

From: [SM-Defra-RESP-notifications \(DEFRA\)](#)
To: [Stephen Raasch](#)
Cc: [Una Chandler](#)
Subject: EPR/XP3330VH/V004 We Need More Information About Your Application CRM:0868166
Date: 09 September 2026 09:50:03
Attachments: [image.png](#)
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[Biomass Boiler Application Requirements - Updated 03-08-2023.doc](#)



Dear Stephen Raasch

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/XP3330VH/V004

Operator: John Smith

Facility: Swarbrick Hall Poultry Unit, Singleton Road, PRESTON, PR4 3JJ

Thank you for your application received on 25/08/2026.

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 questions.

Site drainage layout plan.

Please submit a revised site drainage layout plan that includes the following:

- Please confirm which watercourse the unnamed ditches ultimately discharge into (name of river).
- Please provide National Grid References (NGRs) for all clean water discharge points where water discharges beyond the installation boundary.

Biomass boiler

- The proposed biomass boiler is described as having a net rated thermal input of 1.047 MWth in the biomass boiler document and 1.137 MWth in the Non-Technical Summary. Please review and amend the application documents to reflect the correct thermal input and re-submit the revised documents to ensure this information is consistent across the application.
- Please provide the National Grid Reference (NGR) for the proposed biomass boiler stack. The biomass boiler document currently only provides NGRs for the two existing biomass boilers.
- Please confirm the fuel feed capacity in kg/hr for each boiler to use grade A wood and hence the total fuel capacity for all units using Grade A wood within the installation (if total capacity is > 50 kg/hr, this is a 5.1 Part B(a) (v) activity and if this is first time this has been added to the permit then the additional fee is needed i.e. £1,712.70 in accordance with the table 1.18, section 1.18.2 of the [The Environment Agency Environmental Permitting and Abstraction Licensing England Charging Scheme 2022 Amendments up to 15 May 2026](#).

As you have overpaid the application fee by £450, the Part B activity charge would be reduced by this amount and the total amount due would be

£1,712.70 - £450 = **£1,262.7**.

Please note that this outstanding amount must be paid in full before the application can be duly made.

Note: Details of how to make payment can be found in Part C3.5 of the application form. When responding to this request for information, please confirm the payment date and reference so that we can locate the payment on our system. The application cannot be duly made until receipt of this payment has been confirmed.

- Please demonstrate how the proposed new biomass boiler complies with at least one of the screening criteria set out in the Environment Agency guidance below. Please give relevant stack heights/distances criteria as relevant to show compliance and confirm compliance with criteria under Renewable Heat Incentive Scheme (the boiler manufacturer should have proof of certification). The scheme is not open to new applications, but boilers should still meet the criteria. <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-biomass-boilers>.
- Please complete and submit the attached biomass boiler information form for the proposed biomass boiler.

*Note: Air quality modelling may be required if the proposed biomass boiler does not screen out. Please note that any individual biomass boiler with a net rated thermal input capacity greater than **1 MWth** will be subject to MCPD requirements, including compliance with applicable ELVs and monitoring requirements.*

- Please confirm whether the proposed biomass boiler is a heat-only boiler or a Combined Heat and Power (CHP) plant. If it is a CHP plant (producing both heat and electricity), please amend and resubmit the Technical Standards, Non-Technical Summary (NTS) and biomass boiler document to ensure this information is accurately and consistently reflected throughout the application.
- If the biomass boiler is also a CHP plant, please submit a Decarbonisation Readiness (DR) report in accordance with the guidance [Decarbonisation readiness in environmental permit applications - GOV.UK](#). If a DR report is required, an additional assessment charge will apply. For permit variations requiring submission of a DR report, the current charge is **£3,301.88** in accordance with charge reference 1.19.14 of the [The Environment Agency Environmental Permitting and Abstraction Licensing England Charging Scheme 2022 Amendments up to 15 May 2026](#).

*Note: DR requirements only apply to relevant combustion power plants introduced to the permit on or after **01/04/2026**. DR would not apply where the plant has a **net rated thermal input of less than 1 MWth**.*

If you are applying for an environmental permit for a new or substantially refurbished electricity-generating combustion power plant, or for an energy-from-waste plant on or after 28/02/2026, you may be required to demonstrate Decarbonisation Readiness (DR) as part of your permit application. DR is

demonstrated through a DR report, which shows there are no known barriers to converting the plant in future to low-carbon route operation (carbon capture or hydrogen fuel). You should refer to the published [Decarbonisation readiness in environmental permit applications - GOV.UK](#) guidance for operators and our [Consultation response: Decarbonisation readiness proposed guidance - GOV.UK](#) for full details of applicability and exemptions.

Emission Limit Values:

Use the attached biomass boiler data form for proposed boiler to show compliance with MCP Emission Limit Values in Medium Combustion Plant Directive Table 1 for units 1-5 MW and for biomass boiler:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015L2193>

Specifically, all for concentrations standardised at 6 O₂%

- Dust levels < 50 mg/Nm³
- Oxides of Nitrogen levels < 500 mg/Nm³

NB ! Please confirm biomass will exclude straw and miscanthus otherwise compliance with ELV in Table 1 for biomass boilers for SO₂ applies.

Monitoring

- For all emission substances where ELVs apply as determined by above review plus Carbon Monoxide please confirm MCPs will comply with following low risk monitoring guidance: <https://www.gov.uk/government/publications/monitoring-stack-emissions-low-risk-mcps-and-specified-generators/monitoring-stack-emissions-low-risk-mcps-and-specified-generators>

Grade A recycled wood specification

- Please provide a waste specification for the proposed Grade A recycled wood fuel, including:
 - a description of the wood fuel and its source;
 - confirmation that the wood fuel will be limited to Grade A recycled wood;
 - the relevant EWC waste codes (limited to those identified below); and
 - details of the procedures and quality assurance checks that will be implemented to ensure that only permitted Grade A recycled wood is accepted and used within the biomass boiler.

Table S2.2 Permitted waste types for use as fuel for the biomass boiler units	
Waste code	Description
03	Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard
03 01	wastes from wood processing and the production of panels and furniture

03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
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
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	wood other than that mentioned in 19 12 06

- Please confirm that the proposed Grade A recycled wood fuel meets 5.1 Part B specification i.e. "wood waste with the exception of wood waste which may contain halogenated organic compounds or heavy metals as a result of treatment with wood preservatives or coatings;" and exceptions are not present.

Ammonia Modelling Report

Please provide a revised ammonia modelling report to address the following:

- Please ensure that the bird numbers presented in the ammonia modelling report are consistent with the application documents and the existing permit. The modelling report states existing bird numbers of 337,500 birds, with an additional 112,500 broiler chickens proposed. However, the current permit authorises the rearing of 350,000 broiler places, and the variation application proposes an increase of 100,000 bird places. Please amend the bird numbers as necessary and submit a revised ammonia modelling report.
- Please provide more recent advice from Natural England (NE) confirming that an Ammonia Critical Level (CLE) of 3 µg/m³ remains appropriate. The justification currently provided is based on NE advice associated with variation V002, issued in January 2017. Further evidence is therefore required to demonstrate that this advice remains current and applicable.
- If more recent advice from NE confirming that a CLE of 3 µg/m³ remains appropriate cannot be provided, please submit revised ammonia modelling using the CLE of 1 µg/m³ specified in the pre-application advice for Morecambe Bay and Duddon Estuary SPA and Morecambe Bay Ramsar. The revised assessment should include a comparison against the existing baseline, use the lowest appropriate emission factors, and demonstrate that the proposal results in less than a 1% incremental increase at the designated sites.

Data input files

In accordance with the guidance, [Environmental permitting: air dispersion modelling reports - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports), please submit the data input files for the ammonia modelling.

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

You must send us the information and or payment by 23/09/2026.

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 correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. 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.

Please feel free to contact me using the details below if you have any questions.

Kind regards,
Una

Una Chandler
Permitting Officer

**Installations Permitting - Intensive Farming
Growth, Permitting and Monitoring**

una.chandler@environment-agency.gov.uk
07721618445



