

Mr N. Shawcross
The First Milk Cheese Company Ltd
Haverfordwest Creamery
Pembroke Road
Merlin's Bridge
Haverfordwest
Pembrokeshire
SA61 1JN

**Our ref: PAN-027140
Your ref: EPR/XP3830UR**

Date: 03 December 2025

*Sent via email to: neilshawcross@firstmilk.co.uk
cc: jamescherry@firstmilk.co.uk and sarajones@firstmilk.co.uk*

Dear Mr Shawcross,

We need more information about your application.

**Application reference: PAN-027140 (EPR/XP3830UR/V007)
Operator: The First Milk Cheese Company Ltd
Facility: Haverfordwest Creamery, Pembroke Road, Merlin's Bridge, Haverfordwest,
Pembrokeshire, SA61 1JN**

Thank you for your application received on 7th October 2024.

I need to ask you for some more information before I can do any more work on it. Please would you:

- 1. ACTION: Confirm the following proposed capacity figures, including providing a full breakdown of how they have been determined:**
 - **Average production capacity (tonnes per day).** See Note 1.
 - **Maximum production capacity (tonnes per day).** See Note 2.
 - **Maximum storage capacity (tonnes).** See Note 3.

Note 1: This is a daily average based on production capacity over the course of the year. Described in the Environmental Permitting Regulations as "Quantity of milk received...tonnes per day (average value on an annual basis)".

Note 2: This is the maximum production capacity possible in any one day.

Note 3: This is the maximum amount of material it is possible to store (/ vessel capacity) and includes all milk products (milk, cream and whey).

There are some inconsistencies with the figures in the application documents and/or the calculations are not fully broken down, so we would like to confirm the capacities.

Ffôn/Tel 0300 065 3753
E-bost/Email emily.ingram@cyfoethnaturiolcymru.gov.uk
emily.ingram@naturalresourceswales.gov.uk

Gwasanaeth Trwyddedu, Cyfoeth Naturiol Cymru, Adeilad y Goron, Parc Cathays, Caerdydd, CF10 3NQ
Permitting Service, Natural Resources Wales, Crown Buildings, Cathays Park, Cardiff, CF10 3NQ

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

- 2. ACTION: Provide an assessment of the site drainage system's integrity and ability to cope with the proposed changes.**

The application documents include assessments on the effect of the increased capacity at the Effluent Treatment Plant (App5 and App8), however, we would like assurance that the site drainage system can cope with the changes.

- 3. ACTION: Provide an updated BAT assessment to account for the proposed changes.**

A BAT BREF Review was undertaken for V006 of the permit, however, this did not account for the changes being proposed, so an update is required.

- 4. ACTION: Provide an updated site plan which consolidates the required changes and shows all the emission points (W1, W2, WL1, A1-4).**

There were two site plans submitted as part of the application documents (C2 5a and App9) to demonstrate the location of the proposed changes and the area of land which requires removal due to an error in inclusion in a past version. The current site plan in V006 of the permit shows W2 but not the other emission points. In the permit V006 Schedule 3 Table S3.1 and S3.2 other emission points refer to being shown on historic site plans. A consolidated site plan with the requested area of land removed and all the emission points shown would be of benefit for V007 of the permit.

Refer to [Guidance for environmental permit applications: Part B2 – General: New bespoke permit](#) which includes details on what is expected of a site plan.

- 5. ACTION: Provide an updated Environmental Risk Assessment taking account of the proposed changes, and updated Noise and Odour Management Plans as required.**

We understand updated Environmental Risk Assessment, Noise Management Plan and Odour Management Plans have been provided to the NRW Industry Regulation team since the submission of the application, however, we are uncertain whether the proposed changes have been captured.

We require an [Environmental Risk Assessment](#) which accounts for the proposed changes and if there is additional noise and odour risks, we also require updated Noise and Odour Management Plans.

- 6. ACTION: Provide a water impact assessment.**

It is acknowledged that there are issues with the use of the H1 tool, including the water impact assessment being unavailable. The [surface water pollution risk assessment guidance](#) can be used to carry out this assessment.

- 7. ACTION: Provide details on whether the containment for the PAC dosing system at the Effluent Treatment Plant meets CIRIA C736.**

First Milk provided details of a Water Pollution Management Study (App2) to assess the pollution risk from a tank breach on the site, however, the area covered did not include the Effluent Treatment Plant. A Phosphorus Reduction Proposal Summary (App7) was submitted including some details about the PAC dosing system containment; a bunded IBC, pipework to be dual walled and rated for PAC delivery, and the system to be within the "site containment area". We require more information on whether the design meets CIRIA C736.

Please reply within 10 working days from the date of this letter. If we don't hear from you we must return your application and fee. We will keep 14% of the charge to cover the cost of the assessment work done.

If you email or write to us please quote the application reference PAN-027140 (EPR/XP3830UR/V007) on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

If you have any questions please phone me on 0300 065 3753 or email emily.ingram@naturalresourceswales.gov.uk.

Yours sincerely

Emily Ingram
Lead Specialist Permitting Officer, Installations and RSR Permitting