

## Trafford, Kirsty

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**From:** steve raasch <stephenraasch@gmail.com>  
**Sent:** 22 July 2024 17:03  
**To:** SM-Defra-RESP-notifications (DEFRA); Trafford, Kirsty  
**Subject:** Re: EPR/EP3422SW/A001 We Need More Information About Your Application CRM:0833039  
**Attachments:** Application-for-an-environmental-permit-part-b3.5-intensive-farming-permit.zip

Hi Kirsty

Applicant has made a payment for the additional £620 fee.

1. Revised boundary OS map including house 1 attached.
2. Existing - House 1 4000 birds natural vent flat deck, House 2 16000 birds aviary gable fan, House 4 16000 birds natural vent flat deck.

Proposed - House 1 decommissioned, House 2 16000 birds aviary belt removal gable fan, House 4 32000 birds aviary belt removal natural vent.

3. Revised modelling and back up files attached.
4. No litter storage on site.
5. Revised accident assessment and emergency plan attached.
6. House 1 being decommissioned. No effluent from egg packing.
7. Details of previous flocks from last 5 years. No litter storage. No changes to management techniques.
8. Revised application form attached.

Regards



Steve

On Fri, 12 Jul 2024 at 14:04, SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)> wrote:





Dear Steve Raasch

**Environmental Permitting (England and Wales) Regulations 2016**

**Application reference: EPR/EP3422SW/A001**

**Operator: Multiple operators**

**Facility: High Emmotland Farm, Howes Lane, Driffield, YO25 8JS**

Thank you for your application received on 11/02/2024.

Unfortunately the application payment you sent is incorrect. The correct application charge is £9,260. This leaves a balance of £620 to pay.

The total application charge is comprised of:

- Ref 1.14.1 - Section 6.9 – farming installation; includes assessment of odour management plan and noise and vibration management plan – Permit application = £8,020.
- Ref 1.19.8 – Ammonia modelling assessment = £620.
- Ref 1.19.9 – Dust and bio-aerosol management plan = £620.

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. Site boundary plan**

In accordance with question 5a of the application form, please submit a plan showing the installation boundary clearly marked in green. The plan should be geographically correct (i.e. include roads, hedgerows, tracks or other recognisable features) and accurately drawn to scale, with a north facing

arrow. The plan should not be schematic.

*Note: Please refer to question 3 regarding the ammonia modelling, as you may wish to include existing Poultry House 1 within the installation boundary.*

## **2. Poultry housing and ventilation**

- a. Please confirm the existing and proposed housing type and ventilation for each poultry house, and the split of birds within each house.

*Note: The application and supporting documents are based upon Poultry House 2 with high velocity ventilation and gable end fans and Poultry House 4 as naturally ventilated, whereas the ammonia report has one proposed house as naturally ventilated and the other with gable end fans. Please also ensure the poultry house numbers are consistent throughout the application (the Ammonia Report refers to Houses 1-3, whereas the remainder of the application documents refer to Houses 2 and 4).*

## **3. Detailed ammonia modelling**

Please provide revised ammonia modelling, as required, addressing the following points:

- a. From the site boundary plan submitted at pre-application it would appear that existing Poultry House 1 will be outside of the installation boundary. Please ensure that the same installation boundary is used for both the baseline and proposed scenarios – for the baseline scenario, only those existing houses within the installation boundary can be included.
- b. Following on from question 2, ensure the housing type and ventilation for the poultry houses accurately reflects both the baseline and proposed scenarios.
- c. Following on from question 2, ensure the poultry house numbers are consistent with the rest of the application documents.
- d. For deep litter housing, please use the current standard emission factor of 0.21 kg NH<sub>3</sub>/animal place/year.
- e. Amend to utilise the current advised 80/20 split for free ranging birds – this assumes 80% of birds within houses with the relevant standard emission factor and 20% of birds ranging with an emission factor of 0.225 kg NH<sub>3</sub>/animal place/year. *Note: The Ammonia Report states in section 3.5.2 that further reduction of 8/24 has been applied, however the 20% already takes into consideration.*

- f. Once required changes have been made to the ammonia modelling assessment, please submit the modelling data input files.

*Note: Please note that depending on the results of the revised ammonia modelling, if duly made, the application determination may require additional ammonia reduction measures to be included. If the ammonia modelling shows the process contribution (PC) is >20% of the relevant CLe/CLos at the SSSI then we may need to consider in-combination effects from other relevant farms. Should the PC plus contributions from other relevant intensive farms be >50% then additional mitigation may be required. When considering an emissions reduction proposal (formerly referred to as a 'betterment' proposal) we may require a minimum of a 70% reduction in ammonia emissions at SSSIs when comparing the baseline and proposed scenarios where the proposal's impacts significantly exceed the relevant thresholds.*

#### **4. Manure storage**

Question 8i of the application form – it's confirmed that no manure is stored on the installation, however, the boxes below are also ticked to confirm that manure is stored in the yard on an impermeable base, with the effluent collected, and that manure stores are covered. Please confirm if manure is stored on the installation from the manure belts and if so, how long for and provide the tonnage.

Please note that if there is manure storage on site, then this will need to be included in the ammonia modelling too.

#### **5. Accident risk assessment**

- a. In accordance with question 6a of the application form, as the installation lies within flood zones 2 and 3, please submit a revised accident risk assessment which considers the risk of pollution in the event of flooding and measures to mitigate these risks.
- b. Please confirm whether the accident management plan details how you will respond to a flood event to minimise the risk of pollution.

#### **6. Site infrastructure**

- a. Please confirm whether the egg packing area will result in any process effluent. If so, please detail what it will consist of, maximum volume in litres per day and the proposed disposal route.
- b. The Ammonia Report refers to existing poultry house 1, which will be decommissioned. If Poultry House 1 is to remain within the installation boundary, please confirm if this house has been decommissioned, or has it also been demolished?

## 7. Current free-range bird placement

Please provide the following information for current farm operations:

- a. Provide evidence of placements (ideally from the supplier), with placement dates and number, for the past 5 years.
- b. Confirm the approximate cycle length and downtime in between cycles.
- c. Confirm the current management techniques to control emissions if they are different to the proposed techniques submitted with the application.
- d. In addition please confirm the current manure storage quantity on site and storage location(s) if applicable.

*Note: This is needed so we can confirm the details for the current free ranger layer operation to accurately assess the baseline for our assessment.*

## 8. Application form – Declaration:

The declaration has been completed twice for one of the partners, it only needs to be completed once for each partner. Please provide an updated declaration section.

Please reply directly to this email with your information and copy in [kirsty.trafford@environment-agency.gov.uk](mailto:kirsty.trafford@environment-agency.gov.uk).

You must send us the information and payment by **26/07/24**.

Details of how to pay are given in Part F of the application form.

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 application charge to cover our costs in reviewing your application. 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>.

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 contact me using the details below.

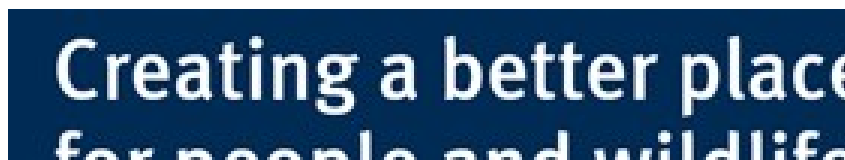
Yours sincerely,  
Kirsty Trafford

**Kirsty Trafford**

Senior Permitting Officer, National Permitting Service  
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