

From: [REDACTED]
To: [SM-Defra-RESP-notifications \(DEFRA\)](#); [REDACTED]
Subject: Re: EPR/KP3426SG/A001 We Need More Information About Your Application CRM:0297164
Date: 15 October 2025 15:19:45
Attachments: [image.png](#)
[ww2krqne.png](#)

Hi Liz,

Please see answers below Blocks plans with drainage will follow - just with Operator for final checks and confirmation of drainage routes.

I will send through plans separately once finalised. Please let me know if there is anything else at all you need from us.

Many thanks

Kind regards

Elaine

Many thanks

Elaine

On 03/10/2025 11:45, SM-Defra-RESP-notifications (DEFRA) wrote:



Dear Elaine Marshall

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/KP3426SG/A001

Operator: Bailey Livestock Ltd

Facility: Fir Tree Farm, Fir Tree Farm, Stokesley, TS9 5LD

Thank you for your application received on 24/09/2025. I'm going to be the Validation/Duly Making Officer for the above application, all my contact details are below.

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:

1. Permit threshold

I presume this is an existing farm which is extending above the permit threshold, please provide a quick overview of this site? Please note that you should not stock over 2,000 production pigs before the permit has been issued.

2. Site condition report

Provide a site condition report for all of the land on which your activity will take place. This should be in line with our '[H5 Site condition report](#)' guidance which includes a template you can use.- *answered in previous email- please let me know if you need anything further*

3. Standby Generator

Within the technical summary it says, "There is a backup generator (60kwh) located on site with associated fuel storage of 5,000 litres all within bunded storage in accordance with the Silage, Slurry and Agricultural Fuel Oil regulations". Can you also answer the following questions:

- a) What is the thermal input of the generator in MWth? **138kw**
- b) Is the generator tested less than 52 hours per annum? **Yes**
- c) Is the generator used for emergency use only as a temporary power source if there's a main power failure? **Yes**
- d) Is the generator operated less than 500 hours per annum (averaged over 3 years)? **Yes**

4. Borehole

Your non-technical summary says site water is obtained by a borehole with mains water back-up available, and your Technical standards document mentions that the borehole is protected from back flow and over-surface flow from yards. Do you abstract less than 20m³/day of water from this borehole? If you abstract more than this, an abstraction licence will be required. See the following for further information if required [Change, revoke or transfer a water abstraction or impoundment licence - GOV.UK](#).- **less than 20m³ per day extracted**

5. Site layout and drainage plan

Your site layout and drainage plan needs more detail adding, if its hard to add the detail onto one site plan you could submit a different layout and drainage plan for each area to give more detail. Please add the following:

- a) The two pig houses with a reference number added and their ventilation shown.
- b) The secure carcass bin location
- c) The location of the generator and its associated fuel storage tank
- d) Feed storage
- e) Chemical store
- f) North arrow
- g) Make sure the key/legend is clear, maybe put in a box so its clear this is a key and not a point on the layout plan. If you colour code some of the points I've requested and add to the key/legend that might work well.
- h) Make sure the drainage is clear, that any attenuation is shown. Your application mentions free-draining hardcore yard acting as soakaway, make sure its location is clear on the plan. Add a national grid reference

to the discharge points to the nearby watercourses so its clear where they enter surface water ditches. Make sure its clear if drains are French drains or sealed pipes. See question 6 below.

i) All manure and slurry storage is shown, including the dirty water tanks and the sealed pipelines.

j) The drinking borehole location.

k) Any other key operational points for the site.

6 Drainage

The drainage from pig houses roofs and associated yard areas that are not clean need to be drained via appropriate attenuation before being discharged to the nearby watercourses, for example via attenuation ponds, French drains, soakaways etc. Your application does mention free-draining hardcore yard acting as soakaway, but it is not clear from your application if all drainage is captured by this hardcore area.

a) Confirm that all required drainage receives appropriate attenuation before being discharges to the nearby watercourses.

b) How is dirty water on yard areas disposed or contained, for example when pigs are moved, or if there is a spillage?

c) When the pig houses are washed down is all the wash water contained within the houses and the dirty water tanks? If washdown water goes onto the yard area how is this managed?

d) Please add this additional site drainage detail to the site drainage plan to make it clear how site drainage on the yard areas and roof water is managed. See question 5 above.

7. Slurry and manure storage

You've said no slurry is produced or stored on site and no slurry has been included within the detailed ammonia modelling report (only manure storage). The pre-application screening back in 2024 included a 1,800m slurry lagoon. I've also noticed the site layout plan includes a wash water lagoon.- [There is no wash water or slurry lagoon](#)

a) Is there any slurry storage at this farm? If so it needs to be included in your permit documents and site location plan. [dirty water directed to dirty water tanks on washdown](#)

b) What is the wash water lagoon? How does this fit in with the pig site? Please provide details on its size and if it is covered? Is this BAT? Please note that we do not include underground dirty water tanks in our assessments, but a lagoon would need to be included. We may be able to do some sensitivity testing around this issue for the detailed modelling report if all details are provided. There is very little information about this in your non-technical summary or technical standards documents. [Actually a pond not a waste water lagoon - removed from installation boundary](#)

c) As this site is not within a Nitrate Vulnerable Zone (NVZ), can you confirm you have four months storage available at this farm? [Yes](#)

8. Modelling input files

Please provide the modelling input files for this detailed ammonia modelling report. [Forwarded previously](#)

9. Flooding

Your supporting information says this site is not in a flood zone 2/3 and is low risk to flooding, however the site installation boundary does border flood zones 2/3, please see the following link [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.gov.uk/flood-map-for-planning-service) for further details. Can you add a sentence to the Environment Management System (EMS) document, to say flooding is covered in your accident management plan. I don't need to see a copy of the accident management plan with this application, but please make sure the accident management plan addresses the following points if relevant: [Amendment to EMS and accident management plan reviewed](#)

- a) Explain what has been done to understand where water would flow and the level of risk of contamination to local watercourses from the site, as a result of a flood event?
- b) What actions have been taken by the operator to minimise potentially polluting flood water running off to clean water drains, and subsequently local watercourses, in the event of a flood, for example kerbing /sumps /shut off valves on clean water drains.
- c) Explain how pig houses, feed bins, chemical store, carcass store and fuel tank/generator are protected from flooding, to prevent contamination of flood waters.
- d) If there is a risk of contamination of local watercourses in the event of a flood, provide a review of the evaluation of water volume created during such a flood event, diversion plans for water transfer to storage facilities and confirmation that storage facilities are of sufficient volume to contain potentially polluted flood water.

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



You must send us the information and or payment by 20/10/2025.

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 £1,613. 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 email liz.topping@environment-agency.gov.uk.

Yours sincerely,
Liz

Liz Topping
Senior Permitting Officer
Installations Intensive Farming Permitting Team



Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, WA4 1HT



Phone: 020 302 50786 | Pronouns: she/her ([why is this here?](#))

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 BSc
 ock Marketing Ltd

Normal working days Tuesday-Friday


Technical Consultant
Working Days : Tuesday to Friday

Office: 01653 697941
Website: www.yorkshirefarmers.co.uk

