Accident Management Plan (AMP) for Parkham Farms Cheese Factory

Parkham Farms Ltd, Higher Alminstone Farm, Woolsery, Bideford, Devon EX39 5PX

ETL928/2025

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Version Control

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Contents

Abbreviations

AD	Anaerobic digester/ digestion
AMP	Accident Management Plan
AW	Ancient Woodland
BMP	Biochemical methane potential
CH4	Methane
CO2	Carbon dioxide
CQA	Construction quality assurance
DSEAR	The Dangerous Substances and Explosive Atmospheres Regulations 2002
DWSZ	Drinking Water Safeguard Zone
EA	Environment Agency
EMS	Environmental Management System
EWC	European Waste Catalogue
LDAR	Leak detection and repair
m AOD	Metres Above Ordnance Datum
MPH	Miles per hour
NGR	National Grid Reference
NH3	Ammonia
OMP	Odour Management Plan
PHI	Priority Habitat Inventory
ppm	Parts per million
PVRV	Pressure and vacuum relief valve
SCADA	Supervisory Control and Data Acquisition
SAC	Special Area of Conservation
SSAFO	The Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010
SOP	Standard Operating Procedure
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
SR	Standard Rules
VOC	Volatile Organic Compound

1 Scope of the AMP

This Accident Management Plan (AMP) is written to cover the scope of operations for Parkham Farms Cheese Factory, located at Higher Alminstone Farm, Woolsery, Bideford, EX39 5PX (the Site) operated by Parkham Farms Limited (PFL).

This AMP has been written with reference to the current Environment Agency (EA) Guidance[1] and should be read in conjunction with the Site environmental management system (EMS). The guidance stipulates that an AMP is necessary for dealing with any incidents / events that could result in pollution.

The aim of the AMP is to:

- identify the hazards posed by the installation / activity;
- assess the risks of accidents and their possible consequences; and
- implement measures to reduce the risks of accidents and contingency plans for accidents that do occur.

The Accident Management Plan and associated procedures include the location of spill kits, muster points and fire extinguishers.

Emergency response procedures and accident/incident forms are included within the management system documents and are listed on the site-specific Master Document Control List **(PFL-OD-07)**.

This first issue of the AMP Manual supports an environmental permit application for a bespoke installation permit. Through pre-application discussions, the Environment Agency have provided a permit reference of EPR/HP3728LG.

The AMP should be reviewed on a four yearly basis or:

- When changes are made to the operations, drainage or site infrastructure or plant and equipment that affect the activities covered by the permit;
- When the permit is varied;
- After any accident, complaint, or breach of the permit; and
- In the event that a new environmental problem or issue has occurred, and the site has needed to implement new control measures to control it.

[1] https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

2 Site Description

2.1 Site Location

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

2.2 Site process summary

2.2.1 Food and Drink Processes

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 (RO 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.

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.

2.3 Key Infrastructure

The Site Infrastructure is listed in Table 1 below.

Table 1 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: ○ 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 Tank 2	 $40m^3$ $10m^3$
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	

2.4 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.

2.5 Site Drainage

The site drainage is fully described in Section 6.3 of the EMS Manual (**PFL-OD-01**).

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 (one above ground, one below ground) 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.

Reference should be made to Figure 5: Site Drainage Plan (Outside Drains and Water Overview schematic).

2.6 Polluting substances

Details of potentially polluting substances is provided in the Raw Materials Inventory, Appendix A.

3 Site Environmental Sensitivities

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.[2]

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.[3]

3.2 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).[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.

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

- Ecological status – moderate
- Biological quality elements - moderate
- Physico-chemical quality elements – moderate
- Hydromorphological Supporting Elements – not high
- Chemical – does not require assessment[5]

[2] https://www.landis.org.uk/soilscapes/ accessed 15 August 2025
[3] National Geological Screening: South-west England Region, Bristish Geological Survey, Comissioned Report CR/17/095
[4] https://magic.defra.gov.uk/MagicMap.aspx Accessed 13 August 2025
[5] https://environment.data.gov.uk/catchment-planning/WaterBody/GB108050014370 Accessed 13 August 2025

The site is not within a Surface Water Nitrate Vulnerable Zone (NVZ) nor is it within a Drinking Water Safeguard Zone.[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.[6]

3.5 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 2 – Human Receptor Plan.

Table 2: 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

[6] 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
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						

3.6 Ecological Receptors

3.6.1 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 3 below for consideration within the permit application.

Table 3 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

3.6.2 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.

3.6.3 Scheduled Monuments

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

3.7 Air Quality Management Areas

The Site is not within an Air Quality Management Area (AQMA).[7]

4 Roles and responsibilities

4.1 Organisation Profile

The site is owned and operated by Parkham Farms Ltd.

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.

4.2 Day to Day

It is the responsibility of the Environmental Compliance Manager to ensure that:

- Site staff are adequately trained on the Accident Management Plan including all related procedures;
- The requirements of this document are adhered to;
- That suitable testing of emergency procedures takes place;
- They perform incident control or delegate the role correctly; and
- Incidents are reported on time and correctly to the EA when required.

[7] https://uk-air.defra.gov.uk/aqma/ Accessed 14 august 2025.

The Head Cheesemaker and Director, Peter Willes has overall responsibility for the Site during normal and abnormal operations. To cover for annual leave, sickness, and unavailability of Peter Willes, there will be a requirement to temporarily delegate the duties to other members of staff to cover. They are known as a Nominated Competent Person (NCP) when covering this role. Necessary hand over information is delivered verbally where possible.

5 Incident response

5.1 During an Incident or Accident

On detection of an incident or accident, the Head Cheesemaker or NCP becomes the Incident Controller. It is the responsibility of the Incident Controller to:

1. Assess danger.
2. Assist in the evacuation process by checking specific areas if required (i.e., if not everyone accounted for) ONLY if safe to do so.
3. Assess response - Decide whether to alert the Emergency Services and / or Environment Agency.
4. Take control of an incident until relieved by the Emergency Services.
5. Serve as a single point of contact between the Emergency Services and other involved parties.
6. Ensure that the correct procedures within the Accident Management Plan are followed.
7. Ensure a formal handover takes place if the Incident Controller changes.
8. Assist in a full incident / accident root cause analysis, review lessons learnt and recommend any changes to procedures.
9. Making a record of the accident and the subsequent investigation using Incident Report Form (**PFL-FT-01**) (for actual or potential environmental incidents) and notifying the Environment Agency where necessary and as described in Section 8 of this manual; and
10. Review and update the Accident Management Plan and procedures, as necessary.

5.2 Reporting incidents and accidents

There is a written Procedure for Reporting Incidents & Accidents (**PFL-PROC-16**). Pertinent points are described below.

To aid reporting of accidents and incidents a list of Key Emergency Contacts, provided in Appendix C of this manual. Ensure the list is clearly displayed in the Site Office.

At the time of the incident, the Head Cheesemaker or NCP is responsible for reporting the incident to the **Environment Agency incident hotline (0800 807060)** as soon as practicably possible and in all cases within 12 hours of the incident or breach of permit.

All incidents that result in the following must be reported:

- Damage or danger to the natural environment;
- Pollution to water or land;
- Any incident which is causing or may cause significant pollution including breakdowns or failure of equipment or techniques and accidents.

Following the incident a record and investigation of the incident must then be made:

- Using the Incident Report Form (**PFL-FT-01**) to record the details of the incident, the consequences (pollution/ damage/ breaches etc.), people involved and immediate response activities that were carried out.

- Investigating using the Incident Report Form (**PFL-FT-01**) for incidents with an impact (or potential impact) on the environment finding the root cause(s) of the incident and identifying corrective action(s).
- Ensuring that a regular review of outstanding actions is undertaken, to ensure that the corrective actions are followed through to completion.
- On completion of the corrective actions (where identified), updating the form with completion dates and filing the form for future reference.

Provide written confirmation to the Environment Agency of all pollution incidents and breaches of emissions **within 24 hours**.

6 Operational Controls relating to Emergency Response

The Operator has established and implemented emergency procedures relevant to the operational processes and the organisation's significant environmental risks. These procedures integrate with this Accident Management Plan Manual.

Emergency response procedures will always be adhered to, by all employees and personnel working for and on behalf of the organisation. The Operator 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 4 below lists the Management System documents relating to Emergency Response that are being implemented.

Table 4 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

7 Accident / Incident Prevention & Management Plan

The key events that could lead to a failure in the risk management systems in place are listed in Table 5 below.

Table 5: Accident/Incident Risk Assessment & Management Plan

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
1. Spillages					
1.1 Spillages of raw milk during delivery	Low – all milk is directly dispatched from delivery tanker into the receiving storage silo.	Potential contamination of the soil, surface water and groundwater through leaching	Low risk of environmental harm from spillages upon concrete access road and yard. Contingency plans in place including spill diversion to emergency Deluge Pit.	Operate site in accordance with Environmental Management System including: • Appropriate training of staff with respect to the EMS including Milk Reception (Drivers' Handbook) and Spillage Procedures. • Daily checks for spillage around site to be carried out by Site Managers or NCP in	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				accordance with the site's Daily Check's sheet (**PFL-MP-04**). • Contingency plans in place with emergency Deluge pit located to the east of the yard area for emergency containment. • Penstock valve located on outlet of the yard surface water drain. Valve is closed during high-risk operations (such as tanker loading or cleaning). Valve will be	

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				automatically closed in the event of a spill. • Spill kits located at strategic locations around the Site.	
1.2 Spillages of raw milk during dispatch into receiving Silos	Low – as above	As above	Low risk of environmental harm from spillages upon concrete surfaces. Contingency plans in place including spill diversion to emergency Deluge Pit.	As above. Operate site in accordance with Environmental Management System including: • Divers' Handbook (Milk Reception Procedures) (**PFL-PROC-11**) • Daily checks for spillage around site to be	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				carried out by Site Managers or NCP in accordance with the site's Daily Check's sheet (**PFL-MP-04**). • All Silos benefit from high level sensors. On dispatching loads into the Silos, the pump will automatically shut off on reaching the high level, preventing overfilling. • Appropriate training of staff with respect to the EMS.	

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
1.3 Spillages of milk / raw materials during processing within the Cheese Factory	Low – cheese making is overseen by trained personnel.	As above	Low risk of environmental harm - any spillages would be contained within the Cheese Factory itself which benefits from impermeable surfacing and sealed drainage system, which drains into the Dirty Water Pit (below ground dirty water tank).	As above. Inspection and maintenance of plant and equipment in accordance with a planned preventative inspection and maintenance programme. Cheese manufacturing undertaken in accordance with the Quality Manual. Within the Dairy Factory itself, the quantities to be dispatched to the pasteuriser and subsequently the cheese vats for each production cycle are stipulated. Flow meters are in place which allow operatives to input the correct amounts.	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
1.4 Spillage of finished dairy products (cream, lactose & whey protein concentrate) during dispatch from site.	Low	As above	If there was a spillage it has the potential to contaminate soil, surface water and groundwater.	Operate in accordance with Environmental Management System in particular: • Training of tanker drivers with respect to Product Dispatch Procedures. • Daily checks for spillage around site to be carried out by Site Managers or NCP in accordance with the site's Daily Check's sheet (**PFL-MP-04**). • Appropriate training with respect to Spillage	

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				Procedure including the location of spill kits.	
1.5 Spillage during delivery of Kerosene and Diesel.	Low – carried out by trained external contractors	As above	Potential contamination of the soil, surface water and groundwater.	All fuel is stored within designated integrally bunded tanks: • Kerosene is stored within a double-skinned steel tank system comprising two compartments, (Fuel Tanks 1 & 2). Each compartment is fitted with a high-level alarm to prevent overfilling. The outer skin	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				provides integral secondary containment and is fitted with a bund (interstitial) alarm. • 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	

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				installed to detect any losses. • Diesel used for the Generator is stored in a 1.2 m^3 bunded tank. Absorbent materials are kept on site at all times. Operate site in accordance with the Environmental Management System in particular: • Daily checks for spillage around site to be carried out by Site Managers or NCP In accordance with the site's Daily Check's	

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				sheet (**PFL-MP-04**). • Appropriate training with respect to Spillage Procedure including the location of spill kits.	
1.6 Leaks and spillages of oil or fuel from plant and equipment	Low	Potential contamination of the soil, surface water and groundwater through leaching	Potential contamination of the soil, surface water and groundwater.	Operate in accordance with the Environmental Management System in particular: • Inspection and maintenance of plant and equipment in accordance with a planned preventative inspection and maintenance	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				programme (**PFL-MP-01**). • Daily checks for spillage around site to be carried out by Site Managers or NCP in accordance with the site's Daily Check's sheet (**PFL-MP-04**).	
2. Overfilling					
2.1 Overfilling of Silos	Low - If the high-level sensor is triggered then the pump will shut off	As above	If there was a spillage it has the potential to contaminate soil, surface water and groundwater.	Silos benefit from high level sensors. On dispatching loads into the Silos, the pump will automatically shut off on reaching the high level, preventing overfilling.	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
	preventing overfilling.			Operate in accordance with Environmental Management System in particular: • Daily checks for spillage around site to be carried out by Site Managers or NCP in accordance with the site's Daily Check's sheet (**PFL-MP-04**). • Appropriate training with respect to Spillage Procedure including the location of spill kits. • Checks on level sensors across	

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				Silos as part of planned preventative inspection and maintenance programme (**PFL-MP-01**).	
2.2 Overfilling of Lactose Tanks	Low	As above	If there was a spillage it has the potential to contaminate soil, surface water and groundwater.	Dispatch of lactose into the Lactose Tanks is carried out under supervision. Any spillages will be contained within the adjacent concrete wastewater storage pit. Operate in accordance with Environmental Management System (EMS) in particular: • Daily checks for spillage around site to be	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				carried out by Site Managers or NCP in accordance with the site's Daily Check's sheet (**PFL-MP-04**). • Appropriate training with respect to Spillage Procedure including the location of spill kits.	
2.3 Overfilling of Waste Water Storage Tanks / and Lagoon	Low	As above	As above	As above, all activities are undertaken in accordance with EMS. Primary storage of wastewater takes place within an on-site concrete pit / tank and an above-ground	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				concrete storage tank. The concrete pit is fitted with a high-level sensor which, when activated, automatically starts a pump to transfer wastewater to the above-ground tank. From there, the liquid flows by gravity into a lined storage lagoon. Daily checks (PFL-MP-04) are undertaken to ensure a minimum freeboard of 750 mm within the lagoon and 300 mm within the dirty water tanks.	
3. Failure of containment infrastructure					
3.1 Failure of Storage Silos containing raw milk or finished products.	Low	As above	As above Contingency plans in place including spill	As per Section 1.1.	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
			diversion to emergency Deluge Pit.		
3.2 Failure of concrete stores & Lagoon containing process water	Low	As above	If there was a spillage it has the potential to contaminate soil, surface water and groundwater.	As per Section 2.3 Routine monitoring and preventative maintenance of the lagoon and dirty water tanks are carried out daily. This includes: • Maintaining a minimum freeboard of 750 mm within the lagoon and 300 mm within the dirty water tanks; and • Verifying the structural integrity of both the dirty water	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				tanks and the lagoon.	
3.3 Failure of below ground pipework or infrastructure carrying or holding potentially polluting liquids	Low – underground pipework is limited to drainage carrying pipework.	As above	Potential contamination of the soil, surface water and groundwater.	Operate in accordance with Environmental Management System in particular: • Daily checks for spillage around site to be carried out by Site Managers or NCP in accordance with the site's Daily Check's sheet (**PFL-MP-04**). • Appropriate training with respect to Spillage Procedure including the	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				location of spill kits.	
3.4 Failure of above ground pipework	Low	As above	Potential contamination of the soil, surface water and groundwater.	As above	In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).
3.5 Wrong connections made in drains or drainage systems	Low – documented drainage plan in place.	As above	Potential contamination of the soil, surface water and groundwater.	Ensure as built plans are consulted and any future changes to the drainage system are fully surveyed to ensure correct connections before use.	Treat all contaminated water as dirty until drainage routes rectified
4. Fire					
4.1 Fire	Low – materials used for	Emissions to air from fire. Run off from	Harm to human health from smoke.	Ensure that there is only smoking in designated area and	In the event of a fire carry out fire response procedure (**PFL-PROC-01**)

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
	dairy processes are not readily combustible.	firefighting water may soak in ground and contaminate groundwater.	Potential contamination of the soil, surface waters and groundwater.	that all electricals are regularly inspected. Appropriate fire detection systems and firefighting equipment in place.	
5. Flood					
5.1 Site drainage system becoming overwhelmed during extreme rainfall events	Low	Potential contamination of the soil, surface water and groundwater from spillages not contained within the designed drainage system.	The Site drainage system may be overwhelmed by extreme rainfall events and there may be insufficient remaining containment volume to retain leaks or spillages from primary containment.	Operate in accordance with Environmental Management System in particular: • Daily check on primary containment integrity, including Silos and waste water storage structures in accordance with the site's Daily Check's sheet (**PFL-MP-04**).	In the event of flooding, follow the Flood Response Procedure (**PFL-PROC-06)**

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				• Emergency Deluge pit located to the east of the yard area may be used for emergency storage for flood water.	
6.2 Failure to contain fire water	Low	Potential contamination of the soil, surface water and groundwater through leaching or entering surface water drainage system.	Run off from firefighting water may soak in ground and contaminate groundwater.	As above - the site benefits from a sealed drainage system and emergency containment provisions. Ensure that there is only smoking in designated area and that all electricals are regularly inspected.	Fire water to be contained in accordance with Fire Procedure (**PFL-PROC-01**). And follow the Flood Response Procedure (**PFL-PROC-06)**
6. Vandalism					

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
7.1 Unauthorised entry and tampering or malicious damage to property, plant, and equipment.	Low -Site security measures in place as per Section 3.6 of EMS Manual.	Potential contamination of the soil, surface water and groundwater through leaching. Emissions to air from fire.	Potential contamination of the soil, surface waters and groundwater by fuel and or hydraulic oil Fire – fire water As above	Site Security is in place including: • 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. Operate in accordance with Environmental Management System in particular: • Daily checks on site security measures in	In the event of a fire carry out fire procedure (**PFL-PROC-01**). In the event of a spillage follow the Spill Control Procedure (**PFL-PROC-02**).

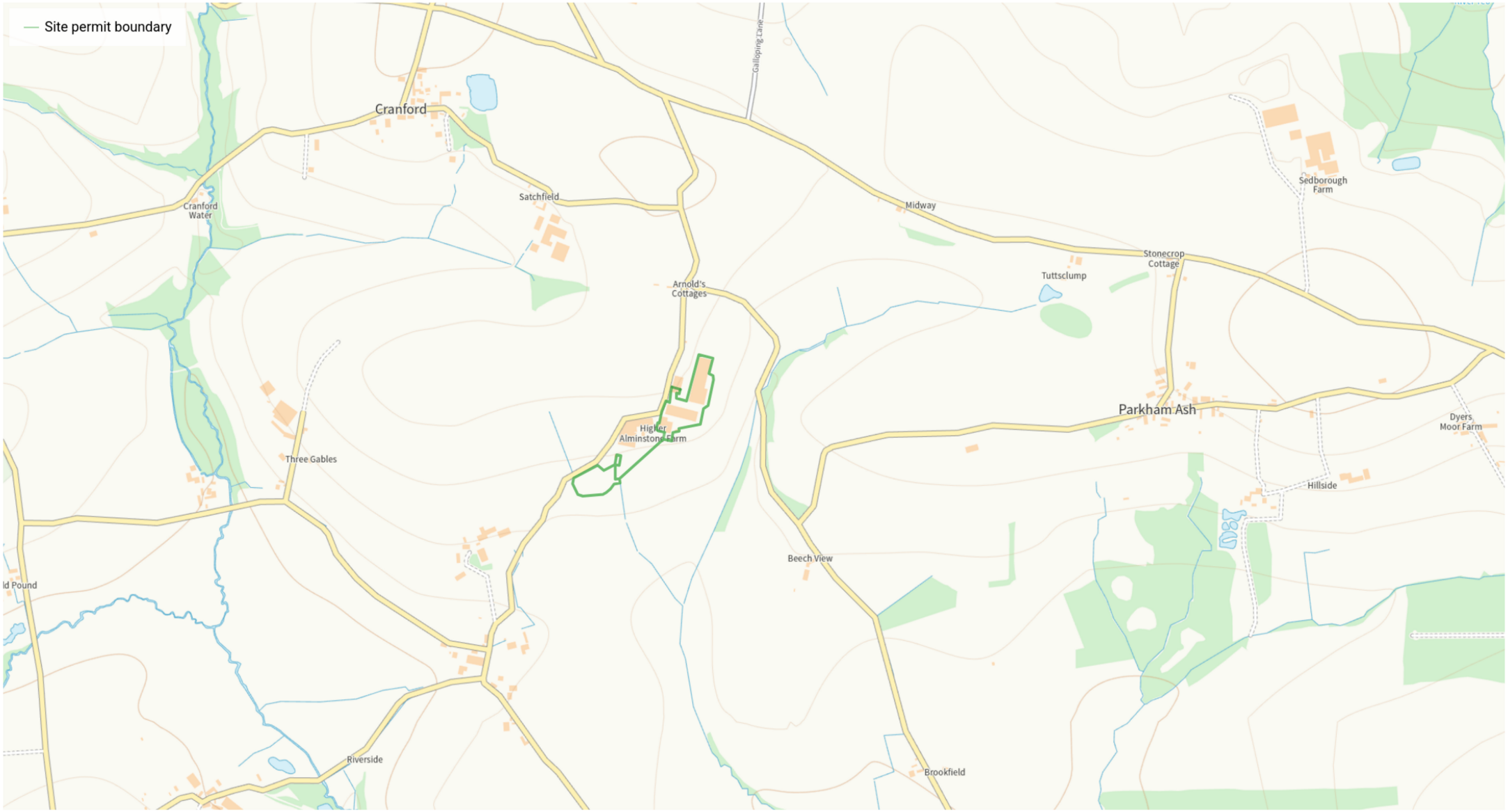
Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
				accordance with the site's daily check sheet (**PFL-MP-04**). • Staff shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.	
7. Power failure					
8.1 Mains power failure leading to shut down of production.	Low – not within control of operator	Overwhelm of storage arrangements leading to release of raw milk or finished product which	Potential contamination of the soil, surface waters and groundwater.	Emergency Standby Generator in place to provide back-up power during situations of temporary mains power failure.	In the event of a power failure initiate Main Power Outage Response Procedure (**PFL-PROC-04**).

Possible Accident/incident	Likelihood of occurrence	Pathways & receptors	What would the environmental harm be?	How do we reduce the chances of it happening?	What to do if it happens
		may cause contamination of the soil, surface water and groundwater through leaching.			

Figures

Earthcare TECHNICAL

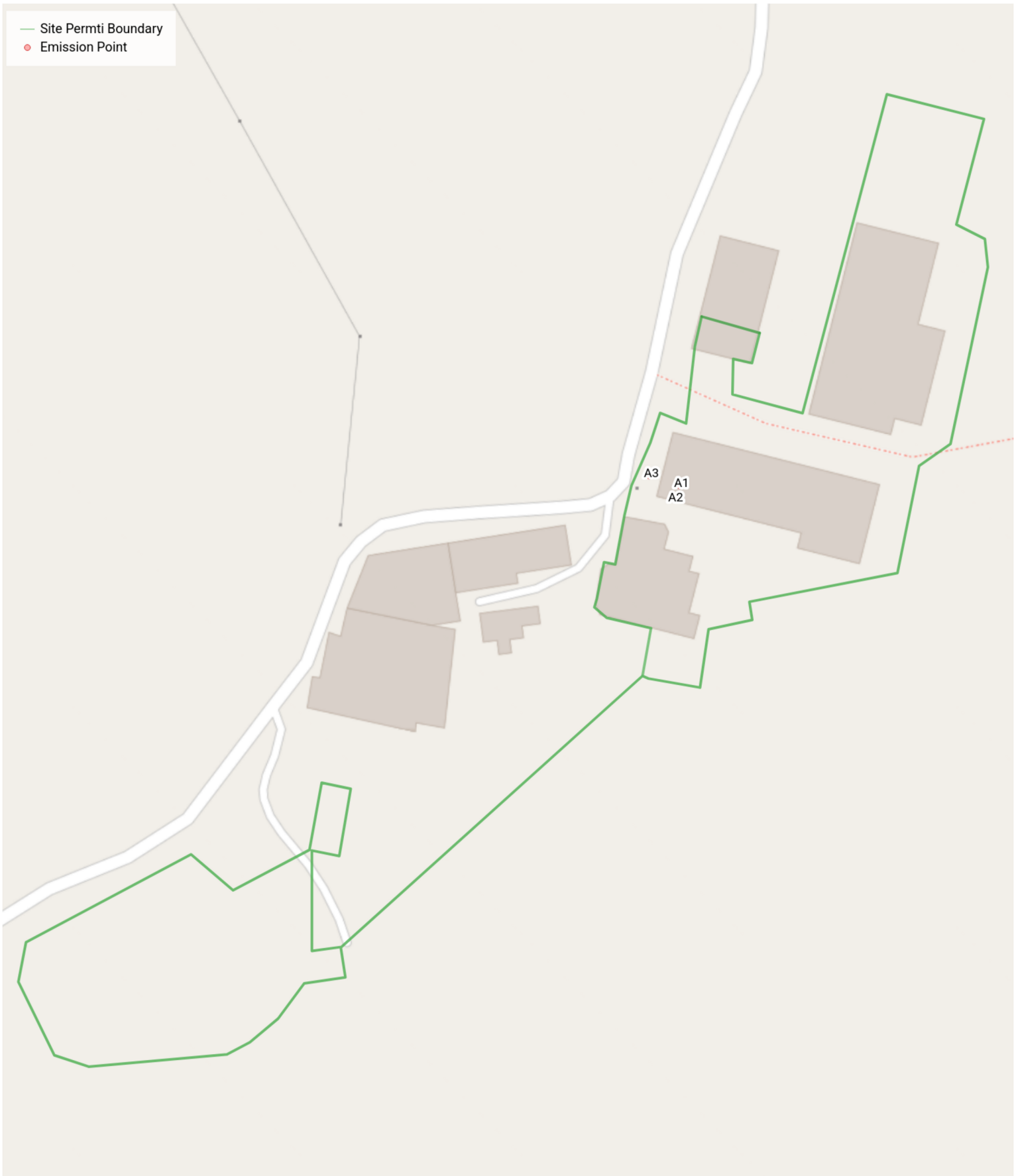
ETL928_2026_EPR01 Site Location Plan



500 m
Scale 1:13000 (at A4)

N

ETL928-2026_EPR02
Permit Boundary and Emissions Point plan

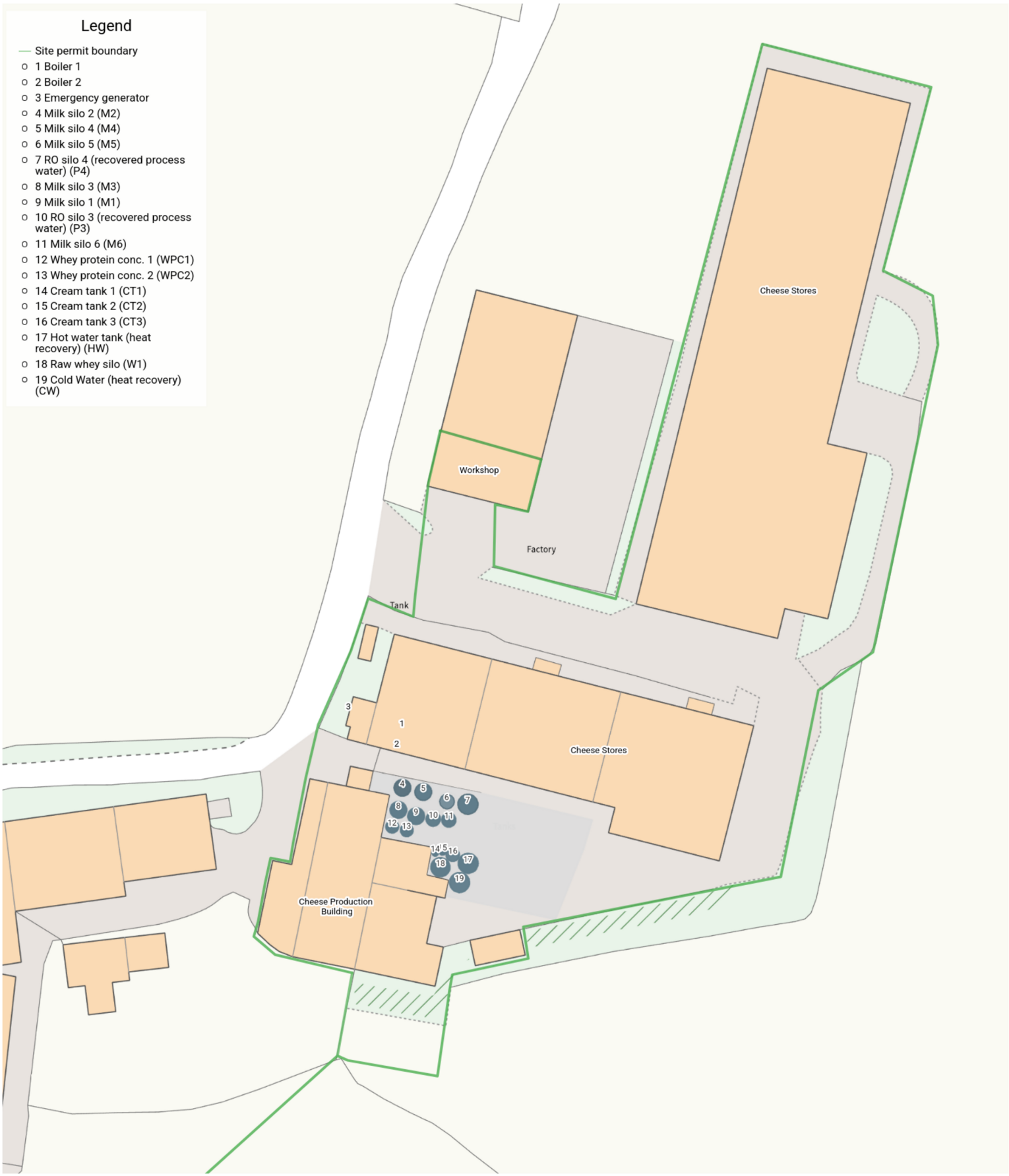


Produced on Land App, Feb 27, 2026.

50 m
Scale 1:1800 (at A4)

N

ETL928_2026_EPR03
Site Layout Plan



20 m
Scale 1:1030 (at A4)

N

Earthcare TECHNICAL

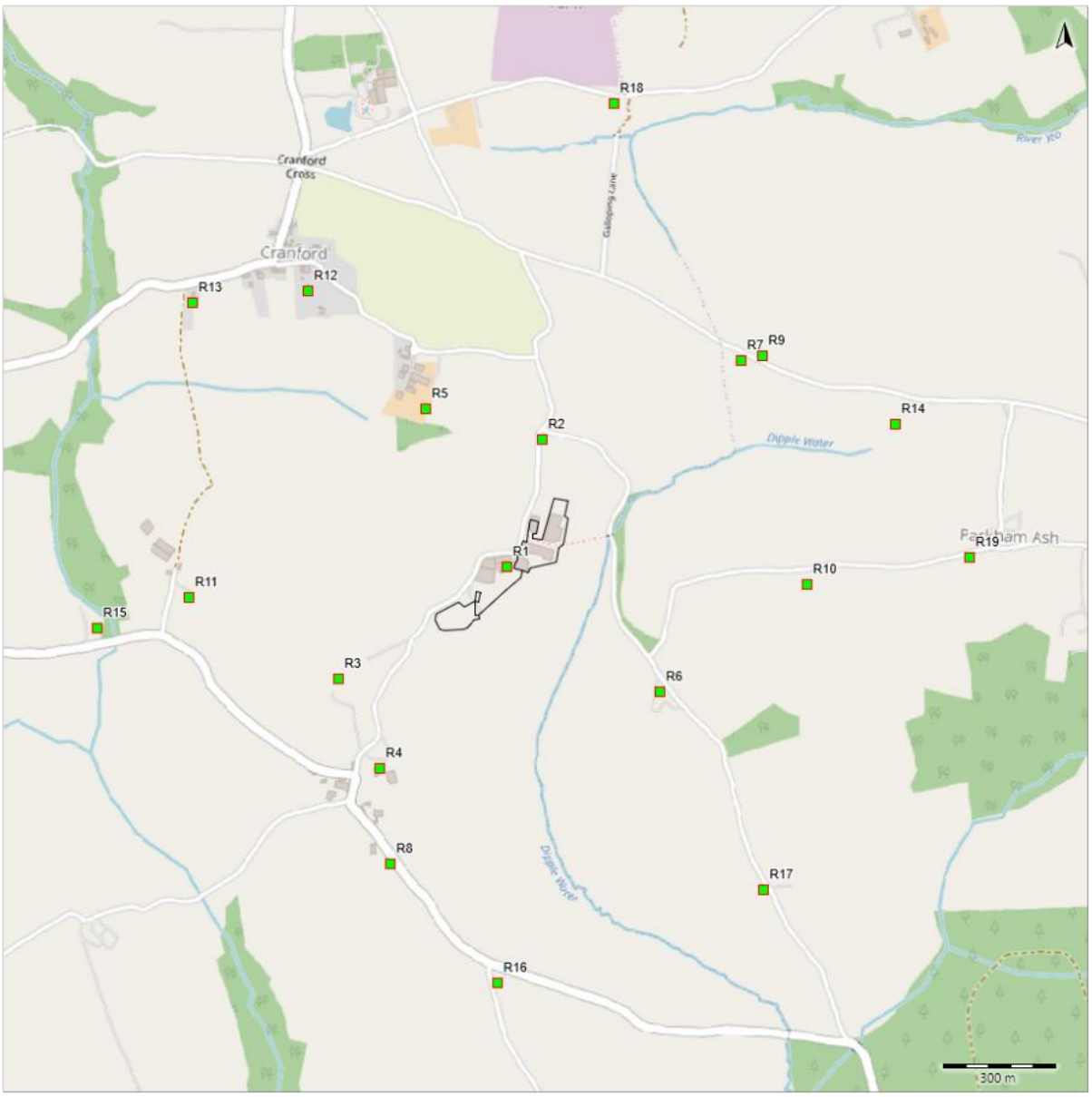
ETL928_2026_EPR03
Site Layout Plan

20 m
Scale 1:1030 (at A4)

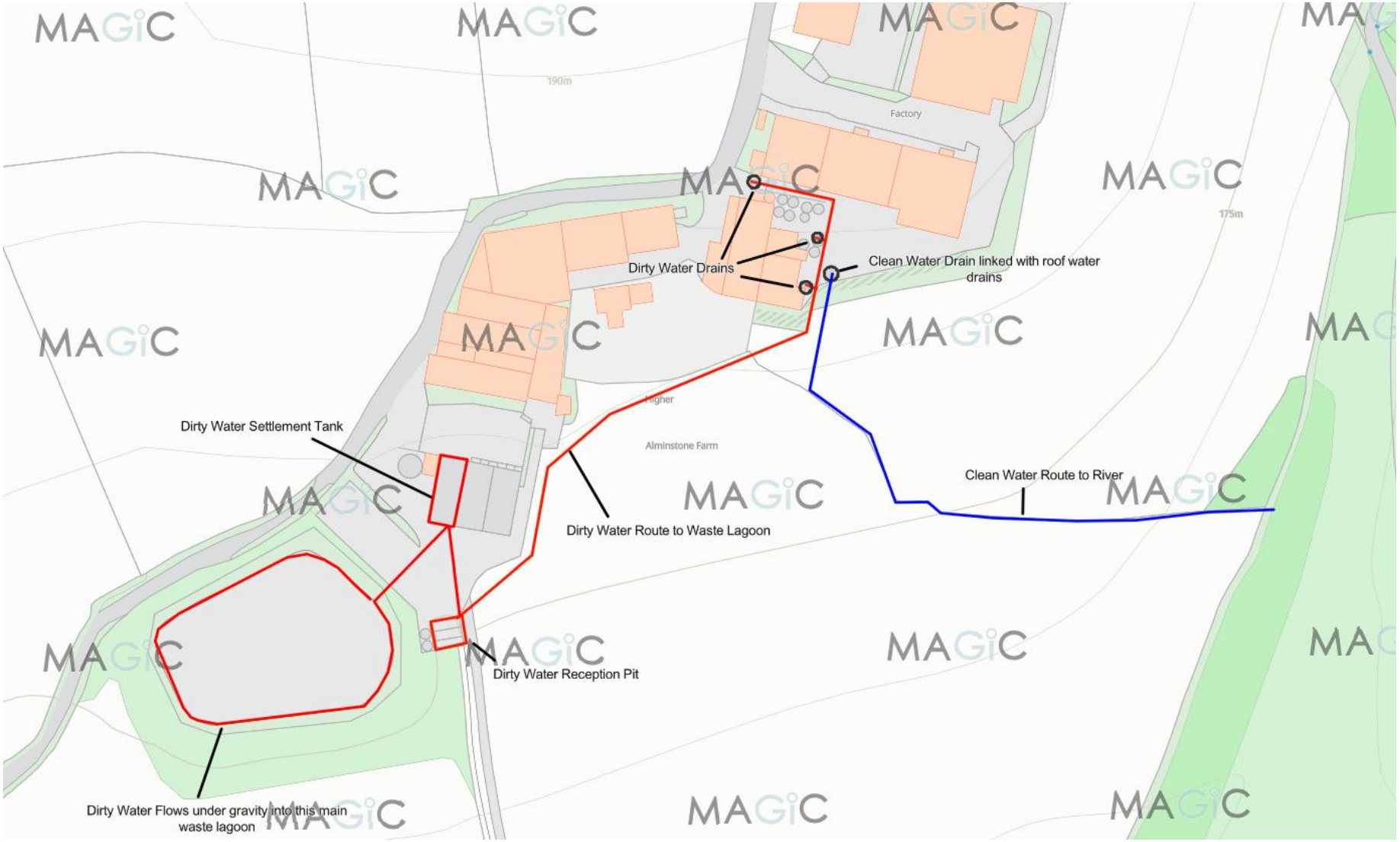
N

EPR928_2026_EPR04

Human Receptor Plan



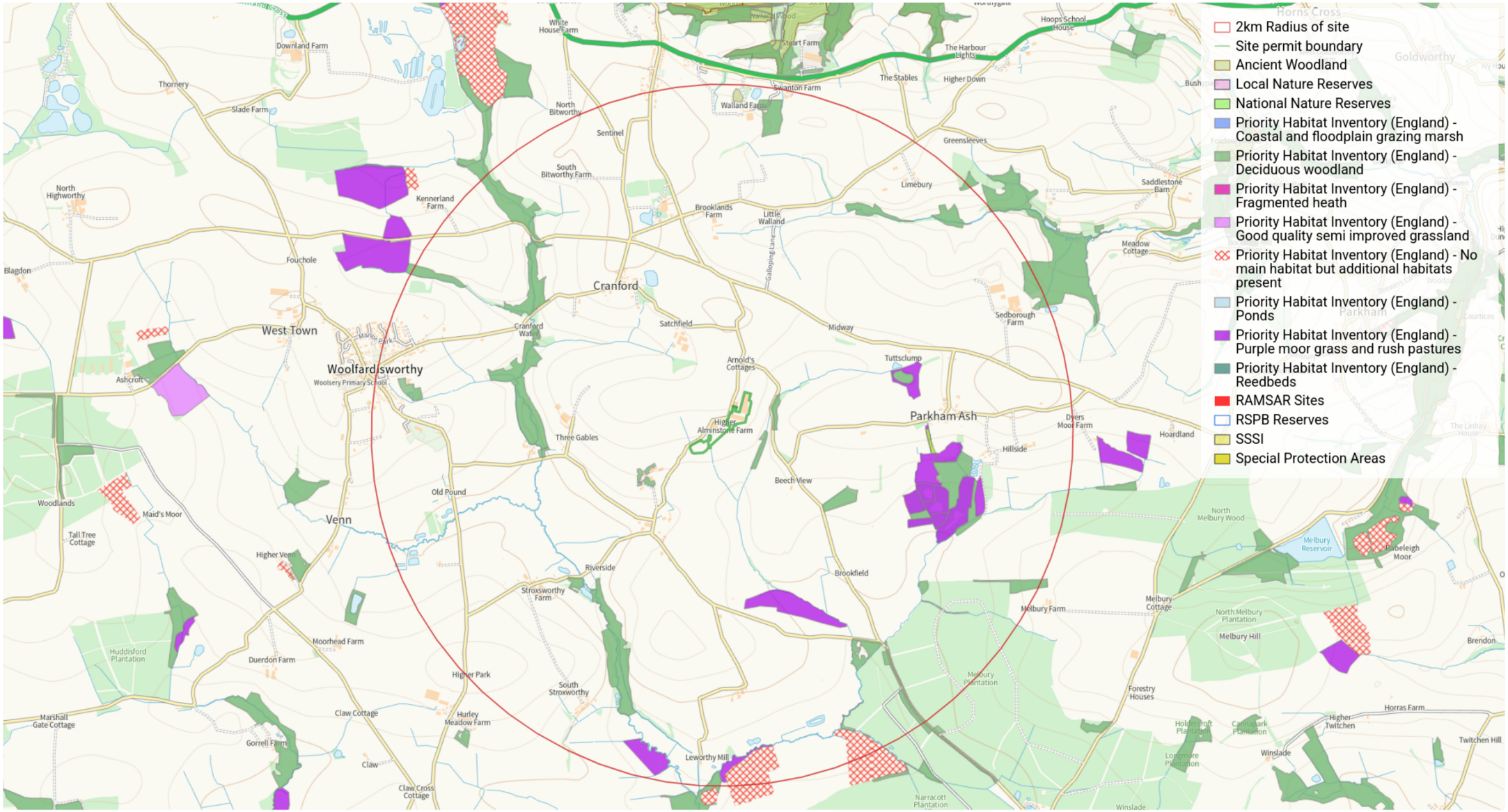
Site Drainage Plan (Outside Drains and Water Overview schematic)



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

Earthcare TECHNICAL

ETL928-2026_EPR05
Ecological Receptors Plan



Produced on Land App, Feb 27, 2026.

500 m

Scale 1:30000 (at A4)

N

Appendix A – Raw Materials Inventory

Raw Material Inventory – Parkham Farms Ltd

Raw Material	Form	United Nations (UN) Number[1]	Maximum amount stored on site at any one time	Use of product	Location on site	Storage arrangements
Milk	Liquid	Not classified / No UN number	810,000 L	Cheese production	Milk Silos	Within designated silos
Rennet	Liquid	Not classified / No UN number	1850L	Cheese production	Cheese Store	20L Jerry Cans
Compressed Oxygen	Gas	UN1072	33.27m3	Cutting and Gas Welding	Gas Cage	Designated caged area on site yard
Pureshield -Argon Gas	Gas	UN1951	23.42m3	Welding shield gas	Gas Cage	Designated caged area on site yard
Argoshield Universal (Argon with CO_2 and O_2 (shielding gas mixture))	Gas	UN1951	23.42m3	Welding shield gas	Gas Cage	Designated caged area on site yard
Propane	Liquid	UN 1978	46.4Kg	Thermal cutting	Gas Cage	Designated caged area on site yard
Caus-Deta 25 -Sodium Hydroxide Solution (Caustic) (30%)	Liquid	UN1824	2500Kg	Cleaning in place systems	Chemical Cage	IBCs
Opti-Caus Max - Sodium Hydroxide Solution (Caustic) (30%) (Prime Cleaning in Place)	Liquid	UN1824	2500Kg	Cleaning in place systems	Chemical Cage	IBCs
NIPAC - Pascal descaler (blend of Nitric Acid (50%) & Phosphoric Acid)	Liquid	UN3264	2500Kg	Breaking down limescale and milk stone build up in production plant/pipework	Chemical Cage	IBCs

[1] https://chem.echa.europa.eu/ Accessed 22 September 2025

Raw Material	Form	United Nations (UN) Number[1]	Maximum amount stored on site at any one time	Use of product	Location on site	Storage arrangements
Pressure Wash 10 - Sodium Hydroxide Solution (Traffic Film Remover) (caustic based)	Liquid	Not classified / No UN number	550L	Lorry washing	Pressure Washer Station	25L plastic jerrycan/containers
Pulsatec 6017 - Sodium Hypochlorite (15%)	Liquid	UN1908	2000L	Water treatment, Chlorine Dioxide dosing.	Chemical Cage	IBCs
Pulsatec 6019 - Sodium Hypochlorite (10%)	Liquid	Not classified / No UN number	2000L	Water treatment, Chlorine Dioxide dosing.	Chemical Cage	IBCs
Ethylene glycol (Anti-freeze)	Liquid	UN 3082	30L	Anti-freeze	Workshop	5L container
Kerosene	Liquid	UN1223	50,000L	Boiler fuel	Kerosene Tank	Kerosene Tanks
Diesel (DERV & generator)	Liquid	UN1202	20,000L	Running vehicles & generator	DERV Tank & Bunded Diesel Tank (generator)	DERV Tank & Bunded Diesel Tank
Engine & Transmission Oils (3 varieties used all supplied by Q8 oils; Q8 T 904 10W-40, Q8 T 2200 and Q8 T 45 LS 90).	Liquid	Not classified / No UN number	2,000L	Vehicle maintenance	Workshop	IBCs
Urea (AdBlue)	Liquid	Not classified / No UN number	1240L	Vehicle maintenance	Adjacent to DERV Tank & workshop	IBCs (adjacent to DERV tank) & drums (workshop)
Sodium Hypochlorite (15%)	Liquid	UN1791	2500kg	Cleaning in place systems	Chemical Cage	IBCs
Aciplusfoam VF59 (blend of phosphoric acid, 20-30%, nitric acid 3-10%, Alcohols, C10-16, ethoxylated (7-<15 EO), alkyl alcohol ethoxylate & Lauramine oxide)	Liquid	UN2031	60L	Cleaning	Chemical Cage	20L containers

Raw Material	Form	United Nations (UN) Number[1]	Maximum amount stored on site at any one time	Use of product	Location on site	Storage arrangements
Acifoam VF10 (blend of phosphoric acid, alkylbenzenesulphonic acid, propan-2-ol & sodium cumenesulphonate)	Liquid	UN1805	60L	Cleaning	Chemical Cage	20L containers
Divodes FG Wipes VT75 - Mainly alcohols (propan-1-ol / n-propanol and propan-2-ol / isopropanol) in an impregnated wipe.	Solid	UN3175	2500PC	Cleaning	Laboratory	Designated cupboard in laboratory
Hypofoam VF6 (blend of Sodium hydroxide: 3–10%, Sodium hypochlorite (active chlorine) 3–10%, Lauramine oxide, 3–10% (plus water and minor additives)	Liquid	UN1719	240L	Cleaning	Chemical Cage	20L containers
Diverflow Direct-N (Sodium hydroxide 20-30%)	Liquid	UN1824	240L	Cleaning	Chemical Cage	20L containers
DI Microwet-N - Alkyl alcohol ethoxylate (Trideceth 7–10)	Liquid	Not classified / No UN number	120L	Cleaning	Chemical Cage	20L containers
Divosan Sanibright VS59 (Sodium Hydroxide, surfactants (Lauramine oxide, Laurylamine Dipropylenediamine_, minor additives such as tetrasodium EDTA (a chelating / sequestering agent))	Liquid	UN 1760	240L	Foam cleaner	Chemical Cage	20L containers
Divos C1 VM60 (Sodium Hydroxide, 7-13%, potassium hydroxide 1-5%, minor additives such as tetrasodium EDTA (a chelating / sequestering agent and surfactants)	Liquid	UN1824	360L	Cleaning	Chemical Cage	20L containers

Raw Material	Form	United Nations (UN) Number[1]	Maximum amount stored on site at any one time	Use of product	Location on site	Storage arrangements
DI Divosan Forte VT6 (Hydrogen peroxide: 20–30 %, Acetic acid: 10–20 %, Peracetic acid: 10–20 %)	Liquid	UN3109	450Kg	Cleaning	Chemical Cage	25kg drums
DI Divos 80-2 VM1(Propylene glycol: 30-50%, alkyldimethyl betaine: 10-20%, Subtilisin: 0.1-1%)	Liquid	Not classified / No UN number	600L	Cleaning	Chemical Cage	20L containers
Phenolphthalein Solution (Phenolphthalein: ~1–2% , Ethanol & Water)	Liquid	UN1170	6L	Cheese testing	Laboratory	2.5L containers
Sodium Hydroxide	Liquid	UN1824	25L	Cheese Testing	Laboratory	5L containers
Proto Solve	Crystals	UN2967	600Kg	Acidic Powdered Detergent	Chemical Cage	25kg drums
Pulsatec 203	Liquid	Not classified / No UN number	250L	Boiler Chemical	Chemical Cage	25L drums
Pulsatec 238	Liquid	Not classified / No UN number	250L	Boiler Chemical	Chemical Cage	25L drums
Pulsatec 230	Liquid	UN 1824	250L	Boiler Chemical	Chemical Cage	25L drums
P171	Liquid	Not classified / No UN number	400L	Boiler Water Treatment - neutraliser	Chemical Cage	25L drums
Pure Dried Vacuum (PDV) Salt	Crystals	Not classified / No UN number	53.9 tonnes	Salt in Cheesemaking Process	Cheese Store	25kg bags

Raw Material	Form	United Nations (UN) Number[1]	Maximum amount stored on site at any one time	Use of product	Location on site	Storage arrangements
Hydrogranular Salt	Crystals	Not classified / No UN number	1.375 tonnes	Boiler Salt	Boiler Room	25kg bags
JLA Ultra Biological	Liquid	Not classified / No UN number	60L	Laundry Detergent	Laundry (High Care)	20L containers
Ambersil Food Grease FG	Liquid	UN1950	1600ml	Lubrication	Office	Aerosol
Ambersil Penetrating Oil	Liquid	UN1950	1200ml	Lubrication	Office	Aerosol

Appendix B Organisation and Structure Chart

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 BANKOVS
(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 Key Emergency Contacts (Display on site)

EMERGENCY CONTACT DETAILS		
EMERGENCY SERVICES	999	
LOCAL POLICE	101	
NEAREST HOSPITAL	NDDH 01271 322577	
ENVIRONMENT AGENCY 24 hr HOTLINE	0800 80 70 60	
ENVIRONMENT AGENCY	**OFFICE HOURS**	**OUT OF HOURS**
	07768 131880	0800 80 70 60
LOCAL AUTHORITY	Torridge District Council	01237 428700
HEALTH & SAFETY EXECUTIVE	(01245) 706200	
WATER SUPPLIER	South West Water	0344 346 2020
ELECTRICITY SUPPLIER-	British Gas	0333 0096060
ENVIRONMENTAL CONSULTANT: Earthcare Technical Ltd	07785978915	07785978915
COMPANY CONTACTS: (OUT OF HOURS)		
DIRECTORS	Peter Willes 07970 857029 Emma Beer 07811 101816 Sarah Berry 07875 086817	
SITE MANAGER	Peter Willes 07970 857029	
SECURITY	Peter Willes 07970 857029	
HEAD OFFICE CONTACT	Peter Willes 07970 857029	