

Pre-application Report

To: Karl Collett (on behalf of GST Limited)

Pre-application number: EPR/EP3228LA/P001

Badcocks Farm Poultry Unit
Saling Road
Stebbing
Dunmow
CM6 3XF

Date Completed – 30/05/2025

Thank you for seeking advice before submitting an application for an Environmental Permit.

We have completed an initial ammonia screening assessment for your proposal to identify if you will need to submit a detailed modelling assessment with your application.

The screening assessment is based on your proposal to operate a farm which is permitted to stock 105,600 broiler birds at Badcocks Farm Poultry Unit.

Summary of the assessment:

The ammonia screening results carried out by the Environment Agency are only intended to apply to any EPR permit application and not for use in local council planning submissions.

Based on the information you have provided you will need to submit detailed modelling with your application. Further information about the screening results is provided in detail in Annex 1.

It will generally be necessary to employ experienced consultants to undertake this work. For more information about consultants you could contact your industry body representative or refer to the ENDS Directory:

<http://www.endsdirectory.com/>

A useful guide to choosing and using an environmental consultant can be found on the government's online resource for businesses 'Business Link':
<http://webarchive.nationalarchives.gov.uk/20120823131012/http://www.businesslink.gov.uk/bdotg/action/detail?itemId=1079422318&type=RESOURCES>

When completed, please include the detailed modelling report and supporting modelling files with your H1 Environmental Risk Assessment and submit these with your completed application form to the address given below.

For an example H1 Environmental Risk Assessment refer to the example Intensive Farming EPR application available on the national archives for Environment Agency Website:

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/business/sectors/40057.aspx>

The Nature Conservation, Landscape and Heritage Factsheet screening lists all the sites that we currently consider when screening. The table details the supporting legislation and policies and the lead organisations for the protected area / species. Please note not all the sites listed are relevant to the Intensive Farming sector.

It is available on the Environment Agency website:

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/geho0612burd-e-e.pdf>

Applying for your permit

You will need to complete application form part B3.5:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b35>

Your application should be emailed to:

PSC@environment-agency.gov.uk

or sent to:

Environment Agency Permitting and Support Centre
Environmental Permitting Team
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

If you need further information about this screening assessment or applying for your permit please email us at the following address:

preapplicationservice@environment-agency.gov.uk

Pre-application nature conservation data are correct at the time of screening. We will consider all nature conservation sites using best available information at the time of permitting. Our GIS data are updated regularly, and we are occasionally

made aware of additional nature conservation sites by other organisations which we will consider when determining a permit.

The Environment Agency takes care to ensure that the conclusions of the screening assessment are correct at the time of preparation but reserves the right to change the basis of the assessment in the light of technical developments or changes in Environment Agency procedures.

Annex 1 Ammonia Screening Results

Screening Input

Grid Reference used for the assessment: 568010, 224902 (with a 95m buffer)

Animal numbers and types

Animal numbers and types, housing systems, manure and slurry storage assessed are listed below. The animal numbers and emission factors are based on an interpretation of the information provided by the applicant during the pre-application process and have been used in this initial risk assessment to identify if modelling is necessary.

It is strongly recommended that the numbers of animal places by category, ventilation type and housing system is reviewed, and appropriate emission factors are assigned before undertaking the detailed modelling assessment.

Category of livestock	Housing system	Number of animal places	Ammonia emission factor (kg NH ₃ /animal place/year)
Broilers	Fan ventilated fully littered floor, non-leaking drinkers	74,946	0.024
	Roof ventilation only (vents greater than 5.5 metres high, fan efflux velocity at 11 m/s)*		
Broilers	Fan ventilated fully littered floor, non-leaking drinkers	30,654	0.024
	Roof ventilation only (vents greater than 3.5 metres high, fan efflux velocity at or greater than 2m/s)*		

* this can include gable end fans that are used for heat extraction only during the summer months

Manure and Slurry Storage- none stored at the installation.

If you decided to alter your proposal by increasing the number of animal places or by changing the animal housing type or by increasing the manure or slurry storage you should include these changes in your modelling report.

Screening Overview

This screening assessment has considered any Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites within 5km, any Sites of Special Scientific Interest (SSSIs) within 5km and also any National Nature

Reserves (NNRs), Local Nature Reserves (LNRs), ancient woodlands and Local Wildlife Sites (LWSs) within 2km of the farm.

We have used the Environment Agency's Ammonia Screening Tool (AST v4.6) to assess the impact of your proposal at those sites identified within the above distance criteria.

We have applied a two-stage screening criteria to the ammonia screening tool results:

For SACs, SPAs, Ramsar sites and SSSIs, the screening assessment has taken into account other intensive farms that could act in-combination with the proposal, where applicable.

Where the ammonia screening tool predicts that emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) will be <Y% (see Table 1 below) of the relevant critical level (CLe) (ammonia) or critical load (CLo) (nutrient nitrogen or acid), the proposal screens out of the requirement for an ammonia assessment.

Further modelling is required where:

- emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) are in excess of Z% of the relevant CLe or CLo at any SSSIs and/or other nature conservation sites (e.g. NNRs, LNRs, LWSs, ancient woodlands)
- emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) are in excess of Y% of the relevant CLe or CLo for any SACs, SPAs or Ramsar sites
- there is the potential for an in-combination effect with existing farms at any SSSIs if emissions are > Y% of the CLe or CLo
- the proposal is within 250m of any nature conservation sites

Table 1 Screening thresholds

Designation	Y%	Z%
SAC, SPA, Ramsar	4	n/a
SSSI	20	50
NNR, LNR, LWS, ancient woodland	100	100

Screening Results

Your proposal is within 250m of the nature conservation sites listed in the tables below. Detailed modelling is therefore required to assess the impact of airborne ammonia at these sites.

Table 1 Assessment of ammonia emissions

Site Name	Designation / Status	Ammonia Critical Level ($\mu\text{g}/\text{m}^3$)
Mouslin Wood	LWS	3
Mouslin Wood	AW	3

Table 2 Assessment of nutrient nitrogen deposition

Site Name	Designation / Status	Nutrient Nitrogen Critical Load (kg N/ha/yr)
Mouslin Wood	LWS	10
Mouslin Wood	AW	10

Table 3 Assessment of acid deposition

Site Name	Designation / Status	Acid Critical Load (keq/ha/yr)
Mouslin Wood	LWS	10.986
Mouslin Wood	AW	10.986

How we decided the sensitivity of the nature conservation site

Relevant critical loads were obtained from the [Air Pollution Information System](#)

Relevant critical levels were obtained from assigned using the best information available at the time from our internal mapping and data application.

We have attached a checklist to this report which you can choose to send to the local authority ecological team, local wildlife trust or local forestry commission to ask for further information about local wildlife sites (LWSs) or ancient woodlands which require modelling. The checklist includes questions about the LWS or ancient woodland to establish their sensitivity and relevance for inclusion within the impact assessment from ammonia emissions. It is possible that these sources will not be able to provide all the required information. If this is the case modelling will be required as outlined earlier in this report.

Undertaking a site survey to identify the presence of species or communities that are particularly sensitive to ammonia is not an automatic requirement and is not an alternative to modelling. If you are thinking about this option, you should speak to us first. Should you demonstrate that a critical level of $3\mu\text{g}/\text{m}^3$ is more appropriate, critical loads should also be applied to the LWS or ancient woodland.

Permitting Outcomes

For NNRs, LNRs, LWSs and ancient woodlands a permit may be issued where the ammonia screening tool or detailed modelling demonstrates that:

- the process contribution is <100% CLe or CLo.

Proposing ammonia emission reduction techniques

Where your modelling indicates the predicted process contribution is greater than the allowable thresholds, your assessment and application should include ammonia reduction techniques* to reduce the contribution to the allowable thresholds.

Where these criteria can not be met a detailed assessment of the proposal will be carried out by the Environment Agency.

For SACs, SPAs, Ramsar sites and SSSIs, we will need to consult with Natural England before the determination of the application can be completed.

Factsheets and guidance about ammonia emissions to the atmosphere and nature conservation, the Environment Agency's assessment process and how to model ammonia emissions from intensive farms can be found on our website at: <http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/business/sectors/40071.aspx>

*Please note: for SACs, SPAs and Ramsar sites where additional checks are required during determination, further reduction of ammonia emissions may be required.

From: SM-Defra-RESP-noreply (DEFRA) <RESP-noreply@defra.gov.uk>
Sent: 30 May 2025 12:56
To: Karl Collett
Cc: Rachel Robinson
Subject: Basic Pre-Application Advice Request EPR/EP3228LA/P001 CRM:0865088
Attachments: Ammonia Checklist AW Jan 15.docx; Pre-application Ammonia Screening Advice 23052025.pdf; Ammonia Checklist LWS Jan 15.docx



Dear Karl Collett,

We have received your request for basic pre-application advice and have attached a relevant basic advice documents.

In response to your queries, please see below:

5. As your results of the detailed modelling show that the PCs are >100%, then we can consider the option for you to model the existing (unpermitted) turkey scenario and compare with the proposed broiler scenario to determine whether there would be a reduction in emissions from the turkey to broiler scenario. For this to be considered, you would also need to provide evidence that at the time of any permit application, the farm was still operational and stocking turkeys, and that this has been the case for at least the past 5 years (the evidence would also need to show the average number of turkeys stocked on site over the previous 5 years, and this number should be used in the modelling). This ensures that the proposal will result in real and considerable reductions in ammonia emissions from existing farm sources (please note -only pig and poultry farm operations should be considered in assessing baseline emissions using appropriate emission factors for the type of housing and livestock). Please note that the policy for accepting emissions reduction process (ERP) proposals is still being determined by the Environment Agency and therefore may be subject to change. At present, for 'other' nature conservation sites (e.g. ancient woodland, local wildlife sites (LWS), local and national nature reserves) we would be hoping to see a reduction of at least 20% of ammonia emissions at the sites (a much bigger reduction may be required for SACs, SPAs, Ramsar sites and SSSIs).

6. The updated broiler EF assumes indirect heating as standard practice in broiler sheds. For heat exchangers, in certain circumstances, a 35% reduction for the use of heat exchangers in broiler and turkey housing has been applied previously. This position is currently under review, but at present we don't accept a further reduction for them.

We recommend that you use all of the available guidance in the attached advice and on our website to help you complete your environmental permit application.

IMPORTANT: Do not reply to the email address you received this email from, it is not monitored. Please send any replies to preapplicationservice@environment-agency.gov.uk

If after reading the advice document (s) you still have questions or want to access other pre-application services then you should follow the instructions given towards the end of the document.