Hi Kate,

Please see below/attached. As soon as we have invoice I shall forward onto Mr Bunting to pay, as long as we have this today he will be able to have payment across to you by the 13th.

Please let me know if you need anything else,

Thanks

Ellie

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| |  | | --- | | Pilgrim's Pride UK | | **Eleanor Jackson**   |  | | --- | | cid:121011115583500519@uk-mta-117.uk.mimecast.lan |   Supply Chain Development Coordinator Pilgrim's Pride Ltd. [eleanor.jackson@pilgrimsuk.com](mailto:eleanor.jackson@pilgrimsuk.com) | |  | | --- | | cid:121011115583500319@uk-mta-117.uk.mimecast.lan | | [www.pilgrimsuk.com](https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.pilgrimsuk.com%2F&data=04%7C01%7Ckate.cummins%40environment-agency.gov.uk%7Cc642434b2c4c4609d13808d8b649c3bc%7C770a245002274c6290c74e38537f1102%7C1%7C0%7C637459775837351014%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=9sioNvnNUiF9%2B6bKD4HUzgTb9LHYIhzfgHh0CE%2BsvHw%3D&reserved=0) Stradbroke Business Centre, New Street Stradbroke Suffolk  IP21 5JJ |
| |  | | --- | | Pilgrim's Pride Values | | | | |

**Subject:** EPR/QP3537JT/A001 Cobbs Farm not duly made request for further information

**[EXTERNAL EMAIL]**

Dear Ellie,

I have now taken an initial look at the application and supporting documents and require the following information and fees before I can duly make the application:

1. **Installation boundary** – you have provided a plan which shows the installation boundary (drawn in green) around the pig housing. It also shows the location of the diesel fuel store and chemical store to the south of the installation boundary. If these are used mainly for the installation they should be included in the boundary by drawing a green boundary line around each part. I have drafted a revised plan including these as part of the installation. Please confirm this is correct and re-submit as part of your response to this request for further information, or submit a revised plan showing the exact boundaries of these stores. Please also confirm we will have the permission of the owner to reproduce this plan in the permit if granted, as it has copyright protection. The pig unit would probably account for a maximum of 5% of diesel use and a similar proportion of space in the chemical/ vet meds store, so yes will include in the site plan. The revised plan is correct and yes permission granted from Owner.

1. **Dust and bioaerosol management plan (DBMP)** –  there appears to be at least one sensitive receptors within 100m of the installation boundary (Cobbs Farm house, measured from the assumed property boundary to the installation boundary) therefore you are required to submit a dust and bioaerosol management plan (and an associated fee for assessing it, see point 3 below). This **includes** properties inhabited by people associated with the installation. You should follow the guidance via the link: Please find attached Cobbs Farm Bioaerosol and Dust management plan.

[https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols](https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fguidance%2Fintensive-farming-risk-assessment-for-your-environmental-permit%23air-emissions-dust-and-bioaerosols&data=04%7C01%7Ckate.cummins%40environment-agency.gov.uk%7Cc642434b2c4c4609d13808d8b649c3bc%7C770a245002274c6290c74e38537f1102%7C1%7C0%7C637459775837351014%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=ozd514qB5cb6UtqMJNMVpkpvhWolWaPwtUWI3RRbVEU%3D&reserved=0)

1. **Application fees** – you have paid £8,640 which is the fee for a new bespoke application (£8,020) plus an additional fee of £620 which I assume is for the ammonia modelling assessment. However, as there are European habitat sites within 5km, you also need to pay £779 for assessing these (and this will include our consultation with Natural England) and a fee for assessing the DBMP requested in point 2 above.

To summarise, please pay the additional payment required of £1,399 (£779 + £620). Please refer to the application form for details on how to pay the additional amount. TBC

For further information please see table 1.19 of the ‘Tables of Charges’ charging scheme at the link:

[https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019](https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fpublications%2Fenvironmental-permitting-charging-scheme-2019&data=04%7C01%7Ckate.cummins%40environment-agency.gov.uk%7Cc642434b2c4c4609d13808d8b649c3bc%7C770a245002274c6290c74e38537f1102%7C1%7C0%7C637459775837360967%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=d9ONSXPKKH8u%2BeJKWIuPXYFVl8g08%2BXtA62uK6cisYU%3D&reserved=0)

In addition to the above, I have some further points that are not required at this stage for duly making but may save some time during determination if you can provide the information now:

1. **BAT compliance**

You must demonstrate how you will comply with the new Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP), published on the 21st February 2017 for all existing animal housing and facilities linked to the installation, by 21/02/21. The BAT Conclusions document sets out the standards that permitted farms will have to meet and can be found via the following link: [http://eippcb.jrc.ec.europa.eu/reference/irpp.html](https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Feippcb.jrc.ec.europa.eu%2Freference%2Firpp.html&data=04%7C01%7Ckate.cummins%40environment-agency.gov.uk%7Cc642434b2c4c4609d13808d8b649c3bc%7C770a245002274c6290c74e38537f1102%7C1%7C0%7C637459775837360967%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=itB0cfmE4LK7RNmHaJaOgDqYuGeC4qc9ASaPkMmcGD0%3D&reserved=0) . You have confirmed in the ‘BAT Conclusions – Cobbs Farm’ document that the farm will be run according to the new BAT. Can you please specifically confirm the following:

* 1. BAT conclusion 25:

This describes 3 techniques for monitoring ammonia emissions and allows for emission levels to be demonstrated through the use of emission factors. Please confirm the applicant will use emission factors to demonstrate this or specify which alternative method the applicant will utilise. The Applicant will use emission factors

* 1. BAT conclusion 27:

This describes 2 techniques for monitoring dust emissions and allows for emission levels to be demonstrated through the use of emission factors. Please confirm the applicant will use emission factors to demonstrate this or specify which alternative method the applicant will utilise. The applicant will use emission factors

1. **Ventilation** – it has been stated that the pig housing has natural ventilation. Please provide further information regarding where the outlets are – e.g.  outlets on the roofs, sides and/or gable ends of the buildings? *This will also affect whether any lightly contaminated drainage needs interception before draining to surface water (see site drainage question below).* The building has natural ventilation. This is provided by an open sided design which has plastic curtains which automatically adjust the size of the opening according to a pre-set temperature. Please see attached photo, they are shown fully closed as we are currently washing out. There are no fans, hence no fan outlets.

1. **Site drainage**

1. Dirty water - in the technical standards, manure management planning section, it states dirty water is stored in underground tanks, and in the fugitive emissions section, it states that drainage from housing and water from cleaning out is collected in the earth banked dirty water storage lagoons marked on the site plans. Can you please confirm the latter is incorrect. Yes all dirty water is stored in underground tanks, please find attached amended technical standards.
2. Roof and clean yard surface water – in the site drainage plan there appears to be drainage directed to a surface water ditch to the west of the installation (blue dashed lines with arrows). Please provide more details for what this drainage consists of, whether it is piped, drains in gullies or via French drains (which may also act as soakaways and mitigation of any lightly contaminated roof or yard water prior to discharge to surface water) and where the surface water ultimately drains to (e.g. a named river). *Please note if there are roof outlets, then roof water will need mitigation before discharge to surface water, and similarly with any potentially lightly contaminated yard water (from side/gable end ventilation outlets). This excludes any contaminated water from mucking out, clean out etc which must drain to the dirty water collection tanks*. The clean water drainage is piped from the rooves of the buildings to the ditch as shown on the site plan. The water from the clean end of the yard (feed bin end), drains via gullies with silt traps and is then piped to the ditch. The yard is arranged so that the clean end falls away from the buildings to avoid surface water entering the dirty area. The rest of the yard (buildings and muck pads) falls the other way so all water is intercepted by the dirty water tanks. *The ditch which the clean surface water enters ultimately ends at the Delf ditch adjacent to the blackwater estuary approximately 3/4 of a mile to the south of the site. This water then enters the estuary via a sluice when the tide is out.*

1. **Chemical storage –** please confirm thatthe store containing pesticides and veterinary medicines is capable of retaining spillage, resistant to fire, frost-free and secure. The chemical store/ medicine store meets the requirements requested and is inspected annually for our Red tractor audits for Pigs , combinable crops, fresh produce. It is also inspected annually as a condition of our membership of freedom foods

1. **Fuel store –** please confirm that the store is bunded, capable of retaining any spillage and the bunds meet the requirements of the Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) Regulations 2010 (SSAFO Regulations) and meet the requirements outlined in SGN EPR6.09 ‘How to comply with your environmental permit for intensive farming’ at [https://www.gov.uk/government/publications/intensive-farming-introduction-and-chapters](https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fpublications%2Fintensive-farming-introduction-and-chapters&data=04%7C01%7Ckate.cummins%40environment-agency.gov.uk%7Cc642434b2c4c4609d13808d8b649c3bc%7C770a245002274c6290c74e38537f1102%7C1%7C0%7C637459775837370924%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=f%2F5paHB5Pjkgqc4IrhrYqLQXpHIctO7LMUN%2BVn5LhSg%3D&reserved=0). The fuel store meets the requested requirements and is inspected annually as per the chemical store.

Please note, only basic checks have been made of the ammonia modelling report, and it appears that only half of the 466 tonnes of manure (maximum amount stored on site at any one time) has been included in the modelling (see table 5.1b on page 19). We will carry out a full audit of the modelling once the application has been duly made and take account of this underestimate in sensitivity checks, which may affect the overall conclusion when we complete the detailed assessment. Furthermore, we will need to consult with Natural England with our conclusions for the ammonia assessment and they may wish us to carry out a further detailed appropriate assessment during the determination of the application. If you wish to complete and submit revised modelling at this stage, please include this in your response to this request for further information ( a revised report and revised modelling files).Please find attached revised report and modelling files. This was a mistake by the modellers, which is now corrected however , there is still no exceedance of the relevant thresholds. Therefore based on the detailed modelling undertaken, no significant effects are predicted at the nature conservation sites.

Can I please ask that you submit, as a minimum, the information and fees requested in points 1 – 3 by Wednesday 6th January 2021 (allowing 10 working days), or let me know if you need more time due to the Christmas holiday period. I will be on leave next week, but working on 29th and 30th December 2020 the week after (and back fully on Monday 4th January 2021) if you need to discuss any of the above issues further.

Best wishes for a very happy Christmas and New Year.

Kind regards,

Kate

**Kate Cummins**

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