

## Pre-application Report

To: Simon Akrill (on behalf of Hook 2 Sisters Limited)

Pre-application number: EPR/GP3232YJ/P002

Brookside Farm Poultry Unit  
Watton Road  
Breckles  
Great Hockham  
Norfolk  
NR17 1ER

Date Completed – 25/03/2025

Thank you for seeking advice before submitting an application for an Environmental Permit.

We have completed an initial ammonia screening assessment for your proposal to identify if you will need to submit a detailed modelling assessment with your application.

The screening assessment is based on your proposal to operate a farm which is permitted to stock 434,000 broiler places.

### Summary of the assessment:

The ammonia screening results carried out by the Environment Agency are only intended to apply to any EPR permit application and not for use in local council planning submissions.

**Based on the information you have provided you will need to submit detailed modelling with your application.** Further information about the screening results is provided in detail in Annex 1.

It will generally be necessary to employ experienced consultants to undertake this work. For more information about consultants you could contact your industry body representative or refer to the ENDS Directory:

<http://www.endsdirectory.com/>

A useful guide to choosing and using an environmental consultant can be found on the government's online resource for businesses 'Business Link':

<http://webarchive.nationalarchives.gov.uk/20120823131012/http://www.businesslink.gov.uk/bdotg/action/detail?itemId=1079422318&type=RESOURCES>

When completed, please include the detailed modelling report and supporting modelling files with your H1 Environmental Risk Assessment and submit these with your completed application form to the address given below.

For an example H1 Environmental Risk Assessment refer to the example Intensive Farming EPR application available on the national archives for Environment Agency Website:

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/business/sectors/40057.aspx>

The Nature Conservation, Landscape and Heritage Factsheet screening lists all the sites that we currently consider when screening. The table details the supporting legislation and policies and the lead organisations for the protected area / species. Please note not all the sites listed are relevant to the Intensive Farming sector.

It is available on the Environment Agency website:

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/geho0612burd-e-e.pdf>

### **Applying for your permit**

You will need to complete application form part C3.5:

<https://www.gov.uk/government/publications/application-to-vary-an-environmental-permit-part-c35>

Your application should be emailed to:

[PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)

or sent to:

Environment Agency Permitting and Support Centre  
Environmental Permitting Team  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

If you need further information about this screening assessment or applying for your permit please email us at the following address:

[preapplicationservice@environment-agency.gov.uk](mailto:preapplicationservice@environment-agency.gov.uk)

Pre-application nature conservation data are correct at the time of screening. We will consider all nature conservation sites using best available information at the

time of permitting. Our GIS data are updated regularly, and we are occasionally made aware of additional nature conservation sites by other organisations which we will consider when determining a permit.

The Environment Agency takes care to ensure that the conclusions of the screening assessment are correct at the time of preparation but reserves the right to change the basis of the assessment in the light of technical developments or changes in Environment Agency procedures.

# Annex 1 Ammonia Screening Results

## Screening Input

Grid Reference used for the assessment: 594666, 293909 (with a 360m buffer)

## Animal numbers and types

Animal numbers and types, housing systems, manure and slurry storage assessed are listed below. The animal numbers and emission factors are based on an interpretation of the information provided by the applicant during the pre-application process and have been used in this initial risk assessment to identify if modelling is necessary.

**It is strongly recommended that the numbers of animal places by category, ventilation type and housing system is reviewed, and appropriate emission factors are assigned before undertaking the detailed modelling assessment.**

Category of livestock	Housing system	Number of animal places	Ammonia emission factor (kg NH <sub>3</sub> /animal place/year)
Broilers	Fan ventilated fully littered floor, non-leaking drinkers  Roof ventilation only (vents greater than 5.5 metres high, fan efflux velocity at or greater than 11 m/s)*	434,000	0.024

\* this can include gable end fans that are used for heat extraction only during the summer months

## Manure and slurry storage

No manure or slurry is stored within the installation boundary.

If you decided to alter your proposal by increasing the number of animal places or by changing the animal housing type or by increasing the manure or slurry storage you should include these changes in your modelling report.

## Screening Overview

This screening assessment has considered any Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites within 5km, any Sites of Special Scientific Interest (SSSIs) within 5km and also any National Nature

Reserves (NNRs), Local Nature Reserves (LNRs), ancient woodlands and Local Wildlife Sites (LWSs) within 2km of the farm.

We have used the Environment Agency's Ammonia Screening Tool (AST v4.6) to assess the impact of your proposal at those sites identified within the above distance criteria.

We have applied a two-stage screening criteria to the ammonia screening tool results:

For SACs, SPAs, Ramsar sites and SSSIs, the screening assessment has taken into account other intensive farms that could act in-combination with the proposal, where applicable.

Where the ammonia screening tool predicts that emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) will be <Y% (see Table 1 below) of the relevant critical level (CLE) (ammonia) or critical load (CLo) (nutrient nitrogen or acid), the proposal screens out of the requirement for an ammonia assessment.

Further modelling is required where:

- emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) are in excess of Z% of the relevant CLE or CLo at any SSSIs and/or other nature conservation sites (e.g. NNRs, LNRs, LWSs, ancient woodlands)
- emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) are in excess of Y% of the relevant CLE or CLo for any SACs, SPAs or Ramsar sites
- there is the potential for an in-combination effect with existing farms at any SSSIs if emissions are > Y% of the CLE or CLo
- the proposal is within 250m of any nature conservation sites

**Table 1 Screening thresholds**

Designation	Y%	Z%
SAC, SPA, Ramsar	4	n/a
SSSI	20	50
NNR, LNR, LWS, ancient woodland	100	100

## Screening Results

The SACs, SPAs or Ramsar sites listed in the tables below require detailed modelling as the emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) are predicted to be > Y% of the relevant CLe or CLo. Detailed modelling is therefore required to assess the impact of airborne ammonia at the following sites:

**Table 2 Assessment of ammonia emissions**

Site Name	Designation / Status	Ammonia Critical Level ( $\mu\text{g}/\text{m}^3$ )	Process contribution (PC) ( $\mu\text{g}/\text{m}^3$ )	PC as % Critical Level
Norfolk Valley Fens	SAC	1	0.161	16.1
Breckland	SAC	1	0.067	6.7

**Table 3 Assessment of nutrient nitrogen deposition**

Site Name	Designation / Status	Nutrient Nitrogen Critical Load ( $\text{kg N}/\text{ha}/\text{yr}$ )	Process contribution (PC) ( $\text{kg N}/\text{ha}/\text{yr}$ )	PC as % Critical Load
Norfolk Valley Fens	SAC	5	0.835	16.7
Breckland	SAC	5	0.35	7

**Table 4 Assessment of acid deposition**

Site Name	Designation / Status	Acid Critical Load ( $\text{keq}/\text{ha}/\text{yr}$ )	Process contribution (PC) ( $\text{keq}/\text{ha}/\text{yr}$ )	PC as % Critical Load
Norfolk Valley Fens	SAC	0.514	0.06	11.7
Breckland	SAC	0.537	0.025	4.7

The ammonia screening tool predicts that emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) will be between Y and Z% at the SSSI listed in the tables below. In addition, there are other farms that could act in-combination with proposal, therefore detailed modelling is required.

**Table 5 Assessment of ammonia emissions**

Site Name	Designation / Status	Ammonia Critical Level ( $\mu\text{g}/\text{m}^3$ )	Process contribution (PC) ( $\mu\text{g}/\text{m}^3$ )	PC as % Critical Level
Cranberry Rough Hockham	SSSI	1	0.414	41.4

**Table 6 Assessment of nutrient nitrogen deposition**

Site Name	Designation / Status	Nutrient Nitrogen Critical Load (kg N/ha/yr)	Process contribution (PC) (kg N/ha/yr)	PC as % Critical Load
Cranberry Rough Hockham	SSSI	5	2.149	43

**Table 7 Assessment of acid deposition**

Site Name	Designation / Status	Acid Critical Load (keq/ha/yr)	Process contribution (PC) (keq/ha/yr)	PC as % Critical Load
Cranberry Rough Hockham	SSSI	0.564	0.153	27.1

The nature conservation site listed in the table below requires detailed modelling as the emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) is predicted to be > Z% of the relevant CLe (ammonia) or CLo (nutrient nitrogen or acid). Detailed modelling is therefore required to assess the impact of airborne ammonia at the following sites:

**Table 8 Assessment of ammonia emissions**

Site Name	Designation / Status	Ammonia Critical Level ( $\mu\text{g}/\text{m}^3$ )	Process contribution (PC) ( $\mu\text{g}/\text{m}^3$ )	PC as % Critical Level
Furze Allotment	LWS	1	1.11	111

In addition, your proposal is within 250m of the nature conservation sites listed in the tables below. Detailed modelling is therefore required to assess the impact of airborne ammonia at these sites.

**Table 9 Assessment of ammonia emissions**

Site Name	Designation / Status	Ammonia Critical Level ( $\mu\text{g}/\text{m}^3$ )
Breckland Forest	SAC	1

**Table 10 Assessment of nutrient nitrogen deposition**

Site Name	Designation / Status	Nutrient Nitrogen Critical Load (kg N/ha/yr)
Breckland	SPA	5
Breckland Forest	SSSI	5

**Table 11 Assessment of acid deposition**

Site Name	Designation / Status	Acid Critical Load (keq/ha/yr)
Breckland	SPA	0.536
Breckland Forest	SSSI	0.536

### **How we decided the sensitivity of the nature conservation site**

Relevant critical loads were obtained from the [Air Pollution Information System](#).

Relevant critical levels were obtained from [Air Pollution Information System](#) assigned using the best information available at the time from our internal mapping and data application.

### **Permitting Outcomes**

For SACs, SPAs and/or Ramsar sites a permit may be issued where either:

- the ammonia screening tool indicates that the process contribution is <4% of the CLe and/or CLo
- or
- detailed modelling indicates that the installation process contribution is < 1 % of the relevant CLe/CLos or, where relevant, the incremental increase from relevant background is < 1 % of the relevant CLe/CLos
- or
- detailed modelling indicates the process contribution plus contributions from other relevant sources plus background is **below** the relevant CLe or CLo AND additional checks\* during determination are acceptable



### Please note

Following receipt of an application, determination may require an additional, more detailed assessment of the installation's impact on any SACs, SPAs and/or Ramsar sites including, if appropriate, consideration of impacts of other local plans, projects, and non-permitted farms which could act in-combination. It may also include consideration of the condition of the SACs, SPAs and/or Ramsar sites and the background concentrations at the sites for ammonia, nitrogen deposition and acid deposition. This potential additional assessment is required to take into consideration recent case law.

We will contact the Applicant during determination of an application if we require any additional information to assess whether to grant/issue or refuse the permit/variation.

For SSSIs a permit may be issued where the ammonia screening tool or detailed modelling demonstrates that either:

- the process contribution is <20% CLe and CLo; or
- the process contribution plus contributions from other relevant intensive farms is <50% CLe or CLo;
- the process contribution plus contributions from other relevant intensive farms plus background is **below** the relevant CLe or CLo.

For NNRs, LNRs, LWSs and ancient woodlands a permit may be issued where the ammonia screening tool or detailed modelling demonstrates that:

- the process contribution is <100% CLe or CLo.

### **Proposing ammonia emission reduction techniques**

Where your modelling indicates the predicted process contribution is greater than the allowable thresholds, your assessment and application should include ammonia reduction techniques\* to reduce the contribution to the allowable thresholds.

Where these criteria can not be met a detailed assessment of the proposal will be carried out by the Environment Agency.

For SACs, SPAs, Ramsar sites and SSSIs, we may need to consult with Natural England before the determination of the application can be completed.

Factsheets and guidance about ammonia emissions to the atmosphere and nature conservation, the Environment Agency's assessment process and how to model ammonia emissions from intensive farms can be found on our website at:

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/business/sectors/40071.aspx>

\*Please note: for SACs, SPAs and Ramsar sites where additional checks are required during determination, further reduction of ammonia emissions may be required.