

SITE CONDITION REPORT

Environmental Permit Variation, Telford
Prepared for: **Muller UK & Ireland Group LLP**

Client Ref: 410. V62639.00001

SLR Ref: 410.V62639.00001
Version No: FINAL
January 2023



BASIS OF REPORT

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- Appendix A: Drainage and Emission Points
- Appendix B: Envirocheck Report

1.0 INTRODUCTION

SLR Consulting Limited (SLR) has been commissioned by Muller UK & Ireland Group LLP ('the site') to prepare a Site Condition Report (SCR) in support of the Environmental Permit (EP) variation application for the Telford manufacturing facility, located at Donnington Wood Business Park, Granville Road, Telford, TF2 7GJ.

The facility is currently permitted for the operation of a Medium Combustion Plant (MCP) under Schedule 25B activity as described in the Environmental Permitting (England and Wales) (Amendment) Regulations (EPR) 2018.

The current EP boundary only surrounds the onsite combined heat and power plant (CHP). Muller propose to extend the EP boundary to incorporate the whole site to match the current site boundary.

This SCR aims to record and describe the condition of the land in the extended EP area prior to the commencement of any operations within the EP installation boundary. The SCR will capture the conditions of the site prior to the proposed EP variation being implemented.

This SCR will provide a point of reference and baseline environmental data so that when the EP is surrendered it can be demonstrated that there has been no deterioration in the condition of the land as a result of the Installation operations and ensure that the condition of the land is in a 'satisfactory state'.

The location of the site is illustrated in Drawing 001. The site layout; site boundary and proposed EP boundary is presented on Drawing 002 and Emission Points are illustrated in Appendix A.

Sections 1 to 3 of the Environment Agency's SCR template¹ have been completed within this document and comprise the following aspects:

- site details;
- condition of the land at permit issue;
- geology;
- hydrology;
- hydrogeology;
- pollution history;
- evidence of historic contamination; and
- permitted activities.

Sections 4 to 7 of the SCR template (refer Section 2) will be maintained during the life of the permit and Sections 8 to 10 (refer Section 3) will be completed and submitted in support of the application to surrender the EP.

The following sources have been utilised in the preparation of this SCR:

- Multi Agency Geographical Information for the Countryside² (MAGIC) map.
- Landmark Envirocheck Report (reference 302396227_1_1 dated 10 October 2022).
- British Geological Survey³.
- Environment Agency. Flood map for planning⁴

¹ <https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report> accessed November 2022

² Multi-Agency Geographical Information for the Countryside Map, available at www.magic.defra.gov.uk, accessed in May 2022.

³ British Geological Survey, available at <http://www.bgs.ac.uk>, accessed May 2022.

⁴ Flood map for planning, available at <https://flood-map-for-planning.service.gov.uk/>, accessed June 2022

1.1 Site Details

1.0 SITE DETAILS	
Name of the applicant	Muller UK & Ireland Group LLP
Activity address	Donnington Wood Business Park, Granville Road, Telford, TF2 7GJ.
National grid reference (centre of site)	SJ 71170 12140
Document reference and dates for Site Condition Report at permit application and surrender	Site Condition Report – 410.V62639.00001_SCR dated December 2022.
Document references for site plans (including location and boundaries)	<ul style="list-style-type: none"> • Drawing 001 - Site Location. • Drawing 002 - Site Layout and EP boundary. • Drawing 003 - Site Setting Plan – Local Receptors. • Drawing 004 - Site Setting Plan – Cultural and Natural Heritage. • Drainage Plan and Emission Points Appendix A.

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.

1.2 Condition of the Land at Permit Issue

2.0 CONDITION OF THE LAND AT PERMIT ISSUE	
Environmental setting including: <ul style="list-style-type: none"> • geology; • hydrogeology; and • surface water 	<p>The site is situated on Donnington Wood Business Park, Granville Road, Telford, TF2 7GJ. To the north of the site lies Granville Road, beyond which lies a residential area (approximately 25m north). Commercial premises lie to the east, south and northwest of the permit boundary. An additional residential area lies approximately 35m to the west beyond Redhill Way.</p> <p>The site is accessed via Granville Road to the north.</p> <p>Geology</p> <p>A review of the British Geological Survey (BGS) map⁵ reveals that the site is underlain by an Etruria Formation of mudstone bedrock</p>

⁵ British Geological Survey map, available at www.bgs.ac.uk, accessed in April 2019

	<p>comprised of mudstone, sandstone and conglomerate formed approximately 308-319 million years ago in the Carboniferous Period in environments dominated by rivers.</p> <p>Regarding superficial deposits the site is underlain by Devensian – Diamicton (Glacial) till, formed up to 2 million years ago in the Quaternary Period in environments previously dominated by ice age conditions.</p> <p>Hydrogeology</p> <p>Aquifer Designations</p> <p>The Etruria Formation bedrock underlying the site is classified as a Secondary A aquifer, which is defined as “<i>permeable strata capable of supporting water supplies at a local rather than strategic scale and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers</i>” on the MAGIC map website.</p> <p>The Superficial Till, Devensian – Diamicton Deposits are defined as a Secondary (undifferentiated) aquifer.</p> <p>Source Protection Zones</p> <p>The site does not lie within a Source Protection Zone.</p> <p>Hydrology</p> <p>Surface Water Features</p> <p>A detention pond is located on site which collects uncontaminated rainwater prior to discharge through W3.</p> <p>A review of the MAGIC map reveals that three ponds are identified within 500m of the site boundary. The ponds are located approximately 355m east; 370m east and 390m southwest respectively. A number of streams are also located in the vicinity of site, located approximately 390m east; 430m northeast and 550m southeast respectively.</p> <p>The Secondary Bedrock Aquifer – is classified as having High Vulnerability in the Envirocheck report.</p> <p>Flood Risk</p> <p>The Flood Map for Planning⁶ identifies that the site lies in a Flood Zone 1, areas with a ‘low probability of flooding from rivers and the sea’. Areas within a Flood Zone 1 have less than 1 in 1,000 annual probabilities of a river or sea flooding.</p>
<p>Pollution history including:</p> <ul style="list-style-type: none"> • Pollution incidents that may have affected land • Historical land-uses and associated contaminants • Any visual/olfactory evidence of existing contamination 	<p>Summary of historical and pollution data from Envirocheck.</p> <p>Site Land Use</p> <p>From the earliest map of 1882 and until 1954 the site appeared to be associated with a coal and ironstone quarry. Four mine shafts were identified in the northern portion of the site. The shaft furthest to the north-west on site was confirmed to be a coal old shaft. The site also</p>

⁶ Flood Map for Planning, available at <https://flood-map-for-planning.service.gov.uk/>, accessed in June 2022.

<ul style="list-style-type: none">Evidence of damage to pollution prevention measures	<p>comprised of clay and shingle pits. Two ponds were identified in the centre of site on the 1885 historical map.</p> <p>From approximately 1966 to 1990 the site is identified as disused workings. In 1968 a pond was observed in the northern portion of site.</p> <p>Between approximately 1990 and 2009, the former clay and shingle pits and onsite ponds appear to have been 'infilled' and the ground level has become uniform across the whole site.</p> <p>The western portion of the site was developed with the current site layout (manufacturing building) by 2009. In 2019 the facility extended into the eastern portion of the site with the construction of the high bay warehouse and despatch building. The detention pond in the eastern portion of site was also created at this time.</p> <p>The Envirocheck report has highlighted that the site comprises potentially infilled land (non-water).</p> <p>The Telford and Wrekin Planning Portal states that the site was given planning permission to construct <i>'an industrial dairy production building to include production and storage areas, milk silos, laboratories and offices, construction of a new vehicular access and car parking'</i> on 14 December 2007.</p> <p>Surrounding Land Use</p> <p>From approximately 1885 to 1954 the 500m surrounding the site comprised coal and ironstone collieries and clay and shingle pits. Additionally, the following features were identified on the 1885 map:</p> <ul style="list-style-type: none">a brick works located 450m north;a canal approximately 275m north and 375m east;a mineral railway approximately (250m) south; anda railway depot and smithy approximately 200m east site Old Lodge Furnaces and a smithy approximately 375m east. <p>The surrounding area remains as predominantly 'disused workings' from 1966 to 1990 with the following features identified:</p> <ul style="list-style-type: none">1966 - an unknown "depot" adjacent to the east of the site boundary;1982 - residential properties located to the west (approximately 500m) of the site; and1990 - Granville Road has been constructed approximately 20m north of the site which joined up with the B5060 at a roundabout. An unknown factory has also been identified, located approximately 440m south-west of the site boundary. <p>In 2000, the surrounding area around site appears to have been infilled where previous clay and shingle pits were present. Granville Country Park is located approximately 280m south and 350m east which includes two ponds present in the location of a former canal (355m and 370m east) and a stream located 390m east.</p> <p>In 2006 a depot has been constructed approximately 45m east of the site boundary along with a collection of three buildings located</p>
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approximately 150m south. The 2021 map presents a depot located approximately 25m south of the site boundary.

Pollution History

The Envirocheck Report included as Appendix B identifies the following events and consents within a 1000m radius of the site.

- Six discharge consents have been reported, the closest two being within 500m and are described as followed:
 - In October 1987 at Golden Bear Products (Rookery Road, Telford) a discharge consent was lapsed under Environment Act 1995, Schedule 23 which referred to sewage discharges (final/treated effluent). This discharge consent was located 446m south-west of the site.
 - In November 1991 at Landmatch Ltd (Littleshall Quarry) a discharge consent was revoked which referred to trade effluent discharge (site drainage) into freshwater stream/river. This discharge consent was located 497m south-west of the site.
- Four records under Integrated Pollution Prevention and Control, the closest of which is described as follows:
 - TM Telford Dairy Limited (onsite), relating to the medium combustion plant installation dated August 2020. The status of the measure is 'effective'.
 - The closest offsite record is for Lodgewood Recycling Limited 816m south for recovery of non- hazardous waste. In June 2022 this record was listed as superseded via variation.
- Five Local Authority Pollution Prevention and Controls, the closest of which is described as follows:
 - The active activity is located 117m west of the site and related to a PG1/14 Petrol filling station. Asda Donnington Petrol Filling Station was authorised to carry out the activity.
- Four Pollution Incidents to Controlled Waters within 500m of the site are described below:
 - Incident Reference: 2504829, in March 1999 a miscellaneous pollutant (inert suspended solids) caused a category 3 minor incident to water within the Severn Catchment: Tern and Roden. The incident occurred approximately 256m north-east of the site.
 - Incident Reference: 2502473, in July 1997 a chemical pollutant (acid) caused a category 3 minor incident to water within the Severn Catchment: Tern and Roden. The incident occurred approximately 373m west of the site.
 - Incident Reference: 2501726, in April 1997 a diesel spillage caused a category 3 minor incident to water (pond/lake) within the Severn Catchment: Tern and

	<p>Roden. The incident occurred approximately 446m south-west of the site.</p> <ul style="list-style-type: none">○ Incident Reference: 2500247, in February 1998 a miscellaneous pollutant (natural) caused a category 3 minor incident to water (pond/lake) within the Severn Catchment: Tern and Roden. The incident occurred approximately 448m south-west of the site.● Seven further incidents within 500m to 1000m of the site have also been reported. <p>Waste Management Activities</p> <p>Five Licenced Waste Management Facilities lie within 1000m of the site, the closest of which is described as follows:</p> <ul style="list-style-type: none">● A D W Aggregates (Licence Number: 47146) located 293m southwest, which treats waste to produce soil (<75,000 tonnes per year). The licence was issued on 25th July 2005 and its status is modified. <p>Landfill Activities</p> <p>Three Local Authority Landfill Sites within 500m of the site have been recorded in the vicinity of the site, and are described as follows:</p> <ul style="list-style-type: none">● Donnington Wood (Shropshire Council – unknown status) and was located 228m north-east of the site.● Rookery Road, St. Georges (Telford and Wrekin Council) was located 324m south-west of the site and its status is closed.● Donnington Wood (Telford and Wrekin Council) was located 365m east of the site and its status is closed. <p>A further two Local Authority Landfill Sites within 500m to 1000m of the site have also been reported.</p> <p>Two Registered Landfill Sites within 500m of the site have also been recorded, and are described as follows:</p> <ul style="list-style-type: none">● Telford Development Corporation (Licence Reference: A25/30/SL 42, dated 1st June 1981) was located 337m north-east of the site, and was authorised for the depositing of construction, demolition, household and commercial waste. The licence status is: “surrendered”.● Shropshire C.C. (Licence Reference: A25/30/SL/CC/ 5) is located 337m north-east of the site and is a medium sized landfill (equal to or greater than 25,000 and less than 75,000 tonnes per year). Authorised waste includes construction industry wastes. The licence status is: “surrendered”. <p>One Registered Waste Transfer Site and is detailed below:</p> <ul style="list-style-type: none">● Telford Container & Waste Services Ltd (Licence Reference: A25/30/SL/ 35) was located 575m south of the site and was classified as a small waste transfer site (equal to or greater than 10,000 and less than 25,000 tonnes per year). Authorised waste includes construction industry wastes. The licence status is: “surrendered”.
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	<p>Historical Landfills</p> <p>The Envirocheck report illustrates that there are four historical landfills within 500m of the site and are described below:</p> <ul style="list-style-type: none"> • Shropshire County Council (approximately 237m north-east) deposited waste up until 30th June 1978 at Donnington Land Reclamation which included inert, industrial, commercial, and household waste. The Provider Reference was: EAHLD24277. • Telford Development Corporation (approximately 240m north-east) deposited waste up until 31st December 1982 at Donnington Land Reclamation which included industrial, commercial and household waste. The Provider Reference was: EAHLD24274. • Oakengates Urban District Council (approximately 324m south-west) deposited waste at Rookery Road, St Georges which included household waste. The Provider Reference was: EAHLD30482. • A historical landfill in Telford (approximately 366m east) deposited household waste. The Provider Reference was EAHLD34469. <p>A further three historical landfills within 500m to 1000m of the site have also been recorded.</p>
<p>Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)</p>	<p>The site did not provide details of a historical intrusive land investigation. The site was constructed between 2007 and 2009. Muller purchased the site in 2013 from NOM Dairy who also ran the site as a dairy. The eastern portion of site was constructed in 2019.</p> <p>Prior to recent occupation on site as dairy, the land was historically utilised for coal mining and extraction of clay and shingle and may comprise infilled areas of land. This infilled land may comprise 'Made Ground' and historical potential unknown contaminants.</p> <p>Muller operate the dairy under an environmental management system with planned preventative maintenance in place including regular integrity testing of the tanks. There are no records of spills onsite during the facilities history. As such, no intrusive investigation at the site has been deemed necessary.</p>
<p>Baseline soil and groundwater reference data</p>	<p>The site did not provide details of any baseline soil or groundwater reference data for the site.</p>
<p>Supporting information</p>	<p>The site did not provide details of any further supporting information for the site.</p>

1.3 Permitted Activities

3.0 PERMITTED ACTIVITIES	
Permitted activities	<p>The facility will be permitted under Schedule 1, Part A1 of the Environmental Permitting (England and Wales) Regulations (EPR) 2016 (as amended), as follows:</p> <ul style="list-style-type: none"> • Section 6.8, Part A(1)(e) Treating and processing milk, the quantity of milk being received being more than 200 tonnes per day (average value on an annual basis). • Section 5.4, Part A(1)(a) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment (1)- <ul style="list-style-type: none"> (i) <i>biological treatment</i>; (ii) <i>physico-chemical treatment</i> • Directly Associated Activities – CHP plant and gas fired steam boiler.
Non-permitted activities undertaken	No non-permitted activities to be undertaken. The EP boundary will match the site boundary.
Document references for: plan showing activity layout; and environmental risk assessment.	<ul style="list-style-type: none"> • Drawing 002 - Site Layout and EP boundary • Drainage and Emission Points – Appendix A • Environmental Risk Assessment – 410.V62639.00001_ERA.

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.

2.0 Maintained During the Lifetime of the Permit

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	If yes, provide a plan showing the changes to the activity boundary.
Have there been any changes to the permitted activities?	If yes, provide a description of the changes to the permitted activities
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	If yes, list of them
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	
Use records that you collected during the life of the permit to summarise whether pollution prevention measures worked. If you can't, you need to collect land and/or groundwater data to assess whether the land has deteriorated.	
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

Summarise any pollution incidents that may have damaged the land. Describe how you investigated and remedied each one. If you can't, you need to collect land and /or groundwater reference data to assess whether the land has deteriorated while you've been there.

Checklist of supporting information	Records of pollution incidents that may have impacted on land Records of their investigation and remediation
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7.0 Soil gas and water quality monitoring (where undertaken)

Provide details of any soil gas and/or water monitoring you did. Include a summary of the findings. Say whether it shows that the land deteriorated as a result of the permitted activities. If it did, outline how you investigated and remedied this.

Checklist of supporting information	Description of soil gas and/or water monitoring undertaken Monitoring results (including graphs)
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3.0 Submitted in Support of the Application to Surrender the Permit

8.0 Decommissioning and removal of pollution risk	
Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.	
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)	
Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.	
If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.	
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	
Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that:	
the permitted activities have stopped decommissioning is complete, and the pollution risk has been removed the land is in a satisfactory condition.	

APPENDIX A

Drainage and Emission Points

APPENDIX B

Envirocheck Report

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