

From: [Lizzie Bentley](#)
To: [Cummins, Kate](#); [SM-Defra-RESP-notifications \(DEFRA\)](#)
Cc: [Jessica MacKintosh](#)
Subject: Re: EPR/AP3400SG/V003 We Need More Information About Your Application (not duly made request for information) CRM:0270061
Date: 03 January 2025 21:12:25
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Overview diets.pdf](#)
[Lizzie.vcf](#)

Hi Kate,

Happy New Year!

Please see responses for Willow Tree below:

- Confirmation of the registered address for Cattle (Holderness) Limited - West Farm, Stone Creek, Sunk Island, Ottringham, Hull HU12 0AP. *There are just some minor inconsistencies; Companies House registered address doesn't include Stone Creek, but Royal Mail and the original permit do, and the original permit doesn't include Ottringham. Please can we go with the Companies House address for consistency.*
- Please confirm:
 - a) The efflux velocity of the roof fans is 11 m/s as stated in the non-technical summary and pre-application request for ammonia screening, and not 12m/s as in the detailed ammonia modelling report. *This has been checked with the manufacturer and the new building will have efflux velocity of 13m/s, whereas the original buildings run at 11m/s as per permit.*
 - b) The amount of manure stored on site – in the ammonia report it is 50 tonnes, but in the pre-application advice request it was 100 tonnes. *50 tonnes*
- *I have discussed the issue of the new EFs with the operator. At this stage they would like to propose to continue to operate a 6 weekly removal frequency for slurry underslats. That means the EF would be 2.813 (i.e. above the BAT target of 2.6), however, we can demonstrate reductions through crude protein levels to get us within target. Crude protein in current rations is as follows, grower: 17.2, Finisher 1: 15.8, Finisher 2: 14.8. So an average of 15.9. Please see evidence attached - the sheet does also have 2 other diets listed but they won't get these at Willow Tree as they are nursery diets. At the allowed 20% reduction in ammonia (for 2% reduction from 18%), that would give us an EF of 2.25. The operator would like to proceed on this basis please, until we have results of Natural England consultation. If further reductions are necessary we will need to discuss further mitigations.*

- Application fee - you have paid £7,218 for a substantial variation. However, the EA have now also confirmed that you need to pay an additional £620 for the detailed ammonia modelling audit and £779 for the habitats assessment, so a total of **£1,399** is required. **This has been paid by Cattle Holderness today, under payment reference PSCAPPCATTL003.**

If you require anything further, please don't hesitate to email or ring me on my mobile.

Many thanks,

Lizzie

Lizzie Bentley

Technical Director
Yorkshire Farmers Livestock Marketing Ltd

[REDACTED]

(Typical working hours Tuesday, Wednesday, Thursday)

On 17/12/2024 17:45, Cummins, Kate wrote:

Hi Lizzie,

Yes that's fine. Thanks for requesting it in writing.

Kind regards,

Kate

From: Lizzie Bentley [REDACTED]
Sent: 17 December 2024 17:00
To: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Cc: Cummins, Kate [REDACTED]
Subject: Re: EPR/AP3400SG/V003 We Need More Information About Your Application (not duly made request for information) CRM:0270061

Hello Kate,

Thank you for the conversation just now to help me understand the EFs and modelling queries.

Please could we request an extension for this information and payment to the 3rd January?

Many thanks,

Lizzie

Lizzie Bentley
Technical Director
Yorkshire Farmers Livestock Marketing Ltd

(Typical working hours Tuesday, Wednesday, Thursday)

On 06/12/2024 16:50, SM-Defra-RESP-notifications (DEFRA) wrote:



Dear Lizzie,

**Environmental Permitting (England and Wales)
Regulations 2016**

Application reference: EPR/AP3400SG/V003

Operator: CATTLE (HOLDERNESS) LIMITED

**Facility: Willow Tree Farm - EPR/AP3400SG, Rysome
Road, Weeton, Withernsea, Hull HU12 0TA**

Thank you for your application received on 11/04/2024.

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following:

1. Company's registered address

Please confirm the correct address as West Farm, Stone Creek, Sunk Island, Ottringham, Hull HU12 0AP. *There are just some minor inconsistencies; Companies House registered address doesn't include Stone Creek, but Royal Mail and the original permit do, and the original permit doesn't include Ottringham.*

2. Ammonia assessment

Since submission of the application, we have published revised ammonia emission factors (EFs); please see the following link for further information: [Ammonia emission factors for pig and poultry screening, modelling and reporting - GOV.UK](#). We can complete sensitivity checks during the audit of the modelling once the application is duly made, against the changes and any

other discrepancies (see below); however we may require further mitigation and revised detailed modelling during determination depending on the outcome of the initial audit and consultation with Natural England (NE) for the appropriate critical levels and loads (CLes/CLos) for the nature conservation sites impacted. Please confirm the following:

a) The efflux velocity of the roof fans is 11 m/s as stated in the non-technical summary and pre-application request for ammonia screening, and not 12m/s as in the detailed ammonia modelling report.

b) The amount of manure stored on site – in the ammonia report it is 50 tonnes, but in the pre-application advice request it was 100 tonnes.

*Please note: the modelling report has assigned no critical loads for the Greater Wash SPA, however we will need to consult NE as APIS has assigned critical loads for this site so we may need to include it in our assessment, and if the process contributions are > 1% of the CLo we will complete a more detailed assessment which may result in the need for further mitigation. In addition the impacts at the Humber Estuary SAC, SPA and Ramsar may also require further detailed assessment once we have confirmed the appropriate CLe/CLos with NE and completed the sensitivity checks to the changes in emission factors and points a and b above. **Please give me a call if you wish to discuss this further.***

3. **Appropriate emission factor for production pigs, BAT AEL and further mitigation**

a) The EFs have now changed for production pigs, and we assume the appropriate one for the installation is 2.813 kg NH₃/ap/year for a fully slatted floor system, based on the description in the application of slurry removal every 6 weeks. This EF is based on an occupancy rate of 87%, which is close to the average of 86.92% quoted in the non-technical summary submitted with the application. Please confirm you agree with this emission factor.

b) The revised EF does not meet the BAT AEL of 2.6 kg NH₃/ap/year for new plant. You have stated in your non-technical summary that the average crude protein level is 16.36%, based on an average of rations at 18% (30 - 50kg pigs), 16.5% (50 - 85kg) and 14.6% (85 - 120kg). Please provide evidence of these crude protein % levels in the feed. *The EF of 2.813 kg NH₃/ap/year is based on a crude protein level of 18% therefore we may consider a 10% reduction in the emission factor for a 1% reduction in crude protein, up to a maximum of 20% reduction to the*

emission factor if we have evidence. For future reference if you wanted more than 20% reduction then you would have to provide more detailed evidence for consideration. Also please note, as you have confirmed the pit will not exceed 800mm we can accept this FSF system meets narrative BAT techniques regardless of slurry removal frequency, without the need for further mitigation for new/redeveloped housing permitted after the publication of the IRPP BAT conclusions on 21/02/2017, such as an air cleaning system, slurry cooling and/or pH reduction of the slurry.

- 4. Application fees** – you have paid £7,218 for a substantial variation. However you also need to pay £620 for the detailed ammonia modelling audit and £779 for the habitats assessment, so a total of £1,399 is required.

The deadline for sending your response is **20/12/2024** (10 working days), however I will be on leave on that day and as the following week is Christmas week I will be working reduced hours and we have a limited permitting support team also over that period so can you please either respond as soon as possible, request an extension, or understand that if your response is submitted on 20/12/2024 I may not be able to progress the application to duly made until I have been able to look through your responses and also confirm the additional payments have been made (in which case I will backdate the duly made date to when the responses and fees have been received).

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 application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,500. 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 please phone or email me. Please note, I will only be working Wednesday 11th – Friday 13th December 2024 next week, if you need to speak to me. If you need an extension to the deadline please request this in an email.

Please 'reply all' to this email with your responses (so I'm copied in) to enable it to be recorded on our applications system.

Yours sincerely,
Kate

Kate Cummins

Senior Permitting Officer, National Permitting Service,
Operations – Regulation, Monitoring and Customer
Environment Agency | Richard Fairclough House, Latchford,
Warrington WA4 1HT

[Redacted signature block]

Please note: my working days are Tuesday - Friday

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Department for Environment, Food and Rural Affairs (Defra)

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