

From: [Misba_Tasawar](#)
To: [Cummins, Kate](#)
Cc: andrew_irving@hook2sisters.co.uk; [SM-Defra-RESP-notifications \(DEFRA\)](#)
Subject: RE: EPR/VP3232YZ/V003 Haveringland Poultry Unit - We Need More Information About Your Application (not duly made request for further information) CRM:0270037
Date: 16 August 2024 15:29:52
Attachments: [ATT00001.png](#)
[ATT00002.png](#)
[ATT00003.png](#)
[ATT00004.png](#)
[ATT00005.png](#)
[ATT00006.png](#)
[ATT00007.png](#)
[ATT00008.png](#)
[ATT00009.png](#)
[Technical Standards.docx](#)
[Haveringland Site Plan 16.08.2024.pdf](#)
[Haveringland Site Plan Zoom.pdf](#)
[Map Key.pdf](#)

Hi Kate,

Thank you very much for your prompt response.

Please see my responses to your queries in red.

We are chasing accounts for confirmation of the payment. Andy will forward this on to you before the close of play today.

Kind regards,

Misba

Misba Tasawar
Environment Officer
Mobile: 07385 953968

From: "Cummins, Kate" <kate.cummins@environment-agency.gov.uk>
To: "Misba Tasawar" <Misba_Tasawar@hook2sisters.co.uk>, "SM-Defra-RESP-notifications (DEFRA)" <RESP-notifications@defra.gov.uk>
Cc: "andrew_irving@hook2sisters.co.uk" <andrew_irving@hook2sisters.co.uk>
Date: 15/08/2024 17:06
Subject: RE: EPR/VP3232YZ/V003 Haveringland Poultry Unit - We Need More Information About Your Application (not duly made request for further information) CRM:0270037

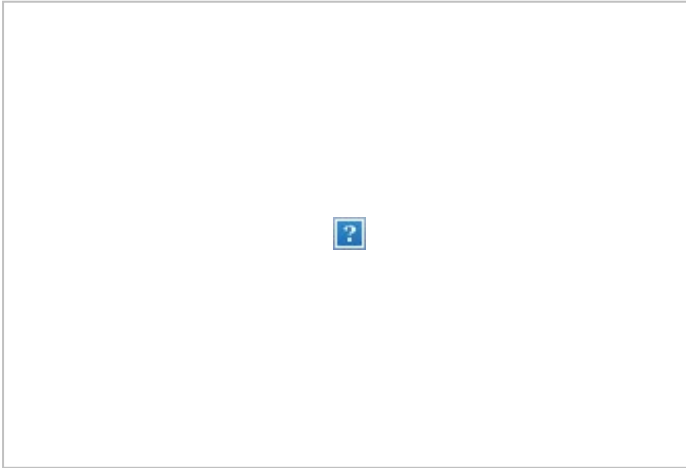
Hi Misba,

Thank you for your responses. I have looked through the information sent in and have the following comments, **and require further clarification for points 1, 5 and 6 please:**

- 1. Site layout, drainage and installation boundary plans**

- a. The installation boundary doesn't quite match that in the original permit – Locks Farm is now included when it was excluded previously.

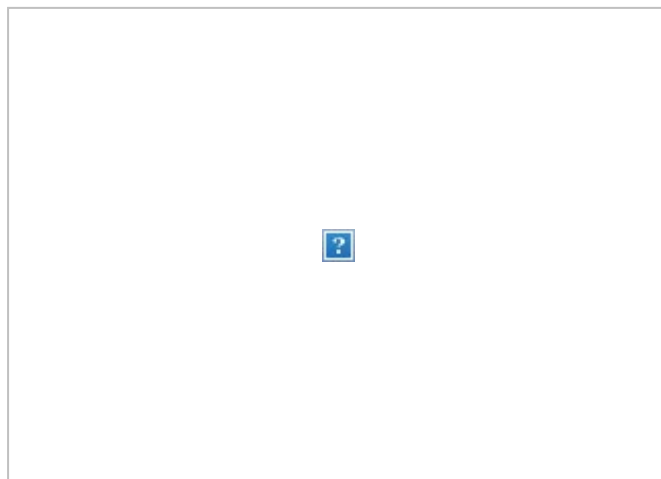
Part of current boundary on site plan:



I assume this is an error, therefore could you please send a further revised plan to address this? Otherwise we would require submission of an updated Site Condition Report to include the additional area. **Apologies, this is an error, the revised plan is attached.**

- b. In addition can you confirm what the red hatched circle represents please? **The hatched area represents the distance between the two boreholes (which I have now labelled on the site map).**

Part of proposed boundary on site plan:



- c. Please send a higher resolution version of the plan when re-submitting,

because the Key to the right is not legible when I zoom in. **Please see the attached site plan. I have also included a plan zoomed in on the area we will be operating and a separate document for the key.**

- d. The plan does not include the locations of the heat exchangers if you are proposing them (see point 5 below). **Please see response in point 5.**
2. Ammonia modelling data files and fee – files received, thank you. I am awaiting confirmation from our permitting support team that the fee has been received. If paid today then it doesn't show on the system until tomorrow so someone is checking for me again tomorrow.
3. DBMP – I haven't reviewed this fully but can accept for duly making, and am awaiting confirmation from our permitting support team about the fee.
4. Habitats fee – I am awaiting confirmation from our permitting support team that this has been received.
5. **Heat Exchangers** – we need to know the final proposal to be able to determine the application. You have not included the information requested for this point or included them on the site plan. Please confirm if you wish to exclude these from your proposal at this stage or submit the required information. **Please note, if you wish to add these at a later stage in the determination this is classed as a change in your proposal and may incur an additional fee of £1,930 and further delays if we need to re-consult.** Please refer to point 10 (a) on page 16 of the charging guidance: [Environmental Permitting and Abstraction Licensing Charging Scheme 2022 - amendments up to 1 June 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Please can we remove the addition of heat exchangers from the application based on the ammonia modelling predicting that the ammonia contribution at Norfolk Valley Fens SAC will be 0.127µg/m³ versus the prescribed threshold set at 0.13µg/m³, in accordance with improvement condition IC5.

6. **Technical Standards** – you have stated there are biomass boilers for heating in the 'housing' section – **please confirm this is an error and the houses are heated using LPG.** My apologies, this is an error, the houses are heated using LPG only. The updated document is attached.
7. Supporting documents and Non-Technical Summary – I haven't reviewed this fully but can accept for duly making.

8. Standby generator – I have found the details in the supporting documents. I have converted the thermal input from 650 kVA to 0.65 MWth, as this is the unit we refer to in permits.
9. BAT conclusions – I can see you have confirmed key BAT conclusions in the Technical Standards which I haven't reviewed fully but can accept for duly making.

I haven't yet checked if there are any differences in the Part C3.5 form you have also submitted (this wasn't required) but assume it will be OK, or will use the previous one.

Can you submit the outstanding responses to points 1, 5 and 6 above please, as soon as possible. The original deadline for responses is tomorrow (16/08/24), so please request an extension to this if required. Please note, I will only be working Tuesday 20/08/24 and Wednesday 21/08/24 next week and then back in the following week Wednesday 28/08/24 – Friday 30/08/24, so if you could get this information over to me for Tuesday morning so I can check the application is duly made and collate everything for consultation that would be good, as it takes some time to do that stage, otherwise it will be another week before I can move this application on and I am very aware this is a priority case for you.

With the above in mind, can you please review your responses for Wendling before submitting – ideally addressing each point individually so it is quicker for me to find the information, and submit before the Tuesday deadline of 20/08/24 (or again it may delay the duly making for a further week).

As previously requested, please 'reply all' to this email so it reaches our application system.

Kind regards,
Kate

From: Misba Tasawar <Misba_Tasawar@hook2sisters.co.uk>

Sent: Thursday, August 15, 2024 9:22 AM

To: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Cc: andrew_irving@hook2sisters.co.uk; Cummins, Kate <kate.cummins@environment-agency.gov.uk>

Subject: Re: EPR/VP3232YZ/V003 Haveringland Poultry Unit - We Need More Information About Your Application (not duly made request for further information) CRM:0270037

Good Morning,

Please find attached a detailed site plan showing the houses which are numbered that have been refurbished and the ones which have been demolished. We do not wish to apply for a partial surrender at this stage.

Attached is the Dust Management Plan; the fee for the assessment has been submitted.

The detailed ammonia modelling predicts that the ammonia contribution at Norfolk Valley Fens SAC is 0.127µg/m³ versus the prescribed limit set at 0.13µg/m³, in accordance with improvement condition IC5. The heat exchangers will be installed dependant on the EA's assessment of this modelling. The modelling data files are attached and the fee for the assessment has been submitted.

Please find attached the Technical Standards (which includes any changes to the BAT conclusions) and the updated Supporting Documents and form C3.5.

Details of the generator, including running times have been included in the Supporting Documents.

Fees for the habitats assessment have also been submitted

Kind regards,

Misba

Misba Tasawar
Environment Officer
Mobile: 07385 953968

From: "SM-Defra-RESP-notifications (DEFRA)" <RESP-notifications@defra.gov.uk>
To: "Misba Tasawar" <misba_tasawar@hook2sisters.co.uk>, "andrew_irving@hook2sisters.co.uk" <andrew_irving@hook2sisters.co.uk>
Cc: "Cummins, Kate" <kate.cummins@environment-agency.gov.uk>
Date: 02/08/2024 10:09
Subject: EPR/VP3232YZ/V003 Haveringland Poultry Unit - We Need More Information About Your Application (not duly made request for further information) CRM:0270037

Dear Misba and Andy,

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/VP3232YZ/V003

Operator: HOOK 2 SISTERS LIMITED

Facility: Haveringland Poultry Unit - EPR/VP3232YZ, Locks farm, School Road, Haveringland, Norfolk NR10 4QE

Thank you for your application received on 10/05/2024.

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following:

10. **Site layout, drainage and installation boundary plans** – the plan submitted does not provide sufficient detail. We require a detailed updated site layout and drainage plan(s) and an installation boundary plan (to scale and including some features to enable location to be found, e.g. nearby road name, or property/village/town name). I have attached a copy of the original permit which has an installation boundary plan in schedule 2. Ideally the site layout plan should indicate which houses are remaining and which will be demolished, and include locations of key infrastructure including the heat exchangers. *Please note: there doesn't appear to have been any partial surrender application to remove land since the original permit was issued in 2008, so if you wish to change the installation boundary by removing areas of land/housing, this will require the submission of a partial surrender application (and associated fee). The partial surrender can be completed at the same time as the substantial variation, but this will delay the duly making and determination of the application. If you wish to extend the installation boundary you will need to submit an updated site condition report.*
11. **Detailed ammonia modelling files and fee** – please submit the modelling data files to enable the modelling to be audited, and in addition a fee of £620 for the modelling assessment.
12. **Dust and Bioaerosol Management Plan (DBMP) and fee** – the DBMP submitted with the application states that there is one sensitive receptor within 100m of the installation boundary, however there appears to be several. Can you please submit a revised DBMP including the details of the locations of all the receptors (including any associated with the farm) and in addition, a fee of £620 for its assessment.
13. **Habitats assessment fee** – the installation is within 5km of Special Areas of Conservation (SACs) therefore we require an additional fee of £779 for the assessment of these.
14. **Heat exchangers**– you have submitted some information about heat exchangers. Please confirm the following:

a) The number and locations of the heat exchangers, and include these on the site layout plan requested above.

b) The heat exchangers installed will all be Agro Clima unit (ACU) Clima+ 200, type 2.5 units, supplied and installed by Rokkedahl Energi ApS, for which you have supplied a VERA verification statement confirming that they can achieve a 28% reduction in ammonia emissions. *Please note, the detailed modelling submitted has assumed for proposal 2 (with heat exchangers) a 35% reduction of ammonia emissions for the heat exchangers, however we will not be able to accept 35% without further evidence, and we will factor in the lower % reduction when we complete the ammonia assessment.*

c) Confirmation that the condensate is collected and disposed of in the same manner as the wash water from the poultry housing.

d) The operation and maintenance of the heat exchangers is in accordance with the manufacturer's instructions.

15. **Technical Standards (TS)** – application form C3.5 references a document named 'Emissions Controls' as the technical standards document. There has been no document with this name submitted. Please submit a Technical Standards document and include all the details we would require in an updated TS document for a change in livestock operation, which should also detail any changes to the drainage and point source emissions, and that the installation will comply with Best Available Techniques. Please see the example broiler application form attached, which includes an example of a TS on pages 34 – 38 Appendix 5 (please note, this document is old and some of the information and examples do not include the latest requirements for applications, however it can be used as a basic guide for some documents). I can see there is some of this information in your 'supporting documents' submitted with the application, but please submit the appropriate revised information in a separate TS, which will replace previous versions submitted for earlier applications.

16. **Supporting documents and Non-Technical Summary** – you have submitted a document called 'supporting documents' which incorrectly states on the second page 'application to transfer an environmental permit'. It includes a section named 'summary of the site/management plans' in which the summary section includes details which should ideally be named 'non-technical summary' for consistency with the application references (application C3.5 points to details in section 2 of the application form for the non-technical summary when we should really have a separate updated document for this). Can you please update and submit a revised document to correct this, ideally with a section for the non-technical summary (and named as such).

17. **Standby generator** – please confirm the net thermal rated input of the

standby generator on site, and that it will not be tested more than 50 hours per year or operated for more than 500 hours per year (averaged over 3 years) for combined testing and emergency use only as a temporary power source if there is a mains power failure.

18. **BAT conclusions** – please review the attached IRPP BAT conclusions 1 – 34, and confirm any changes to the relevant ones, as a result of the variation, will comply. This can be submitted in a separate document, or included within the technical standards document requested above.

Please note, for future intensive farming installation variation applications similar to this one, we only require application form C3.5 and don't need parts A and F1 application forms. In addition, as form C3.5 declaration has been completed by Mark Wannell (Managing Director), we don't need the authorisation for Andy Irving to complete anything (I note his name is in the declaration in form F1). The application contact for this application is Andy, however I will also include Misba as an additional contact. Please let me know if you require anyone else copying into further correspondence.

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

You must send us the information and payment (total fees outstanding £620 + £620 + £779= **£2,019**) by **16/08/2024**.

If we do not receive this by this deadline we will 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 or email me. Please note, I will only be working one day next week (Tuesday 06/08/2024) and then I'm on leave 07/08/2024 - 12/08/2024 (inclusive) if you need to speak to me. If you need an extension to the deadline please request this in an email.

Yours sincerely,
Kate

Kate Cummins

Senior Permitting Officer, National Permitting Service, Operations – Regulation,
Monitoring and Customer

Environment Agency | Richard Fairclough House, Latchford, Warrington WA4
1HT

kate.cummins@environment-agency.gov.uk

External: 020302 50727

Mobile: 07342 060495

Please note: my working days are Tuesday - Friday

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