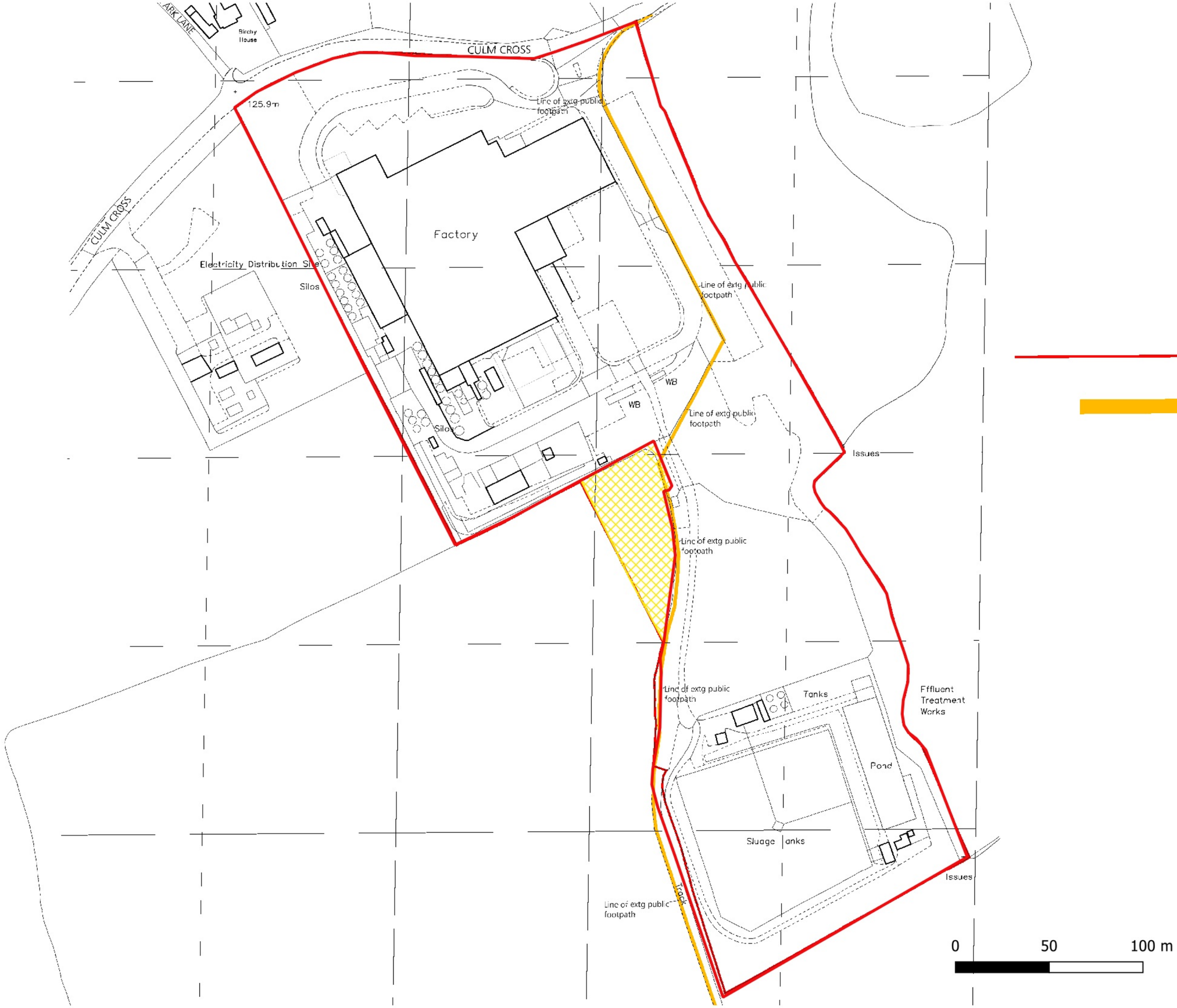
The CGL and TRC investigations did not find any contamination in excess of the GACs for a commercial development. One of the TRC investigation did encountered levels of copper and nickel in excess of the EQS, although these are considered to be natural variations of the underlying stratum. The Site is underlain by Secondary (A) Aquifers in the superficial deposits and bedrock geology. Whilst no samples were collected in the NLL, the groundwater samples collected from the wider Site area have not identified a widespread level of contamination, or a source of contamination.

Recommendations

No further investigation or remediation is recommended at this time. It is not considered that the permitted activities are likely to contribute to further deterioration of the soil and groundwater conditions and should the area be developed in the future for a commercial / industrial use, it is considered unlikely that the permitted activities would pose a significant risk.

TRC recommends that this Site Condition Report is provided to the EA for review in association with the permit variation.

Annex A – Figures



TITLE
SITE LOCATION PLAN

CLIENT
ARLA FOODS LTD

PROJECT
ARLA, TAW VALLEY - SITE CONDITION REPORT

TRC PROJECT NO.
000707569.0000.0000

SCALE	DRAWING SIZE
N/A	A3

DRAWING NO.
FIGURE 01

NOTES

LEGEND
- Site Boundary
- New Lease Land

REVISION	DRAWN	APPROVED	DATE
A	TS	SN	19/12/25
B			
C			

REVISION NOTES

PURPOSE OF ISSUE
SUITABLE FOR INFORMATION

TRC
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20 Red Lion St
London
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Google Imagery January 2025

TITLE
EXPLORATORY HOLE LOCATION PLAN

CLIENT
ARLA FOODS LTD

PROJECT
ARLA, TAW VALLEY - SITE CONDITION REPORT

TRC PROJECT NO.
000707569.0000.0000

SCALE	DRAWING SIZE
1:2,000	A3

DRAWING NO.
FIGURE 02

NOTES

LEGEND

- Site Boundary
- New Lease Land

Locations

- Trial pit

REVISION	DRAWN	APPROVED	DATE
A	TS	SN	19/12/25
B			
C			

REVISION NOTES

PURPOSE OF ISSUE
SUITABLE FOR INFORMATION

TRC
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20 Red Lion St
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Arla Foods Ltd

Annex B – H5 Form

SITE CONDITION REPORT TEMPLATE

For full details, see H5 *SCR guide for applicants* v2.0 4 August 2008

COMPLETE SECTIONS 1-3 AND SUBMIT WITH APPLICATION

DURING THE LIFE OF THE PERMIT: MAINTAIN SECTIONS 4-7

AT SURRENDER: ADD NEW DOC REFERENCE IN 1.0; COMPLETE SECTIONS 8-10; & SUBMIT WITH YOUR SURRENDER APPLICATION.

1.0 SITE DETAILS	
Name of the applicant	Arla Foods Ltd
Activity address	Arla Taw Valley, North Tawton, Devon, EX20 2DA
National grid reference	Easting 265354 , Northing 101407

Document reference and dates for Site Condition Report at permit application and surrender	000707569.0000.0000 – December 2025

Document references for site plans (including location and boundaries)	000707569.0000.0000 – December 2025	

Note:
In Part A of the application form you must give us details of the site's location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part A of the application form then you should submit the additional plan or plans with this site condition report.

2.0 Condition of the land at permit issue	
Environmental setting including: • geology • hydrogeology • surface waters	The previous intrusive investigations identified that the ground conditions beneath the Site comprised a variable thickness of Made Ground (ground level to 4.0m thickness), underlain by the Taw River Terrace Deposits (silt, gravel, clay and sand) to a maximum depth of 3.20m bgl. In turn, this was underlain by bedrock of the Bow Breccia Formation to a maximum depth of greater than 15.21mbgl. The superficial deposits and bedrock geology are classified as Secondary (A) Aquifers. The closest major surface watercourse to the Site is the River Taw, which is located 175m to 220m east of the Site boundary.
Pollution history including: • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination	Three pollution incidents are noted northeast of the Site. The first involved "suspended solids" and was a minor impact to water located 135m northeast in December 2002 (no impact to land and air). The second involved "grey water" and was a minor impact to water located 239m northeast (no impact to land or air was recorded). The third involved "soils and clays" and was a minor impact to

• evidence of damage to pollution prevention measures	water located 259m northeast (no impact to land or air).
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	Please refer to the Site Condition Report for full details.
Baseline soil and groundwater reference data	No available baseline soil and groundwater data.
Supporting information	• Source information identifying environmental setting and pollution incidents • Historical Ordnance Survey plans • Site reconnaissance • Historical investigation / assessment / remediation / verification reports • Baseline soil and groundwater reference data

3.0 Permitted activities	
Permitted activities	• Treating and processing milk with the quantity of milk received being more than 200 tonnes per day (average value on annual basis); • Biological treatment of non-hazardous wastewater; • Medium combustion plants: 26.8 MWth combined power, natural gas-fired; • Storage and handling of raw materials at the installation; • Use of refrigerants in cooling, chilling and/or freezing systems at the installation; • Storage and use of the chemicals and oils at the installation; • Operations of 4 cooling towers; and, • Collection of uncontaminated site surface waters.
Non-permitted activities undertaken	Not applicable.
Document references for: • plan showing activity layout; and • environmental risk assessment.	Technical Note on Site Condition for Arla, Taw Valley 000707569.0000.0000 December 2025

Note:

In Part B of the application form you must tell us about the activities that you will undertake at the site. You must also give us an environmental risk assessment. This risk assessment must be based on our guidance (*Environmental Risk Assessment - EPR H1*) or use an equivalent approach.

It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail.

These include substances that would be classified as ‘dangerous’ under the Control of Major Accident Hazards (COMAH) regulations and also raw materials, fuels, intermediates, products, wastes and effluents.

If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater we may need to request further information from you or even refuse your permit application.

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	Variation to Site boundary – see attached in technical note.
Have there been any changes to the permitted activities?	Not applicable.
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	Not applicable.
Checklist of supporting information	• Plan showing any changes to the boundary (where relevant) • Description of the changes to the permitted activities (where relevant) • List of 'dangerous substances' used/produced by the permitted activities that were not identified in the Application Site Condition Report (where relevant)

5.0 Measures taken to protect land	
Permitted activities not considered to pose a risk to the Site. Please refer to attached technical note.	
Checklist of supporting information	• Inspection records and summary of findings of inspections for all pollution prevention measures • Records of maintenance, repair and replacement of pollution prevention measures

6.0 Pollution incidents that may have had an impact on land, and their remediation	
Please refer to attached technical note.	
Checklist of supporting information	• Records of pollution incidents that may have impacted on land • Records of their investigation and remediation

7.0 Soil gas and water quality monitoring (where undertaken)	
No monitoring undertaken in the NLL. Please refer to the technical note.	
Checklist of supporting information	• **Description of soil gas and/or water monitoring undertaken** • **Monitoring results (including graphs)**

8.0 Decommissioning and removal of pollution risk

Not applicable. Site operations to continue.

Checklist of supporting information	• **Site closure plan** • **List of potential sources of pollution risk** • **Investigation and remediation reports (where relevant)**

9.0 Reference data and remediation (where relevant)

Not applicable. No remediation considered necessary.

Checklist of supporting information	• Land and/or groundwater data collected at application (if collected) • Land and/or groundwater data collected at surrender (where needed) • Assessment of satisfactory state • Remediation and verification reports (where undertaken)

10.0 Statement of site condition

Please refer to the technical note on site condition.

- It is not considered that the permitted activities are likely to contribute to further deterioration of soil and groundwater conditions and should the area be developed in the future for a commercial / industrial use, it is considered unlikely that the permitted activities would pose a significant risk.