

## Permitting Decisions - Bespoke Permit

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We have decided to grant the permit for Parkham Farms Cheese Factory operated by Parkham Farms Limited.

The permit number is EPR/HP3728LG/A001

The permit was granted on 30/09/2026.

The application is for:

- An existing dairy site coming into our regulation for the treatment and processing of cow's milk for the production of hard cheese and cream and by-products including reverse lactose concentrate via ultrafiltration (UF) and osmosis (RO) in addition to whey permeate concentrate (WPC) via pasteurisation and UF.

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

## Best available techniques (BAT) assessment

| BAT ref. | Indicative BAT                                                                            | Key measures proposed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1        | Environmental management system (EMS)                                                     | <p>The operator has provided information to support compliance with BATc 1. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 1.</p> <p>The operator provided an overview of their EMS and detailed the contents to demonstrate compliance with each aspect of BATc 1.</p>                                                                                                                                                                                                                                                           |
| 2        | EMS – inventory of inputs & outputs to increase resource efficiency and reduce emissions. | <p>The operator has provided information to support compliance with BATc 2. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 2.</p> <p>As detailed above, the operator provided an overview of their EMS, demonstrating that each aspect of BATc 2 is complied with.</p>                                                                                                                                                                                                                                                            |
| 3        | Emissions to water – monitor key process parameters                                       | <p>We are satisfied that BATc 3 is not applicable to this Installation.</p> <p>Process effluent is used for landspreading and is permitted under EPR/EB3335RW. The only discharge to water is uncontaminated surface water.</p>                                                                                                                                                                                                                                                                                                                                                                           |
| 4        | Monitor emissions to water                                                                | <p>We are satisfied that BATc 4 is not applicable to this Installation.</p> <p>Process effluent is used for landspreading and is permitted under EPR/EB3335RW. The only discharge to water is uncontaminated surface water.</p>                                                                                                                                                                                                                                                                                                                                                                           |
| 5        | Monitor channelled emissions to air                                                       | <p>BATc 5 sets out air emissions monitoring requirements applicable to specific FDM sub-sectors. None of these monitoring requirements are applicable to this site as the activities undertaken are not specified in the sector and specific processes set out in BATc 5. The operator has confirmed that no drying takes place on site.</p> <p>We are therefore satisfied that BATc 5 is not applicable to this site.</p>                                                                                                                                                                                |
| 6        | Energy efficiency                                                                         | <p>The operator has provided information to support compliance with BATc 6. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 6.</p> <p>An energy efficiency plan has been provided and is incorporated into the site's EMS. Furthermore, the operator is using the following techniques:</p> <ul style="list-style-type: none"> <li>• Boiler burner regulation and control carried out through emissions monitoring and tracking of data;</li> <li>• Economisers on Boilers;</li> <li>• Heat exchangers on pasteurisers;</li> </ul> |

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|   |                                   | <ul style="list-style-type: none"> <li>• Heat recovery system;</li> <li>• Boiler blowdown is limited where possible;</li> <li>• Steam distribution is manifolded with double isolations. Steam leaks reported and dealt with straightaway;</li> <li>• Manual process control systems;</li> <li>• Compressed air leaks checked daily;</li> <li>• Compressor is captured on planned maintenance schedule;</li> <li>• Pipework and buildings hot water ring main all insulated; and</li> <li>• Renewable energy from solar generation on-site, which provides approximately 30% of the electricity required to operate the Site.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 7 | Water and wastewater minimisation | <p>The operator has provided information to support compliance with BATc 7. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 7.</p> <p>The operator is using the following techniques:</p> <ul style="list-style-type: none"> <li>• (a) Wherever feasible, recovered water from the cheese-making process is used in place of mains water to reduce overall water consumption. Whey, a by-product of cheese production, is treated via ultrafiltration and reverse osmosis, resulting in a high-quality water stream. This permeate water (RO water) is then dosed with chlorine to ensure it meets hygiene standards for reuse as process water on site. Uses for the process water include; equipment cleaning, CIP (Clean-in-Place) systems, and lorry washing. Certain elements of Site processes and cheese manufacture necessitate the use of mains water. These include: <ul style="list-style-type: none"> <li>○ Water used when adding rennet to the process;</li> <li>○ Handwashing and drinking water; and</li> <li>○ Boiler water</li> </ul> <p>Any surplus process water in excess of site demands is temporarily stored within the dirty water lagoon before being spread to land for agricultural benefit under deployment.</p> </li> <li>• (b) Mains water is metered. All hoses have spray guns and trigger controls.</li> <li>• (c) All hoses have spray guns and trigger controls.</li> <li>• (d) Segregated clean and dirty water drainage systems. Clean roof water is segregated and discharged to a tributary of the Dipple Water (emission source point W1).</li> <li>• (g) Within the cheese factory, high pressure cleaning techniques (undertaken at 20 bar) are used for washing out vats, cleaning the cheese tables, entry points / jaws of the vertical cheese towers/curd towers and the factory floors. When silos and tanks are cleaned, spray balls are used to increase the water spraying pressure to the contact surface. Spray balls are also used within the CIP system allowing even distribution of CIP systems are fully optimised to ensure effective and resource-efficient cleaning. The following parameters are routinely monitored as part of the CIP process: <ul style="list-style-type: none"> <li>○ Conductivity</li> <li>○ Temperature</li> <li>○ Concentration of caustic or acid detergents (measured as a percentage)</li> <li>○ Daily chemical usage</li> <li>○ Number of wash cycles completed per day</li> <li>○ Visual inspections of valves, pipework, and pumps to identify any defects or maintenance needs</li> </ul> <p>Automatic conductivity meters assess the concentration of cleaning chemicals in the CIP solution and indicate when chemical</p> </li> </ul> |

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|   |                           | <p>replenishment is required. Factory staff also perform manual conductivity tests to verify the accuracy of the automated readings. There are three dedicated CIP systems in operation:</p> <ul style="list-style-type: none"> <li>○ CIP 1 - for raw milk processing areas;</li> <li>○ CIP 2 – for the cheese room; and</li> <li>○ CIP 3 – for the whey room</li> </ul> <p>Monitoring results and visual inspections for each CIP system are recorded daily using manual logs. In addition, automated records (charts) are generated and retained for traceability. These charts record and confirm key process parameters, including:</p> <ul style="list-style-type: none"> <li>○ The areas cleaned;</li> <li>○ Cleaning solution temperature (required: 70 °C); and</li> <li>○ Chemical strength</li> </ul> <ul style="list-style-type: none"> <li>• (i) Cleaning foams are used for the cleaning of open-top cheese tables where clean-in-place (CIP) systems are not suitable. In addition, external surfaces of factory equipment are periodically cleaned using foaming agents.</li> </ul> <p>An alkaline foaming cleaner (Acifoam) is used daily for the removal of residual fats and organic matter from cheese tables. An acid-based foaming cleaner is also applied on a periodic basis (typically every two weeks) to remove mineral deposits and prevent the build-up of scale and rust on equipment surfaces.</p> <ul style="list-style-type: none"> <li>• (j) The design and construction of equipment and process areas is optimised to assist cleaning where possible.</li> <li>• (k) Cleaning of equipment is undertaken as soon as a possible after one production run ends and before the next production run begins. This prevents residues hardening. There is a cleaning schedule in place (Policy II Clean Down Procedures) which contains both the frequency of cleans per instrument and the cleaning procedures to be followed for each area.</li> </ul> |
| 8 | Use of harmful substances | <p>The operator has provided information to support compliance with BATc 8. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 8.</p> <p>The operator uses the following techniques on site:</p> <p><b>(a)</b> The selection of cleaning chemicals is process specific and ensures optimum cleaning of plant. The types of chemicals used are determined through working with chemical suppliers to meet on site requirements. The chemicals are essential to ensure cleanliness of the plant for food safety. Less harmful substances are used where possible.</p> <p>Kersia is the main chemical supplier for the cheese factory with specialist cleaning products for the whey plant provided by Diversey. Kersia provide a number of the factory's chlorinated products and advise that 'All of our Chlorinated products and disinfectants carry the Dangerous to the Environment Hazard symbol in their neat form due to the biocidal nature of the products.' Kersia has confirmed that all cleaning chemicals are used in diluted form and, at their in-use concentrations, are not classified as hazardous to the environment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|    |                     | <p>The operator declared that the cleaning products of Diversey fulfil the biodegradation requirements of the Detergent regulation 648/2004, which includes passing the criteria for ready biodegradability according to methods similar to OECD 301 for all surfactants in the products.</p> <p>Furthermore, there is no discharge of cleaning solutions to surface water. Process water which may contain biodegradable detergents is reused with any surplus in excess of Site demands temporarily stored within the lagoon before being land spread for agricultural benefit under deployment. PFL hold a Mobile Plant Permit, permit number EPR/ EB3335RW/A001.</p> <p><b>(b)</b> PFL operates a CIP recovery loop that allows cleaning chemicals and detergents to be reused multiple times before being replenished.</p> <p>The cleaning solution is collected and stored in the Hot Water CIP Tank, which is maintained at 85 °C to ensure optimal cleaning performance, hygiene, and food safety. A conductivity meter, installed on the return line to the hot water tank, monitors the solution's condition. Conductivity readings are used to assess both detergent concentration and contamination levels. If conductivity remains within acceptable parameters, the solution is reused in subsequent CIP cycles.</p> <p>The cleaning solution is fully replaced every three weeks. The system operates on a chemical rotation schedule, using caustic detergent for three weeks, followed by a three-day acid cleaning cycle to maintain system integrity and effectiveness.</p> <p><b>(d)</b> As described by BATc 7 (j).</p> |
| 9  | Use of refrigerants | <p>The operator has provided information to support future compliance with BATc 9. We have assessed the information provided and we are satisfied that the operator will be future compliant with BATc 9.</p> <p>The operator provided details on all existing refrigerants currently used in the process. A number of these have high global warming potential (GWP) and as such are not deemed BAT compliant, however the operator is developing a replacement plan to ensure all high GWP models are replaced with lower GWP model such as ammonia or CO<sub>2</sub> as soon as practicable. Improvement condition (IC) IC1 has been included in the permit to ensure compliance with BATc 9.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10 | Resource efficiency | <p>The operator has provided information to support compliance with BATc 10. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 10.</p> <p>The operator is using the following techniques:</p> <ul style="list-style-type: none"> <li>(a) While this technique is not used directly, the Lactose separated from the whey byproduct through UF and RO is removed from Site to an Anaerobic Digestion (AD) plant for treatment and recovery.</li> <li>(b) Residues and by-products generated from the cheese production process are recovered and reused through the following pathways: <ul style="list-style-type: none"> <li>• Cream is directed to an external food manufacturing facility for incorporation into food products.</li> <li>• Whey protein concentrate is supplied to a food manufacturing plant to produce whey-based products intended for human consumption.</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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|    |                                                | <ul style="list-style-type: none"> <li>• Lactose is either sent to an anaerobic digestion (AD) facility for treatment and energy recovery or used as an animal feed supplement.</li> <li>• Permeate / RO water (separated during whey and lactose processing) is reused as process water within the facility, contributing to a reduction in mains water usage.</li> </ul> <p>(c) Described in technical BATc 10 (b).</p> <p>(e) Phosphorus recovery as struvite is not applicable; there is no waste wash water treatment plant on site and the phosphorus within the wash water is recovered as a nutrient for agricultural benefit. However, PFL utilise a CIP recovery loop, a resource-efficient cleaning system allowing cleaning chemicals (including phosphorus-based detergents) to be reused multiple times before being replaced.</p> <p>(f) All wastewater generated on site is utilised for landspreading. This includes:</p> <ul style="list-style-type: none"> <li>• Surface water runoff from relevant external yard areas;</li> <li>• Dilute CIP flush water, discharged following the cleaning process once solutions are spent and no longer effective; and</li> <li>• Surplus process water that exceeds the operational requirements of the site.</li> </ul> <p>The waste is applied to land under the conditions of the Standard Rules Permit SR2010No4 for mobile plant landspreading, in line with the requirements for agricultural benefit or ecological improvement, and in accordance with the relevant deployment authorisations for each land parcel.</p> |
| 11 | Emissions to water – wastewater buffer storage | <p>We are satisfied that BATc 11 is not applicable to this Installation as there are no emissions of waste water to surface waters.</p> <p>All waste water is stored at the cheese factory in a purpose-built lagoon which comprises:</p> <ul style="list-style-type: none"> <li>• A permanent engineered structure;</li> <li>• A lined lagoon to protect ground and groundwater;</li> <li>• Constructed access routes for operational and maintenance purposes; and</li> <li>• Fencing and security measures to restrict unauthorised access</li> </ul> <p>The lagoon has a working capacity of 35,500m<sup>3</sup> which maintains a 750mm freeboard.</p> <p>Daily checks of the lagoon and preventative maintenance must be carried out including:</p> <ul style="list-style-type: none"> <li>• Always maintaining a minimum freeboard of 750 mm within the lagoon and 300mm within the tanks; and</li> <li>• Verification of the structural integrity of both the dirty water tanks and the lagoon.</li> </ul> <p>Further determination outside of BAT for the lagoon is addressed within the 'Bulk storage containment' section of this document.</p>                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 12 | Emissions to water - treatment                 | <p>We are satisfied that BATc 12 is not applicable to this Installation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|           |                                                        | <p>Process effluent is used for landspreading and is permitted under EPR/EB3335RW. The only discharge to water is uncontaminated surface water.</p> <p>Permeate water (RO water) is dosed with chlorine to ensure it meets hygiene standards for reuse as process water on site. Uses for the process water include; equipment cleaning, CIP (Clean-in-Place) systems, and lorry washing. Certain elements of Site processes and cheese manufacture necessitate the use of mains water. These include:</p> <ul style="list-style-type: none"> <li>• Water used when adding rennet to the process;</li> <li>• Handwashing and drinking water; and</li> <li>• Boiler water</li> </ul> <p>Any surplus process water in excess of site demands is temporarily stored within the dirty water lagoon before being spread to land for agricultural benefit under deployment. As such, no chlorine treated effluent is discharged to water on this site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 12 - AELs | Emissions to water – Associated emission limits (AELs) | We are satisfied that BATc 12 AELs are not applicable to this Installation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 13        | Noise – management plan (NMP)                          | <p>We are satisfied that BATc 13 is not applicable to this Installation.</p> <p>A noise management plan is only required where noise nuisance at sensitive receptors is expected or has been substantiated. There has been no substantiated noise nuisance from the site therefore an NMP is not a requirement for this site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 14        | Noise minimisation                                     | <p>The operator has provided information to support compliance with BATc 14. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 14.</p> <p>The operator is using the following techniques:</p> <p>(a) All equipment used within the cheese making process is located within the cheese factory building itself. The site layout ensures noisy plant is located away from site boundaries. A noise complaints procedure is in place, and any elevated noise levels are investigated and mitigated. The closest residential receptor not associated with the PFL is located 155m to the north (Arnolds Cottage) of the site. The Boilers and the Standby Generator are situated within buildings or containers.</p> <p>(b) Operational measures to reduce noise emissions include:</p> <ul style="list-style-type: none"> <li>• Planned preventative maintenance of plant and equipment.</li> <li>• Only trained staff permitted to operate equipment.</li> <li>• Vehicle speeds are controlled on site through site rules and operator awareness to minimise noise from vehicle movements.</li> <li>• Doors are kept closed on rooms with higher noise levels during normal operations to reduce external noise emissions.</li> <li>• Restricted delivery times to avoid high-noise operations during sensitive hours.</li> </ul> <p>(d) Noise emissions are minimised through the use of acoustic enclosures on refrigeration compressors and the enclosure of noise equipment</p> |

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|                                     |                                                                            | within the cheese factory building. Where applicable, silencers and anti-vibration mounts are fitted to reduce equipment noise. The main production processes are entirely within buildings.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 15                                  | Odour – management plan (OMP)                                              | <p>The operator has provided information to support compliance with BATc 15. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 15.</p> <p>An odour management plan has been submitted with the application, and this has been formally approved by the Environment Agency.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Dairy sector BAT conclusions</b> |                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 21                                  | Energy efficiency                                                          | <p>The operator has provided information to support compliance with BATc 21. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 21.</p> <p>In addition to the evidence provided for BATc 6, the operator uses the following techniques:</p> <ul style="list-style-type: none"> <li>(c) All pasteurisers on site are continuous.</li> <li>(d) All pasteurisers on site utilise regenerative heat exchange during both the heating and cooling phases. The site operates two 90,000-litre water storage silos: <ul style="list-style-type: none"> <li>• A cold water silo, maintained at 7 °C</li> <li>• A hot water silo, maintained at 40 °C</li> </ul> </li> </ul> <p>During cheese production, whey separated from the curd typically exits at a temperature of 45 °C. It is cooled by circulating it alongside water from the cold water silo, which lowers the whey temperature to approximately 22 °C. In turn, the water is heated to around 40 °C and then returned to the hot water silo.</p> <p>Fresh milk used for cheese manufacturing is stored at 5 °C. Before pasteurisation, it is preheated using the hot water (at 40 °C) from the hot water silo, raising the milk temperature to approximately 33.5 °C. As a result, the water cools down to 7 °C and is returned to the cold water silo.</p> <p>This heat exchange system between milk and whey cooling/preheating processes significantly reduces energy demand. It is estimated to save approximately 1,500 litres of kerosene per day, by reducing the thermal load on the pasteurisers.</p> |
| 21<br>EPL - Energy                  | Environmental Performance Level – Energy consumption for the dairy sector. | <p>The operator has provided information to support compliance with BATc 21 EPL. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 21 EPL.</p> <p>The main product is cheddar cheese with byproducts consisting of cream, WPC and lactose. The maximum milk processing capacity is 408 tonnes per day, which produces the quantities of products and by-products detailed within Table 2 below.</p> <p><i>Table 2 Production figures:</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|                                 |                                                                                      | <table><tr><th>Product</th><th>Tonnes</th></tr><tr><td>Cheese</td><td>48.14</td></tr><tr><td>RO Lactose concentrate</td><td>121.77</td></tr><tr><td>Whey Permeate concentrate (WPC)</td><td>26.92</td></tr><tr><td>Cream</td><td>5.85</td></tr><tr><td>Total Products</td><td>202.68</td></tr></table> <p>The operator has an underlying climate change agreement with the EA. The energy performance level target set for 2024 was 217.914 kWh/tonne (0.217914 MWh/tonne). The energy performance level for specific energy consumption documented for 2024 was 196.825 kWh/tonne (0.196825 MWh/tonne) which meets this target and falls below the maximum specific energy consumption yearly average of 0.22 for cheese production for the BAT-EPL.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Product | Tonnes | Cheese | 48.14 | RO Lactose concentrate | 121.77 | Whey Permeate concentrate (WPC) | 26.92 | Cream | 5.85 | Total Products | 202.68 |
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| Product                         | Tonnes                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |         |        |        |       |                        |        |                                 |       |       |      |                |        |
| Cheese                          | 48.14                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |         |        |        |       |                        |        |                                 |       |       |      |                |        |
| RO Lactose concentrate          | 121.77                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |         |        |        |       |                        |        |                                 |       |       |      |                |        |
| Whey Permeate concentrate (WPC) | 26.92                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |         |        |        |       |                        |        |                                 |       |       |      |                |        |
| Cream                           | 5.85                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |         |        |        |       |                        |        |                                 |       |       |      |                |        |
| Total Products                  | 202.68                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |         |        |        |       |                        |        |                                 |       |       |      |                |        |
| 21 - EPL - Water                | Environmental Performance Level – Specific wastewater discharge for the dairy sector | <p>We are satisfied that BATc 21 EPL - water is not applicable to this Installation.</p> <p>Process effluent is used for landspreading and is permitted under EPR/EB3335RW. The only discharge to water is uncontaminated surface water.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |         |        |        |       |                        |        |                                 |       |       |      |                |        |
| 22                              | Waste reduction                                                                      | <p>The operator has provided information to support compliance with BATc 22. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 22.</p> <p>The operator declared that they use the following techniques on site:</p> <p>(a) A centrifugal separator is used on site to recover residual fat from whey generated during the Cheddar cheese production process. This enables efficient cream extraction, which is then pasteurised and stored for further use or off-site dispatch. The centrifuge is operated in accordance with manufacturer specifications to minimise the rejection of product.</p> <p>The separator is operated under optimised conditions. This includes:</p> <ul style="list-style-type: none"><li>Regular maintenance and cleaning to ensure consistent performance and hygiene,</li><li>Monitoring of flow rates, temperature, and backpressure to maintain separation efficiency,</li><li>Operating parameter checks based on product characteristics (e.g. temperature &amp; fat content (measured by customer)),</li><li>Routine inspection for wear or imbalance to prevent efficiency losses and mechanical failure.</li></ul> <p>These measures ensure the separator operates efficiently and reliably, contributing to improved resource efficiency, reduced waste, and compliance with hygiene and product quality standards.</p> <p>(d) The factory produces hard cheese (cheddar), which generates less whey per unit of cheese compared to soft or fresh cheese varieties. The coagulation process uses rennet rather than acid, resulting in the production of sweet whey by-product with higher reuse value and lower environmental impact.</p> <p>(e) Whey is separated and recovered efficiently through ultrafiltration and used in food manufacturing at another food processing site.</p> |         |        |        |       |                        |        |                                 |       |       |      |                |        |
| 23                              | Emissions to air                                                                     | We are satisfied that BATc 23 is not applicable to this Installation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |         |        |        |       |                        |        |                                 |       |       |      |                |        |

|  |  |                                                                                                                 |
|--|--|-----------------------------------------------------------------------------------------------------------------|
|  |  | None of the techniques used on site result in channelled dust emissions and as such the BATc is not applicable. |
|--|--|-----------------------------------------------------------------------------------------------------------------|

## Impact on habitat sites

A Habitats Risk Assessment (HRA) stage 1 was carried out for the statutory sites in a 10km vicinity of the installation. The following sites required assessment:

Culm Grasslands SAC (UK0012679)

Tintagel-Marsland-Clovelly Coast SAC (UK0013047)

HRA 1 assessment conclusion:

This is an existing installation which has been operating for several years. The installation has not been identified as posing a risk to the designated sites. We are satisfied that the proposed installation will not cause a likely significant effect on the identified designated sites alone and/or in combination.

Natural England was not consulted.

A HRA stage 2 was not required as it was concluded in HRA stage 1 that there is no effect to any of the above listed statutory sites.

We conclude there is no likely significant effect.

## Hazardous chemical use and storage

The operator carried out a H1 screening assessment to identify potentially harmful chemicals (NO<sub>x</sub> and NO<sub>2</sub>) to the environment. The site condition report (SCR) considers relevant externally stored hazardous substances in a stage 1-3 assessment. Where hazardous substances are stored internally on hard standing at the site and the risk of pollution of soil and groundwater as a result of accidental release is considered to be negligible, these substances are not considered further in the assessment.

The site hydrogeology is vulnerable to pollutants released at ground level across the entire site for the following reasons:

- Leaching classification: High. Although the infiltration index is < 40%, the dilution (>550 mm/yr) indicates high annual recharge/percolation, which drives a high leaching class.
- The bedrock geology is the Holsworthy Group (mudstone, siltstone and sandstone). This comprises of interbedded fine-grained rocks with low matrix (intergranular) permeability, where flow pathways are primarily along fractures and bedding planes.

- The Holsworthy Group bedrock geology beneath the site forms a Secondary A bedrock aquifer capable of supporting local supplies and is assessed as high vulnerability.
- There are no superficial deposits on Site.

There is a low risk for contamination of soil or groundwater due to the relatively low quantities of the hazardous substances used and produced at the installation and the site construction and drainage design. In addition, there are management and mitigation control measures in place to further decrease the risk. Therefore, it is deemed that a baseline report is not required for this installation.

We believe the operator has adequately assessed potential environmental impact to the environment and is currently operating in such a way that poses low risk.

## **Bulk storage containment**

The Operator provided an internal assessment of the containment measures on site which stated the following:

All storage and treatment of waste takes place within enclosed buildings with impermeable surfacing and sealed drainage system.

Chemicals are stored securely and housed on impermeable surfacing.

All storage tanks are constructed of stainless-steel base, shell and roof as per the industry standard. Milk Silos, both RO Silos (Permeate Silos 3 & 4) and the 3 no. cream Silos (CT1, CT2 & CT3) all benefit from high level sensors (differential pressure). The Lactose storage tanks are of concrete construction.

All fuel is stored within designated integrally bunded tanks.

Primary storage of wastewater takes place within 2 No. Dirty Water Storage Tanks (one above ground, one below ground). The below ground concrete tank is equipped with a high-level sensor, which, when triggered, activates a pump to transfer wastewater into the above ground tank. From there, the liquid is transferred by gravity to a lined storage lagoon.

On dispatching loads into the Silos, the pump will automatically shut off on reaching the high level, preventing overfilling. Within the Cheese Factory itself, the quantity to be dispatched to the pasteuriser for each production cycle is automated. A flow meter is in place which allow operatives to confirm the correct amount is dispatched into the pasteuriser.

The entire site benefits from impermeable surfacing and a sealed drainage system designed to contain potential spillages and prevent pollution. As part of ongoing environmental improvements, the operator has proposed the implementation of an enhanced emergency containment solution for the milk

silos and chemical storage areas, where the risk of significant spillage is greatest. Once implemented, a concrete drainage channel will be installed directly in front of the milk storage areas. In the event of a major spill, this channel would capture and convey spilled material to an emergency lined Deluge Pit, which will be located to the east of the yard.

Further containment development includes the installation of a penstock valve on the outlet of the surface water drain. This valve can be manually or automatically closed in the event of a spill or during high-risk operations (such as tanker loading or cleaning), effectively isolating the surface water system. In addition, portable drain covers are kept on hand for immediate use, allowing surface drains to be temporarily sealed at the point of entry.

The operator has confirmed and we have assessed that on site containment currently does not meet CIRA C736 standards. A phased instalment plan of the proposed containment improvements was proposed in the first instance but the operator was not able to achieve this before permit issue. Therefore, IC2 has been added to the permit to address containment improvement.

Spills are controlled through a spillage procedure documented in 'PFL-PROC-02'. All operatives are trained on emergency preparedness and response.

## **Odour Management Plan**

The operator has submitted an odour management plan (OMP) as part of the application (A001) in line with our guidance - [Control and monitor emissions for your environmental permit - GOV.UK](#). This outlines the possible sources of odour, the prevention and mitigation controls in place to prevent odours from the site as well as the monitoring in place to limit the impact on sensitive receptors. The operator highlights all receptors within the vicinity of the site; consideration was given to these receptors when analysing the OMP.

An OMP was deemed warranted due to the process of dairy products and the storage of dirty water in an uncovered process waste effluent lagoon. This process does not vent to atmosphere however an OMP was still deemed necessary to prevent fugitive odour emissions.

We have reviewed the revised OMP for compliance in respect of our guidance H4 Odour Management, How to comply with your environmental permit. The OMP is referenced within Table S1.2 of the permit as it forms part of the Operating Techniques.

We consider that the conditions in the permit are sufficient to ensure that the risk of odour pollution beyond the site boundary is low. In the event that odour emissions cause pollution beyond the site boundary, the permit conditions require the Operator to comply with the measures specified in the site's operating techniques and odour management plan.

## Discharge to lagoon and containment

Primary storage of wastewater takes place within an on-site concrete pit and an above-ground concrete storage tank. The concrete pit is equipped with a high-level sensor, which, when triggered, activates a pump to transfer wastewater into the above-ground tank. From there, the liquid is transferred by gravity to the dirty water lagoon for temporary storage which has a capacity of 35,500m<sup>3</sup>. The lagoon is a lined permanent engineered structure.

The lagoon is sized to allow storage contingency. In previous years 23,000 - 26,000m<sup>3</sup> of wash water has been produced i.e. 85-125m<sup>3</sup>/day may be passed to the lagoon depending on production levels. The lagoon has a capacity of 35,500m<sup>3</sup> and with rainfall ingress has a capacity of at least 10 months storage for the effluent produced. The lagoon is subject to daily checks on levels and integrity. The lagoon is emptied once a year and the liner fully checked as to its integrity.

The wastewater is landspread in accordance with Parkham Farms Limited Standard Rules Permit SR2010 No.4 for mobile plant landspreading (Permit Ref: EPR/EB3335RW). This permit requires that all landspreading activities result in either agricultural benefit or ecological improvement. Routine monitoring and preventative maintenance of the lagoon and dirty water tanks is carried out daily, including:

- Always maintaining a minimum freeboard of 750mm within the lagoon and 300mm within the tanks; and
- Verification of the structural integrity of both the dirty water tanks and the lagoon.

The wastewater is tested at least once every 12 months to inform Agricultural benefit statements for landspreading deployment applications for pH, conductivity, dry matter levels, major and minor nutrients, potentially toxic elements, neutralising value, BOD, COD and Oils, Fats and Grease at a suitably accredited laboratory.

The catchment area is the Dipple Water and was classified in 2022 under the Water Framework Directive as follows:

- Ecological status – moderate
- Biological quality elements - moderate
- Physico-chemical quality elements – moderate
- Hydromorphological Supporting Elements – not high
- Chemical – does not require assessment as the site is not within a Surface Water Nitrate Vulnerable Zone (NVZ) nor is it within a Drinking Water Safeguard Zone.

A second ordinary (unnamed) watercourse lies 15m to the north of the dirty water storage lagoon. It drains and flows via field ditches to the Dipple Water and thence to the River Torridge and the Taw Torridge estuary at Bideford.

The site is in a Flood zone 1 which means that overall, there is a low probability of flooding from rivers or sea.

### **Further information of the Whey and lactose removal from process effluent before discharge to the dirty water lagoon**

The Whey and lactose by-products in the production process do not enter into the lagoon itself. This is achieved as the Whey which is produced as a by-product of cheese-making undergoes treatment via ultrafiltration (UF) which results in the production of whey protein concentrate (WPC) and a mixture of lactose, salts and water. The lactose mixture then undergoes reverse osmosis (RO) whereby the lactose is concentrated, and the water is removed. The resultant permeate/RO 'water' undergoes further treatment; it is dosed with chlorine and is used as 'production water' within the factory to reduce reliance on mains water supply.

The Lactose separated from the whey by-product through UF and RO is removed from Site to an Anaerobic Digestion (AD) plant for treatment and energy recovery, or used as an animal feed supplement. Whey protein concentrate is supplied to a food manufacturing plant to produce whey-based products intended for human consumption.

During cheese production, Whey separated from the curd typically exits at a temperature of 45 °C. It is cooled by circulating it alongside water from the cold water silo, which lowers the whey temperature to approximately 22 °C.

The factory produces hard cheese (cheddar), which generates less whey per unit of cheese compared to soft or fresh cheese varieties. The coagulation process uses rennet rather than acid, resulting in the production of sweet whey by-product with higher reuse value and lower environmental impact. Whey is separated and recovered efficiently through ultrafiltration and used in food manufacturing at another food processing site.

### **Further information regarding domestic discharge consent**

There is an on-site sewage treatment plant (Permit Reference: EPR/BB3595WU) which serves the cheese factory. The permitted discharge is for 2m<sup>3</sup>/day of domestic sewage which is discharged to an unnamed tributary of the Dipple Water.

## **Category 1 fish kill incident during determination**

During determination of this application, on 05/08/2026 the umbilical between this site and the deployment site in the form of a 6" lay flat pipe passing through a culvert under the road leaked due to a hole in the pipe, which was not detectable

via the flow rate on the umbilical system, i.e. there was no discernible pressure drop. This caused waste cheese factory wash water (Waste code 02 05 01) to run out into a drain and down the ditch to the river. Pumps were stopped, removed pipes and made every effort to stop the pollution. The downstream and upstream river flow were banded to isolate polluted water and used tankers to remove polluted water from the river immediately. The leak stopped as soon as pumping ceased. Tankers were brought on the site to downstream to remove all contaminated effluent that could be accessed. Not all of the river could be accessed due to different land ownership and forestry.

The defective pipe will be replaced and all lay flats will be rolled out and visually inspected. Going forward, full visual line check will be carried out when land spreading is in operation by walking the pipeline and visual checks will be recorded throughout the day. A new pump with a flow metre has been commissioned in order to record flow rate of effluent entering and exiting the pipework. The flow metre pressures are digitally displayed to the driver in the cab when operating. The display alerts the operator immediately if a drop occurs between the pump and equipment with a hazard warning.

While this leak was detected on the deployment permitted site and not on this permitted site, under RGN2 section 3.6 part (ii) regarding 'technical connection', there is a joint responsibility to safeguard the environment as the technical connection originates from this site. During a site visit on 09/09/2026, we inspected the safeguards in place to cut off effluent discharge from the where the effluent is deployed from on site before flowing through the umbilical. The new flow metres and live monitoring systems and were observed to be in place. The operator confirmed that the deployment machinery operator is able to immediately to stop effluent from entering the umbilical if any change of flow is detected, or if any leak is visually identified.

## **Decision considerations**

### **Confidential information**

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

The decision was taken in accordance with our guidance on confidentiality.

### **Identifying confidential information**

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

The decision was taken in accordance with our guidance on confidentiality.

## **Consultation**

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

We consulted the local authority.

No response was received.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority – Environmental Protection Department
- Local Authority – Planning
- Director of PH/UKHSA
- Health and Safety Executive
- Animal and Plant Health Agency

No responses were received.

## **Operator**

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

## **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', 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 and in the permit. The activities are defined in table S1.1 of the permit.

## **The site**

The operator has provided a plan which we consider to be satisfactory.

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

The plan is included in the permit.

## **Site condition report**

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports.

## **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.

As part of the application, we carried out a habitats assessment of the site and the surrounding area. See the 'Impact on habitats sites' sub-section under 'Key issues of the decision' for a summary of the assessment.

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 1-15 and dairy sector specific BATc 21-23.

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

## **Odour management**

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

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

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

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

The plan has been incorporated into the operating techniques table S1.2 of the environmental permit.

## **Raw materials**

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

## **Improvement programme**

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

The operator has provided information to support future compliance with BATc 9. We have assessed the information provided and we are satisfied that the operator will be future compliant with BATc 9. The operator provided details on all existing refrigerants currently used in the process. A number of these have high GWP and as such are not deemed BAT compliant, however the operator is developing a replacement plan to ensure all high GWP models are replaced with lower GWP model such as ammonia or CO<sub>2</sub> as soon as practicable. IC1 has been included in the permit to ensure compliance with BATc 9.

The operator has confirmed and we have assessed that on site containment currently does not meet CIRA C736 standards. A phased instalment plan of the proposed containment improvements was proposed in the first instance but the operator was not able to achieve this before permit issue. Therefore, IC2 has been added to the permit to address containment compliance.

## **Emission Limits**

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on the medium combustion plant directive (MCPD) have been added for the following substance:

- Oxides of Nitrogen (NO and NO<sub>2</sub> expressed as NO<sub>2</sub>)
- The limit is set at 200 mg/m<sup>3</sup> for boiler 1 (emission point A1, existing MCP) and boiler 2 (emission point A2, existing MCP).

## **Monitoring**

We have decided that monitoring should be added for the following parameters, using the methods detailed and to the frequencies specified:

- Oxides of Nitrogen (NO and NO<sub>2</sub> expressed as NO<sub>2</sub>) - Periodic reference period and a monitoring frequency of three-yearly under monitoring standard/method BS EN 14792.
- Carbon Monoxide - Periodic reference period and a monitoring frequency of three-yearly under monitoring standard/method BS EN 15058.

## **Reporting**

We have specified reporting in the permit.

We made these decisions in accordance with the Medium Combustion Plant Directive; Food, Drink and Milk Industries BRef; and Industrial Emissions Directive.

## **Considerations of foul sewer**

We agree with the operator's justification for not connecting to foul sewer.

The facility is in a location where it is not reasonable to connect to the foul sewer. All process effluent is stored in an onsite lagoon for use of landspreading off-site under permit reference EPR/EB3335RW. The only other water discharge onsite originates from uncontaminated surface water runoff and discharges directly to water. Due to the nature of site operations regarding process effluent and uncontaminated surface water runoff, we agree that connecting to sewer is not required in this instance.

## **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.

We only review a summary of the management system during determination. The applicant submitted their full management system. We have therefore only reviewed the summary points.

A full review of the management system is undertaken during compliance checks.

## **Previous performance**

We have assessed operator competence. We have noted the past poor performance of Peter Willes.

We have checked our systems to ensure that all relevant convictions have been declared.

Relevant convictions were found and declared in the application. We considered relevant convictions as part of the determination process.

While in the position of the Director of Parkham Farms Limited, Peter Willes was convicted under the Environment Protection Act 1990 Section 33 - Depositing controlled waste on land without a licence and Water Resources Act 1990 Section 85 - Causing or knowingly permitting polluting matter on 12/04/2011. The penalty for this conviction was a total fine cost of £23,000.00 for Peter Willes.

While in the position of a Partner (P.W. & R.M. farming partnership, Peter Willes was convicted under Slurry pollution of a stream - Water Resources Act 1990 Section 85 - Causing or knowingly permitting polluting matter and Spreading cheese-factory waste on land in breach of a permit condition - Contravention of an environmental permit condition, reg. 38(2) of the Environmental Permitting (England and Wales) Regulations 2010 on 29/07/2015. The penalty for this conviction was a total fine of £4,280.00 for Peter Willes and £22,620.00 for P.W. & R.M. farming partnership.

Taking this into account, we do have concerns about operator competence but we have considered this and on balance we have decided to issue the permit. The operator has since invested in ultra filtration and reverse osmosis process to remove the whey from the process effluent which has reduced the level of polluting matter that could possibly enter groundwater. We take compliance with our permits very seriously. We will be monitoring the site, and if performance is

poor, then appropriate enforcement action will be taken, and we will reconsider the operator's suitability to hold a permit.

## **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.

## **Consultation Responses**

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

### **Responses from organisations listed in the consultation section**

No responses received.