



Dust & Emissions Management Plan

Brackley Farms Limited



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SITE DETAILS

Brackley Farms Limited
Wing Complex
Stewkley Road
Buckinghamshire
LU7 0LD

OPERATOR DETAILS

Brackley Farms Limited
The Homme
Hom Green Ross On Wye
Herefordshire
HR9 7TF

APPLICATION REFERENCE

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Figure 2	Bedford wind rose. Annual 5-year average, July 2020 to July 2025 (willyweather.co.uk)

APPENDICES

APPENDICES	TITLE
Appendix A	Site Layout Plan
Appendix B	Air Dispersion modelling report produced by Cambridge Environmental Research Consultants: Ref: FM1516/R1/25; June 2025
Appendix C	Wood waste trial runs report: June 2024

1. INTRODUCTION

This document is the Dust & Emissions Management Plan (DEMP) 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 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 application has been prepared by Wiser Environment Limited on behalf of the applicant Brackley Farms Limited.

This DEMP identifies potential dust issues and proposes mitigating measures that can reduce adverse impacts. The DEMP should be read by the Site Manager, site staff, contractors working on site, and the Environment Agency (EA).

1.1. Site Description



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

The site is located 1 km from the town of Stewkley and 1.6 km from the B4032. It is bounded to the north, east and west by agricultural land and a former RAF wing to the south. The site consists of three farms with eight broiler sheds giving a total of 24 sheds with stocking capacity of up to 971,999 broilers. The site layout is shown in Appendix A.

1.2. Maintenance & Review of the DEMP

The Site Manager is responsible for the DEMP and ensuring that people are trained. The plan is stored in the site office, with an electronic back-up. The DEMP will be reviewed annually or following a substantiated emissions complaint.

All personnel shall be trained in the procedures for which they are responsible, including any reporting and contingency procedures. Records of all training shall be maintained and reviewed in accordance with Brackley Farms Limited written Management System.

All staff or contractors working on site must not undertake any work for which they are not competent – except under the careful instruction and supervision of a competent person.

Site specific inductions must include relevant aspects of the health and safety, environmental and quality policies, documentation, risk assessments, and emergency procedures. Further training will be provided if skills decline when not used regularly, and refresher training will be provided as necessary to ensure continued competence. Information from personal performance, health and safety monitoring, accident investigation and near-miss incidents are to be used to identify any gaps in skills and competence.

1.3. Relevant Sector Guidance

This DEMP has been produced in accordance with the following guidance:

- Control and monitor emissions for your Environmental Permit¹

¹ [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit), Updated 24 November 2022

2. RECEPTORS

2.1. Receptor List

A receptor is the object (e.g. person, organism, resource, or property) impacted by a hazard. For example, odour may cause offence to a human (the receptor). The nearest sensitive receptors surrounding the site have been considered in the Air Dispersion modelling report produced by Cambridge Environmental Research Consultants (FM1516/R1/25; Appendix B).

The sensitive receptors are listed in Table 4.1 & 4.2 in Appendix B. This report identified 10 residential receptors, six of which are within the Wing Complex, and 2 Ancient Woodlands. The closest human health receptors are the Wing Complex (within 200m of the site) and Blackthorn nursery (800m north of the site).

2.2. Wind Rose & Weather Data

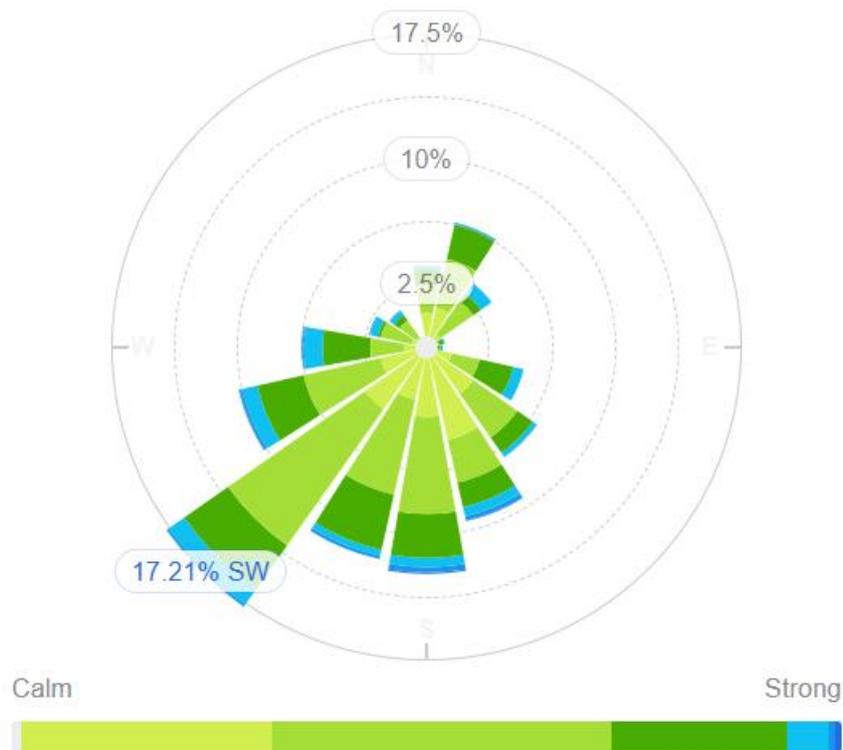


Figure 2 Bedford wind rose. Annual 5-year average, July 2020 to July 2025 (willyweather.co.uk).

The closest observing station where wind statistic data is available is at Bedford, approximately 28 miles north-east of the permit boundary. Figure 2 presents the wind statistics on a wind rose as an annual average using data from the previous 5 years (July 2020 to July 2025). The wind rose indicates that the sensitive receptors located towards the south-west of the site are potentially at greatest risk from hazards transmitted through the air.

3. SOURCE OF EMISSIONS & SITE PROCESSES

The following hazards of greatest significance have been identified:

- Fugitive emissions of dust and particulate matter relating to waste delivery, the treatment process and material dispatch.
 - Dust and particulate matter generated from external areas (e.g., haul roads) during dry conditions.
 - Dust and particulate matter liberated from imported and stockpiled materials.
- Fugitive emissions of mud and debris during waste delivery and material dispatch.

3.1. Materials Entering & Leaving Site

Brackley Farms Limited currently accepts non-hazardous poultry manure and this permit application is to accept on-hazardous waste wood (wood waste grades A-C). The wastes that the site would like to permit onsite as part of this application are shown in Table 1 below.

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

CODE	DESCRIPTION
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

All incoming loads will be pre-booked, having undergone basic characterisation by the waste producer prior to delivery to site. Waste will only be accepted from suitably permitted facilities and delivered to site by registered waste carriers. 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 relevant Waste Transfer Note.

Vehicles leaving site have the potential to track mud on the public highway which could cause visual soiling and consequent resuspension of dust. There is also the potential for debris to fall from vehicles.

The procedure for waste rejection is detailed in the Management System Summary (K526.1~09~002).

3.1. Overview of Dusty Processes & Emissions

A comprehensive list of the waste types permitted to be accepted at the site can be found in the List of Wastes (K526.1~09~003). The waste types accepted have potential to emit dust in dry conditions.

Dust emissions from site traffic will be controlled by a combination of limiting vehicle speeds, covering all loads during transport, and daily cleaning of the internal roads.

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

The site is operated in accordance with written procedures incorporated within the Brackley Farms Limited Management System. All procedures: identify the potential hazards; include written instruction on how to undertake tasks; and specify the required control measures (including PPE and safety equipment). Each procedure is accompanied by an activity risk assessment.

3.2. External Dust & Particulate Emitting Operations

Other potential sources of dust and particulate emissions exist in the locality. This includes soil erosion from the surrounding arable farmland, harvesting of arable crops, and related vehicle movements.

4. CONTROL MEASURES & PROCESS MONITORING

4.1. Appropriate Measures

Table 2 outlines the monitoring procedures and appropriate measures to mitigate the risk of fugitive emissions from site. The Site Manager, or nominated person, is responsible for the monitoring procedures and employing appropriate measures.

Table 2 Monitoring Procedures for Appropriate Measures

Process / Material that can cause Dust & Emissions	Control measures (Appropriate Measures)	Monitoring frequency	Monitoring procedure and optimum process parameters	Trigger level	Action taken if outside optimum process parameters
HGV movements onsite, leaving site, tracking mud on wheels of vehicles, & during vehicle movement on site. Particulate from exhausts of equipment & vehicles on site.	<ul style="list-style-type: none"> • Vehicles will be sheeted to contain the load. • Direct placement of loads into the designated areas prior to combustion. • Restrict speed limit onsite. • All machinery is routinely inspected. Preventive maintenance programme in place. 	<ul style="list-style-type: none"> • Vehicles checked entering and leaving site. 	<ul style="list-style-type: none"> • Monitor site and weather conditions. • Plan ahead for dry or wet and muddy conditions. 	<ul style="list-style-type: none"> • Hot and dry weather and site conditions. • Wet weather and muddy site conditions. 	<ul style="list-style-type: none"> • Dry conditions: damp down haul roads to prevent dust emissions. • Wet and muddy conditions: instruct drivers to use wheel wash and employ road sweeper. Ensure the public highway is cleaned if mud is tracked off-site.
Litter	<ul style="list-style-type: none"> • Site access & hardstanding are swept as necessary. • Site has robust housekeeping measures in place. • Site shall be inspected daily by site manager & any litter or accumulated debris shall be dealt with immediately. 	<ul style="list-style-type: none"> • Daily site checks. • Daily pre-emptive checks of weather. 	<ul style="list-style-type: none"> • Daily site checks will assess the extent of the litter. 	<ul style="list-style-type: none"> • The visible presence of litter on the ground. 	<ul style="list-style-type: none"> • Site access and hardstanding are swept as necessary.

4.2. Trial Stack Emission Scenarios

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 C 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)
- NO_x (141 - 188 mg/m³)

An 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 B of this document.

5. REPORTING & COMPLAINTS REPONSE

The Site Manager is responsible for responding to complaints and implementing the complaints procedure. All complaints will be investigated within 24 hours upon receipt.

The complaints reporting procedure is detailed in the Management System Summary (K526.1~09~002).

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 emission 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 to prevent dust emissions.

The details of the complaint and any subsequent investigation will be recorded with relevant information.

5.1. 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 Site Manager, or nominated person, with resultant actions reported to the complainant and the Environment Agency.

5.2. Community Engagement

On receipt of a complaint, the Site Manager, 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.

5.3. Pro-active Dust Monitoring

The Site Manager and site staff will monitor site conditions periodically throughout the day (at least twice). Any adverse observations, that are directly attributed to the site's activities, will be recorded in the daily log.

5.4. Reactive Dust Monitoring

On receipt of a complaint, the Site Manager, or nominated person, will investigate the complaint to swiftly rectify the dust source. Checks on site and the permit boundary will be carried out by the Site Manager, or nominated person, to confirm that the mitigation measures rectify the issue.



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