[redacted]

Our ref:
EPR/XP3632QE/V003

Date: 03/05/2024

Dear [redacted]

We need more information about your application and incorrect payment of application charge.

Application reference: EPR/XP3632QE/V003
Operator: WAYLAND FARMS LIMITED
Facility: Methwold Farm Pig Unit - EPR/XP3632QE

Thank you for your application received on 08/11/2023. The following is to confirm our conversation of 03/05/2024.

- **Application Fee**

Unfortunately, the application payment you sent is incorrect. The correct application charge is £9,737.
The total application charge is comprised of:

- Ref 1.14.1 - Section 6.9 – farming installation; includes assessment of odour management plan and noise and vibration management plan – Substantial variation = £7,218.
- Ref 1.19.2 – Habitats assessment = £779.
- Ref 1.19.8 – Ammonia modelling assessment = £620.
- Ref 1.19.9 – Dust and bio-aerosol management plan = £620. Please note that there is only one fixed charge payable per application for the assessment.
- Additional charge for newspaper advertising = £500. This is because the application will need publicising more widely in the form of a newspaper advert, which will be in addition to the web publicising on gov.uk.

You have paid £9,857 so no additional payment is required. If it is agreeable, the balance from the second fee for the dust and bio-aerosol management plan can be used for the additional charge for the newspaper advertising. At the end of the determination should a further refund be required for the remaining balance then that will be arranged.

In addition, I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information to the following questions.

- **Gale Breaker Curtains**

The application references curtains being manually lowered to provide narrow air inlets, or infrequently larger inlets for additional cross-ventilation for cooling pigs in the warmest weather.

The Environment Agency has experienced an increased number of complaints from sensitive receptors due to odour on intensive farms using this form of ventilation. If duly made, the determination of the application will assess the impacts of odour from the pig houses on sensitive receptors close to the installation and we may find the impact to be unacceptable.

Please conduct an option appraisal for different housing designs on Feltwell Farm to minimise odour emissions.

Note: Should you proceed with installing gale breaker curtains on the pig houses, this will need to be accounted for within the revised ammonia modelling assessment.

- **Ammonia Modelling**

Please submit a revised modelling report that takes into account the following;

a. Inclusion of the existing slurry lagoon to be retained and proposed slurry tank to be added at Feltwell Farm.
   Note: Within the ammonia modelling report you have advised that the lagoon and slurry tank will be used to store washdown water from pig operations. Due to the nature of the stored material and application of a cover to the lagoon, it was not considered an emission source for consideration in the dispersion modelling assessment. However, this is incorrect and does require inclusion in the ammonia modelling, as slurry tanks/lagoons have specific ammonia emission factors requiring inclusion.
b. Inclusion of the proposed manure storage at Feltwell Farm with no reduction applied to the total emission rate.
c. The animal numbers and housing systems you have used for the existing permitted scenario in the ammonia modelling are different to the animal numbers and housing systems applied for under the existing permit (please see below). Please review the animal numbers and housing systems you have modelled for the existing pig rearing operations in the ammonia modelling to ensure they are correct and representative of the existing animal numbers and housing systems on the installation. Where there are differences in animal numbers and housing systems from the application for the existing permit, please provide further explanation for this. Please reflect any changes in the revised modelling assessment and report.

Livestock Type	Housing Type	Number of animal places
Sows	Part-slatted floor (PSF) with reduced manure pit	524
Sows	FSF with vacuum system for frequent slurry removal	524
Farrowers	FSF/PSF with combination of water & manure channel	312
Weaners	Pen/flatdeck with FSF/PSF with vacuum system for frequent slurry removal	6,900

Finishers	Fully Slatted Floor (FSF)	14,058 (note this includes 10 Boar places)

d. The details for the existing slurry lagoons you have used for the existing permitted scenario in the ammonia modelling are different to the to the details applied for under the existing permit (please see below). Please review the details for the slurry lagoons you have modelled for the existing pig rearing operations in the ammonia modelling to ensure they are correct and representative of the existing slurry lagoons on the installation. Where there are differences in the slurry lagoons from the application for the existing permit, please provide further explanation for this. Please reflect any changes in the revised modelling assessment and report.

Storage Type	**Cover**	**Surface area of store (m^2)**
Slurry – Lagoon	No Cover	3,265
Slurry – Lagoon	No Cover	6,598
Slurry – Lagoon	No Cover	8,394
Slurry – Lagoon	No Cover	6,559

e. For the existing pig rearing operations, please confirm if the existing housing on Feltwell, Methwold and Airfield Farms were built before the introduction of the new Best Available Technique (BAT) conclusions for the intensive rearing of poultry or pigs in February 2017.

f. For the existing permitted scenario, where production pigs > 30kg are housed on solid floor – straw systems, use an emission factor of 2kg NH3/animal place/year. *Note: this emission factor is based on AHDB Pork Trials 2017 for Production Pigs on Straw*. Please reflect this in the revised ammonia modelling assessment and report.

g. For the existing permitted scenario, where Pigs > 30kg and unserved gilts are housed on fully slatted floors (FSF), the emission factor for this type of housing system does not meet the current BAT-AEL for existing permitted housing using FSF (BAT-AEL is 3.6 kg NH3/animal place/year). Please review this and either:

    i. Provide further information on how you meet the BAT AEL for pigs > 30kg and unserved gilts on an FSF system and which narrative BAT technique you meet under BAT 30 (please see attached BAT Conclusions document), or:

    ii. Consider whether the FSF with vacuum system for frequent slurry removal emission factor is more appropriate. Should FSF with vacuum system for frequent slurry removal be more appropriate, 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 – this would result in being able to assign a lower emission factor of 2 kg NH3/animal place/year for pigs > 30kg on FSF with a vacuum system for frequent removal.*

    Please reflect any changes in emission factors in the revised ammonia modelling assessment and report.

h. For the existing permitted scenario, where pigs < 30 kg are housed on fully slatted floors (FSF), the emission factor for this type of housing system does not meet the current BAT-AEL for existing permitted housing using FSF (BAT-AEL is 0.7 kg NH3/animal place/year). Please review this and:
    i. Provide further information on how you meet the BAT-AEL for pigs < 30 kg on an FSF system and which narrative BAT technique you meet under BAT 30 (please see attached BAT Conclusions document):

   Please reflect any changes in emission factors in the revised ammonia modelling assessment and report.
i. For the existing permitted scenario, for Young Gilt's 30kg, please confirm if these are served or unserved gilts.

In addition to the above revisions to the ammonia modelling assessment, please also provide the following in the revised report;

j. Include a table which provides a comparison of the process contributions from the current permitted operating scenario against the process contributions of the proposed operating scenario and what these are as a percentage of the relevant critical level and critical loads for each receptor point modelled. In addition to this, include the predicted percentage change between the current permitted operating scenario and proposed operating scenarios.
k. Include the critical level for ammonia and critical loads for nitrogen deposition and acid deposition used for each nature conservation site assessed in the ammonia modelling.
   Note: these should be as advised within the ammonia pre-application report provided on 28th July 2022 with the exception of those nature conservation sites listed below where revised critical levels and critical loads have been obtained from APIS or in consultation with Natural England.

Site Name	Designation / Status	Ammonia Critical Level (µg/m3)	Nutrient Nitrogen Critical Load (kg N/ha/yr)	Acid Critical Load (keq/ha/yr)
Breckland Farmland	SSSI	---	10	4.856
Breckland	SPA	3	3	0.536

l. Include the grid co-ordinates for the receptor points modelled.
m. Confirm the efflux velocity of the high velocity roof fans on the broiler houses at Methwold farm and include this within the revised report.
n. Confirm the efflux velocity of the high velocity roof fans on the pig houses at Feltwell Farm and include this within the revised report.

Note: If duly made, the determination of the application may result in refusal if we find the proposed impact unacceptable, and this may mean we are unable to refund the application fee as a result.

If duly made, the application determination may require additional ammonia reduction measures to be included.

Please consider carefully if you wish to proceed with the application on this basis or

would like to withdraw it and reconsider the proposal before resubmitting an application.

- **Ammonia Modelling Input Files**

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

- **Heat Exchangers**

Please provide the following for the heat exchangers on Methwold Farm;

a. Confirm what happens to the condensate produced from the heat exchangers on the poultry houses.
b. Submit evidence for the 27.5% reduction in ammonia emissions applied to the broiler emission factor used in the ammonia modelling based on the heat exchangers.

- **Evaporative Cooling Units**

Please confirm what happens to any condensate produced from the evaporative cooling units on the poultry houses at Methwold Farm.
Specifically if not able to be classed as uncontaminated surface water, the condensate needs to be separated and not sent to surface water.

- **Standby Generators**

Please provide the following for the standby generators on the installation:

a. Within the submitted noise management plan (NMP) for Feltwell Farm, 'Noise from back-up generator' has been listed as a noise related issue. However, there is no standby generator marked on site plans 20-L45-IP001A and 20-L45-IP001B for Feltwell Farm or identified as an emission to air source within Table 2 Emissions (releases) within the 'Supporting information to vary permit at Feltwell Fm' document.
   Please confirm whether there are standby generators at Feltwell Farm.
   If reference to a standby generator within the NMP is an error, please resubmit a revised NMP correcting this error.
b. For each standby generator on the installation (comprising Methwold, Feltwell and Airfield Farms) please confirm the following details:
   i. Please provide the thermal rated input in MWth for each of the standby generators;
   ii. Please confirm that each standby generator is operated for a maximum of 50 hours per annum for testing purposes.
   iii. Please confirm that each standby generator is only for emergency use for power supply where the mains power has gone down and will not be used for more than 500 hours per annum averaged over 3 years;
   Note: the maximum hours need to include the 50 hours per annum for testing.

- **Slurry Storage**

Please confirm the following for the proposed slurry storage tank at Feltwell Farm:

a. The capacity and surface area of the slurry tank (m^2)
b. The type of cover that will be installed on the slurry tank (rigid, floating or low tech cover)

Please confirm the following for the existing slurry lagoon at Feltwell Farm:

c. The capacity and surface area of the existing slurry lagoon (m^2)
d. The type of cover that is / will be installed on the existing slurry lagoon (rigid, floating or low tech cover)
e. The date in which the cover was installed / is to be installed on the existing slurry lagoon.

Please confirm the following for the proposed slurry storage system at Feltwell Farm:

f. That the 6 months storage criteria will be met for the final slurry volumes and the slurry storage facilities after the changes as outlined in the application.
g. Please list all the relevant slurry storage facilities that allow for this 6 months storage; with any locations for any storage beyond the Installation and whether the operator has control to ensure sufficient storage is available if any storage facilities are owned by a third party.

Please confirm the following for any existing slurry lagoons at the installation that are no longer proposed to be used:

h. There will be no transfer of slurry from Feltwell Farm for storage in slurry lagoons at the installation that are no longer proposed to be used.
i. That the existing slurry lagoons at the installation that are no longer proposed to be used are empty or provide the date on which they will be empty.

- **Used Litter**

You have confirmed in the supporting documentation that used litter from Methwold Farm will be exported from the installation for either land spreading under the control of a separate farming business or power generation. However, in the ammonia modelling report it specifically references that used litter will be used as feedstock by Methwold Anaerobic Digestion plant.

Please confirm if it is still intended that some of the used litter from Methwold Farm will be used as feedstock by Methwold Anaerobic Digestion (AD) plant. If this is the case, please confirm that the anaerobic digestion facility is capable of processing the increased capacity of used litter that will be sent to the facility.

- **Airfield Farm**

Please confirm the following for Airfield Farm:

a. The sites proposed use in future.
b. Advise if any activities relating to the pig operations at Feltwell Farm and the broiler operations at Methwold Farm will take place at Airfield Farm.

- **Site Boundary Plan**

Please submit a plan showing all boundaries clearly marked in green for the installation (comprising Methwold, Feltwell and Airfield Farms). The plan should be geographically correct (i.e. include roads, hedgerows, tracks or other recognisable features) and accurately drawn to scale, with a north facing arrow. The plan should not be schematic.

- **Methwold Site Layout and Drainage Plan**

The Supporting Information document for Methwold Farm references drawing No. 'BRECK-LAY1-12' dated 07/11/23. The plan we have on our system is drawing No. 'BRECK-LAY1' dated 15/08/23.

a. Please confirm if we have the correct version, and submit an updated plan as needed.
b. Please note that the plan we have has the following points to address:
    i. Clearly show the drainage route of clean and dirty water.
    ii. Show the location of any isolation/diverter valves.
    iii. Show the location of underground dirty water tanks, chemical store(s) and wheel washes.
    iv. Include all discharge points from the surface water system – the Supporting Information document lists discharge points W1-W7, and the plan shows W1, W2, W4, W5 and W6.

- **Feltwell Site Drainage Plan**

a. The plan shows soakaway (SW1) and infiltration basin (SW9) outside of site boundary – can these be included in the installation boundary?
    i. If they can, please can you extend the boundary to include this area of land on both the site boundary plan and the site layout & drainage plan.
    ii. If they can't, please can you provide the reason why.
b. Please show the location of wheel washes.
c. Show the location of any isolation/diverter valves.

- **Feltwell Site Layout Plan**

Please show the location of carcass storage and the chemical store(s). As well as standby generator(s) and associated fuel tank(s) if applicable.

- **Environmental Impact Assessment**

Question 9 of Application Form Part C3.5 references document 'Bidwells Environmental Statement Addendum Main Report'. We haven't been able to find this on our system, please provide a copy.

- **Site Drainage - Methwold**

a. There is reference in your supporting documents to wheel washes being present on both Feltwell and Methwold Farms. Please confirm what happens to the dirty wash water from the wheel washes on Methwold Farm.
b. Confirm whether any of the infiltration basins have overflows?
    i. If they do, where would the water drain to? Please provide a NGR for the outlet and confirm which watercourse the water would eventually drain into. Please provide a revised site drainage plan if required.

- **Chemical Store**

Please confirm that the chemical and veterinary store on Feltwell Farm is capable of retaining spillage.

- **Odour and Noise Management Plans**

Please ensure all relevant non operator owned sensitive receptors are identified in the table; this should be all receptors where the boundary of the receptor is within 400m of the installation boundary.

- **Operating Experience**

The supporting documents confirm that the sites will be operated in accordance with Sector Guidance Note EPR6.09 'How to comply with your environmental permit for intensive farming' and that all staff will be suitably qualified to work at the installation. Please can you expand on this and provide further details of the operational experience with regards to poultry installations?

Please reply directly to the Not Duly Made email with your information and copy in [redacted]

Please send the information by **28th May 2024**. If we don't hear from you, we must return your application.

When we receive the requested information, we'll 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 letter 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 and requesting information. 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-permitting-ep-charges-scheme

If you have any questions please phone myself or [redacted] or [redacted] and [redacted] (please send the email to us both).

Yours sincerely

[redacted]
Permitting Officer