

Pre-application Report

To: Mrs Lizzie Bentley (on behalf of Buckton Gate Livestock)

Pre-application number: EPR/HP3308BF/A001

Buckton Gate Livestock
Buckton
Bridlington
North Humberside
YO15 1DH

Date Completed – 18/02/20

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 4,000 >30kg finisher pigs.

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 B3.5

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b35>

Your application should be emailed to:

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:

preapplicationsevice@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: 517968,472303 (with a 115m 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 ₃ /animal place/year)
>30kg Production Pigs	Side ventilation, natural or combination ventilation Note this includes tunnel ventilation and cross ventilation	4,000	1.85*

* Downtime of 1 week between each batch. At 4 batches per year, this is equivalent to 4 weeks. You can apply the emission factor of 2 for production pigs on straw, based on AHDB Pork trials and further reduction for occupancy time - $2 \times 48/52 = 1.85$.

Manure Storage

Storage type	Tonnes of fresh manure stored per year	Factor Kg NH ₃ / tonne fresh manure
Manure heap	100	1.49

Slurry Storage

No slurry storage on site.

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 (SAC), Special Protection Areas (SPA) and Ramsar sites within 5km; any Sites of Special Scientific Interest (SSSI) within 5km and also any National Nature Reserves (NNR), Local Nature Reserves (LNR), ancient woodlands and local wildlife sites (LWS) within 2km of the farm.

We have used the Environment Agency's Ammonia Screening Tool (AST v4.5) 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 SAC, SPA, Ramsar 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 or Critical Load, 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 Critical Level (ammonia) or Critical Load (nutrient nitrogen or acid) at any particular designated site;
- there is the potential for an in-combination effect with existing farms at a SAC, SPA, Ramsar and/or SSSI if emissions are > Y% of the critical level or critical load;
- the original permit for the installation required an Improvement Condition to reduce ammonia emissions;
- your proposal is within 250m of a nature conservation site.

Table 1 Screening thresholds

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

Screening Results

The ammonia screening tool predicts that emissions of ammonia or ammonia deposition (nutrient nitrogen or acid) will be between Y and Z% at the nature

conservation sites listed in the table below. However, there are currently no other farms that could act in-combination with proposal. Detailed modelling is not required.

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
Flamborough Head	SAC	3	0.202	6.7
Flamborough and Filey Coast	SPA	3	0.202	6.7
Flamborough Railway Cutting	SSSI	3	0.294	9.8

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

Table 3 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
Hoddy Cows Spring	SSSI	1	0.513	51.3

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 4 Assessment of ammonia emissions

Site Name	Designation / Status	Ammonia Critical Level ($\mu\text{g}/\text{m}^3$)	Distance
Flamborough Railway Cutting	LWS	3	141m
Buckton – Speeton Railway Track	LWS	3	94m

Table 5 Assessment of nutrient nitrogen deposition

Site Name	Designation / Status	Nutrient Nitrogen Critical Load (kg N/ha/yr)	Distance
Flamborough Railway Cutting	LWS	15	141m

Buckton – Speeton Railway Track	LWS	15	94m
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Table 6 Assessment of acid deposition

Site Name	Designation / Status	Acid Critical Load (keq/ha/yr)	Distance
Flamborough Railway Cutting	LWS	4.856	141m
Buckton – Speeton Railway Track	LWS	4.856	94m

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 assigned using the best information available at the time.

We have attached a checklist to this report which you can choose to send to the local authority ecological team, local wildlife trust or local forestry commission to ask for further information about local wildlife sites (LWS) or ancient woodland which require modelling. The checklist includes questions about the LWS or ancient woodland to establish their sensitivity and relevance for inclusion within the impact assessment from ammonia emissions. It is possible that these sources will not be able to provide all the required information. If this is the case modelling will be required as outlined earlier in this report.

Undertaking a site survey to identify the presence of species or communities that are particularly sensitive to ammonia is not an automatic requirement and is not an alternative to modelling. If you are thinking about this option you should speak to us first. Should you demonstrate that a Critical Level of $3\mu\text{g}/\text{m}^3$ is more appropriate, Critical Loads should also be applied to the LWS or ancient woodland.

Permitting Outcomes

For SAC, SPA, Ramsar a permit may be issued where the ammonia screening tool or detailed modelling demonstrates that either:

- the process contribution is <4% Critical Level and Critical Load; or
- the process contribution plus contributions from other relevant intensive farms is <20% Critical Level and Critical Load; or
- the process contribution plus contributions from other relevant intensive farms plus background is **below** the relevant Critical Level or Critical Load.

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

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

For NNR, LNR, LWS and ancient woodland a permit may be issued where the ammonia screening tool or detailed modelling demonstrates that:

- the process contribution is <100% Critical Level or Critical Load

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 threshold.

Where these criteria can not be met a detailed assessment of the proposal will be carried out by the Environment Agency. For SAC, SPA, Ramsar and SSSI we will 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>