

Wight, Jonathan Robert

Subject: FW: FW: PLEASE RESPOND Re: EPR/XP3101MD/A001 The Piggery

From: Kevin@kbenvconsult.co.uk <Kevin@kbenvconsult.co.uk>
Sent: 06 January 2023 14:06
To: Topping, Liz <liz.topping@environment-agency.gov.uk>
Subject: Re: FW: PLEASE RESPOND Re: EPR/XP3101MD/A001 The Piggery

Hello

Thank you for submitting the ammonia modelling onto the queue. At this stage, their questions indicate they need more information from us and we're hoping that their assumptions may yet allow us to increase pig numbers, only by a few hundred perhaps but that can easily be the difference between breaking even and losing money in the hard pressed pig industry.

Any reference to point sources can be ignored as they were only included to cover/investigate the option of changing the buildings from naturally ventilated to mechanically ventilated and it is now known this is not economically viable for the business.

I can confirm the figure for 8% downtime.

Loscar Common is almost entirely arable farmland. There are no Critical Level or Loads for arable farmland. The only place a Critical Level of 1 might possibly be applicable is for the plantation woodland and hedgerows and headlands. However it is very unlikely that this woodland (or any hedgerows/headlands in the LWS) contains sensitive lichens/bryophytes, or that lichens/bryophytes are an integral part of the ecosystem.

In other recent cases elsewhere, the EA have used a Critical Level of 3 for AWs and LWSs that are extensive, not surrounded by arable farmland and are in areas where sensitive lichens/bryophytes are quite possibly present. Again, we would suggest that ammonia and N loading from the arable farmland far outstrips any that might occur from airborne emissions from a farm at a distance of over a kilometre.

As far as we are aware, the LWS has not been assessed in any way at all apart from determining the presence of a LWS. The land use has been assessed (mostly arable) and species recorded in the NBN atlas database (none of note) and would suggest the LWS is probably designated for badgers, ie Loscar Common is not relevant for consideration as part of the impact assessment for potential airborne emissions.

regards

Kevin

On 28/12/2022 12:41 GMT Topping, Liz <liz.topping@environment-agency.gov.uk> wrote:

Hi Kevin,

Thank you for confirming the additional payment should have been made by Fraser Watts and sending me the updated application form with his details. I have just asked our Permit Support Centre to check if the payment has been received this end and await their response.

To be honest I didn't think you were changing the pig numbers as you never supplied revised documents previously, so I have asked for this application to go on our internal modelling queue to be audited (I may need to remove this now if revised information is going to be submitted). The modelling team have replied and they would like you to explain why the modelling files include point sources when there is no mention of these in the report or proposal? Could you please reply to this question please.

In relation to emission factors, in the pre-application screening we used 1.49 for the manure heap and 1.84 for the pigs >30kg on solid floor straw system with natural ventilation. This 1.84 includes downtime hence the reason why its lower than the emission factor of 2 you have used in the modelling report, but we would be happy to except 1.84 in your modelling report if you can confirm the downtime of 8% is still appropriate and wish to revise it. If you change the pig numbers at this stage, you will need to re-do the modelling and submit revised supporting documents and revised modelling files with the correct pig numbers within. Can you please make sure this information is submitted by **13/01/2023**, if the full information is not received by this deadline, then we will return the application as not duly made.

Please note that we are still checking if a critical level of 3 µg/m³ is acceptable or a CLe of 1 µg/m³ is more appropriate for Loscar Common LWS and this will be determined at a later stage. However we do not think a critical level of N/A is appropriate, so please update any revised modelling to remove the N/A critical level and include a relevant CLe and also a relevant CLo for nitrogen deposition. If you have any evidence (further to your e-mail dated 16/12/2022) on the use of a critical level 3 at Loscar Common LWS, please supply this information. The isopleths in figure 7a of your modelling report will change if you increase the number of pigs at this site which may show an increased impact at Loscar Common LWS. If this is the case we may need you to provide a revised proposal including additional abatement.

I look forward to receiving your response.

Thanks

Liz

From: Kevin@kbenvconsult.co.uk <Kevin@kbenvconsult.co.uk>

Sent: 22 December 2022 12:06

To: Topping, Liz <liz.topping@environment-agency.gov.uk>

Subject: RE: PLEASE RESPOND Re: EPR/XP3101MD/A001 The Piggery

Hello

As regards any further change in pig numbers from 3,900 to 4,500, this is something we would like to do and hopefully have now proved that a Cle of 3 could be allowed (as below).

However, at this stage AS Modelling & Data Ltd would like to understand the assumptions made once the ammonia deposition report is under consideration. If possible, we would like the modeller to keep in touch to allow us to understand at the earliest opportunity what thresholds and critical levels for ammonia loadings are now being used as such assumptions are difficult to gauge outside the EA.

many thanks

Kevin