

[REDACTED]

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**From:** Kevin Brook [REDACTED]  
**Sent:** 15 March 2023 21:36  
**To:** Trafford, Kirsty  
**Subject:** RE: We need more information about your application and Underpayment of application charge  
EPR/XP3539XH/V003  
**Attachments:** Raw material review Furniss New House Farm.pdf; Appendix 10\_Energy.pdf; Appendix 11 Waste  
Review Action Plan.pdf

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Hello

### **Variation Type**

Yes, please proceed with the application as a substantial variation.

### **Outstanding Information and application fees**

I can confirm the area included previously has not been used as part of the activities at the pig unit.

The site condition report has not been updated as no extra land is now included within the revised boundary. Please refer to the original report submitted with the initial application.

### **Supporting documents**

Please find documents attached.

### **Ammonia modelling**

The data input files have been requested and will be submitted as soon as they become available.

i I can confirm where stated, the buildings have a fully slatted floor (FSF) with frequent slurry removal (slurry depth of less than 800mm and removed at a frequency of 12 weeks or less).

ii I can confirm your assumption is correct.

Please assume there is now no requirement for manure to be stored on site.

### **Outstanding application fees**

Please send an invoice with vat details to ME Furniss & Sons (Farms) for the outstanding amount.

regards

Kevin

On 02/03/2023 16:42 GMT Trafford, Kirsty [REDACTED] wrote:

Hi Kevin

Thank you for the additional information provided on 20/02/23, I've reviewed this and looked into the queries raised (including the ammonia pre-app screening request):

### **Variation type**

A substantial variation is defined in the (EPR) regulations as a change in operation which in itself meets the thresholds and so we're unable to change the variation type. As the number of production pigs (over 30kg) on site is proposed to increase by 2940, which is over the threshold of 2000 production pigs, the application is a substantial variation.

Please confirm that you wish to proceed with the application as a substantial variation.

### **Ammonia modelling:**

We have completed an initial ammonia screening assessment for your proposal. The screening assessment is based on your proposal to vary the permitted number of animal places at New House Farm to 6,000 production pigs over 30kg. The BAT Conclusions section of the Non-Technical Summary from the variation application confirms depth of slurry managed within 800mm and frequent slurry removal a minimum of every 10 weeks.

Based on this scenario, detailed modelling is needed. I've attached the pre-application advice letter (it's a standard template so won't all be applicable as the variation application is already submitted), which contains all the details of the screening results in Annex 1.

Additionally, the application proposes a betterment and so detailed modelling is required for both the existing and proposed scenarios so this can be assessed, as the variation is to redevelop the site.

Please note that whilst there are other existing farms that may act in-combination with your proposal, an in-combi check wasn't undertaken as part of the initial ammonia screening assessment in this instance as the submitted variation application proposes betterment and detailed modelling has already been provided. It was understood that the pre-app request was to confirm the need for detailed modelling.

### **Outstanding information and application fees:**

As a result, there is still some information and outstanding application fees from the information request. Please can you provide the following:

### **Site boundary:**

- a. With regards to the area of land to removed, which was included in error previously, please confirm it has not been used as part of the activities at the pig unit.
- b. I haven't been able to find an updated Site Condition Report with the variation application, please can you send a copy?

## Supporting documents

As the proposal is to redevelop the site, with buildings being demolished and new ones constructed, please confirm the following documents have been reviewed and revised. Provide updated versions as required:

- a. Raw materials inventory.
- b. Energy efficiency review.
- c. Waste minimisation review.

## Ammonia modelling

- a. Please submit a copy of the ammonia modelling data input files.
- b. It would be helpful if you could confirm the following details regarding the housing types and weights breakdown for the existing houses:
  - i. For houses EX1, EX2, EX5, EX6&7 and EX8 where the flooring type is stated as 'slatted', please confirm if this is fully slatted floor (FSF) with frequent slurry removal (slurry depth of less than 800mm and removed at a frequency of 12 weeks or less)?
  - ii. House EX3 states 1,600 pigs 20-45kg – I've assumed a breakdown of 800 pigs in the weight range 15-30kg and 800 pigs > 30kg to replicate the total numbers in the original permit. Is this correct? The original permit was for 450 sows, 2040 pigs up to 30kg and 3060 pigs over 30kg
- c) The original permit application included manure storage on site of 400 tonnes per year, and the ammonia modelling report states 600 tonnes in total. Please confirm the quantity of manure stored per year for the existing site.

## Application fees outstanding

In addition to the habitats assessment fee (£779) and dust & bioaerosol management plan assessment fee (£620), there are also outstanding application fees for the ammonia modelling assessment (£620) and the remaining substantial variation application fee (£3,208). This totals **£5,227**.

Please note that the additional fees must be paid in full before we can class the application as 'duly made'.

Please send the information and payment by 16/03/23.

If you have any questions, please let me know.

Many thanks,  
Kirsty

**Kirsty Trafford**

Senior Permitting Officer, National Permitting Service

**Environment Agency**

[Redacted]

Mobile: [Redacted]



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**From:** Kevin Brook [Redacted]  
**Sent:** 20 February 2023 15:15  
**To:** Trafford, Kirsty [Redacted]  
**Subject:** Fwd: We need more information about your application and Underpayment of application charge  
EPR/XP3539XH/V003

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Hello

**1. Variation type**

The increase in the number of production pigs >30kg is greater than the threshold of 2,000 suggesting the type of variation should be substantial. However, the overall environmental impact of the permit is actually reduced by the removal of the breeding unit comprising 450 sows and 2,040 weaners.

We are aware of a number of situations where a reduction in the environmental impact has been demonstrated despite the increase in numbers of production pigs for example, through demonstration of a reduction in the ammonia emission. This then allowed the variation to be classed as normal and we would hope this would be the case at New House Farm.

## **2. Site Name**

Please change the name of the site to New House Farm.

## **3. Site Boundary**

Apologies for the reference in the paperwork to the site boundary not changing. As you have pointed out, the boundary has been changed slightly to improve accuracy along the southern boundary and excluding the farmhouse accommodation along the eastern boundary. The attenuation pond has also now been included in the revised copy attached. The site condition report as already submitted was completed to include the area associated with the attenuation pond and no further revision is required.

## **4. Site Drainage and plan**

- a. Clean water discharge to the river uses existing pipework via an overflow from the attenuation pond at NGR 372692 321532, piped drainage north to the farm boundary and then a continuation into the piped drainage system for the road which eventually discharges to the river.
- b. The pond is earth-lined and slowly permeable and will not act as a soakaway to any degree.
- c. All discharges are as marked on the attached plan, the entry to the attenuation pond also acting as the overflow to the discharging pipework to the north and the farm boundary.

## **5. Supporting Documents**

We are hoping that the variation will be 'normal.' In this case, please clarify the need for any additional supporting documentation.

## **6. Dust and Bioaerosol Management Plan**

See attached.

## **7. Ammonia modelling**

We have recently forwarded a preapplication ammonia screen. Following the results of this, we'd be grateful if you could confirm the requirement for detailed modelling.

## 8. Slurry Tank

The size of the tank is 380m2. The cover type is yet to be decided.

## 9. Application Fees Outstanding

We accept the requirement for the Habitats and Dust and Bioaerosol assessment fees but are hoping the variation will be classed as normal and aren't yet certain that an ammonia modelling assessment will be required.

many thanks

regards

Kevin

K Brook

Yorkshire Farmers

[REDACTED]

----- Original Message -----

From: PSC Land <[PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)>

To: [REDACTED]

Date: 03/02/2023 11:36 GMT

Subject: We need more information about your application and Underpayment of application charge  
EPR/XP3539XH/V003

Dear Mr Brook

**We need more information about your application and Underpayment of application charge**

**Application reference: EPR/XP3539XH/V003**

**Operator: M. E. Furniss & Sons (Farms)**

**Facility: New House Pig Farm**

Thank you for your application received on 25/05/2022.

I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information.

**1. Variation type**

The application proposes to increase the number of production pigs (over 30kg) from 3060 to 6000, which is an increase over the permitted threshold of 2000 production pigs. As a result, the application is a substantial variation rather than a normal variation (and the incorrect fee has been paid, please see point 9 below).

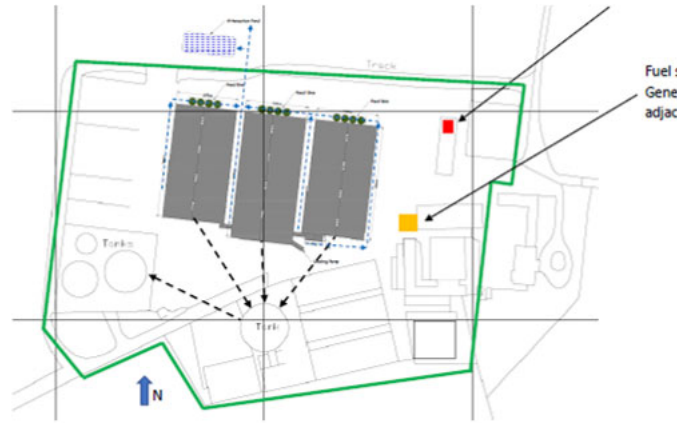
Please confirm that you wish to proceed with the application as a substantial variation.

**2. Site Name**

Please confirm the site name you wish to proceed with as the application form states 'New House Farm' and the previous variation notice (V002) states 'New House Pig Farm'.

**3. Site boundary:**

The application documents state that the site boundary will not be changing as part of the variation proposal, however, the boundary line on the site plan in the original permit (see image on left below) appears to differ from that on the site plan provided in this application (image on right below). In particular the bottom edge and right-hand side.



Please check the installation boundary shown on the site plan from the original permit and the plan submitted with this application. Submit a boundary plan, addressing the following points:

- a. The proposed attenuation pond to the north of the site will need to be included within the site boundary.
- b. From the original permit application and our mapping systems the area within the blue circle appears to include the farmhouse, which shouldn't be included. If this was included in error previously, please confirm that this area of land has not been used as part of activities at the pig unit. I will then be able to remove this area as part of this variation.
- c. If any additional land is being included as part of this variation, submit an updated site condition report to include the additional land.

*Notes: Please show local geographical features on the plan beyond the installation boundary to help us place the site in its local environment. The installation boundary on the plan should not encompass buildings and plant not associated with the installation (e.g. the farm house where the site manager lives or a barn used for another activity).*

#### 4. Site drainage and plan

The Technical Standards document states that roof water and clean yard water leaves the site via pipework to an attenuation pond and discharge to river. Please provide the following information:

- a. Clarify if the discharge to river is via an overflow from the attenuation pond or a separate discharge.
  - i. If a separate discharge, confirm which watercourse the roof water and clean yard water discharges to and provide the NGR of the discharge point.
  - ii. If the attenuation pond overflows, where would the water drain to? Please provide a NGR for the outlet and confirm which watercourse the water would eventually drain into.
- b. Please confirm if the attenuation pond acts as a soakaway or is it lined?
- c. Please provide an updated drainage plan with all emission points marked on as required (discharge point to watercourse, outlet from attenuation pond).

#### 5. Supporting documents



As this is a substantial change to the site, please confirm the following documents have been reviewed and revised. Provide updated versions as required:

- a. Raw materials inventory.
- b. Energy efficiency review.
- c. Waste minimisation review.

## 6. Dust and bioaerosol management plan

There appears to be sensitive receptors within 100m of the installation boundary therefore you are required to submit a dust and bioaerosol management plan (and an associated fee for assessing it, please see point 9 below). You should follow the guidance via the link:

<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols>

*Note: We require this if there are any sensitive receptors within 100m of the installation boundary (this distance is measured from the installation boundary to the assumed boundary of the property, including the garden), and includes properties inhabited by people associated with the installation (such as the farmhouse or farm worker's houses) as it is a human health assessment rather than an amenity issue. There looks to be a property associated with the farm, close to the boundary to the east.*

## 7. Ammonia modelling

- a. Please submit a copy of the ammonia modelling data input files.
- b. It would be helpful if you could confirm the following details regarding the housing types and weights breakdown for the existing houses:
  - i. For houses EX1, EX2, EX5, EX6&7 and EX8 where the flooring type is stated as 'slatted', please confirm if this is fully slatted floor (FSF) with frequent slurry removal?
  - ii. House EX3 states 1,600 pigs 20-45kg – I've assumed a breakdown of 800 pigs in the weight range 15-30kg and 800 pigs over 30kg to replicate the total numbers in the original permit. Is this correct? The original permit was for 450 sows, 2040 pigs up to 30kg and 3060 pigs over 30kg
- c. The original permit application included manure storage on site of 400 tonnes per year, and the ammonia modelling report states 600 tonnes in total. Please confirm the quantity of manure stored per year for the existing site.
- d. There is an associated fee for ammonia modelling assessment, please see point 9 below.

*Note: The additional information is required to establish the pig numbers/weights in each of the houses and the housing types, and therefore whether the correct emission factors have been used in the assessment.*

## 8. Slurry tank

- a. The original permit application states the floor area of the slurry tank to be 436m<sup>2</sup> and the ammonia modelling report for this application states 380.1 m<sup>2</sup>. Please confirm the floor area of the slurry tank.

- b. Please confirm the cover type.

## 9. Application fees outstanding

As covered in points 1, 6 and 7 there are additional fees required, which totals **£5,227**. This is comprised of:

- The remaining substantial variation application fee – £3,208.

The application fee for a substantial variation is £7,218 and you've already paid £4,010. As covered in point 1, this is because the variation proposes to increase the number of production pigs (over 30kg) by 2940 which is over the permitted threshold of 2000 pigs.

- Ammonia modelling assessment – £620.

You have submitted an ammonia modelling report (titled 'A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Pig Rearing Houses at New House Farm, Chester Road, near Chetwynd in Telford and Wrekin) but you have not submitted the associated fee, which is required in order to assess the report. See Table 1.19 (1.19.8) of the Charging Scheme.

- Habitats assessment – £779.

With reference to Table 1.19 (1.19.2) of the Charging Scheme, a fixed charge is payable for a habitat assessment as there is a European Site within the screening distance.

- Dust and bioaerosol management plan assessment – £620.

With reference to Table 1.19 (1.19.9) of the Charging Scheme a fixed charge is payable for assessment of the dust and bioaerosol management plan.

Please submit payment of this. For further details please refer to the Charging Scheme: [Environmental permits and abstraction licences: tables of charges - GOV.UK \(www.gov.uk\)](#).

Please send the information, quoting the above application reference, to:

Email address: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

Postal address:

Regulated Industry Team, Permitting Support, NPS Sheffield

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

Please send the information and payment within 10 working days of this letter. Details of how to pay are given in Part F of the application form.

If we do not receive the information and payment within 10 working days we will return your application. –  
**17/02/2023**

If we do receive the requested information and payment within 10 working days, we'll 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 letter 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 and requesting information. 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>

If you have any questions please phone Kirsty Trafford [REDACTED]

Yours sincerely

**Tchale Lymer**

Permitting Support Advisor– Permitting Support Regulated Industry - National Permitting Service  
**Environment Agency** | Quadrant 2, 99 Parkway Ave, Parkway Business Park, Sheffield, S9 4W  
Contact: 02030253898

Working days: Monday-Friday

Regulated Industry Team Phone Number : 02030253898 (9am to 4pm)

Regulated Industry Team Email : [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk)

Incident response

National duty communications officer (24/7) | 0800 023 2522

National duty communications manager | 0800 028 2411

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[Environment Agency - National Permitting Service Survey \(smartsurvey.co.uk\)](https://smartsurvey.co.uk)



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regards

Kevin