

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

To: Mrs Julia Whittall

TL Whittall Limited

The Old Rectory

Moccas

Hereford

Herefordshire

HR2 9LA

Application number: EPR/BP3003MP/A001

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 11/04/2022.

Send the information to either the email or postal address below by 22/07/2022. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: [REDACTED]

Postal address:

Permitting and Support Centre

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

S9 4WF

Name	Date
[REDACTED]	04/07/2022

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

Please note that we charge £ 1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Schedule

1. Site Infrastructure

How much infrastructure is required to be changed on site to allow the farm to be converted from the existing turkey farm to a broiler farm?

2. Manure management

In your current Odour Management Plan (OMP) / application you have stated that there will be no storage of poultry litter on-site at any time and that all poultry manure will be exported off-site. Please confirm the following:

- a) What are the timescales for the removal of poultry manure from site?
- b) Will the poultry manure be removed from the site on the cleaning out of the poultry houses?
- c) Will there be any storage of poultry manure on site at all following destocking?
- d) What contingencies are in place if you are unable to remove the manure from the site as planned?

It is noted that the technical standards states that contingency arrangements are in place with surrounding farms to accept the manure in case of an emergency, but the nature of these arrangements need to be explained, with associated timescales.

3. Site drainage

- a) Within the technical standards it refers to a settlement pit (which receives clean yard water drainage) which has an outfall to the River Arrow. Please identify this on the site layout/drainage plan and explain what the purpose of this settlement pit is.
- b) Is the settlement pit lined or does it act as a soakaway?
- c) Please confirm the size of the settlement pit and provide information as to how this size was calculated to ensure that it is large enough and fit for purpose.
- d) Does the drain from the settlement pit to the River Arrow already exist or does it need to be installed?
- e) If the drain does already exist, does it have a headwall to protect against river bank erosion? If so, please identify where the drainage headwall is located in the information response, providing a grid reference (ideally shown on a map) and if already in place, a photograph of this headwall. If the headwall/drain currently does not exist, please identify where the drainage from the settlement pit is planned to enter the River Arrow, with a grid reference.
- f) Within the technical standards it states that clean water drains from the roof buildings and surrounding yard area via routes as identified on the site drainage plan and routed to soakaways. How does the roof water drain to the soakaways, as this isn't clear on the site drainage plan (for example, is it done via French drains, which also act as soakaways)? Please confirm this and update the drainage plan as appropriate.

4. Poultry growth cycle

- a) No mention of thinning taking place is present within the application. Will thinning of the stock take place or will all birds be grown to a fixed age?
- b) If thinning is to take place, when in the cycle is this anticipated to take place and how many birds are anticipated to be removed?
- c) If the process of thinning is to take place, can you confirm that bird catching/de-population will occur during two nights of the cycle?

- d) How long will the de-population process take (i.e., are all six poultry houses de-stocked in one night?)?
- e) The non-technical summary it is stated that the birds will be de-populated at around thirty-two to forty-two days of age with approximately seven days where the poultry houses are empty, which will give between 7-7.5 cycles per annum. However, the actual number of cycles would be 7.4 – 9.4 per annum ($365/39 = 9.4$; $365/49 = 7.4$) if birds would be de-populated at thirty-two to forty days of age, with seven days empty. Is this correct?

The above answers must be recognised within the noise assessment and odour assessment and the processed must be reflected in appropriate operating techniques within the noise management plan and odour management plan, along with the non-technical summary and technical standards; together with any other appropriate documents to ensure consistency across all of the information provided. Please provide revised or amended supporting documents as appropriate.

5. Placement of turkeys

- a) Please provide evidence that supports the case that turkeys have been present on site for at least the past five years.
- b) Please confirm the occupancy levels of the turkeys currently stocked on site (i.e., are they there 100% of the time?). If they are not there 100% of the time, please provide details of the occupancy levels.
- c) How many cycles of turkeys are there per annum?
- d) Please expand upon the information within the spreadsheets provided detailing placement of turkeys, including further details of the breeder source, the meaning of 'G.O', and so on.

In order for us to accurately assess the betterment scenarios proposed in the application, it is important to be able to understand and accept the baseline scenario and be able to confirm its accuracy. Details of farm records, invoices for bird numbers placed on site, etc., would all aid in confirming the baseline scenario. Please note that the spreadsheets provided (including the most recent provided on 14 April) so far detailing bird numbers are not deemed as sufficient in of themselves and it would be helpful if information within the spreadsheets were expanded upon, as explained in question 5d, above.

6. Odour management

- a) Within the boundary plan document, please confirm that the green boundary is the Installation boundary.
- b) Have you calculated the distances to receptors from the Installation boundary or from the farm boundary or from the poultry houses themselves?
- c) Please review and amend the list of sensitive receptors (calculating the distance from the Installation boundary to the receptors) provided within the OMP to ensure they are accurate.

The Table of sensitive receptors within the OMP is very inaccurate in terms of both receptor orientations to the farm and distances from the farm. For example, some distances to Arrow View have been given as 7 metres and 15 metres, when in reality they are over 100 metres away from the Installation boundary. The residential receptor listed third line down (327510,254281) is recorded as being 60m away, when in reality it is in excess of 320m from the Installation boundary; the residential property listed as 326m to the west (327129,254295) is in reality over 500m to the south west of the Installation boundary; the residential receptor listed as 399m away to the south (327625,254959) of the Installation, is actually to the north of the site, and there doesn't appear to

be a receptor at this grid coordinate; the residential receptor listed as 303m to the east (327984,254507 - Arrow Court) is to the south east and appears to be in excess of 340m away from the Installation boundary; the residential receptor (appears as though it may be a caravan) listed as 111m to the west (327292,254512) is actually in excess of 250m away to the south west of the Installation boundary; there appears to be a property (Arrow Court Villa), which is located approximately 180m from the Installation boundary to the east (327835,254523), but does not appear on the list of sensitive receptors. Please note that the above errors may not be the only distances/orientations which are incorrect.

There is a boundary plan, which shows the farm boundary (outlined in red) and a green boundary, which I assume is the Installation boundary, although this hasn't been labelled as such on the plan.

- d) As there are a substantial number of receptors within 400m of the Installation boundary, please provide a diagrammatic layout (rather than a list) within the OMP labelling all relevant receptors.

Due to the significant number of sensitive receptors, it would be preferable to see the sensitive receptors mapped out and where a residential property has a name, the name mentioned or alternatively referenced by way of a number. To make the task easier the multiple houses on Arrow View could be identified as a single (multiple) sensitive receptor for example "X number of houses to the north east at distances Y-Z". Likewise, where there is one industrial estate it could be identified as a single sensitive receptor comprising "X number of units at distances Y -Z of the Farm".

- e) Please provide an introductory statement in the document titled 'Contingency measures for Hergest Camp Farm'.

The purpose of this document needs to be made clear e.g., 'the following contingency measures are included in farm operations'.

- f) For the 'washing operations – Use of second contract cleaners', 'carcass disposal – secondary collect agent', and 'staff shortage – contract labour' sections of the contingency measures document, please provide further information as to when these contingency measures are activated/time delay for usage and the impact on the odour that this may have. Please state who is to provide supervision and training for such contract labour to ensure correct procedures are followed to minimise risk of odour pollution?
- g) In the event of a total power failure (including backups) as described in the Hergest Camp Farm Emergency Plan document, please provide an impact assessment of the affect this will have on the potential for odour pollution, plus actions to minimise odour risk and if the event were to continue unresolved, actions to communicate the situation to the neighbours of the farm.

Please update the OMP, and any other plans you deem necessary, as appropriate.

- h) Within the 'ventilation and heating systems/dust' section of the OMP, please provide further information on the design basis of the fans. For example, elsewhere in the application it has been

stated that the fans will operate at 7m/s. This dispersion velocity should be referenced within the OMP.

Please update the OMP, and any other plans you deem necessary, as appropriate.

- i) Within the 'fugitive emissions' section of the OMP, there is no mention of procedures in place for checking doors/drains/buildings to ensure their integrity in order to minimise the risk of fugitive emissions. Please provide details of the procedures in place to check such matters.

Please update the OMP, and any other plans you deem necessary, as appropriate.

- j) How will abnormal operations be recorded? Is there a dedicated recording sheet for this?
- k) The 'Abnormal operations' section of the OMP states that the plans are "reviewed and updated to prevent reoccurrence i.e., Routine maintenance schedule, technical standards." Please confirm that the contingency measures document and the emergency plan will also be reviewed and updated as necessary?

Within the 'Abnormal operations' section of the OMP, reference is made to the documentation of abnormal operations.

- l) Please include detail of i) how you clean storage areas, containers, sumps etc that have been contaminated with potentially odorous materials and ii) how you intend to record these activities?

Please update the odour risk assessment and OMP, as appropriate.

- m) There is insufficient detail of how you propose to suspend relevant operations and stop the site operating if required. Please provide an updated contingency plan for the site explaining what the criteria will used in order to suspend operations and what actions will then be taken.

Please update the odour risk assessment and OMP, and any other plans you deem necessary, as appropriate.

- n) In the event that the Environment Agency begins to receive significant numbers of odour complaints from residential properties and those odour reports are substantiated what action(s) would the operator take to reduce the odour?

Please update the OMP, and any other plans you deem necessary, as appropriate.