



Management System Summary

Brackley Farms Limited



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SITE DETAILS

Wing Complex

Stewkley Road

Buckinghamshire

LU7 0LD

OPERATOR DETAILS

Brackley Farms Limited

The Homme

Hom GreenRoss On Wye

Herefordshire

HR9 7TF

APPLICATION REFERENCE

EPR/DP3240QK/P001

DOCUMENT REFERENCE

K526.1~09~002

ISSUE DATE

15/12/2025



Wiser Environment Ltd, Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
94 Xuan Thuy, Thao Dien Ward, District 2, Ho Chi Minh City, 713385
+44 1480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk

DOCUMENT CONTROL

DOCUMENT TITLE:	Management System Summary
REFERENCE:	K526.1~09~002
CLIENT:	Brackley Farms Limited
REPORTED BY:	Wiser Environment Limited
STATUS:	Final
ISSUE:	3
ISSUE DATE:	15/12/2025
AUTHOR:	Wiser Environment Limited
APPROVED BY:	Brackley Farms Limited

REVISION HISTORY

REFERENCE	DATE	ISSUE:	REVISION SUMMARY
K526.1~09~002	11/06/2025	D1	For client review.
K526.1~09~002	17/06/2025	1	First Issue for submission to LPA
K526.1~09~002	24/07/2025	2	Following LPA Request for Information
K526.1~09~002	15/12/2025	3	For EA submission

QUALITY CONTROL

ACTION	DATE	NAME
Prepared	11/06/2025	Andrea Petrolati
Checked	11/06/2025	Andrea Petrolati
Approved	17/06/2025	Andrea Petrolati

CONTENTS

1	INTRODUCTION	6
2	SCOPE OF MANAGEMENT SYSTEM	7
3	SITE LOCATION	8
4	PERMITTED ACTIVITIES	9
4.1	Delivery of Waste	9
4.2	Unloading of Waste	9
4.3	Storage of Waste	10
4.4	Combustion of wood waste	10
5	PERMITTED WASTE TYPES	12
6	WASTE QUANTITIES	13
7	RECEPTION, HANDLING & STORAGE OF FEEDSTOCK	14
7.1	Pre-Acceptance Procedure	14
7.2	Reception	14
7.3	Process Controls for waste handling and storage	14
7.4	Handling & Storage	15
7.5	Waste Dispatch	15
8	PLANT DESIGN AND OPERATION	16
9	CONTROL OF EMISSIONS AND MONITORING	18
9.1	Emission to air	18
10	SITE & EQUIPMENT MAINTENANCE	19
10.1	Site Operational Procedures	19
10.2	Training	19
10.3	Site Security	19
11	ACCIDENT PREVENTION & MANAGEMENT	20
12	WASTE MANAGEMENT	21
13	ENERGY EFFICIENCY	22
14	TRAINING & COMPETENCE	23
15	COMPLAINTS	24
15.1	Complaints Reporting	24
15.2	Community Engagement	24
16	DOCUMENTS & RECORDS	25
17	REVIEW THE MANAGEMENT SYSTEM	26

FIGURES

FIGURE	TITLE
Figure 1	Process flow diagram of the combustion plant

APPENDICES

APPENDIX	TITLE
Appendix A	Process Flow Diagram
Appendix B	Wood waste trial runs results
Appendix C	Air Emission Risk Assessment
Appendix D	Quality Certification for an Existing CHP Scheme
Appendix E	Polytechnik Biomass Energy Model Declaration

1 INTRODUCTION

This document is the Management System Summary (MSS), that accompanies the application for a substantial variation of existing Environmental Permit at The Wing Complex, Buckinghamshire, LU7 0LD. The site is located at National Grid Reference SP 8614 2381.

The application has been prepared by Wiser Environment Limited on behalf of the applicant Brackley Farms Limited.

The variation seeks to add to the permit the following activity:

- 'Local authority activity – Part A(2) or small waste incineration plant (SWIP) to which Schedule 13 of the Regulations applies

Currently, the permit includes burning unprocessed poultry manure generated on site as a Directly Associated Activity (DAA).

The proposed application seeks to change the fuel source for an existing boiler (3.8 MWth) from poultry litter to waste wood (grades A-C).

The quantity of waste wood (Grades A-C) to be delivered to site is up to 7,500 tonnes per annum.

The application has been prepared by Wiser Environment Limited on behalf of the applicant Brackley Farms Limited.

2 SCOPE OF MANAGEMENT SYSTEM

The scope of this Management System Summary (MSS) extends to all operations associated with the acceptance, handling, storage and combustion of waste wood at The Wing Complex, Buckinghamshire, LU7 0LD. The wastes permitted to be accepted at the facility are detailed within the List of Waste [(K526.1~09~003), in Section 6 of this application.

The site is operated in accordance with management procedures and controls outlined within this MSS.

The benefits of operating an effective and efficient Management System are to ensure sustainable business practices, reduce risks and losses, reduce operational costs, to help obtain business and a good reputation, and to ensure legal compliance.

A controlled copy of the MSS will be available at The Wing Complex, Buckinghamshire, LU7 0LD.

Brackley Farms Limited will ensure that copies of all relevant permits and approved supporting documents are provided to all personnel with nominated responsibility for the management or control of the site.

The locations of the documents will be made known to all relevant personnel and will always be readily available for inspection by regulatory bodies when the site is operational.

3 SITE LOCATION

The site is located 1 km from the town of Stewkley and 1.6 km from the B4032. The site is located at National Grid Reference SP 8614 2381.



Figure 1 Aerial image of the site, showing the permit boundary in green

4 PERMITTED ACTIVITIES

The site consists of three farms each with eight broiler sheds giving a total of 24 sheds with a stocking capacity of up to 971,999 broilers.

Permitted activities are restricted to:

- Section 6.9 A(1)(a) - rearing of poultry intensively in an installation with more than 40,000 places.
- Heat and power generation - operation of one on farm combustion unit with a thermal rated input not exceeding 3,800kWth. Burning unprocessed poultry manure generated on site.

The Permit Variation application seeks to add the burning of grades A to C wood waste in the same combustion unit.

From the point of view of operating the combustion unit, the variation would not change the location of feedstock storage, which would happen in the same area as currently the poultry manure is stored on an impermeable surface with secondary containment.

The total waste combustion capacity of the plant would also remain the same (i.e. the maximum throughput is 1,768 kg/h (4.9 m³/h)).

The waste wood burning activity will burn no more than 1 tonne/day.

Stages of the waste wood operations are summarised below.

4.1 Delivery of Waste

On arrival, vehicle details will be recorded in the site diary or similar document. Waste will only be accepted from companies who have provided a valid waste carrier registration and the relevant Waste Transfer Note.

All loads will be pre-booked, no ad-hoc deliveries will be accepted. All loads are inspected for non-permitted wastes, quality and conformance with Environmental Permit requirements. Non-conforming loads are refused entry and details are recorded.

All drivers must be wearing appropriate PPE, before beginning the unloading process.

4.2 Unloading of Waste

Waste deliveries will be inspected upon arrival and then directed to the unloading designated area.

4.3 Storage of Waste

Waste will be stored in a dedicated storage area with impermeable surface and secondary containment.

4.4 Combustion of wood waste

A process flow diagram of the combustion plant is present in Figure 1 and presented in APPENDIX A of this document. In summary:

- The feedstock is fed through the combustion chamber with preheated primary combustion air and secondary combustion air.
- The heat generated is used in the steam boiler to generate steam which can be used for heating and powering the rest of the site operations.
- The residual heat of the flue gas is used to preheat the primary combustion air.
- The flue gas is cleaned through a cyclone and bag house prior to release.

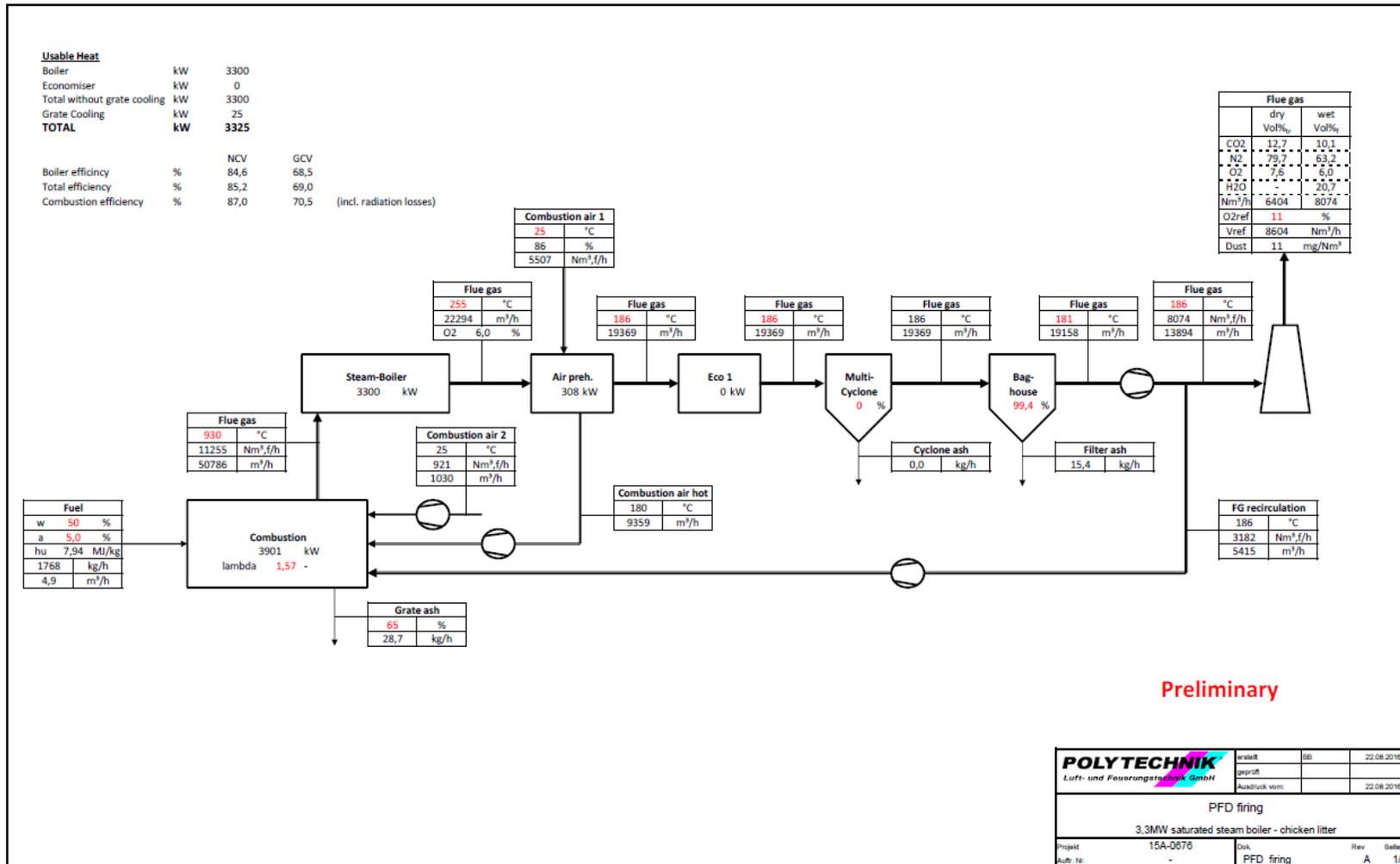


Figure 1. Process flow diagram of the combustion plant

5 PERMITTED WASTE TYPES

The waste types listed in Table 1 will be accepted at the site:

Table 1. Permitted Waste types

CODE	DESCRIPTION
15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 03	wooden packaging
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 01	wood
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 07	non-hazardous wood
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	garden and park wastes (including cemetery waste)
20 01 38	non-hazardous wood

6 WASTE QUANTITIES

The quantity of waste wood (Grades A-C) to be delivered to site is up to 7,500 tonnes per annum.

7 RECEPTION, HANDLING & STORAGE OF FEEDSTOCK

The following section describes the operational techniques that are implemented on site to control the release of any potentially polluting substances to the environment during reception, handling and storage of the waste.

All operations and working practices are regularly reviewed and improved where necessary. There are robust mechanisms in place for investigation of incidents/accidents if they occur.

7.1 Pre-Acceptance Procedure

Brackley Farms Limited accepts non-hazardous waste (wood waste grades A-C) The types of wastes to be accepted at the site are detailed in Table 1.

The waste producer is asked to confirm the type of process where the waste is produced, the expected quantity of waste.

7.2 Reception

On arrival, vehicle details will be recorded in the site diary or similar document. Waste will only be accepted from companies who have provided a valid waste carrier registration and relevant Waste Transfer Note.

All loads will be pre-booked, no ad-hoc deliveries will be accepted. All loads are inspected for non-permitted wastes, quality, and conformance with Environmental Permit requirements. Non-conforming loads are refused entry and details are recorded.

All drivers must be wearing appropriate Personal Protective Equipment (PPE) before beginning the unloading process.

Waste deliveries will be inspected upon arrival and then directed to a designated unloading before being directed to the storage area.

The site is operated in accordance with written procedures incorporated within the Management System.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

7.3 Process Controls for waste handling and storage

- Site personnel always wear the correct PPE and report any wear and tear so that it might be replaced.
- Vehicles are driven around the site in accordance with site driving rules.

- Only trained operators may operate machinery on site in accordance with operational procedures.

7.4 Handling & Storage

All equipment used for unloading of the waste is periodically inspected in accordance with manufacturers' guidance and manuals to ensure the plant and equipment is available for work when required.

Any non-conforming waste types, other than those listed in the Permit, will be rejected upon visual identification. Rejected wastes will be quarantined and the customer will be informed (usually via telephone/email) and arrangements will be made to remove these items from site within 72 hours.

A record is kept of all waste received at, or rejected from, the site. These records contain:

- Date of arrival;
- Producers' details;
- Previous holders;
- A unique reference number;
- Intended treatment/recovery route;
- Accurate nature and quantity of waste, including hazards; and
- Storage location.

All records are maintained for a minimum of 3 years following recovery or disposal.

7.5 Waste Dispatch

Any waste leaving the site will be accompanied by a written description, and due diligence checks will ensure that they are transferred to a suitably permitted waste management facility, by a registered waste carrier.

8 PLANT DESIGN AND OPERATION

The combustion plant at the Wing Complex site has been designed and operated under the current Environmental Permit (EPR/XP3437MW).

To comply with the current permit, the combustion plant is built and operated in such a way that even under the most unfavourable conditions it will comply with Chapter IV of the Industrial Emission Directive (IED).

The plant has been designed so that the temperature of at least 850°C is maintained for at least two seconds, making it compliant with IED Chapter IV with flue gasses being resident in the combustion zone for in excess of 2 seconds at over 850°C.

Appendix E reports the Declaration of Compliance of the combustion chamber which states that the combustion chamber is designed to remain compliant with these requirements by use of LPG auxiliary burner.

The boiler has inbuilt 2 second gas residency time with gas pre heaters / burners with feed interlock preventing feed of biomass fuel until chamber reaches more than 850 °C. The biomass feeding system is locked out until the combustion chamber reaches over 850 °C,

APPENDIX D reports the quality certification for an existing CHP scheme. The report shows the following parameters:

- The Total Power Capacity of this Scheme is: 0.240 Mwe and the Qualifying Power Capacity is: 0.240 MWe
- The threshold Power Efficiency criterion for this Scheme is: 20.00 % and the Power Efficiency of this Scheme is: 4.32 %
- The Qualifying Heat Output from this Scheme is: 2,756 MWh and the Heat Efficiency of this Scheme is: 19.78 %
- The threshold Quality Index criterion for under Annual Operation is: 100 and the Quality Index of this Scheme is: 37.87
- The Total Fuel Input to this Scheme is: 13,938 MWh and the Qualifying Fuel Input is: 3,011 MWh
- The Percentage of Fuel Input Referable to Electricity Generation is: 75.58 %
- The Percentage of Conventional Fuel is: 1.57 %
- The Total Power Output from this Scheme is: 602 MWh and the Qualifying Power Output is: 166 MWh

Other operational controls for the plant are summarised in the table below:

Requirement	Implemented measures
Monitor key process parameters relevant for emissions to air.	Continuous emissions monitoring (CEMS) equipment installed for key parameters identified in the Permit
Monitor channelled emissions to air with at least the frequency specified	Monitoring regime that meets the requirements of the Permit This will include monitoring of all relevant determinands to the required standard and frequency
Monitor channelled emissions to air with at least the frequency specified and in accordance with Environmental Permit	A monitoring regime that meets the requirements of the Permit has been established which includes monitoring of all relevant determinands to the required standard and frequency.
Monitor channelled emissions to air from the incineration plant during Other Than Normal Operating Conditions (OTNOC).	<p>The process is designed to stop if OTNOC occur, whilst the CEMS equipment remains operational to monitor channelled emissions to air.</p> <p>The two LPG gas burners will cut in triggered by the CEMS plant if emissions exceed permitted levels and Boiler will then shut down until issue addressed.</p>
Prevent or reduce diffuse dust emissions to air from the treatment of slags and bottom ashes	All equipment is enclosed; all storage of ash is internal.
Reduce channelled emissions to air of: <ul style="list-style-type: none"> • NOx • Dust • metals and metalloids • SO₂ • Organic Compounds 	<ul style="list-style-type: none"> • The process is optimised • The flue gas is recirculated • The abatement system uses cyclones, bag filter and lime injection.

9 CONTROL OF EMISSIONS AND MONITORING

9.1 Emission to air

The first key operational measure to control emissions to air is the control of the incoming waste, which will be subject to the pre-acceptance and acceptance procedures described in Section 6 of this document.

Other key elements of emission control are the following:

- Pre-treatment of the waste: removal of metals and non-combustible items from the feedstock.
- Process controls
- Effective abatement system

To demonstrate that the existing combustion plant can burn waste wood and still meet the Emission Limit Values (ELV) imposed by the Permit, two trial runs have been conducted using waste wood as feedstock.

The reports for the two trial runs are reported in Appendix B of this document. The report demonstrates, through stack emission testing, that the following parameters are below relevant ELV values:

- Total Particulate Matter (3.6 - 4.5 mg/m³)
- SO₂ (0.53 - 0.27 mg/m³)
- Nox (141 - 188 mg/m³)

And air emissions risk assessment including detailed dispersion modelling has been also carried out. The dispersion modelling assumed a worst-case scenario where the emission concentrations are at the ELVs.

The air emission risk assessment concludes that the parameters assessed are all either screened out or are predicted to be well below the air quality standards.

The Air Emission Risk Assessment is reported in Appendix C of this document.

10 SITE & EQUIPMENT MAINTENANCE

All equipment is periodically inspected in accordance with manufactures' guidance and manuals to ensure the plant and equipment is available for work when required.

All lifting equipment is inspected and tested by an external auditor on an annual basis.

Weighing equipment is inspected and tested on annual basis by an external auditor in accordance with the Weight and Measures Act 1985.

The site is operated in accordance with written procedures incorporated within the management system.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

The Site Manager maintains a register of all calibrations of measuring and monitoring devices. All calibrations are undertaken by an approved subcontractor.

10.1 Site Operational Procedures

The site is operated in accordance with a number of written procedures incorporated within the Company Management System.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

10.2 Training

It is the responsibility of Senior Management and the Site Manager to ensure that no unauthorised persons operate equipment on site.

Operation of the equipment is carried out exclusively by staff that are fully trained in safe working practices and the safety features of the equipment.

Individual operators have access to the operation and maintenance manuals of the equipment they use.

10.3 Site Security

The site is enclosed within a perimeter fence and benefits from 24/7 CCTV coverage with gated access.

11 ACCIDENT PREVENTION & MANAGEMENT

Control measures are applied to the process to prevent the occurrence of accidents and to minimise their consequences:

- Site is secured by fencing, gated and CCTV is monitored externally 24/7;
- Waste deliveries and site operations shall be overseen by the Site Manager or nominated competent person;
- Unloading of waste will only be undertaken in designated areas;
- Waste storage and treatment activities will be undertaken on an impermeable surface with sealed drainage;
- Appropriate training regarding process/plant operation and emergency procedures is provided to all relevant staff;
- Plant and equipment will be maintained in accordance with their maintenance schedules or when applicable;
- Accident prevention and management will be reviewed on an annual basis along with the Management System or following an accident.

12 WASTE MANAGEMENT

The main residue of the combustion process is the ash.

Bottom ash and fly ash are managed through contract with a waste management company.

All ash is automatically transferred to enclosed 1 tonne bags as part of the combustion process.

All ash is then transferred to a licensed waste operator. Prior to dispatch all waste is stored on a sealed concrete pad.

13 ENERGY EFFICIENCY

The efficiency of the biomass boiler will be maintained through the following operational measures:

- Regular measurement of the calorific value of the feedstocks.
- Weekly recording of Fuel intake aligned with measured calorific values of feedstocks into the plant.
- Weekly measurement of net thermal and electrical output of the boiler measured and compiled for submission to the Ofgem administered CHPQA program.
- The Heat and Power generated will be use on site across the neighbouring 3 poultry farms. Historically, the primary heat use is averaging 250kWh/m² per annum netting a total use of 9.3GWh per annum.
- At times of lower heat demand in the poultry sheds, heat may be used for other drying and or heating requirements.

The calorific value, fuel intake, electrical and heat outputs data is compiled into an Energy Efficiency Plan, which is used to track how efficiently the plant is running and to implement any measures as part of the Brackley Farms' Management System improvement process.

Other general operational measures that ensure efficiency of the process are the following:

- Fuel Storage: the waste wood and poultry manure is stored mostly indoors ensuring that the feedstock remain dry, so that moisture does not negatively impact combustion efficiency.
- Regular maintenance of the boiler: avoid build up of residue such as ash
- Regular checks for leaks and blockages in the system
- Maintenance of the SCADA and associated CEMS unit.

14 TRAINING & COMPETENCE

The site shall be overseen and managed by a Site Manager holding the relevant Operator Competence Certificate qualification. The TCM will be responsible for the day-to-day operations at the site, and to ensure that site personnel operate the site in compliance with the Environmental Permit. They will be responsible for ensuring adequate training of staff has been undertaken.

The TCM will report any problem, or potential problem, to Senior Management as well as the Regulators.

All new site staff are taken through an induction process, covering all areas of site operations, including company policies, operational and emergency procedures, risk assessments, site rules, and all relevant conditions of the Environmental Permit.

It is the responsibility of Senior Management and the TCM to ensure that no unauthorised persons operate plant and equipment on site.

Operation of the equipment is carried out exclusively by operators fully trained in safe working practices and safety features of the equipment.

Individual operators have access to operation and maintenance manuals of the equipment they use.

Staff training is reviewed regularly through refresher courses, to ensure continued competence in their daily tasks.

15 COMPLAINTS

The Technically Competent Manager (TCM) is responsible for responding to complaints and implementing the complaints procedure. All complaints will be investigated within 24 hours upon receipt.

Upon receipt of a complaint, either directly from a neighbouring resident or indirectly via the Regulator. The following information will be requested from the complainant:

- Name;
- Address;
- Contact details;
- Date(s) and time(s) to which the complaint relates; and
- Nature of the complaint and any other details which may assist in the identification of the source, activity or circumstances which prompted the complaint.

The timings and description of the complaint will be analysed in conjunction with the activities and meteorological conditions logged on site without delay to identify the odour source. The complainant may be asked to keep ongoing log for correlation with the site operational log. Once the source or activity is identified suitable mitigation measures will be implemented without delay.

15.1 Complaints Reporting

Records relating to management review, complaints, internal audits and inspections are held for a minimum of six years.

All complaints will be acknowledged and investigated by the TCM, or nominated person, with resultant actions reported to the complainant and the Regulators.

15.2 Community Engagement

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint to swiftly rectify the source.

Where contact details are made available, the complainant will be contacted within 24 hours to check that the mitigation measures rectify the issue.

Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint, the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

16 DOCUMENTS & RECORDS

As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the site permit;
- Site management plans;
- Operational procedures;
- Site and activity risk assessments;
- Competence and training records;
- Compliance records; and
- Duty of Care documentation and Environment Agency (EA) waste returns.

Records must be retained for 6 years; unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender.

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

17 REVIEW THE MANAGEMENT SYSTEM

The Management System Summary will be reviewed in its entirety at least annually or following any substantial change in site operations.

Other activities which may prompt review of the Management System are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review results in required changes, this will be documented and maintained with the site records, for example, changes to environmental management measures, new or altered equipment.



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Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
01480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk

