

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:**  
**Subject:** RE: EPR/XP3632QE/V003 We Need More Information About Your Application CRM:0163039 - Follow Up  
**Date:** 27 August 2024 12:09:31  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.jpg](#)

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Hi [REDACTED]

We don't appear to be quite on the same page. If permit and planning permission are issued the operator proposes:

- Rearing pigs at both Feltwell and Airfield, to minimise reduction in supply of pigs for slaughter during development.
- Continue rearing in house nos. 1,6&7 with solid concrete floors and straw at Feltwell.
- Demolish existing houses around them and erect first phase of new pig houses for 7x1,000 places at Feltwell
- Stock 4,874 pigs in house 1&2 with concrete floor and straw at Airfield, first time in a long time owing to not preferred houses.
- Nearly same time destock houses 1,6&7 at Feltwell , there will be overlap with pigs on both sites expected as last pigs out of Feltwell.
- Convert house no.1 and drainage to FYM store before bringing any new houses into use at Feltwell.
- Stock 7,000 pigs in first 7 new houses and nearly same time destock Airfield, some overlap with pigs on both sites expected as last pigs out of Airfield.
- All rearing activities will cease at Airfield as soon as first new houses can be brought into operation.
- Erect and stock second phase of new pig houses for 7x1,000 places and convert houses 6&7 to store straw at Feltwell.

So two periods are expected when pigs are likely to be stocked on both sites, potentially overlapping for months to minimise shortfall in pig supply. Submitted modelling for worse-case scenario for 4,874 and 14,000 places for pigs at Airfield and Feltwell respectively (plus 870,000 broilers). To ensure apply for the correct number of places for permit and account for emissions including from Airfield during development, although recognise the predictions around critical levels at sensitive receptors are overstated as a consequence of more pigs input into the model.

Alternatively could 14,000 places be permitted across both Airfield and Feltwell? Rather than separate references to specific number of places for each site in Schedule1. Submit modelling for only 14,000 places at Feltwell (plus 870,000 broiler places). During development the maximum will be 4,874+7,000 = 11,874 across Airfield and Feltwell, respectively, and emissions from Airfield are farther away from conservation areas.

Kind regards

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**From:** [REDACTED]  
**Sent:** Monday, August 19, 2024 12:18 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039 - Follow Up

Hi [REDACTED]

We have reviewed the responses you have provided below and attached in relation to the proposed temporary stocking of Airfield Farm.

Please could you clarify and confirm, by adding a statement into the supporting information for Feltwell Farm document (attached), that you do not intend to part-stock Feltwell Farm whilst Airfield Farm is operational and vice versa (i.e. at no point in time will there be pigs stocked on both Airfield and Feltwell Farms, the proposal is to only stock the 4,874 Production Pigs >30kg at Airfield Farm temporarily during the proposed demolition and construction phases at Feltwell Farm, and then once the proposal at Feltwell Farm is operational you only intend to stock the proposed 14,000 Production Pigs >30kg at Feltwell Farm. There will be no overlap in operation of both Airfield and Feltwell Farm).

If you are able to do this by the original response date of **Tuesday 27th August 2024** that would be much appreciated.

Many thanks,

[REDACTED]

[REDACTED]

Permitting Officer – Installations

**National Permitting Service | Part of Operations – Regulation, Monitoring & Customer Environment Agency** | [REDACTED]

[REDACTED]

[REDACTED]



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**From:** [REDACTED]

**Sent:** Wednesday, August 14, 2024 9:19 AM

**To:** [REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039 - Follow Up

Hi [REDACTED]

Many thanks for your quick interim response – much appreciated.

We will continue with our checks based on the responses you have provided below and will await the plans for Airfield Farm and revised Q7 Emissions to air, water, and land for emissions to air and into soakaways at Airfield Fm in the supporting information document from yourselves in due course.

Many thanks,

[REDACTED]

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**From:** [REDACTED]

**Sent:** Tuesday, August 13, 2024 11:26 AM

**To:** [REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039 - Follow Up

Hi [REDACTED]

Responses in your text below in [blue](#). So checking can continue on the document, ammonia report and files.

Otherwise please bear with me for a few days more to create a layout and drainage plan for Airfield Fm. Latter will also require me to update Q7 Emissions to air, water, and land for emissions to air and into soakaways at Airfield Fm in the supporting information document, but should be achieved well ahead of the response date.

Kind regards

[REDACTED]

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**From:** [REDACTED]

**Sent:** Monday, August 12, 2024 5:14 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** EPR/XP3632QE/V003 We Need More Information About Your Application CRM:0163039  
- Follow Up

Hi 

Many thanks for sending over your response to the request for further information – very much appreciated.

We have been reviewing the response and just wanted to check a few things with you in relation to the proposal to retaining Airfield Farm within the permit – please can you confirm the following:

- In your response you refer to submitting a revised ‘*supporting information to vary an intensive farming permit for proposed development at Feltwell Farm Pig Unit*’ which includes updates to Q2b *Summary of proposed change* to include lagoon A and confirmation Airfield Fm must be preserved in the application to vary permit. Attached is the version received in the response but we cannot see that the changes stated above are reflected in this version. We wanted to confirm with you if the attached version had been superseded as the document advises ‘*At Airfield Fm already ceased rearing pigs so propose to remove from the permit all 4,874 places for production pigs >30kg. Will not be used for rearing pigs, but not proposing to surrender any part of the permit*’.

Could you confirm if the attached version has been superseded. If so, please can you submit a copy of the updated version with a statement confirming that the stocking of 4,874 production pigs >30kg at Airfield Farm is a temporary measure whilst the demolition and construction phases take place at Feltwell Farm and that following completion of the re-development at Feltwell Farm, no livestock will be housed at Airfield Farm.

Apologies but I had updated the Word document but not saved as a pdf. Submitted revised version for:

*Supporting information to vary an intensive farming permit for proposed development at Feltwell Farm Pig Unit 13082024*’ attached.

In Q2b *Summary of proposed change* includes confirmation to “*Continue stocking 4,874 production pigs >30kg at Airfield Farm is a temporary measure whilst the demolition and construction phases take place at Feltwell Farm and that following completion of the re-development at Feltwell Farm, no livestock will be housed at Airfield Farm.*” Highlighted all the changes.

- We have reviewed the revised ammonia modelling submitted and note that the proposal now includes the addition of the temporary measure to stock 4,874 production pigs >30kg at Airfield Farm. Please can you confirm that this addition has also been reflected in the revised ammonia modelling files that have been submitted?

Modelling report and files include 4,874 pigs temporary stocked at Airfield during demolition and construction phase at Feltwell Fm.

- As the proposal is to continue to use Airfield Farm temporarily, please can you provide up to date copies of the site layout and site drainage plans for Airfield Farm. The copies that we have are currently hand drawn and span over multiple A4 pages and it would be beneficial for the purposes of this application to have the plans so that they each fit onto one page.

Requested Wayland send me surface water and dirty water drainage plans for Airfield Fm. Will take a few days longer to create a revised plan using a planning app with drainage routes and emission points. Latter will require me to update Q7 Emissions to air, water, and land in the supporting information to add additional soakaways.

Please can we ask that you send us your response by **Tuesday 27th August 2024**. Please do let us know if you need any further clarity on the above.

Many thanks,

[Redacted]

[Redacted]

Permitting Officer – Installations

**National Permitting Service | Part of Operations – Regulation, Monitoring & Customer Environment Agency |** [Redacted]

[Redacted]

[Redacted]



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**From:** [Redacted]

**Sent:** Monday, August 5, 2024 6:26 PM

**To:** [Redacted]

**Cc:** [Redacted]

[Redacted]

**Subject:** FW: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039

Hi [Redacted]

The updated OS plan for the permit including lagoon A attached this time.

Please replace the plan emailed with all the other information on Friday last week. Just realised I'd scanned it to use in the management plans but not saved it as an up-to-date pdf to be included in the permit.

Kind regards

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**From:** [REDACTED]  
**Sent:** Monday, August 5, 2024 6:23 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039

Hi [REDACTED]

The updated OS plan for the permit including lagoon A attached.  
Please replace the plan emailed with all the other information on Friday last week. Just realised I'd scanned it to use in the management plans but not saved it as an up-to-date pdf to be included in the permit.

Kind regards

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**From:** [REDACTED]  
**Sent:** Friday, August 2, 2024 5:49 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039

Hi [REDACTED]

'EA modelling files' via Google WeTransfer still larger than server allows for email.  
Please let me know when you have received them.

Kind regards

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**From:** [REDACTED]  
**Sent:** Friday, August 2, 2024 5:46 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** RE: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039

Hi [REDACTED]

Response to EA request for more information 22/07/2024 and associated updated documents, attached.

For quick reference not relying on demonstrating a reduction in EF result of reducing crude protein (below), having identified the correct EF to be used.

Sending 'EA modelling files' in separate email otherwise package of attachments are larger than server allows.

Kind regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, August 1, 2024 5:16 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039

Hi [REDACTED]

Many thanks for your email.

I can confirm that we can agree to the deadline extension of Friday 9<sup>th</sup> August. Please note that it is unlikely that further extension beyond this date will be agreed.

In relation to the emission factor for pigs 7-30kg on FSF with vacuum removal, when demonstrating a reduction to the average emission factor of 0.70kg NH<sub>3</sub>/animal place/yr (note: this is based on an average of the standard emission factors for 7-15kg and 15-30kg pigs on FSF with vacuum removal), you will need to provide evidence (e.g. diet sheets) of the actual crude protein percentage in the feed for each relevant weight range to support the reduction. The maximum reduction in emissions factors that we currently accept is 20% based on a crude protein reduction of 2% from the levels on which the standard emission factors are based on. Any emission factor reduction greater than 20% would require evidence to demonstrate this, which would then need further consideration for approval.

In addition to the above, you could also review occupancy levels in the housing. The average emission factor of 0.70kg NH<sub>3</sub>/animal place/yr for 7-30kg pigs on FSF with vacuum removal assumes 100% occupancy and does not account for any downtime

for cleaning etc.

Please do let me know if you have any further questions.

Many thanks,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, July 30, 2024 5:50 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039

Hi [REDACTED]

Not forgotten and would like to ask for extension of the deadline to another week to Friday 9<sup>th</sup> August please.

To complete the revised modelling and reporting and update plans externally.

Work is progressing on revised ammonia modelling. Conducted a site survey last week to confirm depth of all the slurry pits <800mm and slurry could be removed every 10 weeks, if all the existing houses were in use. Have instructed Redmore's to revise the modelling with updated emission factors as instructed for pigs >30kg, and identified a likely appropriate EF to be used for the small pigs 7-30kg from the BREF of 0.50 so not using the BAT-AEL 0.53. Alternatively working on demonstrating we might justify using 0.46 based on reducing crude protein in diets by as much as 3.5% in recent years. Site layout and drainage plans to be updated to enclose lagoon A inside the installation boundary. Expert drawing will ensure all the labelling on these very large plans remains legible. Otherwise collected all the other information required, including a drive-by to confirm the sensitive receptors at Feltwell Fm.

Kind regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, July 30, 2024 5:14 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: EPR/XP3632QE/V003 We Need More Information About Your Application  
CRM:0163039



Dear [REDACTED]

I just wanted to send a gentle reminder for the below additional request for further information following review of the not duly made response. The deadline for submission of the further information is Friday 2<sup>nd</sup> August.

Please do let us know if you need any further clarity on the below.

Many thanks,

[REDACTED]

[REDACTED]  
Permitting Officer – Installations

**National Permitting Service | Part of Operations – Regulation, Monitoring & Customer Environment Agency |** [REDACTED]

[REDACTED]



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**From:** SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>

**Sent:** Monday, July 22, 2024 5:09 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** EPR/XP3632QE/V003 We Need More Information About Your Application CRM:0163039

Dear [REDACTED]

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

**Application reference: EPR/XP3632QE/V003**

**Operator: WAYLAND FARMS LIMITED**

**Facility: Methwold Farm Pig Unit - EPR/XP3632QE, Methwold Group, Methwold, IP26 4RJ**

Thank you for your application received on 08/11/2023.

Following our review of your not duly made response, we need to ask for further

clarification on the below before we can do any more work on your application. We need further information on the following:

### 1. **Slurry lagoon A**

Slurry lagoon A is currently outside of the installation boundary for Feltwell Farm – as you are proposing to use this lagoon, and it has been included in the ammonia modelling, please include it within the installation boundary assuming this is land owned by the operator.

- a. If land is owned by the operator, please extend the boundary to include this area of land on both the site boundary plan and the site layout & drainage plan, and other documents as required.
- b. If the slurry lagoon is not owned by the operator, please confirm this. If there is agreement by a third party for it to be used as slurry storage capacity, please confirm this. If slurry lagoon A is owned by a third party, please confirm whether the installation would be the sole user of slurry lagoon A or if not please confirm the % of liquor from the installation relative to full capacity of the lagoon.

### 2. **Feltwell Farm OMP, NMP and DMP**

On our mapping system there appear to be two receptors within 100m of the installation boundary that have not been included. They are located at approximate grid references: TL 73040 92824 and TL 73037 92804. Please either include these receptors within the management plans or provide the reason why they have been excluded.

### 3. **Evaporative cooling units on Methwold (Breckland) Farm poultry unit**

In the not duly made response (in response to Question 4) it advises that *no chemicals or disinfectant to be used for any cleaning will enter into the water circulation system and evaporate into air stream.*

Please could you confirm if the evaporative cooling units have an emissions to air point? If so, please can these be included as emissions to air points under Question 7 within the Methwold Supporting Information document.

### 4. **Ammonia Modelling**

You have advised in the ammonia modelling that pigs >30kg at Feltwell Farm are housed on fully slatted floor (FSF) systems. In addition, you have also advised that Pigs 7-30kg at Feltwell Farm are also housed on fully slatted floor (FSF) systems.

In your response to our duly making questions (in response to Question 2 g & h) you advise that the Operator complies with BAT 30 for this housing by using frequent slurry and manure removal to external storage.

**Please conduct a revised ammonia modelling assessment and submit a revised report that uses appropriate emission factors (EF's) (not BAT-AELs) for pigs on Fully Slatted Floor systems that comply with the BAT-AEL's for existing housing (please see below for further details).**

**For pigs >30kg at Feltwell Farm that are currently housed on fully slatted floor (FSF) systems please advise on the following:**

- A. If using frequent slurry and manure removal to external storage
  - i. Which narrative BAT 30 measure the Operator uses for frequent slurry

removal (Techniques a1, a3 and a4 reference methods for frequent slurry removal).

ii. Please confirm if the frequent slurry removal for the pigs >30kg at Feltwell Farm housed on fully slatted floor (FSF) systems meets the following criteria: Please confirm if the depth of the slurry pit below the slats is less than 800mm and that the slurry is removed at least every 10 weeks or less.

**Note – if the frequent slurry removal meets the above criteria your revised ammonia modelling should use an emission factor of 2 kg NH<sub>3</sub>/animal place/year for pigs > 30kg on FSF with frequent slurry removal which would meet the required BAT-AEL.**

*Please note: vacuum removal does not refer to a mechanically created vacuum, rather the flow of slurry when sluices are opened creating a temporary vacuum to draw the slurry out. Whether it flows this way or via gravity, when sufficient slurry is present to allow movement, should not make any difference.*

**or**

**B. If using a deep pit (in case of a fully or partly slatted floor) (technique a0)**

i. If the existing housing for pigs >30kg at Feltwell Farm on FSF system utilises deep pit storage with infrequent slurry removal you will need to confirm which of the additional measures, e.g. a combination of nutritional management techniques, air cleaning system, pH reduction of the slurry, slurry cooling or other alternative measures, provide the equivalent ammonia reduction levels to meet the BAT-AEL. If alternative measures are employed, please provide justification of ammonia emission reduction levels.

ii. Based on the additional measures used, you will need to demonstrate what reduction can be applied to the standard EF for FSF (4.14 kg NH<sub>3</sub>/animal place/year) in order to meet the BAT-AEL for existing housing of 3.6 kg NH<sub>3</sub>/animal place/year. Please provide evidence to support reduction below the BAT-AEL e.g. specific level of reduction in feed crude protein levels and confirmation evidence that these measures have been actioned over the last 5 years to support both BAT and an emissions reduction proposal.

**Note - You will need to use your proposed emission factor (not the BAT-AEL) within the revised ammonia modelling assessment.**

**For pigs 7-30kg at Feltwell Farm that are housed on fully slatted floor (FSF) systems please advise on the following:**

**C. If using frequent slurry and manure removal to external storage**

i. Which narrative BAT 30 measure the Operator uses for frequent slurry removal (Techniques a1, a3 and a4 reference methods for frequent slurry removal).

ii. Please confirm if the frequent slurry removal for the pigs 7-30kg at Feltwell Farm housed on fully slatted floor (FSF) systems meets the following criteria: Please confirm if the depth of the slurry pit below the slats is less than 800mm and that the slurry is removed at least every 10 weeks or less.

iii. Please confirm what measures you use to demonstrate a reduction in ammonia emissions from the standard EF for FSF (0.94 kg NH<sub>3</sub>/animal place/year) in order to meet the BAT-AEL for existing housing of 0.7 kg NH<sub>3</sub>/animal place/year.

**Note - You will need to use your proposed emission factor (not the BAT-AEL) within the revised ammonia modelling assessment.**

or

D. If using a deep pit (in case of a fully or partly slatted floor) (technique a0)

i. If the existing housing for pigs 7-30kg at Feltwell Farm on FSF system utilises deep pit storage with infrequent slurry removal you will need to confirm which of the additional measures, e.g. a combination of nutritional management techniques, air cleaning system, pH reduction of the slurry, slurry cooling or other alternative measures, provide equivalent ammonia reduction levels to meet the BAT-AEL. If alternative measures are employed, please provide justification of ammonia emission reduction levels.

ii. Based on the additional measures used, you will need to demonstrate what reduction can be applied to the standard EF for FSF (0.94 kg NH<sub>3</sub>/animal place/year) in order to meet the BAT-AEL for existing housing of 0.7 kg NH<sub>3</sub>/animal place/year. Please provide evidence to support reduction below the BAT-AEL, e.g. specific level of reduction in feed crude protein levels and confirmation evidence that these measures have been actioned over the last 5 years to support both BAT and an emissions reduction proposal.

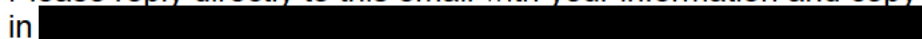
**Note - You will need to use your proposed emission factor (not the BAT-AEL) within the revised ammonia modelling assessment.**

## 5. Ammonia Modelling Data Input Files

Once the changes have been made to the ammonia modelling assessment, please submit the revised modelling data input files.

### Airfield Farm

It was stated in the not duly made response that although Airfield farm is not currently being used, it is proposed for it to be used temporarily for rearing 4,874 permitted production pigs >30kg until demolition and construction phases at Feltwell Farm are complete. Please be aware that should the variation to the permit be granted, then there cannot be any pigs at Airfield Farm from that point onwards. This is because the assessments are based upon livestock at Feltwell and Methwold Farms only.

Please reply directly to this email with your information and copy in 

Please send us the information by **2<sup>nd</sup> August 2024**.

If we do not receive this by this deadline we will need to 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 myself or [REDACTED] or email [REDACTED] (please send the email to us both).

Yours sincerely,

[REDACTED]  
Image removed by sender. [REDACTED]  
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by someone other than the sender or recipient, for business purposes.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.