



**Non-Technical Summary -
Bespoke Installation Permit Application:**

On behalf of:

Parkham Farms Cheese Factory, Higher Alminstone Farm,
Woolsey, Bideford, Devon EX39 5PX

ETL928/2025

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Abbreviations

| | |
|-------|--|
| AMP | Accident Management Plan |
| AQIA | Air Quality Impact Assessment |
| AQMA | Air Quality Management Area |
| AW | Ancient Woodland |
| BRCGS | Brand Reputation through Compliance Global Standard |
| CIP | Cleaning in Place |
| CO2 | Carbon dioxide |
| COSHH | Control of Substances Hazardous to Health |
| CQA | Construction quality assurance |
| DWSZ | Drinking Water Safeguard Zone |
| EA | Environment Agency |
| EMS | Environmental Management System |
| EN | European Standard |
| ETL | Earthcare Technical Limited |
| EWC | European Waste Catalogue |
| IBC | Intermediate Bulk Container |
| m AOD | Metres Above Ordnance Datum |
| MCPD | Medium Combustion Plant Directive (2015) |
| MPH | Miles per hour |
| MWh | Mega watt hour |
| MWth | Mega watt thermal (unit for net rated thermal input) |
| NGR | National Grid Reference |
| NMP | Noise Management Plan |
| OMP | Odour Management Plan |
| PHI | Priority Habitat Inventory |
| ppm | Parts per million |
| RO | Reverse Osmosis |
| SCADA | Supervisory Control and Data Acquisition |
| SAC | Special Area of Conservation |
| SOP | Standard Operating Procedure |
| SPA | Special Protection Area |
| SPZ | Source Protection Zone |
| SSSI | Site of Special Scientific Interest |
| TPA | Tonnes per annum |
| UF | Ultrafiltration |

1 Introduction

This Non-Technical Summary has been prepared by Earthcare Technical Ltd (ETL) on behalf of Parkham Farms Limited in support of an application for a bespoke installation permit (Permit ref: EPR/HP3728LG) for Parkham Farms Cheese Factory, Higher Alminstone Farm, Woolsery, Bideford, EX39 5PX (the Site) operated by Parkham Farms Limited (PFL), herein termed 'the Operator'.

This Non-Technical Summary highlights the key control measures that are employed on Site proposed to minimise any impacts from the Site operations and signposts the reader to the key supporting documents for the permit application.

2 Planning

The site falls within the jurisdiction of the Torridge District Council. A review of the Torridge District Council website reveals an extensive planning history surrounding the application site and associated with Parkham Farms as follows:

- 1/0990/1982- BARN AND LEAN TO BUILDING FOR STORING HAY AND WINTER HOUSING OF CATTLE- APPROVED 27.10.1982
- 1/1279/1984- PROPOSED AGRICULTURAL LIVESTOCK BUILDING- PERMITTED 31.12.1984
- 1/0932/1986- ERECTION OF A REPLACEMENT AGRICULTURAL BUILDING- PERMITTED 14.10.1986
- 1/0342/1989- ERECTION OF AN AGRICULTURAL BUILDING TO HOUSE CATTLE- PERMITTED 23.03.1989
- 1/1552/1989- ALTERATIONS AND EXTENSIONS TO EXISTING DWELLING- PERMITTED 21.08.1989
- 1/0434/1993- ERECTION OF A PORTAL FRAMED AGRICULTURAL BUILDING- PERMITTED 07.05.1993
- 1/1188/1994- ERECTION OF AGRICULTURAL BUILDINGS- PERMITTED 19.10.1994 • 1/0532/1996- PROPOSED SUBSURFACE CONCRETE DAIRY EFFLUENT STORAGE CONSTRUCTION- PERMITTED 30.05.1996
- 1/0534/1996- ABOVE GROUND MAIZE STORAGE PIT- PERMITTED 30.05.1996
- 1/0535/1996- ABOVE GROUND DLURRY STORE WITH EFFLUENT TANK- PERMITTED 30.05.1996
- 1/0536/1996- PROPOSED STEEL FRAMED AGRICULTURAL (STOCK) BUILDING- PERMITTED 30.05.1996
- 1/0528/1997- ERECTION OF AN AGRICULTURAL BUILDING- WITHDRAWN 10.06.1997
- 1/0806/1997- ERECTION OF A BUILDING FOR THE MIXED USE FOR AGRICULTURAL STORAGE AND B8 STORAGE FOR DAIRY PRODUCE- PERMITTED 05.09.1997
- 1/2036/2000- PROPOSED PORTAL FRAME MILKING PARLOUR BUILDING- APPROVED 07.02.2001

- 1/1308/2003/FUL- AGRICULTURAL STORAGE BUILDING- PERMITTED 26.09.2003 •
1/2128/2006/FUL- ERECTION OF EXTENSION TO STORAGE BUILDING- PERMITTED
22.12.2006 • 1/1023/2007/FUL- EXTENSION AND ALTERATION TO OFFICE AND CHEESE
MAKING ROOM- PERMITTED 17.10.2007
- 1/1305/2007/OUT- ERECTION OF OCCUPATIONAL/SUPERVISORY DWELLING TO
SERVICE THE NEEDS OF THE CHEESE FACTORY- WITHDRAWN 08.10.2008
- 1/0850/2008/FUL- RETROSPECTIVE APPLICATION FOR MILK SILOS AND STORAGE
TANKS- PERMITTED 13.11.2008
- 1/0607/2011/FUL- VERTICAL TOWER FOR PRESSING CHEESE- PERMITTED 30.08.2011
- 1/0919/2015/FUL- PROPOSED DIRTY WATER LAGOON (RESUBMISSION OF
WITHDRAWN PLANNING APPLICATION 1/1060/2014/FUL)- PERMITTED 09.11.2015
- 1/0930/2015/FUL- PROPOSED EXTENSION TO EXISTING AGRICULTURAL BUILDING
USED FOR CHEESE STORAGE (AFFECTING A PUBLIC RIGHT OF WAY)- PERMITTED
11.11.2015
- 1/0189/2019/FUL – ERECTION OF NEW WORKSHOP/MACHINERY STORE – PERMITTED
29.04.2019
- 1/0267/2023/- EXTENSION TO CHEESE STORAGE BUILDING – PERMITTED 11.08.2023

3 Permitting

Following a helpful meeting with the Local Environment Agency (EA) 5th November 2024, basic pre-application advice was requested on 20 November 2024 (Reference: EPR/HP3728LG/P001). The process of preparing the permit application was then begun which has entailed a redesign of site drainage provision. The Nature and Heritage Conservation Screening Report was provided by the EA on 07 May 2025 included as Appendix A.

3.1 Requested Environmental Permit

The operation requires an Installation permit for the following listed activities under Schedule 1 of the Environmental Permitting Regulations (England & Wales) 2016:

- Section 6.8 Part A(1)(e) -Treating and processing milk, the quantity of milk received being more than 200 tonnes per day (average value on an annual basis), namely the production of production of cheese.

The Directly Associated Activities are detailed in Table 1 below:

Table 1: Directly Associated Activities

| Directly Associated Activity (DAA) | Description of Activity | Limits of activity |
|--------------------------------------|--|--|
| Steam supply | The operation of 2 No. Boilers fuelled by kerosene to produce steam for cleaning and pasteurisation. | From storage of fuel to emission of combustion gases. |
| Cleaning | Cleaning-in-place systems | The cleaning of storage and production areas, associated equipment and vehicles. |
| Use of refrigerants | Use of refrigerants in cooling, chilling and/or freezing systems at the installation. | The storage and handling of refrigerants and the operation of refrigeration plant |
| Storage of raw material | This activity relates to storing raw materials. | Raw materials will be stored securely, away from vehicle impact and with secondary containment as appropriate. |
| Oils and chemicals storage | Storage of oils and chemicals on site in dedicated areas. | From receipt of raw materials to disposal of wastes arising. |
| Waste storage, handling and dispatch | Storage and handling of waste materials | The storage and handling of liquid and solid wastes associated with the processing of raw whole milk and |

| Directly Associated Activity (DAA) | Description of Activity | Limits of activity |
|---|--|---|
| | | production of cheese; whey concentrate and cream. |
| Lorry wash | Lorry wash | The storage, handling and disposal of liquid wastes and cleaning chemicals associated with the cleaning of vehicles onsite. |
| Emergency back-up generator | Emergency back-up generator | Emergency back-up diesel generator operated for the purpose of testing or for no more than 50 hours per year and no more than 500 hours operation in an emergency |
| Surface water collection, storage and discharge | Collection and discharge of clean surface water. | Collection of rainwater from building roofs and clean external concrete areas. Discharge of water to the tributary of the Dipple Water. |

3.2 Milk Acceptance, Storage and Processing Capacity

Raw materials inventory / maximum daily acceptance

For the purposes of the raw materials inventory, we are proposing to define the maximum quantity of milk that can be accepted on site in a single day as the combined capacity of the 6 No. raw milk silos. Based on the information provided, this equates to a total storage capacity of **810,000 litres**. This figure will therefore be used as the maximum daily on-site milk acceptance.

Processing capacity

In terms of processing capacity, the site has a maximum of **18 vats**, each with a capacity of **22,000 litres**, giving a total processing volume of **396,000 litres**.

Applying a milk density of **1.0297**, this equates to approximately **408 tonnes per day**. This is the figure we propose to use as the maximum daily processing capacity in the permitted activity description, non-technical summary, and environmental management system.

Production outputs

Based on a daily processing input of approximately **408 tonnes of milk**, the total daily production output is expected to be in the region of **203 tonnes**, as summarised within Table 2 below.

Table 2: Production Figures

| Product | Tonnes |
|---------------------------------|---------------|
| Cheese | 48.14 |
| RO Lactose concentrate | 121.77 |
| Whey Permeate concentrate (WPC) | 26.92 |
| Cream | 5.85 |
| Total Products | 202.68 |

3.3 Discharge consent

There is an onsite sewage treatment plant (Permit Reference: EPR/BB3595WU) which serves the cheese factory. The permitted discharge is for 2m³/day of domestic sewage which is discharged to an unnamed tributary of the Dipple Water.

3.4 Emissions to air – air quality impact assessment

The proposed installation includes emissions to air from 2 No. Boilers and 1 No. emergency Back-up Diesel Generator and therefore the application documents include an H1 risk assessment of emissions to air.¹ The H1 Screening Tool identified pollutants which required further assessment. These were considered within an Air Quality Impact Assessment² (AQIA) using detailed dispersion modelling.

3.5 Site Condition Report

A Site Condition Report (SCR) has been produced and is submitted as a supporting document to the permit application. The SCR includes details of the previous land uses and current site condition.³ A Groundsure Enviro Insight report forms Appendix A of the SCR and is referenced in this document.

¹ ETL (2024) H1 Assessment to Support a Bespoke Installation Permit Application: Parkham Farms Cheese Factory. Document reference: ETL928_H1_PFL_V1.0

² ETL (2024) Air Quality Assessment to Support a Bespoke Installation Permit Application Parkham Farms Cheese Factory. Document reference: ETL928_AQIA_PFL_V1.0

³ Earthcare Technical Ltd Site Condition Report (SCR) Bespoke Installation Permit Application: Parkham Farms Cheese Factory, Higher Alminstone Farm, Woolsery, Bideford, EX39 5PX. Document reference: ETL928_SCR_PFL_V1.0

4 Site Details

4.1 Location

| | |
|---------------------------------------|--|
| Address: | Parkham Farms Cheese Factory, Higher Alminstone Farm, Woolsery, Bideford, EX39 5PX |
| National Grid Reference (NGR): | SS 35168 20723 |
| Local Authority: | Devon County Council, Torridge District Council |

The Site Location is shown in Figure 1 - Site Location Plan.

The Site footprint (proposed permitted area) is approximately 1.78 hectares (4.4 acres).

Parkham Cheese Factory is located at Higher Alminstone Farm, Woolsery, Bideford, EX39 5PX, in the rural district of North Devon. The site operates as a specialist dairy processing facility, primarily focused on the production of hard cheeses, specialising in traditional Cheddar, using milk sourced from local farms. Site activities include milk reception, pasteurisation, curd processing, cheese maturation, and the recovery and reuse of whey and cream by-products.

The factory is situated in a predominantly agricultural setting, with the village of Woolsery approximately 2 km to the north-west and the town of Bideford located about 15 km to the north-east. Access to the site is via local roads branching from the A39. The surrounding area consists largely of farmland and open countryside, with a small number of residential properties in the immediate vicinity.

4.2 Infrastructure

The Site Infrastructure is listed in Table 3 below. A Site Layout Plan is provided as Figure 3. (ETL928_2025_EPR03)

Table 3 List of site infrastructure

| Item. | Working capacity |
|---|---------------------------------------|
| Access Road | |
| Lorry Wash Bay | |
| Parking Area | |
| 1 No. Cold Water Tank (for regenerative heat) (7oC) | 90 m ³ |
| 1 No. Hot Water Tank (for regenerative heat) (40oC) | 90 m ³ |
| 6 No. Milk Silos | 810 m ³ total capacity |
| 2 No. Whey Protein Concentrate (WPC) Silos | 30 m ³ & 50 m ³ |
| 2 No. Reverse Osmosis Water Tanks | 45 m ³ & 90 m ³ |
| Raw Whey Silo | 60 m ³ |

| | |
|--|---|
| Cream Silos (CT1 & CT2) | 4 m ³ each |
| Cream Silo (CT3) | 23 m ³ |
| Main Cheese Production Building including: <ul style="list-style-type: none"> ○ 4 No. Milk Reception Vats ○ 1 No. Drainer ○ 2 No. Cheese Cutting Tables ○ 1 No. Curd Unloader ○ 3 No. Cheese Block Formers ○ 1 No. Boxing Room ○ 1 No. Re-gassing System ○ 1 No. Vacuum Packer ○ 1 No. Wedge Wire Curd Screen ○ 1 No. Press (fines) ○ Ultra Filtration Membranes ○ Reverse Osmosis Membranes ○ Chlorine Dosing Station ○ Whey Protein Concentrate (WPC) Cooler ○ 1 No. Whey Separator (Centrifuge) ○ 3 No. Pasteurisers ○ Chillers ○ 3 No. Cleaning in Place (CIP) systems(raw milk processing, cheese room & whey room) ○ Compressors | |
| WPC and Whey Cream Tanker Loading Bay | |
| IBC Storage Areas for chemicals | |
| Mechanics Workshop including engine oil storage | |
| Back-up Generator | 805KVA |
| 2 No. Kerosene Boilers for steam production | 1,567 kW (each) |
| Bunded Kerosene Tanks: | |
| Tank 1 | 40m ³ |
| Tank 2 | 10m ³ |
| 1 No. Bunded Diesel Tank (DERV Tank) | 20m ³ |
| 1 No. Bunded Diesel Tank (generator) | 1.2 m ³ |
| 2 No. Lactose Tanks (Nos 1 and 2) | 60 m ³ & 90 m ³ respectively |
| 1 No. Dirty water storage tank (below ground) | 300m ³ / 270 m ³ working capacity |
| 1 No. Dirty water storage tank (above ground) | 840m ³ / 756 m ³ working capacity |
| Dirty Water Lagoon | 35,500 m ³ |

| | |
|--|-----|
| Deluge Lagoon (proposed to be installed) | tbc |
| 2 No. Boreholes | |
| 1 No. Sewage Treatment Plant | |
| Cheese Store | |

4.3 Environmental Sensitivities

4.3.1 Soils and Geology

Across most of the site the soils are freely draining, slightly acidic loamy soils. At the southern extent, including the Dirty Water Lagoon, soils are predominantly slowly permeable, seasonally wet acidic loamy and clayey soils.⁴

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.⁵

There are no records of superficial geology on Site.

4.3.2 Hydrogeology

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. The absence of superficial deposits combined with high leaching potential at the surface (infiltration index < 40%, dilution > 550 mm/year) increases the vulnerability of the underlying aquifer.

The site is not within a Groundwater Source Protection Zone.

The site is not within a Drinking Water Safeguard Zone (Groundwater).⁶

4.3.3 Surface Water

The site lies to the west of a tributary of the Dipple Water. Surface water from the main yard area, is directed to a ditch located along the eastern boundary of the site. From there, it flows into the unnamed tributary of the Dipple Water (an ordinary watercourse) approximately 125m to the south west of the site and then flows on to the River Torridge. From there, the River Torridge continues north to the Taw–Torridge Estuary at Bideford, and out into Bideford Bay.

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.

⁴ <https://www.landis.org.uk/soilscapes/> accessed 15 August 2025

⁵ National Geological Screening: South-west England Region, British Geological Survey, Comissioned Report CR/17/095

⁶ <https://magic.defra.gov.uk/MagicMap.aspx> Accessed 13 August 2025

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 assessment⁷

The site is not within a Surface Water Nitrate Vulnerable Zone (NVZ) nor is it within a Drinking Water Safeguard Zone.⁷

4.3.4 Flood Risk

The site is in a Flood zone 1 which means that overall, there is a low probability of flooding from rivers or sea.⁸

4.3.5 Ecological Receptors – Statutory Designated Sites

Ecological receptors are shown in Figure 6 - Ecological Receptor Plan and in the EA Nature and Heritage Conservation Screening Report (Appendix A).

In accordance with the EA Nature and Heritage Conservation Screening Reports (Appendix A) there are two statutory designated sites within 10 km of the permitted boundary, namely:

- Tintagel-Marsland-Clovelly Coast Special Area of Conservation (SAC) is approximately 2.3 km north from the Site at the nearest point.
- Culm Grasslands SAC which is 2.9 km south of the Site.

Both SAC sites are also designated as Sites Special Scientific Interest (SSSIs). There are several SSSIs within 10 km of the Site but none within 2 km.

The EA Nature and Heritage Conservation Screening Report identifies the sites in Table 4 below for consideration within the permit application:

Table 4: Nature and Heritage Conservation sites within relevant screening distance

| Site name and type | Screening distance (km) |
|--|-------------------------|
| Special Areas of Conservation (cSAC or SAC) | |
| Tintagel-Marsland-Clovelly Coast (SAC) | 10 |
| Culm Grasslands (SAC) | 10 |
| Local Wildlife Sites | |
| Leworthy Cross | 2 |

⁷ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB108050014370> Accessed 13 August 2025

⁸ <https://flood-map-for-planning.service.gov.uk/> Accessed 30 July 2024.

| | |
|-------------------------|---|
| Parkham Ash | 2 |
| South Stroxworthy | 2 |
| Kerswell Farm | 2 |
| South Bitworthy | 2 |
| Sedborough Farm Wood | 2 |
| Buck's Mills Woods | 2 |
| Dipple Bridge | 2 |
| The Moor, Kennerland | 2 |
| Bucks Cross | 2 |
| Ancient Woodland | |
| Bucks Cross Wood | 2 |

4.3.6 Ecological Receptors – Priority Habitats & Species

There are no Priority Habitats within 50m of the Site. The closest area of Priority Habitat is an area of Deciduous Woodland 108m to the east.

4.3.7 Air Quality Management Areas

The Site is not within an Air Quality Management Area (AQMA).⁹

4.4 Human Receptors

The nearest residential dwelling to the Site is the Onsite Farmhouse approximately 20m south west of the Site boundary to the property boundary.

Human receptors within proximity to the Site are captured in Table 4 below and are shown on Figure 5 – Human Receptor Plan.

⁹ <https://uk-air.defra.gov.uk/aqma/> Accessed 14 august 2025.

Table 5: Human receptors within approximately 1 km

| ID | Location | Type of receptor | NGR X | NGR Y | Distance from site boundary (m)* | Direction from site |
|-----|----------------------------------|------------------|--------|--------|----------------------------------|---------------------|
| R1 | Onsite Farmhouse | Residential | 235188 | 120723 | 20 | SW |
| R2 | Arnolds Cottage | Residential | 235279 | 121056 | 155 | N |
| R3 | Parkham Ash | Agricultural | 235798 | 121262 | 580 | NNE |
| R4 | Midway, Parkham Ash | Residential | 235855 | 121274 | 635 | NNE |
| R5 | Tuttsclump, Parkham Ash | Residential | 236202 | 121096 | 875 | NE |
| R6 | Linhay Meadow | Residential | 236394 | 120748 | 1,050 | E |
| R7 | Agricultural building | Agricultural | 235970 | 120678 | 645 | E |
| R8 | Beech View | Residential | 235587 | 120400 | 435 | SE |
| R9 | Brookfield/ Kingsland Stables | Residential | 235857 | 119882 | 1,010 | SE |
| R10 | Leworthy Cross | Residential | 235165 | 119642 | 925 | S |
| R11 | Alminstone Cross resi | Residential | 234883 | 119952 | 620 | SSW |
| R12 | Woolfardisworthy, Cranford | Residential | 234858 | 120199 | 395 | SSW |
| R13 | Lower Alminstone Farmhouse | Residential | 234748 | 120434 | 295 | SW |
| R14 | Three Gables | Residential | 234359 | 120646 | 645 | WSW |
| R15 | Venn, Woolfardisworthy | Residential | 234119 | 120565 | 880 | WSW |
| R16 | Satchfield | Agricultural | 234977 | 121138 | 400 | NNW |

| ID | Location | Type of receptor | NGR X | NGR Y | Distance from site boundary (m)* | Direction from site |
|-----|--------------------------------|------------------|--------|--------|----------------------------------|---------------------|
| R17 | Woolfardisworthy, Cranford (1) | Residential | 234369 | 121414 | 1,030 | NW |
| R18 | Woolfardisworthy, Cranford (2) | Residential | 234670 | 121445 | 835 | NW |
| R19 | Little Walland | Residential | 235467 | 121932 | 1,040 | N |

Notes: * To the nearest 5 meters

5 Process Summary

5.1 Overview

This section provides a summary of the processes on the Site which comprise of:

- Food and drink production processes utilising milk to produce cheddar cheese and cream;
- Production of by-products including whey protein concentrate and lactose via Ultrafiltration (UF) and Reverse Osmosis (RO); and
- Further treatment of permeate water (RO water) by chlorine dioxide dosing to produce process water for site use.

5.2 Food & Drink Production Processes

This section should be read in conjunction with the Process Flow Diagram (Appendix B).

Parkham Farms manufacture cheddar cheese from milk produced by Parkham Farm's own herds and directly contracted local farms with the addition of DVI starter cultures, microbial rennet and PDV salt. The Site has the capacity to process 408 tonnes of milk per day.

Raw materials are defined by a specification and then delivered to the Parkham Farms Cheese Production Site. All deliveries are checked and recorded before acceptance and records of all purchases are retained. A rejection procedure is in place if any problems occur with the raw material at any stage and appropriate action is taken with the supplier.

Raw materials are stored under controlled conditions prior to use. The stores are regularly inspected, and maintenance requirements are captured within the Maintenance and Service Planner (**PFL-MP-01**).

Raw milk is accepted in bulk and stored within 6 designated Milk Silos.

5.2.1 Raw Milk Acceptance and Storage

Raw milk is monitored in accordance with established site procedures to ensure quality and compliance with food safety standards. A sample is taken from each farm's milk tank during every collection and submitted to National Milk Laboratories (NML) for analysis. The testing parameters include butterfat, protein, somatic cell count (SCC), Bactoscan, urea, and freezing point depression (FPD) to detect added water.

In addition, a rapid antibiotic residue test (Charm test) is carried out on-site at each farm prior to milk collection, ensuring that only antibiotic-free milk enters the supply chain.

Raw milk is accepted in bulk and stored within the Milk Silos which are detailed in Table 6 below.

Table 6: Silos for storage of raw milk

| Milk Silo Reference | Storage capacity (m ³) |
|--|------------------------------------|
| Milk Silo 1 | 160 |
| Milk Silo 2 | 160 |
| Milk Silo 3 | 120 |
| Milk Silo 4 | 160 |
| Milk Silo 5 | 160 |
| Milk Silo 6 | 50 |
| Total raw milk storage capacity (m³) | 810 |

5.2.2 Cheddar Cheese Production

Raw milk is stored in a series of milk silos located externally. From which, milk is transferred into the cheese processing building, where it undergoes pasteurisation via a continuous pasteuriser to ensure microbiological safety and product consistency. The Pasteuriser uses heat from the steam Boilers (see Section below on steam production).

Following pasteurisation, milk is transferred into cheese vats where starter cultures are added. Once the vat is full, rennet is added to initiate the coagulation process. Once the milk has coagulated, it is cut and stirred to separate into curds and whey. The mixture passes through a drainer, where the initial separation of curds and whey occurs. The curds are then transferred to cutting tables for further handling and whey drainage, followed by passage through curd screens and block formers, which shape the curds into the final cheese blocks.

The whey by-product is separated and sent through a whey separator, followed by a cream pasteuriser, to recover cream or butterfat from the whey. The remaining whey is pasteurised and undergoes further processing:

- Ultrafiltration (UF membranes) is used to recover whey protein concentrate (WPC), which is cooled and stored in dedicated WPC silos.
- The permeate stream from UF is processed via reverse osmosis (RO membranes) to extract lactose concentrate, which is directed to storage.

- The remaining process water, recovered from RO, is chlorinated and reused within the factory to reduce reliance on mains water.

The final cheese is vacuum-packed, metal detected, weighed, labelled, and boxed, then sent to cold storage for maturation.

Cleaning-in-Place (CIP) systems are used throughout the process to maintain hygiene and product integrity, supported by hot and cold water storage and recovery systems.

Dairy products and production residues are stored in Silos as described in Table 7 below.

Table 7: Process storage silos

| Silo Reference | Substance | Storage capacity (m ³) |
|--|---|------------------------------------|
| Whey Silos | | |
| Raw Whey Silo | Whey separated from curds | 60 |
| Whey Permeate Concentrate Silos | | |
| WPC Silo 1 | Whey Protein Concentrate produced from UF | 30 |
| WPC Silo 2 | Whey Protein Concentrate produced from UF | 30 |
| Lactose Silos | | |
| Lactose Silo 1 | Lactose produced from RO | 60 |
| Lactose Silo 2 | Lactose produced from RO | 90 |
| Permeate Silos | | |
| RO Silo (Permeate Silo 3) | Process water recovered from RO | 45 |
| RO Silo (Permeate Silo 4) | Process water recovered from RO | 90 |
| Cream Tanks | | |
| CT1 | Cream | 4 |
| CT2 | Cream | 4 |
| CT3 | Cream | 23 |
| Heat Recovery Tanks | | |
| EW Silo Cold | Cold water for heat recovery | 90 |
| EW Silo Hot | Hot water for heat recovery | 90 |
| Total process tank storage capacity (m³) | | 616 |

5.2.3 Steam Production & Use

There are 2 No. fixed Boilers on site (one duty and one standby) used for the production of steam. The Boilers are fuelled by kerosene. The Boilers are detailed in Table 8 below:

Table 8: Boilers for steam production

| Boiler number | Size (MWthi) | Grid reference (X, Y) |
|---------------|--------------|-----------------------|
| Boiler 1 | 1.84 | 235238, 120766 |
| Boiler 2 | 1.84 | 235237, 120762 |

The locations of the Boiler House containing the 2 No. Boilers and the fuel tanks can be seen in Figure 3 – Site Layout Plan. The steam from the Boilers is used on site for pasteurisation of milk and for the cleaning in place (CIP) systems.

5.2.4 Heat Recovery

All pasteurisers on site utilise regenerative heat exchange during both the heating and cooling phases. To achieve this, the site operates two 90,000-litre water storage silos:

- A cold water silo, maintained at 7 °C
- A hot water silo, maintained at 40 °C

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 (from the heat exchange) and then returned to the hot water silo.

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.

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.

5.2.5 Cleaning in Place Systems

Automatic cleaning of dairy plant and equipment takes place via 3 No. Cleaning in Place (CIP) systems or ‘sets’ which are scheduled at certain intervals depending on production runs. The CIP sets utilise either a caustic or acid wash. 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. Caustic acid is used within the CIP to break down and remove any accumulated fat, whereas an acid wash is used to remove calcium buildup. CIPs serve designated areas as shown in Table 9 below.

Table 9: CIP systems

| CIP reference | Areas which are cleaned |
|---------------|---------------------------|
| CIP1 | Raw milk processing areas |
| CIP2 | Cheese room |
| CIP3 | Whey room |

6 Management

The site is operated by PFL under the leadership of Peter Willes, who serves as both Head Cheesemaker and Director. Peter Willes is responsible for the overall management of the facility and provides strategic oversight across key operational areas, including Quality Assurance, Environmental Compliance, and Finance.

He is supported by a team of designated leads who are responsible for the day-to-day implementation of procedures within their respective areas. The staffing structure is shown on the Structure and Organisation Chart (Appendix C).

7 Control of Emissions to Land and Water

7.1 Primary Containment

7.1.1 Storage Tanks

Storage Silos and associated storage capacities are detailed within Tables 3 and 4. Silos are constructed of stainless-steel base, shell and roof as per the industry standard. The Lactose storage tank is of concrete construction.

Milk Silos benefit from high level sensors (differential pressure). On dispatching loads into the Silos, the pump will automatically shut off on reaching the high level, preventing overflowing. 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.

In addition, both RO Silos (Permeate Silos 3 & 4) and the 3 no. cream Silos (CT1, CT2 & CT3) also benefit from high level sensors.

7.1.2 Wash Water Storage

Process water is reused on site wherever possible. Any surplus water that exceeds site demand is temporarily stored in a purpose-built dirty water lagoon, which includes the following features:

- A permanent engineered structure;
- A lined lagoon to protect ground and groundwater;

- Constructed access routes for operational and maintenance purposes; and
- Fencing and security measures to restrict unauthorised access

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 lagoon for temporary storage.

Routine monitoring and preventative maintenance of the lagoon and dirty water tanks is carried out daily, including:

- Always maintaining a minimum freeboard of 750 mm 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 landspread in accordance with PFL's Standard Rules Permit SR2010No4 for mobile plant landspreading (Permit Ref: EPR/EB3335RW/A001). The wash water is spread for agricultural benefit to the farm.

7.1.3 Fuel Storage

All fuel is stored within designated integrally bunded tanks.

Kerosene is stored within a double-skinned steel tank system comprising two compartments, referred to as Fuel Tank 1 and Fuel tank 2 (40 m³ and 10 m³ respectively). Each compartment is fitted with a high-level alarm to prevent overfilling. The outer skin provides integral secondary containment and is fitted with a bund (interstitial) alarm to detect any loss of containment.

Diesel (DERV – Diesel Engine Road Vehicle fuel) is stored in a Harlequin EVO bunded tank (20m³ capacity), constructed from moulded, weather-resistant polyethylene and providing integral secondary containment. A bund alarm is installed to detect any loss of containment. Diesel used for the Generator is stored in a 1.2 m³ bunded tank.

The locations of the fuel tanks are shown in Figure 3 – Site Layout Plan.

7.1.4 Chemical Storage

Chemicals are stored within a designated Chemical Storage Area, within small containers within a caged bunded area and within IBCs. The Chemical Storage Area is located on concrete impermeable surfacing; adjacent to the Hot and Cold Water Tanks (Heat Recovery Tanks) .

Additionally, some chemicals are stored within buildings, including;

- Ethylene glycol (Anti-freeze) and Engine & Transmission Oil, stored within the Workshop;
- Phenolphthalein Solution and Sodium Hydroxide, stored within the Laboratory; and
- Ambersil Food Grease FG and Ambersil Penetrating Oil, stored within the Office.

A full list of raw materials and their storage locations can be found within the Raw Materials Inventory (document reference: ETL928_PFL_RawMaterials_V1.0) which is included within this application.

7.2 Secondary Containment

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 management improvements, the operator is currently designing an enhanced emergency containment solution for the milk silos and chemical storage areas, where the risk of significant spillage is greatest.

The proposed solution will include a concrete drainage channel located directly in front of the storage areas. In the event of a major spill, this channel would capture and convey spilled material to the lined emergency Deluge Pit, located to the east of the yard area. This containment system is specifically designed to prevent any release from entering the surface water drain, which is situated within proximity to the silos within the yard. Once implemented the Site will produce an updated Drainage Plan.

To further strengthen this containment strategy, a penstock valve will be installed 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.

Spill kits and clean-up materials are strategically positioned nearby to allow for quick response, and regular inspection and testing of the penstock and containment systems will be carried out to ensure continued functionality.

All staff are trained in spill response and emergency preparedness, including the use of the penstock valve, deployment of drain covers, and clean-up procedures. This multi-layered approach ensures that any loss of containment from the silos or chemical stores is effectively managed, protecting both the on-site drainage infrastructure and the wider environment.

7.3 Drainage Description

This section provides a summary of the site's drainage arrangements and should be read in conjunction with Figure 5: Site Drainage Plan (Outside Drains and Water Overview schematic).

Wherever possible, the site maintains segregation between clean and dirty water drainage systems. Clean water, including roof runoff and surface water from the main yard area, is directed to a ditch located along the eastern boundary of the site. From there, it flows into the River Torridge catchment, ensuring that uncontaminated water bypasses the dirty water system.

Dirty water, including runoff from designated yard areas, factory floor washdown water and excess process water is conveyed to the dirty water storage tanks for temporary storage. This primary treatment stage allows any solids to settle out before the liquid fraction is transferred to the covered dirty water lagoon. The stored wash water is subsequently used for agricultural benefit in accordance with the PFL's Standard Rules Permit SR2010No4 for mobile plant landspreading.

7.4 Control of Emissions to Land & Water under Abnormal Operations

Control of emissions to water and land under abnormal operating conditions are detailed in the Accident Management Plan (**PFL-OD-04**) and associated procedures including the Spillage Control Procedure.

8 Control of Emissions to Air

8.1 Overview

The emission points to air A1 to A3 inclusive are shown on Figure 2 – Permit Boundary & Emission Point Plan and are shown in Table 10 below:

Table 10: Emission Points to Air

| Emission point reference | Source |
|--------------------------|-------------------|
| A1 | Boiler 1 |
| A2 | Boiler 2 |
| A3 | Standby generator |

Combustion plant details are provided within the application document Medium Combustion Plant (MCP) and Specified Generator (SG) List (document reference: ETL928_PFL_Combustion Plant_V1.0).

Emissions will be monitored in accordance with the conditions of the permit. In relation to the monitoring requirements set out in Form B3, Question 4, an MCERTS-accredited emissions testing contractor will be engaged to confirm the suitability of sampling locations. The contractor will visit the Site to verify whether the sample test ports comply with BS EN 15259 and, if necessary, advise on suitable locations for new ports. PFL will arrange for any required ports to be installed before further compliance emissions testing is undertaken.

8.2 Control of Combustion Emissions

Emissions from combustion plant; Boilers (A1 and A2) and Standby generator (A3) are controlled through a planned preventative inspection and maintenance regime.

8.3 Control of Emissions to Air under Abnormal Operations

Control of emissions to air under abnormal operating conditions are further detailed in the Accident Management Plan (**PFL-OD-04**) and associated procedures.

9 Control of Amenity Impacts

9.1 Odour

Odour emissions are minimised through:

- Process monitoring to ensure optimal operation of the UF and RO systems, ensuring that whey permeate concentrate and lactose are removed from the permeate water.
- Process monitoring and automated dosing of the permeate water with chlorine dioxide such that it is suitable for use as process water.
- Covered storage of lactose within a designated tank.
- The settlement pit and storage tank are subject to periodic cleaning and desludging, generally undertaken annually where practicable, to minimise the accumulation of anaerobic sludge and associated odour potential.
- Regular inspection and maintenance critical plant and infrastructure in accordance with manufacturers recommendations and the Maintenance and Service Planner (**PFL-MP-01**).
- Maintenance of an odour complaint log and a clear response protocol to investigate and mitigate any reported incidents.
- Ensuring staff are trained to identify and report unusual odours promptly, so corrective action can be taken before complaints arise.

Odour emissions will be controlled in accordance with the Odour Management Plan (**PFL-OD-03**).¹⁰

9.2 Noise

Noise emissions will be minimised through planned preventative maintenance for all equipment including the Boilers which are potential sources of noise emissions, in accordance with the Maintenance and Service Planner (**PFL-MP-01**).

9.3 Air Quality Impact Assessments

Air quality impacts from the operation on ecological receptors have been considered within an H1 risk assessment of emissions to air² and an AQIA³. The AQIA has concluded that the long-term and short-term impacts at all receptors can be screened out as **not significant** and there is no need for further assessment.

10 Resource Efficiency

Resource efficiency including raw materials, water and energy are fully considered in the BAT Assessment and the that accompanies the permit variation application.¹⁰ Energy efficiency is further described within the Site's Energy Efficiency Plan (**PFL-OD-09**).

¹⁰ PFL-OD-03 Odour Management Plan V1.0

Figures

Figure 1: Site Location Plan, Earthcare Technical Limited (ETL928_2026_EPR01)

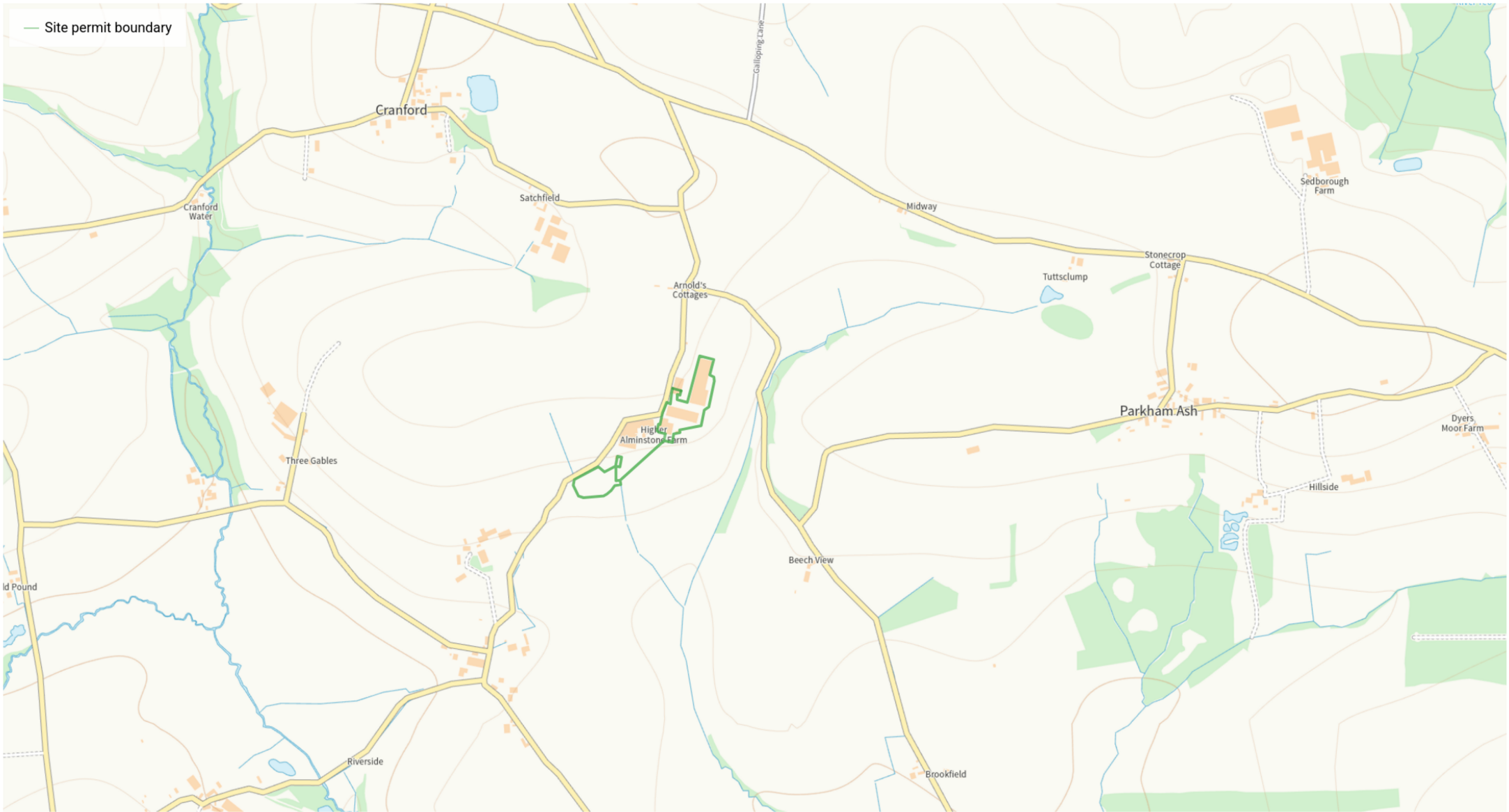
Figure 2: Permit Boundary & Emission Point Plan, Earthcare Technical Limited (ETL928_2026_EPR02)

Figure 3: Site Layout Plan, Earthcare Technical Limited (ETL928_2026_EPR03)

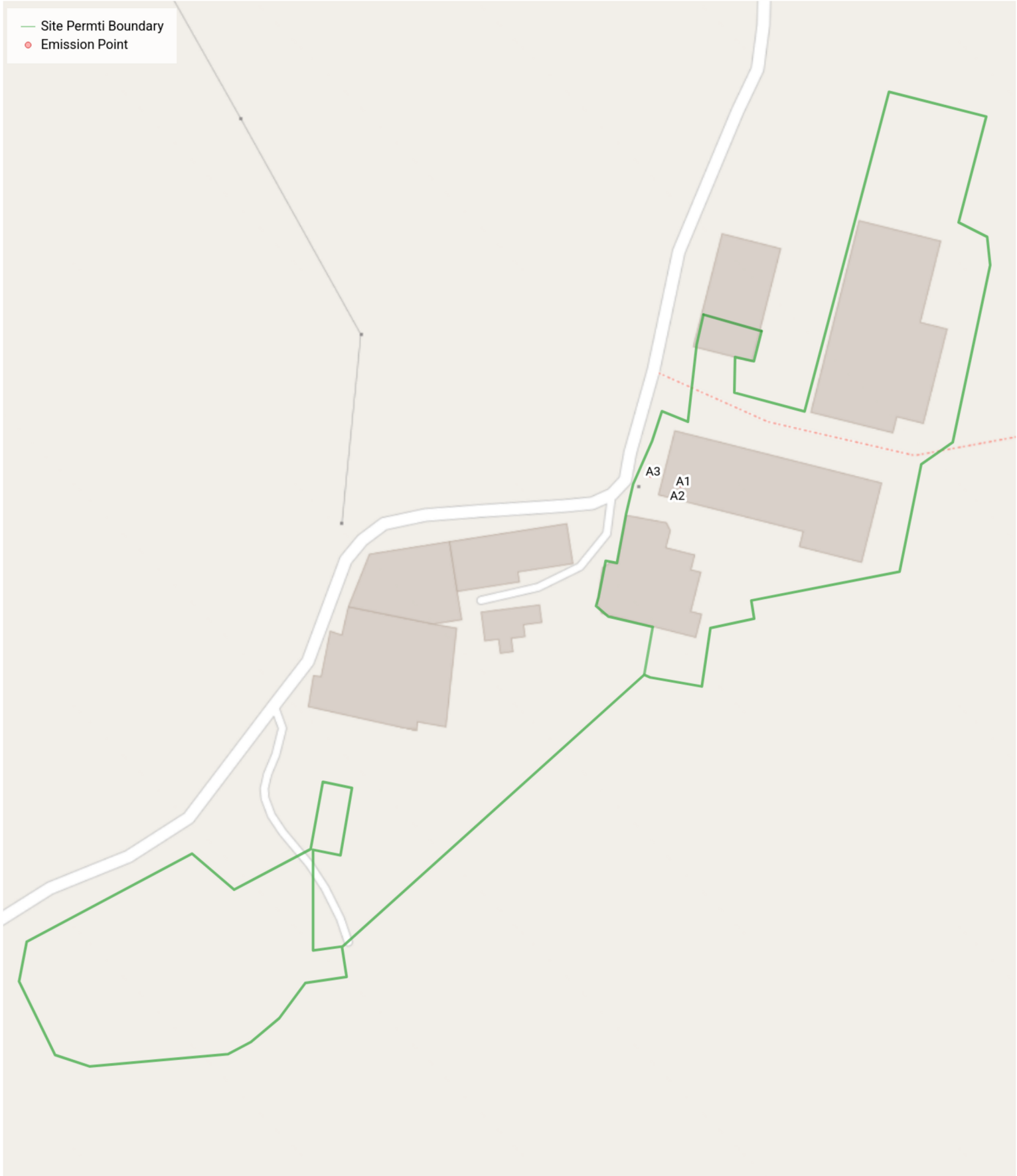
Figure 4: Human Receptor Plan, Earthcare Technical Limited (ETL928_2026_EPR04)

Figure 5: Site Drainage Plan (Outside Drains and Water Overview schematic)

Figure 6: Ecological Receptor Plan, Earthcare Technical (ETL928_2026_EPR05)

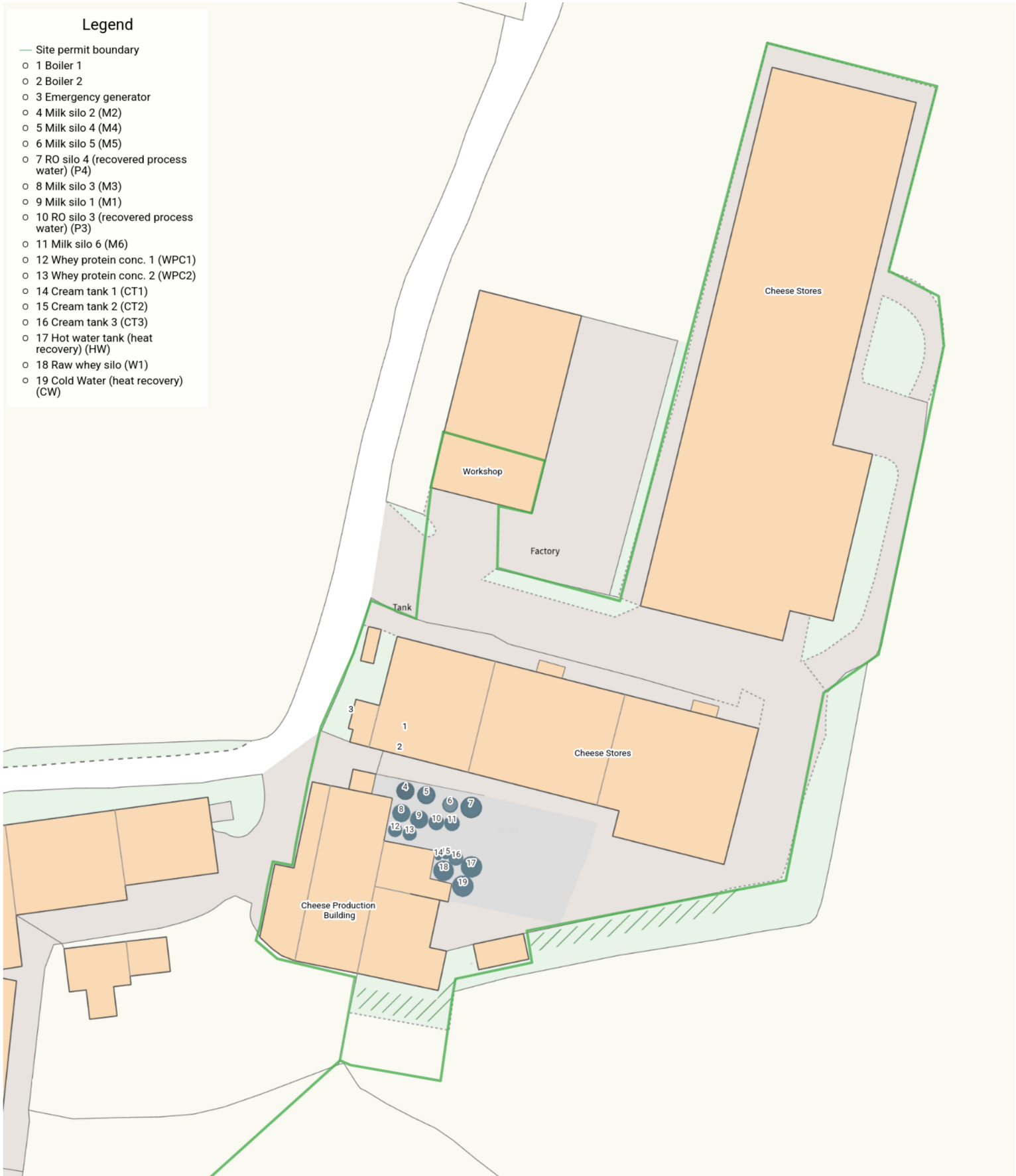


— Site Permti Boundary
● Emission Point



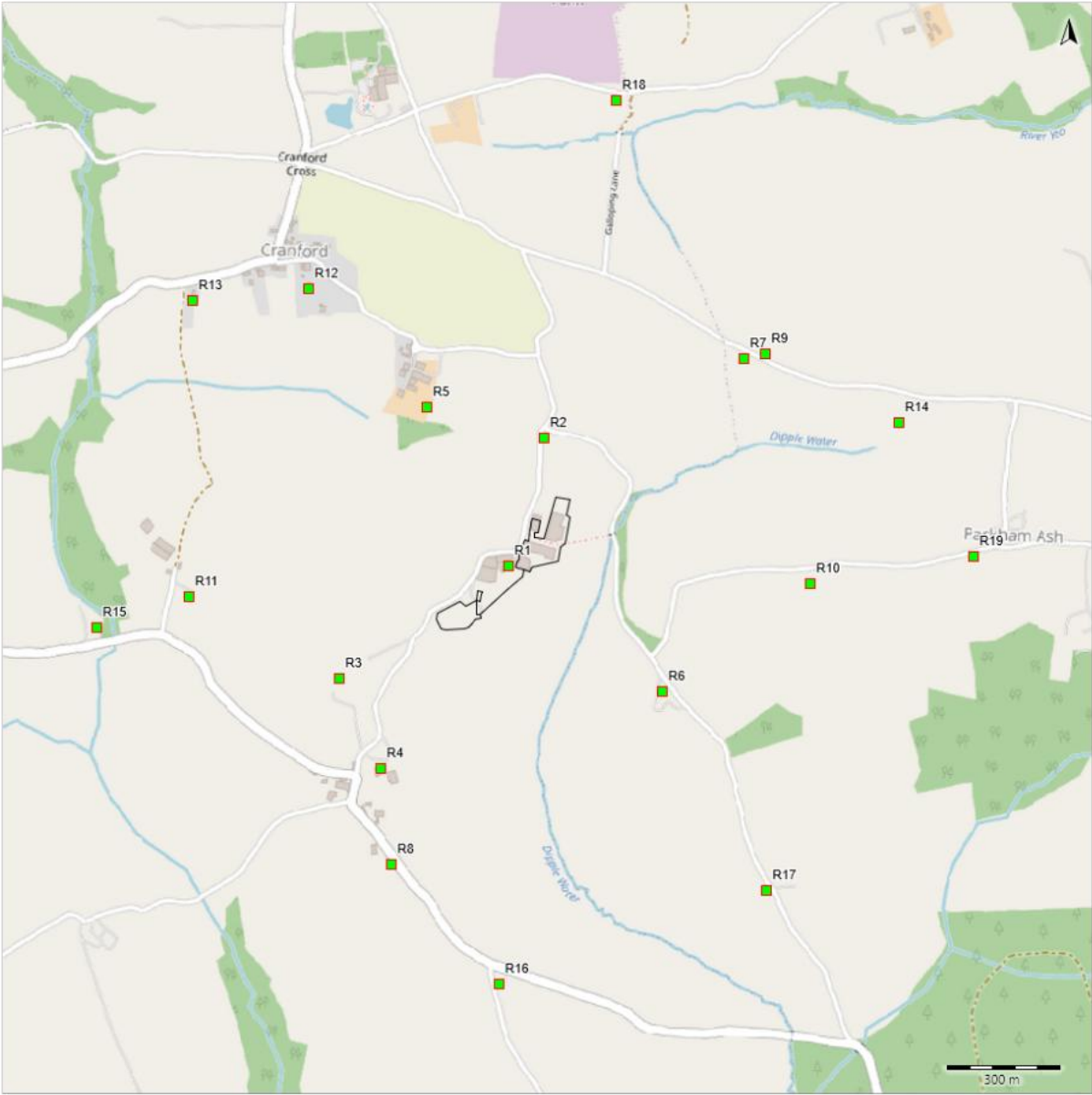
Legend

- Site permit boundary
- 1 Boiler 1
- 2 Boiler 2
- 3 Emergency generator
- 4 Milk silo 2 (M2)
- 5 Milk silo 4 (M4)
- 6 Milk silo 5 (M5)
- 7 RO silo 4 (recovered process water) (P4)
- 8 Milk silo 3 (M3)
- 9 Milk silo 1 (M1)
- 10 RO silo 3 (recovered process water) (P3)
- 11 Milk silo 6 (M6)
- 12 Whey protein conc. 1 (WPC1)
- 13 Whey protein conc. 2 (WPC2)
- 14 Cream tank 1 (CT1)
- 15 Cream tank 2 (CT2)
- 16 Cream tank 3 (CT3)
- 17 Hot water tank (heat recovery) (HW)
- 18 Raw whey silo (W1)
- 19 Cold Water (heat recovery) (CW)

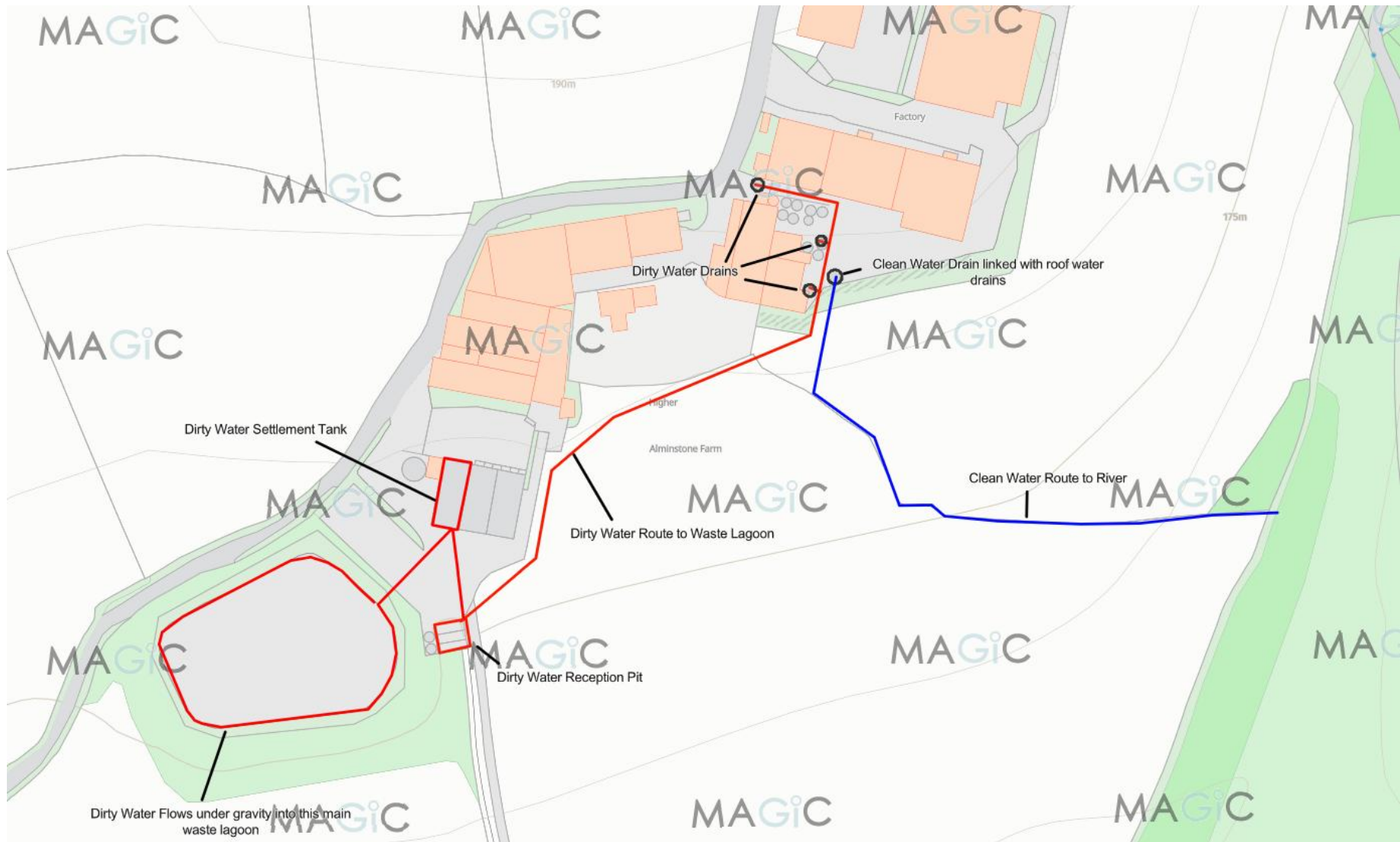




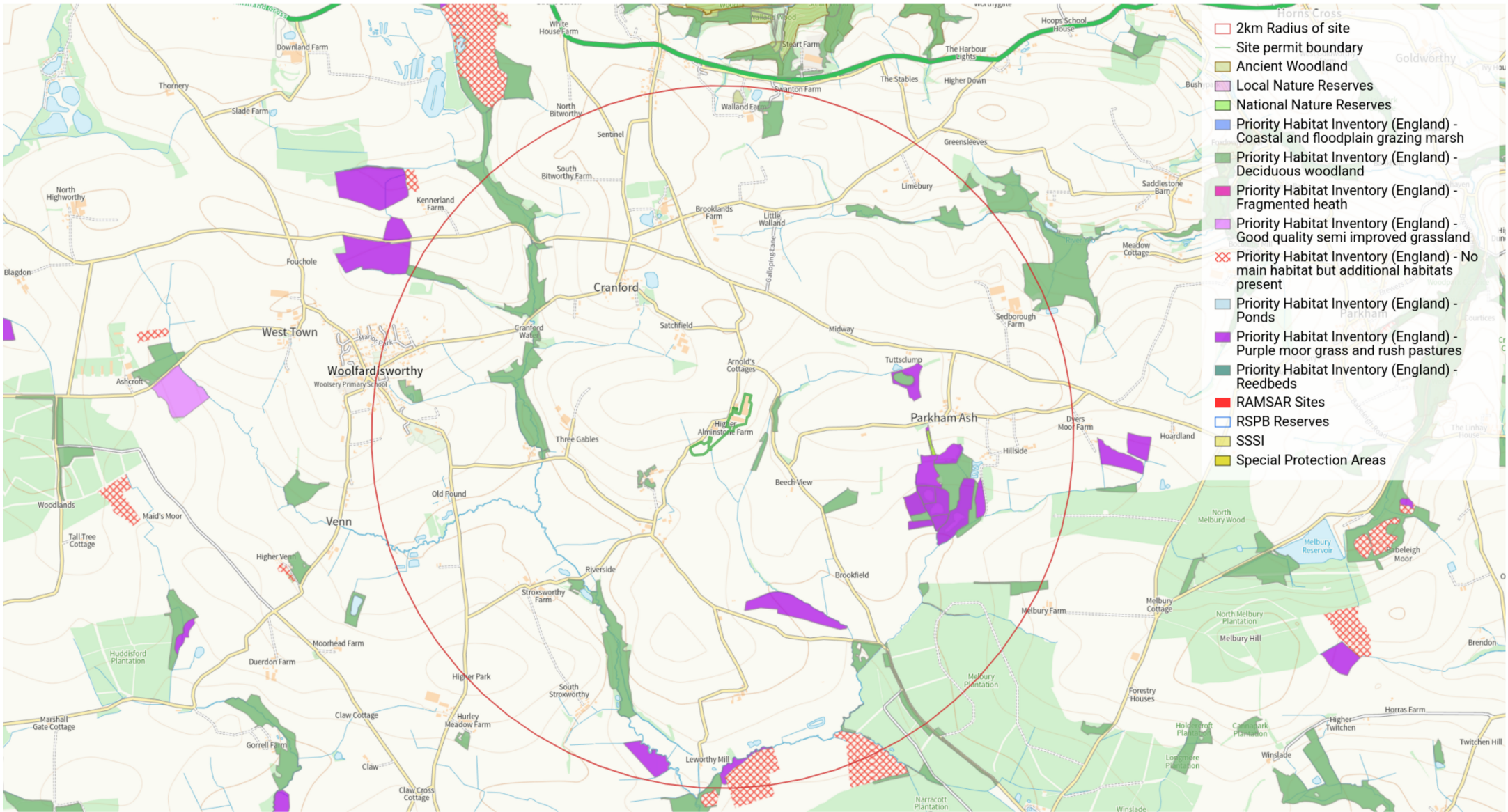
EPR928_2026_EPR04
Human Receptor Plan



Site Drainage Plan (Outside Drains and Water Overview schematic)



Parkham Farm cheese Factory -Site Drainage Plan (Outside Drains and Water Overview schematic)



Appendix A – Nature and Heritage Conservation Screening Report & Maps

Nature and Heritage Conservation

Screening Report: Bespoke installation

| | |
|-------------------------|-------------------|
| Reference | EPR/HP3728LG/P001 |
| NGR | SS 35238 20764 |
| Buffer (m) | 295 |
| Date report produced | 07/05/2025 |
| Number of maps enclosed | 1 |

This nature and heritage conservation report

The nature and heritage conservation sites, protected species and habitats, and other features identified in the table below **must be considered in your application**.

In the further information column, there are links which give more information about the site or feature type and indicate where you are able to self-serve to get the most accurate site boundaries or feature locations.

Most designated site boundaries are available on [Magic map](#). Using Magic map allows you to zoom in and see the site boundary or feature location in detail, Magic map also allows you to measure the distance from these sites and features to your proposed boundary. [Help videos](#) are available on Magic map to guide you through.

Where information is not publicly available, or is only available to those with GIS access, we have provided a map at the end of this report.

| Sites and Features within screening distance | Screening distance (km) | Further Information |
|---|-------------------------|---|
| Special Areas of Conservation (cSAC or SAC) | 10 | Joint Nature Conservation Committee and Magic map |
| Tintagel-Marsland-Clovelly Coast (SAC) | | |
| Culm Grasslands (SAC) | | |
| Local Wildlife Sites (LWS) (see map below) | 2 | Appropriate Local Record Centre (LRC) |

Leworthy Cross

[Appropriate Wildlife Trust](#)

Parkham Ash

South Stroxworthy

Kerswell Farm

South Bitworthy

Sedborough Farm Wood

Buck's Mills Woods

Dipple Bridge

The Moor, Kennerland

Bucks Cross

Ancient Woodland

2

[Woodland Trust](#)
[Forestry Commission](#)
[Natural England](#)
and [Magic map](#)

Bucks Cross Wood

Where protected species are present, a licence may be required from [Natural England](#) to handle the species or undertake the proposed works.

The relevant Local Records Centre must be contacted for information on the features within local wildlife sites. A small administration charge may also be incurred for this service.

The following nature and heritage conservation sites, protected species and habitats, and other features have been checked for, where they are relevant for the permit type requested, but have not been found within screening distance of your site unless included in the list above.

Special Areas of Conservation (cSAC or SAC), Special Protection Area (pSPA or SPA), Marine Conservation Zone (MCZ), Ramsar, Sites of Special Scientific Interest (SSSI), National Nature Reserve (NNR), Local Nature Reserve (LNR), Local Wildlife Sites (LWS), Ancient Woodland, relevant species and habitats.

Please note we have screened this application for features for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be required.

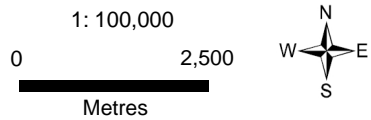
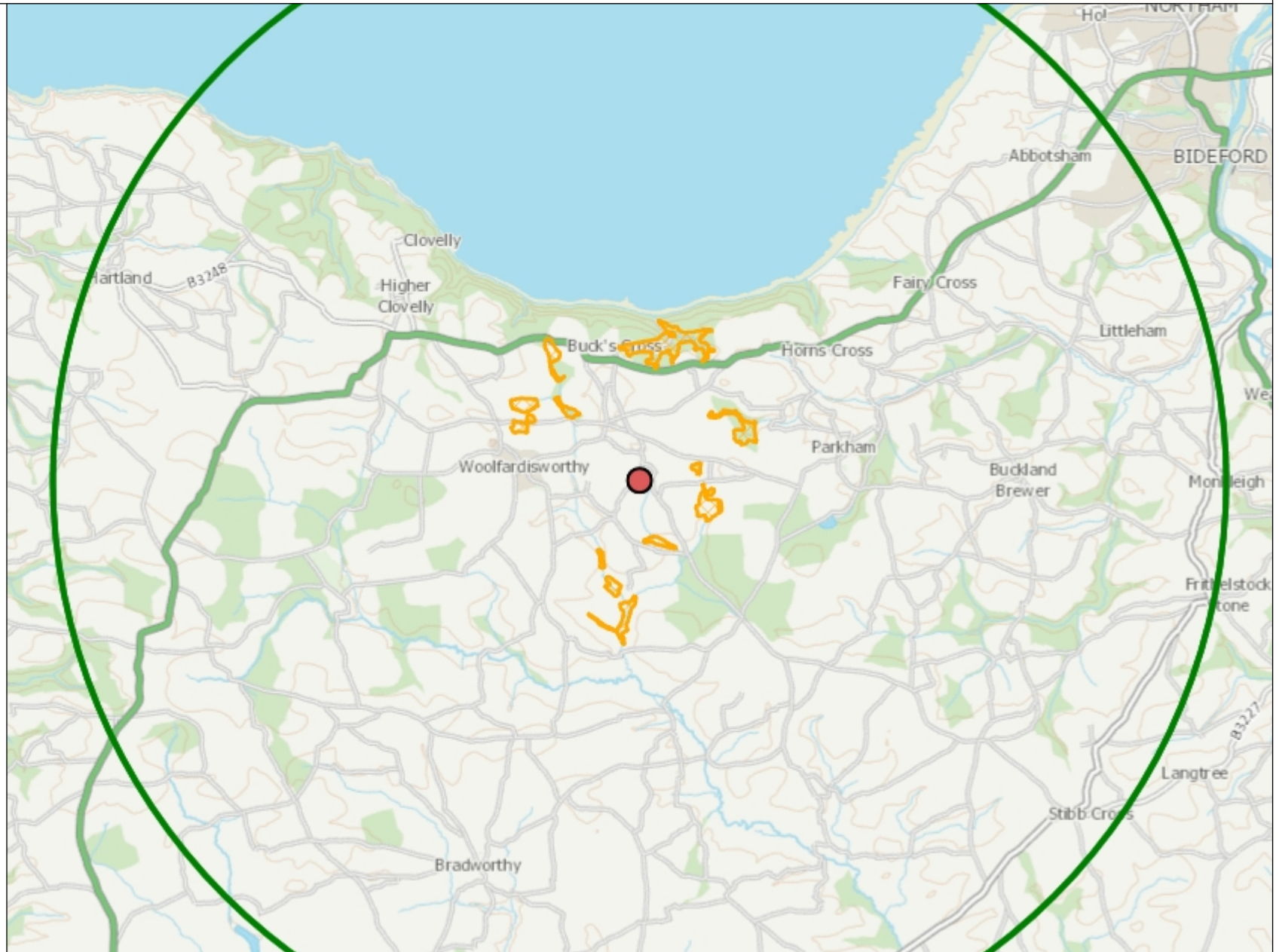
The nature and heritage screening we have conducted as part of this report is subject to change as it is based on data we hold at the time it is generated. We cannot guarantee there will be no changes to our screening data between the date of this report and the submission of the permit application, which could result in the return of an application or requesting further information

Local Wildlife Sites



Legend

 Local Wildlife Sites



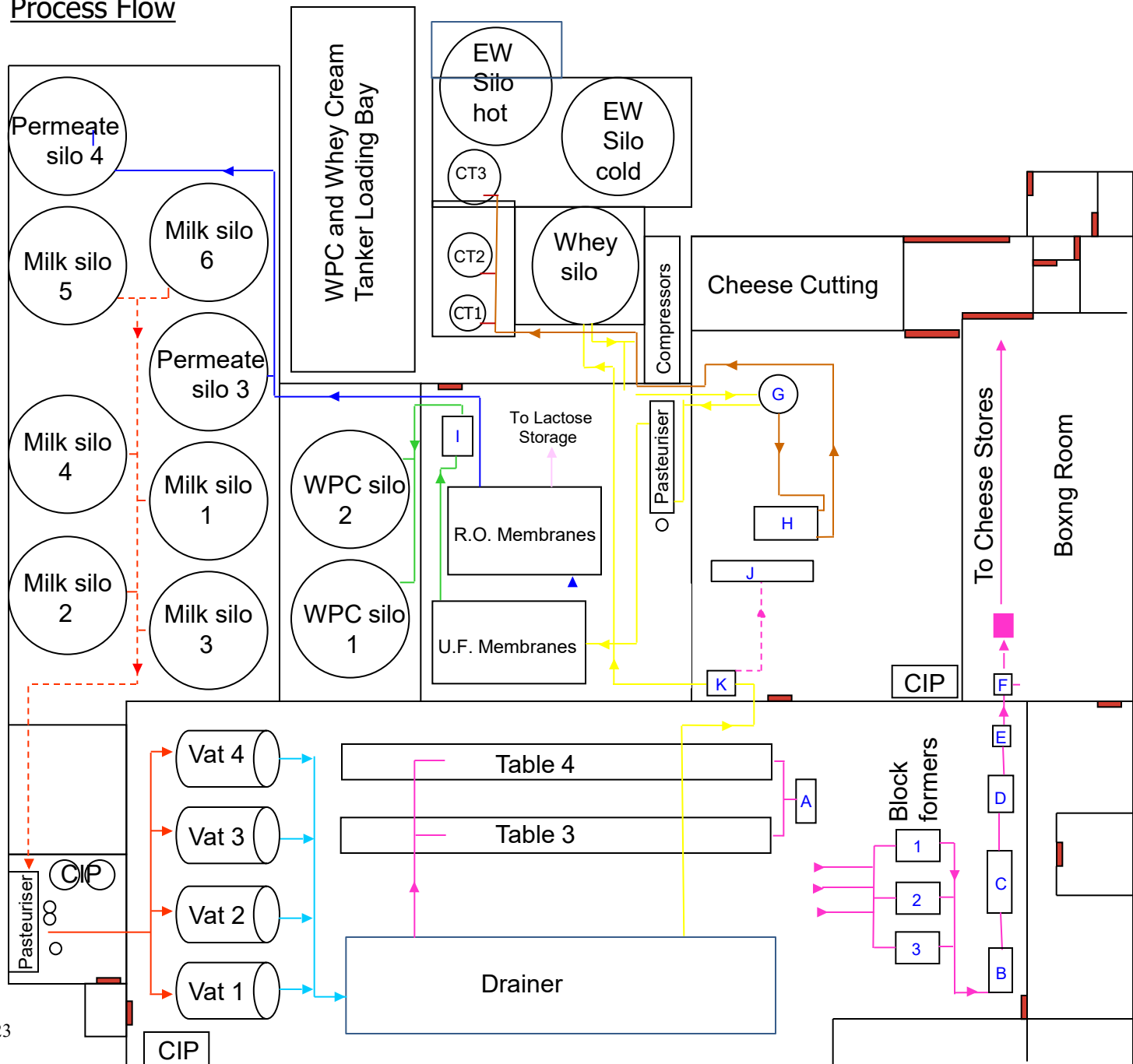
Appendix B - Process Flow Diagram

Process Flow

Key

- A Curd Unloader
- B Re-gussing system
- C Vacuum Packer
- D Metal Detector
- E Check Weigher
- F Labeller
- G Whey Separator
- H Cream Pasteuriser
- I WPC Cooler
- J Press (fines)
- K Wedge Wire Curd Screen

- - - Raw Milk
- - - Pasteurised Milk
- - - Curds & Whey
- - - Whey
- - - Whey Cream / Butter
- - - WPC
- - - Permeate Water
- - - Lactose Conc
- - - Cheese
- - - Fines Curd



Appendix C - Structure and Organisation Chart

| | | |
|---------------|--------------------|-------------|
| | Prepared by E Beer | Signed: |
| February 2026 | | Issue No 39 |

STRUCTURE & ORGANISATION

P A WILLES

(Head Cheesemaker & Director)

Overall control of the entire premises including maintenance
HACCP Team Member

S J BERRY

***(Administration
& Accounts)***

Accounts & VAT
Cashflows
Cashbook Analysis
Cheese Stocks
Invoices/Payments
Profit & Loss
Management Accounts

E L BEER

***(Quality
Assurance)***

Customer Complaints
Quality Manual & HACCP
Product Safety & Testing
Document Control
Health & Safety & COSHH Regulations
Producer Contact
Production Details
Certificates of Analysis & Conformity
Staff Liaison & Training
Salaries & Wages
HACCP Team Leader
Halal Team Leader

E BANKOV'S

(Cheese Maker)

***N Zinovjevs/M Wigley
(Cheese Maker)***

M Robertson

***(Staff
Supervisor)***

Stock Control
Despatch
HACCP Team Member

L Stacey

***(Cream
Maker &***

***WPC
Maker)***
Whey/Cream
HACCP Team
Member

S Tolley

***(Technical
Co-Ordinator)***

Daily Technical
Checks

Emma Kivell

***(Technical
Assistant)***

Daily Technical Checks
Internal Auditing
Halal Team Member

Assistants in the Manufacture (Farmhouse Cheddar)

(All staff are expected to carry out duties relating to the cheese making operation)

Mark Symons

(Environmental Compliance Manager)

Oversight of Environmental Permit Compliance
Management and Implementation of the Environmental Management System
Responsibility for the Odour Management Plan
Supervision and / or undertaking environmental Daily Checks

Edgars Bankovs/Nikita Zinovjevs provide cover for Peter Willes in his absence and vice versa. Sarah Berry provides cover for Emma Beer in her absence and vice versa. Jamie Robertson is able to despatch in the absence of Michael Robertson.

Emma Kivell is able to deputise responsibility for Halal requirements in the absence of Emma Beer.