



**Environment Management System Parkham
Farms Cheese Factory**

Parkham Farms Ltd, Higher Alminstone Farm, Woolsery,
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
CO ₂	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 Scope of the EMS

This Environmental Management System (EMS) Manual has been prepared by Earthcare Technical Ltd (ETL) to cover the scope of operations for Parkham Farms Cheese Factory, Higher Alminstone Farm, Woolsery, Bideford, EX39 5PX (the Site) operated by Parkham Farms Limited (PFL).

This version of the EMS Manual has been written to support the environmental permit application for the Site, which requires a bespoke installation permit (Permit ref: EPR/ HP3728LG). It is a live document that will be updated accordingly throughout the operation and closure of the regulated facility.

The EMS is written with consideration to the Site Environmental Risk Assessment which has been developed to:

- Assess the potential environmental risks from the operations;
- Determine if existing control measures are sufficient; and
- Propose additional site-specific control measures where appropriate.

The entire EMS comprises of a series of 'live' documents to assist and inform daily site operations. This document, the EMS Manual, is an overarching document providing a foundation structure to the EMS which then links to specific EMS documents including Standard Operating Procedures (SOPs/ PROCs), maintenance schedules and template forms used for record keeping.

All environmental management system documents are listed on the Master Document Control List (**PFL-OD-07**) which is used as a complete reference to all environmental management system documents relevant to the Site and includes version numbers and issue dates to ensure document control.

2 Environmental Policy

The environmental policy outlines the environmental commitments of PFL with respect to its overall operations, activities, and environmental performance.

The Environmental Policy (**PFL-OD-02**) is a management system document.

3 Organisation & Site Profile

3.1 Permitting

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 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.

Parkham Farms met with the Environment Agency (EA) Local team 5th November 2024 and basic pre-application advice was initially sought from the Environment Agency (EA) with respect to this permit variation application on 20 November 2024 (Reference: EPR/HP3728LG/P001) with a follow up request for the Nature and Heritage Conservation Screening Report provided by the EA in 07 May 2025 included as Appendix A.

3.2 Management Overview

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 B).

3.3 Site Description

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

3.4 Infrastructure

The Site Infrastructure is listed in Table 2 below.

Table 2 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	

3.5 Hours of Operation

The Site typically operates 24 hours per day, 5.5 days of the week. Operations usually cease at around 14:00 on Saturdays with maintenance undertaken on Sundays; however, production can occasionally extend to up to 6.5 days per week.

3.6 Site Security

The Site benefits from:

- Staffing 24 hours per day (when operational);
- CCTV; and
- Maglocks on cheese factory doors.

In addition, the site benefits from an enhanced level of security with to the Herd Manager for the adjacent dairy residing on the site complex.

Staff shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.

4 Environmental Sensitivities

4.1 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.¹

¹ <https://www.landis.org.uk/soilscapes/> accessed 15 August 2025

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.²

There are no records of superficial geology on Site.

4.2 Hydrogeology

The Holsworthy Group 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).³

4.3 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.

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 assessment⁴

The site is not within a Surface Water Nitrate Vulnerable Zone (NVZ) nor is it within a Drinking Water Safeguard Zone.⁴

²National Geological Screening: South-west England Region, British Geological Survey, Commissioned Report CR/17/095

³ <https://magic.defra.gov.uk/MagicMap.aspx> Accessed 13 August 2025

⁴ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB108050014370> Accessed 13 August 2025

4.4 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.⁵

4.5 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 3 below and are shown on Figure 3 – Human Receptor Plan.

Table 3: 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

⁵ <https://flood-map-for-planning.service.gov.uk/> Accessed 30 July 2024.

ID	Location	Type of receptor	NGR X	NGR Y	Distance from site boundary (m)*	Direction from site
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
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

4.6 Ecological Receptors

Statutory Designated Sites

Ecological receptors are shown in Figure 2 - 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
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

Priority Habitats and 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.

4.7 Scheduled Monuments

There are no Scheduled Monuments within 1km of the Site boundary.

4.8 Air Quality Management Areas

The Site is not within an Air Quality Management Area (AQMA).⁶

5 Process Description

5.1 Overview

This section provides a summary of the processes on the Site which can be summarised as:

- 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.

⁶ <https://uk-air.defra.gov.uk/aqma/> Accessed 14 august 2025.

5.2 Food & Drink Production Processes

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

Parkham Farms manufacture cheddar from directly contracted local cow's milk 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.

5.2.1 Raw Materials Acceptance

All raw materials and services are purchased from reputable suppliers. Supplier approval is gained by a formal procedure which includes a written questionnaire and may include a site visit or audit of the premises dependent upon the risk associated with the type of ingredient or packaging supplied.

A list of approved suppliers is maintained which includes the products they have been approved to supply. Records of all approved suppliers are kept and reviewed regularly.

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**).

5.2.2 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 5 below.

Table 5: 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

Milk Silo Reference	Storage capacity (m ³)
Total raw milk storage capacity (m³)	810

5.2.3 Cheddar Cheese Production

Raw milk is stored in a series of milk silos located externally. From there, 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 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 6 below.

Table 6: 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		

Silo Reference	Substance	Storage capacity (m ³)
Whey 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

5.2.4 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 7 below:

Table 7: 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.

5.2.5 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.

5.2.6 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 8 below.

Table 8: CIP systems

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

Process monitoring is undertaken across the CIP Sets its described in Section 12.2: Process Monitoring.

6 Control of Emissions to Water & Land

6.1 Primary Containment

6.1.1 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 tanks are 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 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.

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

6.1.2 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.

The wastewater is landspread in accordance with PFL's Standard Rules Permit SR2010No4 for mobile plant landspreading (Permit Ref: EPR/EB3335RW/A001). 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 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.

6.1.3 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.

6.1.4 Chemical Storage

Chemicals are stored within a designated Chemical Storage Area, both 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.

6.2 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 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.

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.

6.3 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 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 dirty water lagoon. The

stored wash water is subsequently used for landspreading in accordance with the PFL’s Standard Rules Permit SR2010No4 for mobile plant landspreading.

6.4 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.

7 Control of Emissions to Air

7.1 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 9 below:

Table 9: Emission Points to Air

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

7.2 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.

7.3 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.

8 Control of Amenity Impacts

8.1 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 designated tanks.
- The dirty water tanks 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**).

8.2 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 Control of Climate Change Impacts

Climate change impacts and mitigation controls are considered in a separate site-specific Climate Change Adaptation Risk Assessment (**PFL-OD-08**).

10 Roles and Responsibilities

10.1 Overview

This section of the Manual sets out the management structure of PFL relevant to site operations along with the roles and responsibilities placed on operational staff. Specific responsibilities are also set out in the accompanying operational procedures.

All members of staff should be clear on their role, responsibilities, and position within the management structure to facilitate effective environmental management. All roles and responsibilities will be reviewed no less than annually by the Head Cheesemaker and Director, Peter Willes.

An Organisation and Structure Chart for Operational Staff is in Appendix B.

10.2 Head Cheesemaker and Director

The Head Cheesemaker and Director is responsible for:

- The overall management of the Site and production;
- Management of the Engineering, Maintenance, Administration & Accounts and Quality Assurance, and Environmental Compliance;
- Undertaking an annual review of all roles and responsibilities;
- Providing extra resources / contingency arrangements due to staff shortages; and
- Providing the Site Managers with such support and guidance as necessary to fulfil the requirements of the EMS within the organisation.

10.3 Environmental Compliance Manager

The Environmental Compliance Manager is responsible for:

- Approving and endorsing the EMS including any amendments;
- Ensuring the EMS requirements are operationally maintained through regular site visits;
- Checking that relevant training and competencies are maintained for operational staff, in particular emergency response procedures within the Accident Management Plan Manual (**PFL-OD-04**);

- Ensuring integration of the EMS within the business is achieved;
- Document control and record keeping in relation to the EMS including responsibility for editing, updating, or superseding of documents;
- Reviewing the EMS procedures and processes ensuring any changes to the EMS are planned and implemented;
- Ensuring the requirements Maintenance and Service Planner are adhered to;
- Retaining inspection and maintenance records;
- Managing external contractors carrying out planned or ad hoc maintenance tasks; and
- Implementing and overseeing emergency response procedures as required.

10.4 Quality Assurance Manager

The Quality Assurance Manager is responsible for activities relating to the Quality Management System (QMS) including:

- Maintaining and updating the QMS as required;
- Ensuring the QMS is readily available to key staff;
- Ensuring that all HACCP team members are appropriately qualified;
- Ensuring the HACCP is regularly reviewed as and when deemed necessary by the company's requirements and all records appropriately retained;
- Coordinating internal audits relating to the Quality Manual and HACCP Plan;
- Maintaining producer contacts;
- Maintaining document control,
- Monitoring and responding to customer complaints;
- Managing product safety and testing;
- Maintaining certificates of analysis and conformity;
- Staff liaison and training; and
- Ensuring adherence to health and safety and COSHH regulations.

10.5 Technical Coordinator and Technical Assistants

The Technical Coordinator and Assistant is responsible for:

- Undertaking daily technical checks;
- Undertaking daily integrity checks on primary and secondary containment; and
- Conducting internal auditing.

10.6 Staff Supervisor

The Staff Supervisor is responsible for:

- Stock control;
- Dispatch of products; and
- HACCP Team member

10.7 Cream Maker and WPC Maker

The Cream Maker and WPC Maker is responsible for:

- Whey and cream production;
- HACCP team member

Nominated competent persons are designated to provide appropriate cover in the event of absence of the Head Cheesemaker, Quality Assurance personnel, or the Staff Supervisor. This ensures the continued execution of all critical tasks, including production operations, quality assurance, and product dispatch.

11 Implementation & Operation

This section of the EMS Manual outlines the procedures and processes for identifying and delivering training requirements, communications, emergency preparedness and response, operation controls and documentation in relation to the EMS.

11.1 Document & Record Control

PFL is committed to maintaining document and record controls to provide an audit trail of evidence in support of the company's activities.

11.1.1 Control of Documents

The EMS requires that all documents are clearly identifiable and traceable through their version history, and that only the current versions of documents are in circulation throughout the company. PFL will ensure that documents are appropriately organised, stored and archived in a place (physical or electronic) that is easily accessible to staff who may need to consult or edit documents.

The Quality Assurance Manager is responsible for document management including responsibility editing, updating, or superseding of documents.

The internally produced documentation associated with the EMS is presented in a consistent format including:

Title of document

Document reference of the format PFL-YYY-NN where:

- 'YYY' is:
 - OD denoting an Overarching Document, for example a management plan.
 - PROC is a Standard Operating Procedure.
 - MP is a Monitoring and / or Maintenance Schedule.
 - FT is a Standard form template used to make records in relation to the EMS and associated procedures.
- 'NN' is a unique number to identify the document.

Document author / name of person who issued the document.

Version number. (The Master Document Control File is the only document without version number and is controlled through a date format instead).

Date of issue.

To prevent the loss of documents PFL use a cloud-based systems which is protected and backed up.

The process for creating and reviewing documents is detailed in the Document Control Procedure (**PFL-PROC-07**). The status of all management system documents is recorded within the Master Document Control File.

11.1.2 Control of Records

Records are maintained to provide evidence of conformity with the requirements of the EMS.

All records are:

- legible;
- made as soon as reasonably practicable;
- if amended, amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval;
- retained for at least 6 years from the date when the records were made,
- or in the case of the following records until permit surrender:
 - off-site environmental effects; and
 - matters which affect the condition of the land and groundwater.

11.2 Competence, Training & Awareness

PFL will ensure all persons performing tasks for the organisation or on its behalf are competent based on appropriate education, training and/or experience, to enable them to carry out the specific task safely.

PFL has established and implemented procedures to identify the training needs associated with the EMS, the operation of the Site and the retention of staff competencies. Training requirements will be determined following the Training Procedure (**PFL-PROC-10**).

It is essential that all staff are fully aware of the EMS to ensure that procedures and controls are upheld. All new staff joining PFL will receive appropriate training using the environmental permit for the Site and the EMS including documented procedures to understand and reduce environmental impact of the organisation's activities.

All formal training and Toolbox Talks received will be logged on manual recording sheets. Records of training on SOPs will be retained by the relevant department manager.

11.3 Operational Planning

Operational planning at the site is structured to ensure the effective implementation, maintenance, and continual improvement of the food safety, quality management systems and environmental management system. It supports regulatory compliance, customer requirements, and internal business objectives.

A core component of this planning process is the biannual Management Review Meeting, which serves as a formal platform to evaluate site performance and identify areas for improvement. These meetings are attended by key members of the leadership, technical, and operational teams to ensure cross-functional input and accountability and include the review of:

- Previous management review / matters arising
- HACCP and food defence
- Changes in company structure
- Training

- Food Safety Culture
- Whistleblowing
- Key Performance Indicators
- Process performance and product conformity
- Factory Hygiene, GMP, Safety, Legality, Authenticity & Quality
- New Regulations
- Customer complaints
- Incidents – product withdrawals and product recalls
- Results of internal, second party and/or third-party audits and compliance with BRCGS
- Review of objectives
- Any other points and responsibility for corrective actions

Monthly management meetings track delivery of actions and objectives, review KPIs, and address emerging issues between the biannual reviews, with any material matters escalated to the next formal review.

11.4 Communication

11.4.1 Communications & Reporting

For internal communication, the Environmental Compliance Manager ensures that information regarding the EMS such as the environmental policy, EMS manual, management plans and SOPs, including emergency response procedures, are readily available to all relevant employees and contractors.

It is essential that all personnel are fully aware of the EMS to ensure that procedures and controls are upheld. All new employees and contractors receive appropriate training using the EMS documents and procedures to understand and reduce environmental impact of the organisation's activities.

For external communication, the Environmental Policy (**PFL-OD-02**) will be made available upon request. PFL seeks to proactively communicate with its external stakeholders about its EMS.

11.4.2 Complaints

PFL understands the importance of addressing both internal and external complaints in a prompt and comprehensive manner to resolve any issue as quickly as possible. All complaints are dealt with according to the Complaints Procedure (**PFL-PROC-08**).

11.5 Operational Controls & Emergency Response

11.5.1 Operational Controls

PFL has established and implemented operational controls relevant to the operational processes and the organisation's significant environmental risks.

The management system documents relevant to operational control are Overarching Documents (ODs), including the Environmental Policy and overarching management plans, SOPs, monitoring and maintenance schedules and the record keeping forms associated with the SOPs (Form templates).

The operational controls will be adhered to, by all employees and personnel working for or on behalf of the organisation. PFL therefore ensures that all relevant management system documents are communicated to the personnel to whom they apply.

Management system documents are reviewed at planned intervals as stated within with the Master Document Control File (**PFL-OD-07**) and revised when necessary.

Table 10 below lists the management system documents relevant to operational control.

Table 10: Management System Documents (Operational Controls)

Document Reference	Document Title
PFL Overarching Documents	
PFL-OD-01	Environmental Management System Manual (this document)
PFL-OD-02	Environmental Policy
PFL-OD-03	Odour Management Plan
PFL-OD-04	Accident Management Plan
PFL-OD-05	Organisation and Structure Chart
PFL-OD-06	Process Flow Diagram
PFL-OD-07	Document Control File
PFL-OD-08	Skills, Competency and Training Records
PFL-OD-09	Energy Efficiency Plan
PFL Overarching Procedures	
PFL-PROC-01	Fire Procedure
PFL-PROC-02	Spillage Procedure
PFL-PROC-03	Procedures for Spreading Wash Water
PFL-PROC-04	Main Power Outage Response Procedure
PFL-PROC-05	Mechanical Failure Procedure
PFL-PROC-06	Flood Response Procedure
PFL-PROC-07	Document Control Procedure
PFL-PROC-08	Complaints Procedure (Policy XV)
PFL-PROC-09	Change Control Procedure
PFL-PROC-10	Training Procedure (Policy VIII)
PFL-PROC-11	Divers' Handbook (Milk Reception Procedures)
PFL-PROC-12	Environmental Monitoring Procedure
PFL-PROC-13	Laboratory Procedures (SDXIV a)
PFL-PROC-14	Process Monitoring Procedure
PFL-PROC-15	Odour Monitoring Procedure
PFL-PROC-16	Procedure for Reporting Incidents & Accidents
PFL-PROC-17	Good Manufacturing Practice (incl. housekeeping procedures)
PFL-PROC-18	Waste Handling Procedure

PFL Form Templates	
PFL-FT-01	Accident and Incident Report Form
PFL-FT-02	Complaints Record Form
PFL-FT-03	Odour Report Form (monitoring form)
PFL-FT-04	Odour Complaint Form
Site Specific Monitoring & Maintenance Schedules	
PFL-MP-01	Maintenance & Service Planner
PFL-MP-02	Site Diary
PFL-MP-03	Critical Spares List
PFL-MP-04	Daily Checks
PFL-MP-05	Weekly Checks

11.5.2 Emergency Preparedness & Response

PFL has established and implemented emergency procedures relevant to the operational processes and the organisation's significant environmental risks.

Emergency response procedures will always be adhered to, by all employees and personnel working for and on behalf of the organisation. PFL therefore ensures that all emergency response procedures are communicated to personnel to whom they apply. Emergency response procedures are reviewed at planned intervals as stated within with the Master Document Control File (**PFL-OD-07**) and revised when necessary.

Table 11 below lists the Management System documents relating to Emergency Response that have been implemented.

Table 11: Management System Documents (Emergency Response)

Document Reference	Document Title
PFL Overarching Documents	
PFL-OD-03	Odour Management Plan
PFL-OD-04	Accident Management Plan
PFL-OD-06	Process Flow Diagram
PFL-OD-08	Skills, Competency and Training Records
PFL Overarching Procedures	
PFL-PROC-01	Fire Procedure
PFL-PROC-02	Spillage Procedure
PFL-PROC-03	Procedures for Spreading Wash Water
PFL-PROC-04	Main Power Outage Response Procedure
PFL-PROC-05	Mechanical Failure Procedure

PFL-PROC-06	Flood Response Procedure
PFL-PROC-15	Odour Monitoring Procedure
PFL Form Templates	
PFL-FT-01	Accident and Incident Report Form
PFL-FT-03	Odour Monitoring Form

12 Monitoring

12.1 Environmental Monitoring

PFL monitors, on an ongoing basis, the environmental performance of the Site through environmental monitoring as required to determine environmental performance and control environmental risks, as determined through the Environmental Risk Assessment (**PFL-OD-11**).

Environmental monitoring procedures will always be adhered to, by all employees working for or on behalf of the organisation. PFL therefore ensures that all environmental monitoring procedures are communicated to personnel to whom they apply. Environmental monitoring schedules and procedures will be reviewed at planned intervals as stated within with the Master Document Control File (**PFL-OD-07**) and revised when necessary.

Table 12 below lists the environmental monitoring procedures and check lists that will be implemented.

Table 12: Management System Documents (Environmental Monitoring)

Document Reference	Document Title
PFL Overarching Documents	
PFL-OD-03	Odour Management Plan
PFL Overarching Procedures	
PFL-PROC-12	Environmental Monitoring Procedure
PFL-PROC-13	Laboratory Procedures (SDXIV a)
PFL-PROC-14	Process Monitoring Procedure
PFL-PROC-15	Odour Monitoring Procedure
PFL-PROC-17	Good Manufacturing Practice (incl. housekeeping procedures)
PFL Form Templates	
PFL-FT-01	Accident and Incident Report Form
PFL-FT-03	Odour Monitoring Form
PFL Monitoring & Maintenance Schedules	
PFL-MP-01	Maintenance & Service Planner
PFL-MP-02	Site Diary
PFL-MP-03	Critical Spares List

PFL-MP-04	Daily Checks
PFL-MP-05	Weekly Checks

12.2 Process Monitoring

Process monitoring is key to ensuring the effective operation of critical components of the Site, including the CIP sets. Product sampling is also undertaken to ensure products produced are safe for consumption and meet the required quality.

12.2.1 CIP Sets

Parameters considered as part of the CIP process monitoring includes the following:

- Conductivity
- Temperature
- Concentration of caustic or acid detergents (measured as a percentage)
- Daily chemical usage
- Number of wash cycles completed per day
- Visual inspections of valves, pipework, and pumps to identify any defects or maintenance needs

Conductivity meters are used to assess the concentration of cleaning chemicals in the CIP solution and indicate when chemical replenishment is required. Factory staff also perform manual conductivity tests to verify the accuracy of the automated readings.

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 confirm key process parameters, including:

- The areas cleaned
- Cleaning solution temperature (required: 70 °C)
- Chemical strength

Every product run also undergoes microbiological testing to ensure that CIPs are effective.

12.2.2 Reverse Osmosis (RO) System Testing and Monitoring

The Reverse Osmosis (RO) water treatment system is subject to a structured programme of testing and process monitoring to ensure water quality and hygiene standards are maintained. The RO water is treated with chlorine dioxide to ensure microbial control.

I. Microbial Testing

Three RO water samples are taken weekly; at the start, middle, and end of the operational run. These samples are tested for:

- Total coliforms
- Enterobacteriaceae

- Escherichia coli
- Enterococci

II. Daily Monitoring

Site personnel perform daily checks of the water treatment system, including a manual chlorine dioxide test to verify effective dosing.

III. Monthly External Monitoring

A specialist contractor (PWT) carries out a monthly inspection of the RO system, which includes:

- pH
- Conductivity
- Chlorine dioxide levels

All monitoring results are recorded and reviewed to ensure compliance with water quality standards, and any deviations are addressed promptly.

12.2.3 Product Sampling

As part of the broader Quality Management System a documented programme of product sampling is in place and is consisting of microbiological, chemical, nutritional and organoleptic testing.

The programme considers all raw materials and finished products from receipt to end of shelf life. The programme considers In House Laboratory testing and UKAS accredited Laboratory for pathogen testing, nutritional and environmental testing.

This programme enables PFL to meet customers specifications and ensure all products produced are safe, legal, authentic.

12.2.4 Waste wash water testing

The waste wash water is tested at least once every 12 months to inform 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.

12.3 Inspection & Maintenance of Equipment

PFL will ensure that all process plant and equipment is commissioned, operated, and maintained in accordance with the manufacturers recommendations and is documented and recorded.

PFL will ensure that all monitoring and measuring equipment is fit for purpose, maintained, and calibrated to appropriate standards (UKAS approved where applicable).

The following procedures and processes listed in Table 13 have been implemented to ensure continued maintenance of the Site's infrastructure. A suitably qualified person undertakes all maintenance and calibration work.

Table 13: Management System Documents (Monitoring & Maintenance)

Document Reference	Document Title
PFL Overarching Documents	
PFL-OD-08	Skills, Competency and Training Records
PFL Monitoring & Maintenance Schedules	
PFL -MP-01	Maintenance & Service Planner
PFL -MP-02	Site Diary
PFL -MP-03	Critical Spares List
PFL -MP-04	Daily Checks
PFL -MP-05	Weekly Checks

A documented Planned Preventative Maintenance (PPM) schedule (**PFL-MP-01**), maintained in Excel format, is in place for all plant and machinery across the site. The schedule is structured by month and clearly identifies the responsible party for each task, whether internal engineering staff or external contractors. The plan covers all key equipment and systems, including routine servicing, inspections, and calibration of critical instruments.

There is a list of approved contractors which details the maintenance contractor for each piece of equipment for which servicing or maintenance activities are outsourced. Key equipment maintained under contract is included in table 14.

Table 14: Maintenance and Approved Contractors

Equipment	Maintenance contractor	Telephone number
Alarm systems	Churches Fire and Security Ltd	(01598) 710853
Pasteuriser	P J Webb / Moody Heat Exchangers	(01278) 425734 / (01453) 827734
Boilers	Cochran Boilers Ltd	(01461) 202111
Software	Oakmount Control Systems Ltd	(0)1935 478588
Refrigeration	K J R	(01271) 344410
Separator	Centrifuge Maintenance Services Ltd	(0141) 434 1023
Whey processing plant	Mr Joe Dodwell/ Andrew Blackler/ David Kellett	(01604) 405311 / (07748) 141606/ (01981) 57061

Figures

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

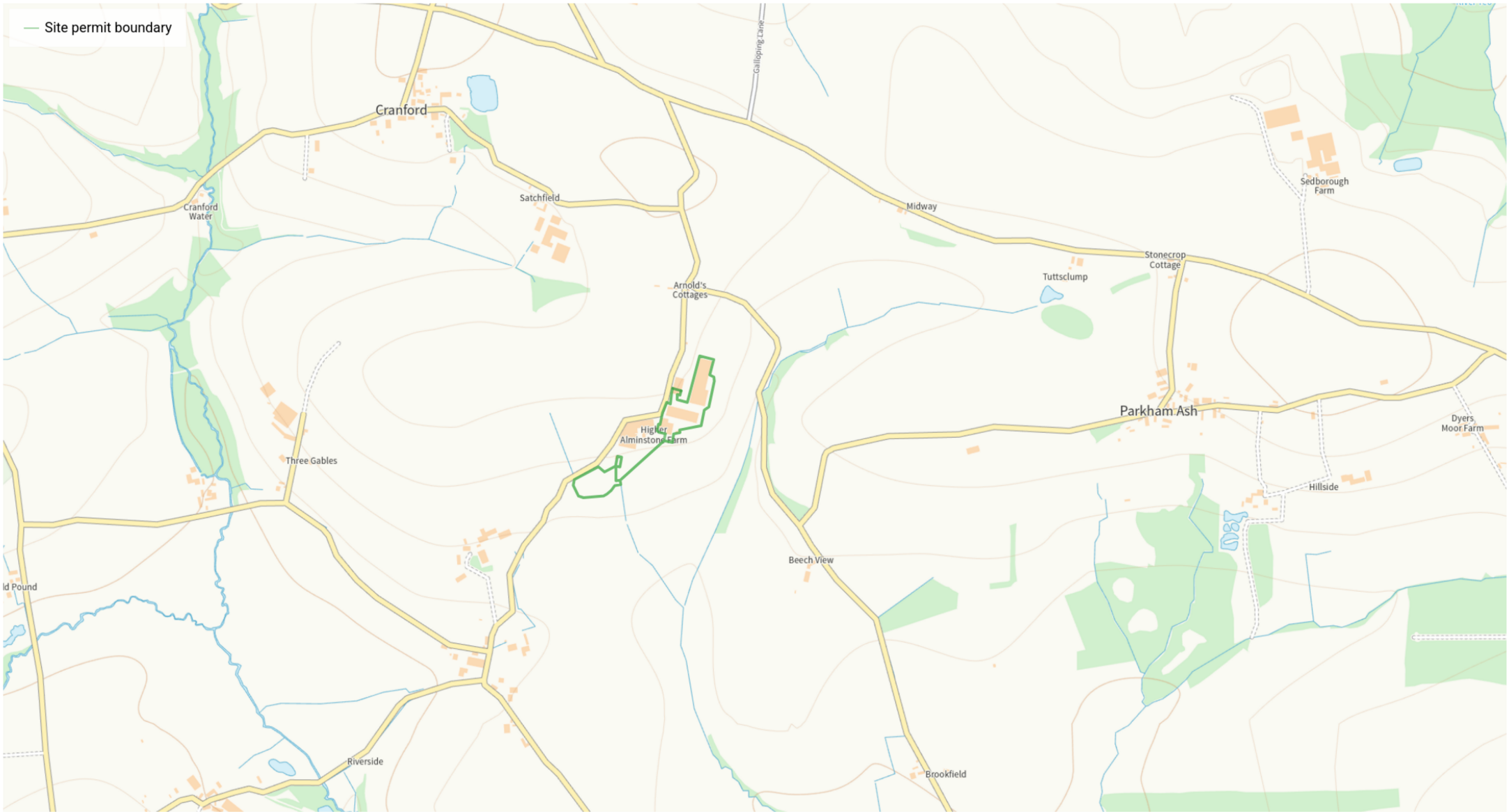
Figure 2: Permit Boundary & Emission Point Plan, Earthcare Technical Limited (ETL928_2026_EPR02)

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

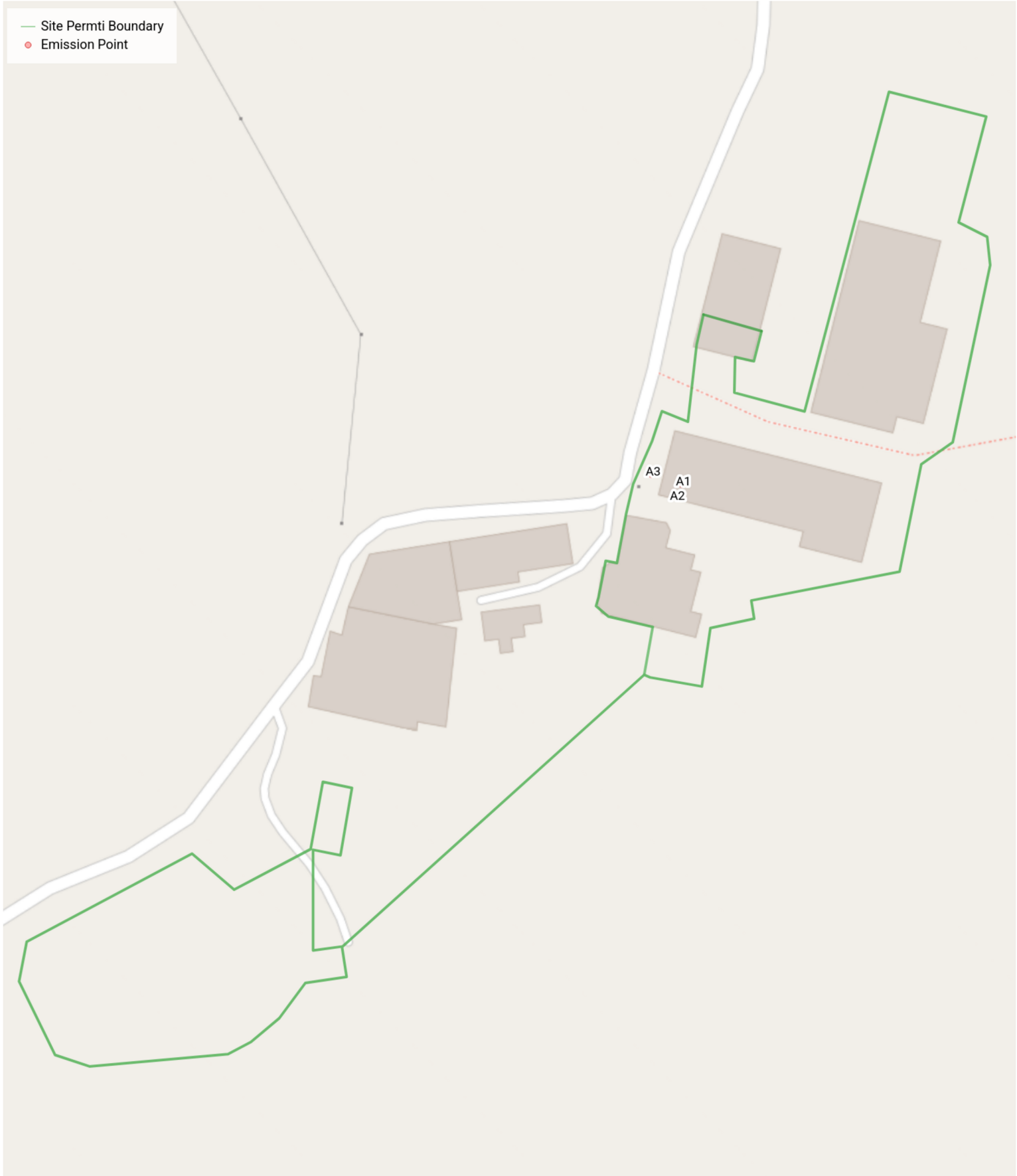
Figure 4: Human Receptor Plan, Earthcare Technical Limited (ETL928_2026_EPR04)

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

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

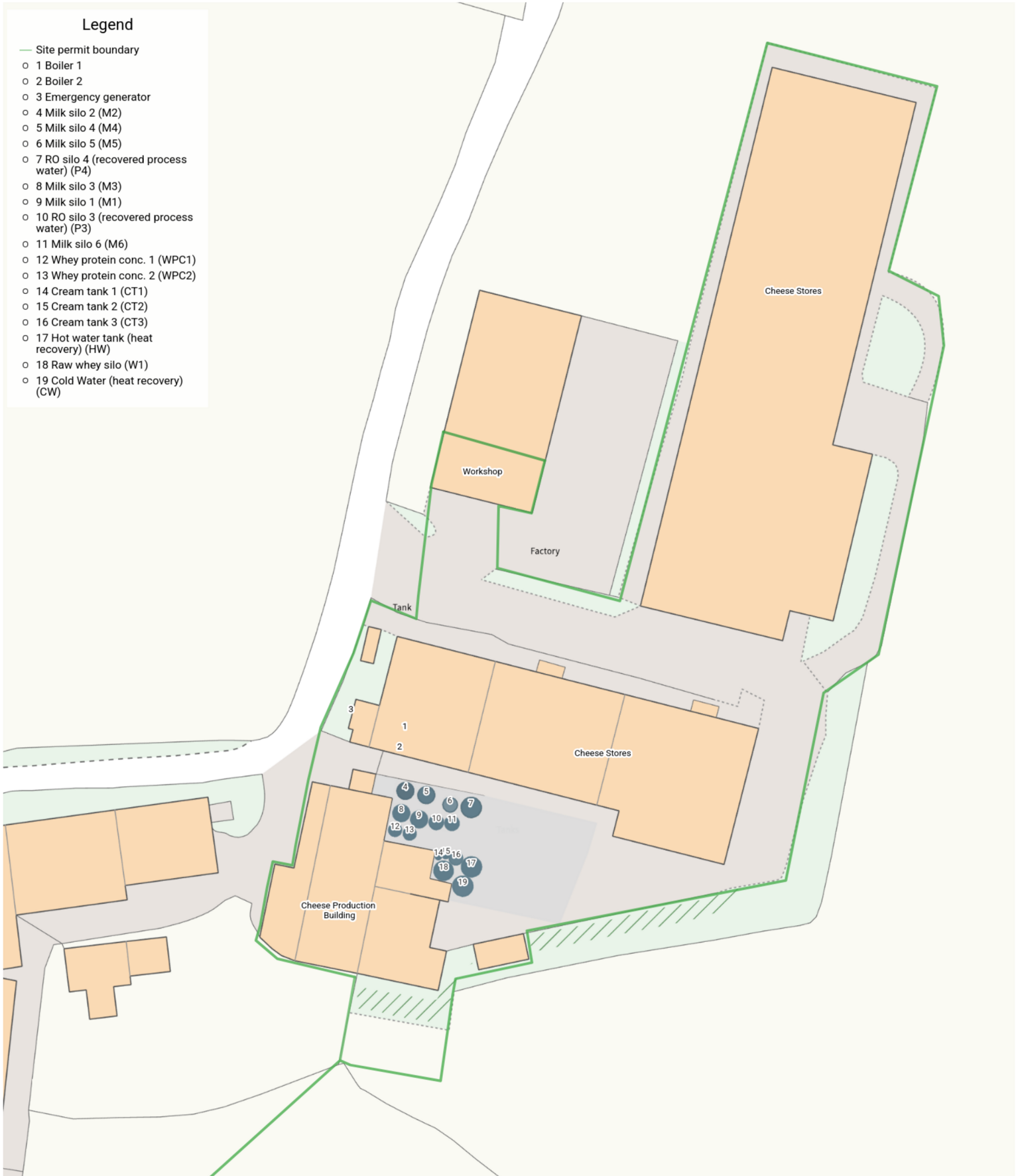


— Site Permti Boundary
● Emission Point



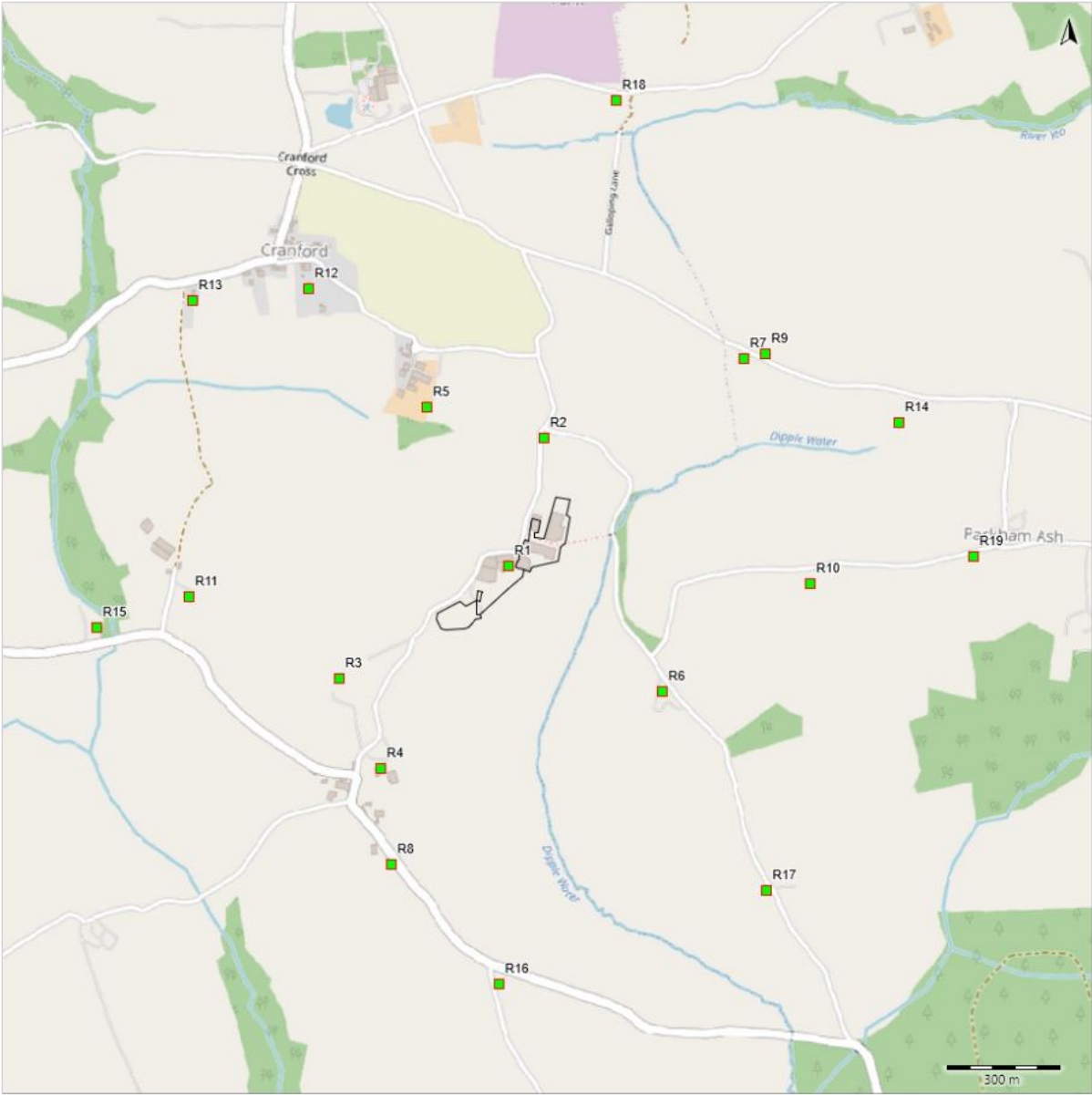
Legend

- 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)

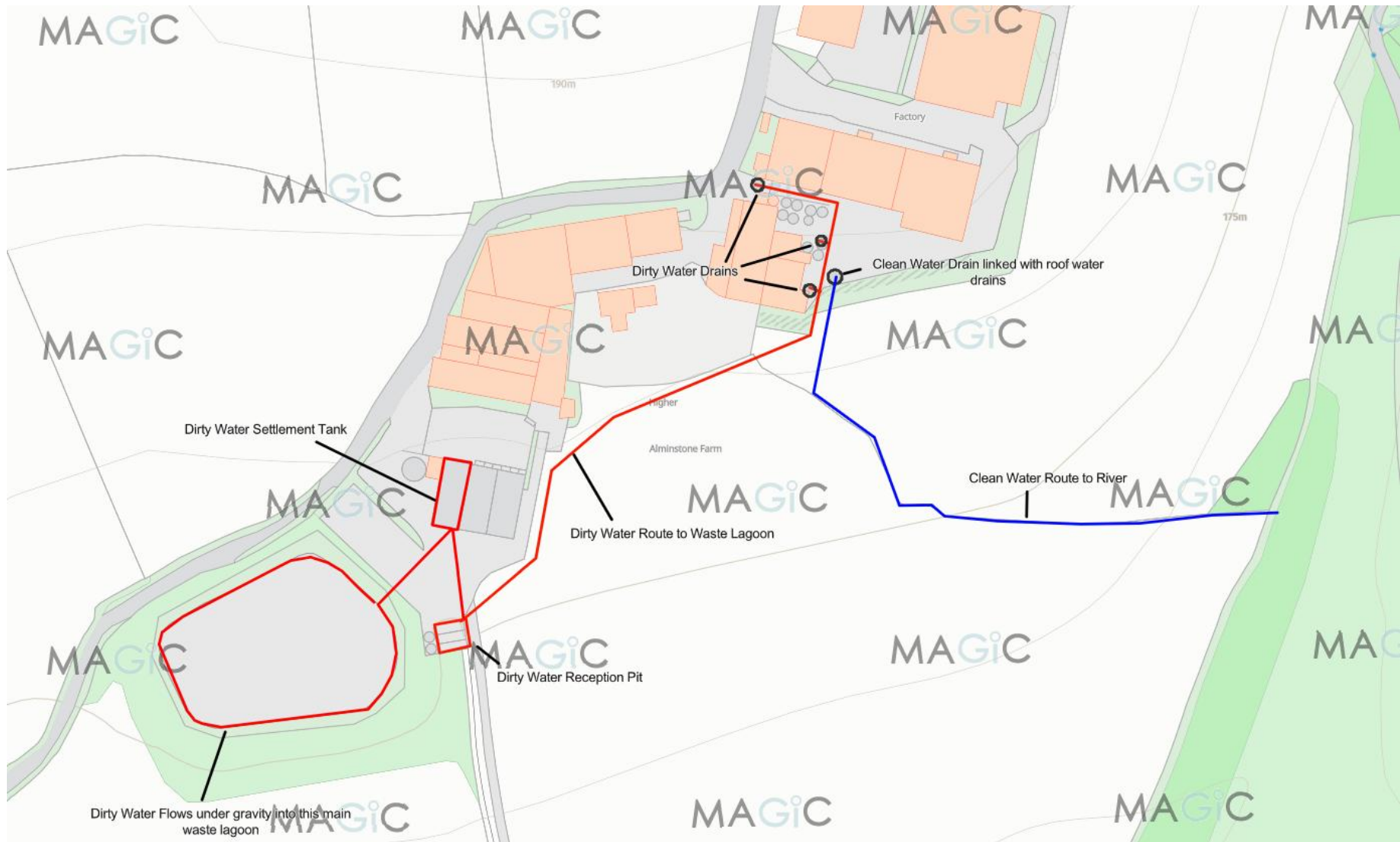




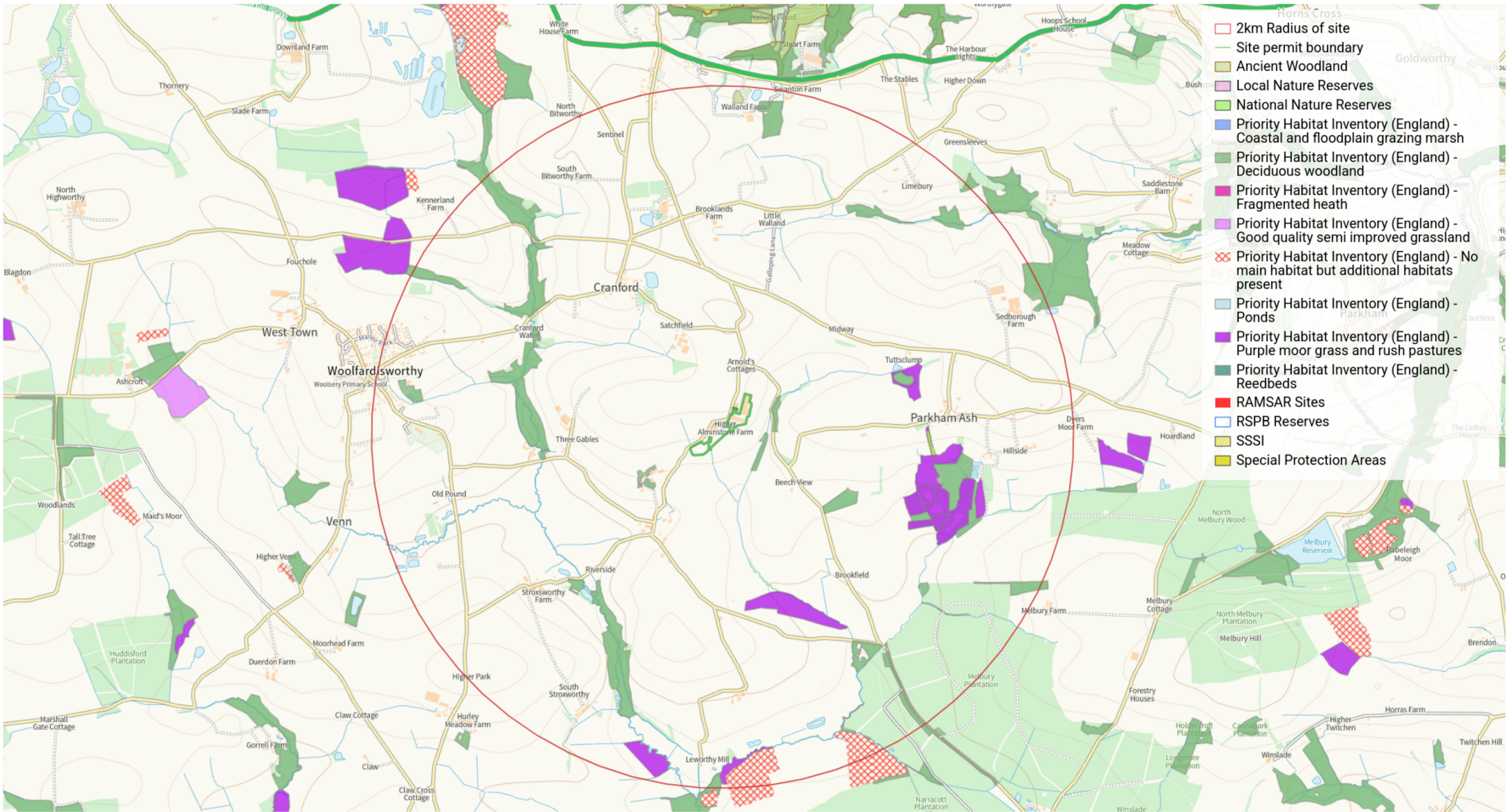
EPR928_2026_EPR04
Human Receptor Plan



Site Drainage Plan (Outside Drains and Water Overview schematic)



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



- 2km Radius of site
- Site permit boundary
- Ancient Woodland
- Local Nature Reserves
- National Nature Reserves
- Priority Habitat Inventory (England) - Coastal and floodplain grazing marsh
- Priority Habitat Inventory (England) - Deciduous woodland
- Priority Habitat Inventory (England) - Fragmented heath
- Priority Habitat Inventory (England) - Good quality semi improved grassland
- Priority Habitat Inventory (England) - No main habitat but additional habitats present
- Priority Habitat Inventory (England) - Ponds
- Priority Habitat Inventory (England) - Purple moor grass and rush pastures
- Priority Habitat Inventory (England) - Reedbeds
- RAMSAR Sites
- RSPB Reserves
- SSSI
- Special Protection Areas



Appendix A – Nature and Heritage Conservation Screening Report

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.

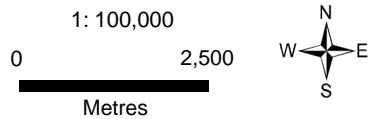
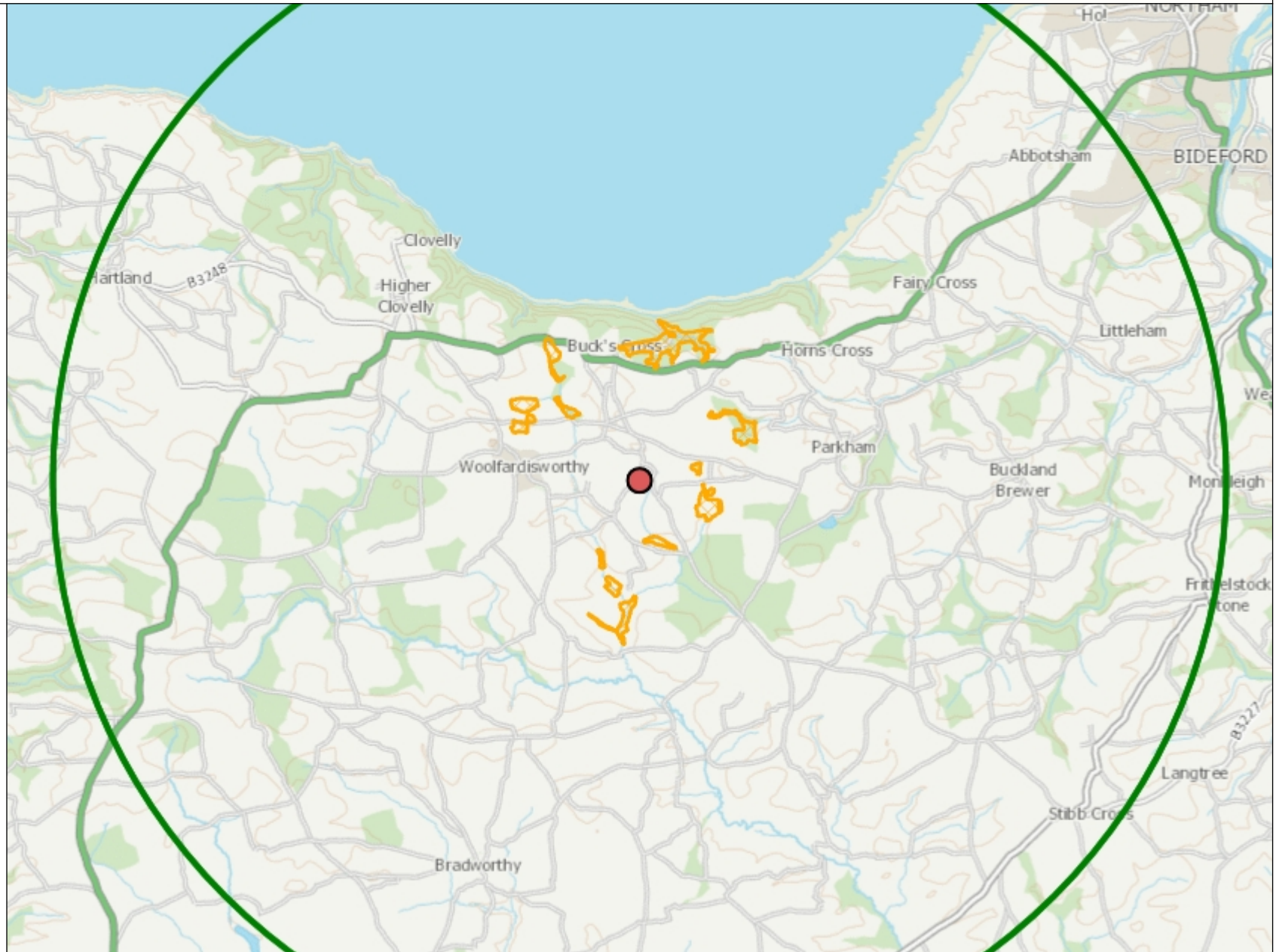
The nature and heritage screening we have conducted as part of this report is subject to change as it is based on data we hold at the time it is generated. We cannot guarantee there will be no changes to our screening data between the date of this report and the submission of the permit application,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

Local Wildlife Sites



Legend

 Local Wildlife Sites



Appendix B – 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.

Appendix C – 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

