EA/EPR/EP3204SE/A001 New farm application (Lower Barn Poultry Unit) Duly Making Questions

1. BAT

It is unclear how the BAT criteria will be complied with for the new farm

The criteria are laid out in Intensive Farming BAT document dated February 2017 and attached

Please confirm

a. Compliance with N/P Emission Limits– see sections 3 and 4 of BAT document

Checked operator will be able to achieve the lower end of the range of 0.2-0.6 kg N excreted/broiler place per year. The BAT Reference Document states the lower end of the range can be achieved by using a combination of techniques. The Operator will be using all of the BAT 3 techniques described:-

- Reducing crude protein content by using a N-balanced diet based on the energy needs and digestible amino acids – flaked soya bean will be added into the feedstuffs during milling to increase crude protein and supplement otherwise low natural levels in wheat grains, especially in first diets. The percentage of flaked soya will be reduced as the chickens grow.
- Multiphase feeding with a diet formulation adapted to the specific requirements of the production period – 4 separate diets will be provided which contain an increasingly lower percentage of crude protein as the chickens grow .
- Addition of controlled amounts of essential amino acids to a low crude protein diet – amino acid analogues will be added into all of the feedstuffs during milling, including lysine, methionine, threonine and valine to supplement otherwise low natural levels in wheat grains.
- Use of authorised feed additives which reduce total nitrogen excreted – xylanase enzyme will be added into all of the feedstuffs during milling, for breaking down macro-molecules and antinutritional factors such as non-starch polysaccharides (E.g. cellulose in cereal grains) into absorbable nutrients in feedstuffs.

Checked operator will be able to achieve the lower end of the range for of 0.05-0.25 kg P_2O_5 excreted/broiler place per year. The BAT Reference Document states the lower end of the range can be achieved by using a combination of techniques. The Operator will be using all the BAT 4 techniques described:-

- Multiphase feeding with a diet formulation adapted to the specific requirements of the production period – 4 separate diets will be provided which contain an increasingly lower percentage of phosphorous.

- Use of authorised feed additives which reduce the total phosphorous excreted – 6-phytase enzyme will be added into all the feedstuffs during milling. The enzyme degrades the phytate phosphorous in grain during digestion, making more naturally occurring phosphorous and other nutrients available to the chickens.
- Use of highly digestible inorganic phosphates for the partial replacement of conventional sources of phosphorous in the feed - calcium hydrogen orthophosphate/ calcium phosphate will be added into all the feedstuffs during milling.

b. Compliance with N/P monitoring – see section 24 –which option will operator use?

   Analysis technique is preferred for estimating total nitrogen and phosphorous content of the litter annually.

c. Compliance with Ammonia monitoring – see section 25 – will operator use ammonia emission factors?

   Will use the EA published poultry ammonia emission factors for pollution inventory reporting for annually estimating ammonia emissions into air.

d. Compliance with Dust monitoring – see section 27 – will operator use dust emission factors?

   Will use the EA published poultry dust emission factors for pollution inventory reporting for annually estimating dust emissions from each poultry house.

2. Site Drainage Plan

We note drainage plan provided

We just need an updated plan as follows:

- Colours for clean and dirty water need to be more distinct e.g. green and red – currently difficult to distinguish
- Please mark on sections of French drains with partial drains/stones

Created a new drainage plan with more distinctive colours for clarity and continued using the EA convention for marking clean and dirty water drainage routes blue and red, respectively.

General questions:

- Also please just confirm that **all** uncontaminated or lightly contaminated water discharges via attenuation pond and off site at a single point.

  All the uncontaminated and lightly contaminated water will be discharged via the attenuation pond from a single emission point into the off-site ditch, marked on the drainage plan.

- Also is attenuation pond a lined pond or acting as a soakaway?

  The attenuation pond will be unlined so will also act as a soakaway and is marked on the drainage plan. Owing to the low to moderate permeability of the Superficial Drift here - we expect most of the run-off will outfall into the off-site ditch.

3. Dust Management Plan

Please confirm whether in future there will be no receptors including farm houses within 100 metres of the installation boundary.

If there is please provide a NGR location and distance from the installation boundary

If a receptor within 100 metres a dust management plan is required, as per our gov.uk website and specifically under heading **Intensive farming risk assessment for your environmental permit**

Again only if dust management plan required – an additional fee is required

under 1.19.9 of 2019 Charging Scheme of £ 620

There are no receptors withing 100m of the installation boundary - nearest is Three Wells Farm, a dwelling, approx. 260m south of the installation boundary. Also obtained an email from Gooderham Farms Ltd on 08/10/20 confirming no plan to provide a dwelling for a Farm Manager:

Q. Can you confirm if you propose to apply for planning permission to build a home for a Farm Manager here? **No, this is not intended.**

There is no mention in the current application for the poultry farm, and I've not seen another application in the planning portal.

4. Declaration

The declaration at the end of application B3.5 needs to be signed by a director of the company

The only exception is a letter from a director of the company giving you authority to sign the declaration

Please resubmit B3.5 with a director declaration or email authority as above.

Gooderham Farms Ltd have provided a letter of delegated authority for the declarations and included in the Lower Barn Poultry Unit Supporting Information on p19.

5. Fees

In addition to question about the dust management plan fees there is also a definite additional fee required linked to charges guidance 1.19.2

This is the basic fee for creating a habitat assessment as there are European sites within 5 km screening distance. This is required in addition to ammonia modelling assessment charge which is a further additional piece of work

Please provide additional £779 fee.

12/10/20 Bacs payment, payment reference PSCGREEN008.

Also updated application form F1 with the additional payment.

6. Environmental Impact Assessment

Please provide more detailed assessment against key environmental impacts odour, and noise and dust.

Provided relevant reports for the Environmental Statement including:

Appendix 4 – Noise Impact Assessment (Matrix Acoustics)
Appendix 5 – Odour Report (A S Modelling & Data Ltd)
Appendix 8 – In-combination Ammonia Assessment (APT Group)

Please confirm that there is no biomass boiler heating of poultry houses and heating via being only via LPG heaters.

Confirmed all of the poultry house will be heated with liquid petroleum gas-fired heaters inside the houses.

Simon Wigglesworth

Environment Agency.