

From: [Kate Wray](#)
To: [Elaine Marshall](#)
Cc: [Izzie \(Guest\)](#)
Subject: EPR/RP3028MM/A002 - Thorps Farm - We Need More Information About Your Application
Date: 18 August 2026 16:23:00
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Hi Elaine,

I have finished an initial review of your application and supporting documents and require some additional information please to enable the application to be duly made, as follows:

1. Site plan

- Revise the plan to include the deadstock store within the installation boundary.
- Add a scale to the plan.

2. Site drainage plan

- Revise the plan to include the deadstock store within the installation boundary.
- Add the location of any fuel storage.
- Show the location of the borehole, if it is located within the installation boundary.

3. Non-technical summary

- Confirm the maximum quantity of manure stored within the installation boundary in tonnes and update the document accordingly.

Note: the ammonia screening assessment was based on a maximum of 5 tonnes of manure in accordance with the ammonia screening request form but the BAT documents states 'The maximum FYM storage at any one time on site is 200t'. If a maximum of 200t of manure is stored on site the ammonia screening assessment will need to be revised to reflect this and relevant documents will need updating.

4. Technical standards document

- Update the document to confirm manure is stored at the installation.
- Reference the second discharge to surface water (D2).
- Include the two standby generators as emission points to air in the Emissions point table.
- The document states that 'The mechanically ventilated sheds will use high speed roof fans for improved dispersal and dilution of emissions'. The ammonia screening assessment was based on roof fans at or greater than 3.5 metres high and fan efflux velocity at or greater than 2 m/s (classed as medium velocity roof fans), in line with the ammonia screening request form for house 1. Confirm the efflux velocity and height of the roof fans on house 1 and update the document as needed.

5. Slurry storage

- As your farm falls within a Nitrate Vulnerable Zone (NVZ), confirm whether you have 6 months' slurry* storage capacity**.

** For the purposes of NVZ and SSAFO compliance the definition of slurry includes dirty water, wash water from livestock housing and run off from contaminated yards.*

*** Where a farm's slurry store falls within an NVZ, the NVZ Regulations require 6 months storage capacity for slurry. Where a slurry store falls outside* of an NVZ, and it is intended to spread the slurry stored on the premises, under the Silage, Slurry and Agricultural Fuel Oil (SSAFO) Regulations it must be able to hold the maximum quantity of slurry produced in any four-month period. A longer period of storage may be required to comply with NVZ (if the slurry is applied within an NVZ) and FRFW spreading rules.*

- If you do not have 6 months storage capacity, confirm whether you always export slurry from the slurry storage site during the closed period*?

**Operators may deduct from the 6 months storage capacity requirement calculation any slurry that can always be exported from site during the storage period.*

- Confirm whether you have adequate slurry storage capacity to ensure that slurry will be applied to land in compliance with Farming Rules for Water and the NVZ Regulations*?

**Where dirty water/lightly fouled water slurry is stored and spread separately to other slurry on the holding, the volume of storage provided must be sufficient to comply with SSAFO and to ensure the application is planned so that it does not exceed the needs of the soil and crop, or give rise to a significant risk of agricultural diffuse pollution (i.e. in line with rule 1 of Farming Rules for Water) and to be compliant with the NVZ closed period rule for organic manures with a high readily available nitrogen.*

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6. Site condition report

- Parts of the proposed site to the north and west fall within flood risk zones 2 and 3. Update the SCR to reflect this.
- Amend the existing pig numbers stated in the document as they do not reflect the correct numbers:



7. BAT compliance

- For Pigs >30 kg on fully slatted floors, address the following questions to demonstrate BAT compliance:

- Confirm the depth of slurry beneath the slats.

Note: to be classed as shallow pit the depth must be <800mm.

- Confirm how frequently slurry is removed from the houses.

Note: To be considered as frequent slurry removal, slurry must be removed from under the slats a minimum of once weekly and can be achieved through scraping, pumping or flushing.

- If you do not meet the criteria for frequent slurry removal, and the emission factor of 2.11kg NH3/animal place/yr, you cannot meet the standard BAT-AEL of 2.6 NH3/animal place/yr. Provide evidence (e.g. diet sheets, feed dockets) of the actual CP% in the feed at each stage of the cycle for pigs >30kg, to demonstrate how you will meet the BAT-AEL. Include details of your workings out to show how you calculated the average CP%.

- Pigs <30 kg on fully slatted floors:

- Confirm the depth of slurry beneath the slats.
- Confirm how frequently slurry is removed from the houses.

8. Standby generators

Confirm the following details for the two standby generators located within the installation boundary:

- Thermal input capacity of each standby generator in MWth.
- How many hours per annum each standby generator is operated for testing purposes.
- Whether the standby generators are only used for emergency power supply use, where mains power has gone down, for less than 500 hours per annum.

Note: In accordance with guidance, [Emergency backup diesel engines on installations: best available techniques \(BAT\) - GOV.UK](#), you must test the standby generators for less than 50 hours a year. In the Intensive Farming sector, operators generally test for 1 hour per week which we can accept.

You must send us the information by **01/09/2026**.

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application, we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>.

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions or wish to discuss any of the above, please contact me.

Kind regards
Kate

Kate Wray
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