W.D. Stephen & Co.
Meikle Geddes Farm (Free Range Eggs), Balinrait, Nairn, IV12 5QY

Permit Application

Permit Number: PPC/A/5011623

Contents

Applicant:
Permit/Application number:

How to use this form
Purpose of the document - This document is intended to demonstrate transparency of the determination process to all interested parties. It should record all significant issues, decisions made, actions taken, and rationale for the approach adopted. It should be sufficiently detailed to demonstrate that all legal requirements were adhered to and provide the basis for defending any appeal. **Language used –** You should use non-technical language as far as practicable, avoiding unexplained acronyms and technical terms. While aiming to be comprehensive, it must also be as brief as possible, consistent with the overriding need for clarity and accuracy. Officers should bear in mind that much of the document may be available publicly under the Freedom of Information Act etc. **Timely recording of information -** Completion of the various forms should be done on a progressive basis rather than at the end of the process. **Level of detail -** Officers should use their professional judgement as to the level of detail required which will depend on the complexity of the process. Officers must consider why the information is required and ensure appropriate detail is included. Each table is designed to be expanded as text is added and will obviously allow the insertion of additional rows where necessary. **Applicability of any Section -** Do not delete whole sections of the form unless directed to do so. If something is not applicable to your determination please record this on the form and give a justification if appropriate indicating you have considered the issue and not just missed it.

1 Non-Technical Summary of Determination

Provide a non-technical summary of the process and determination

The permit application is made under Part A of Section 6.9 (a) of Schedule 1 of the Pollution Prevention and Control (Scotland) Regulations 2012.

This application by W.D.Stephen & Co is for a new PPC Permit (PPC/A/5011623) for a free range egg production farm, located on agricultural land at Meikle Geddes, Balinrait, approximately 930m north of the village of Piperhill in Nairnshire. The site is located at Ordnance Survey national grid reference NH 8652 5224.

The site lies to the west of the Moray, Aberdeenshire, Banff and Buchan Nitrate Vulnerable Zone (NVZ). It is a (groundwater) Drinking Water Protected Area (DWPA).

Meikle Geddes Farm (Free Range Eggs) will house a total of 64,000 free range layers in one existing and one new housing unit in multi-tier aviary system with pop holes to the range. Both houses will have two bird units for 16,000 birds each.

All walls and roofs will be insulated to retain heat and minimise condensation. The concrete floors will be protected from water ingress by an impermeable damp-course membrane. Ventilation will be computer controlled to create a stable climate. Air inlets will be predominantly on the roofs but augmented in warm weather by side, 'passive' air inlets. Sensors linked to the site computer will ensure the internal air quality conditions are maintained within a narrow band throughout the year, keeping temperatures around 21°C and humidity between 50% and 70%.

The proposed poultry house will be ventilated by six high speed ridge mounted fans. Each house will have six roof mounted air exhausts, with four gable end warm weather only exhausts. There will be 16 roof air inlets and 6 side passive air inlets in times of maximum ventilation.

16 week old birds will be introduced onto a littered floor (wood shavings) of a pre-sterilised building and kept for a period up to 65 weeks. On depletion, the birds will be removed to another farm for subsequent introduction into the food chain. Only small amounts of additional wood shavings would be added through the campaign if required.

The system to be used is a multi-tier 'aviary' system with belts removing manure regularly from underneath bird perches, nesting boxes and drinking and feeding stations. Manure will be transferred to a trailer and removed from site twice weekly to farm manure stores off the permitted site for subsequent spreading.

At the end of the cycle, birds are removed and all litter and manure is completely removed from the house and taken to the litter/manure store where it is stored prior to being applied to land out with the permit boundary as organic fertiliser. The houses are then completely washed out and disinfected. All wash water is collected in an underground sealed tank before also being applied to land out with the installation boundary, compliant with good farming practice.

There is no food mixing within the installation boundary. Pre-mixed feed is delivered directly to the site as required. Feed composition is adjusted throughout the flock cycle to provided optimal nutrient uptake and minimise loss via manure. Feed is stored in 4 silos at each house and delivered to the poultry houses via auger system. Feed silos will be protected from vehicle collision.

Water is supplied to the site via mains water supply. Nipple drinkers with collection cups will be used to water the birds. These reduce wastage of water and maintain dry litter.

Lightly contaminated roof and surface water from the concrete pads around the site and scratch areas will drain to a series of swales for treatment. The swales have been designed in accordance with the

CREW Rural SuDS Guide (Rural Sustainable Drainage Systems: A Practical Design and Build Guide for Scotland's Farmers and Landowners).

Eggs are conveyed to a central service area where they are packed for processing off site.

Mortalities will be removed from housing daily and transferred to a secure freezer. They will be removed from the site by a licenced contractor.

Chemicals used for cleaning and disinfection will be stored in a locked cupboard within a bund in the chemical storage area located in the Central Services Building. Procedures are in place to absorb any spillage and ensure appropriate disposal.

The site's power will be supplied by Photo- Voltaic cells, augmented by main electricity. Two emergency back-up generators, with internally bunded diesel storage (one at 662litres and one with 270litres), will be on site of less than 1MW.

For biosecurity onsite, wheel washing will be carried out with knapsack sprayer. This is accepted as low risk as there is very little residual run off. Spraying will be undertaken a minimum of 10m from any drainage feature. Foot baths are located around the site for all personnel entering poultry zones. The foot baths have lids and therefore will not overtop in wet weather. All personnel will use appropriate PPE. There will be minimal deliveries and collections to minimise biosecurity risk.

Tree shelter belts and copses will be planted across the new range and gable ends of the housing. These will act positively in removing and metabolising residual ammonia and dust emissions. This planting will contribute to both air quality and overall bird welfare.

The principal emissions from the houses will be potentially ammonia from the degradation of faeces and dust. Ammonia however will be minimised by maintain dryness throughout and preventing biodegradation which could yield ammonia being released.

The Water Resource Unit within SEPA have highlighted that the water feature in the northwest of the site should be sampled prior to commencing operations at the site. Follow up with the operator shows that there is no water feature on the site and therefore no sampling can take place. WRU have agreed that this is acceptable and therefore no additional monitoring is required. This area should be looked at during site inspection to confirm.

There are duties placed on SEPA for the protection of designated sites under The Conservation (Natural Habitats, &c.) Regulations 1994 and the Nature Conservation (Scotland) Act 2004. Meikle Geddes Farm (Free Range Eggs) lies within 10 kilometres of several designated sites (please see Section 4.5 of this Decision Document). SEPA has assessed the impact of ammonia emissions and nitrogen and acid deposition on the designated sites as acceptable (see Section 5.2 and 6 of this Decision Document).

The application submitted complies with both the requirements of PPC and the Standard Farming Installation Rules (SFIR).

Determination was therefore to issue the Permit PPC/A/5011623 based on the application submitted.

Glossary of Terms

AESI – Adverse Effect on Integrity of the Site
BAT - Best Available Techniques
BREF – Best Available Techniques Reference Document
BAT-C – Best Available Technique Conclusions
CREW - Centre of Expertise for Waters
CO – Coordinating Officer
DWPA – Drinking Water Protected Area

ELV – Emission Limit Value
LSE – Likely Significant Effect
NVZ – Nitrate Vulnerable Zone
PV - Photo Voltaic panels
SAC - Special Area of Conservation
SPA - Special Protected Area
SSSI - Site of Special Scientific Interest

2 External Consultation and SEPA's response

Is Public Consultation Required? (if no delete rows below)	**Yes**

Advertisement Check:	**Date**	**Compliance with advertising requirements**
Edinburgh Gazette	**23/09/2025**	**Yes**
Inverness Courier	**23/09/2025**	**Yes**

Officer Checking advert: CO	
No of responses received	0
Is PPC Statutory Consultation Required? (if no delete rows below)	**Yes**

Food Standards Agency:	Due to an error in the FSA email, we did not receive a response initially. 11/11/2025 this was discovered at the FSA end and response below shared dated 30/09/2025. In our role as statutory consultee under these Regulations, Food Standards Scotland's assessment of the application is limited to potential risks to the safety of the human food chain that could result from the environmental impact of emissions from the installation to the site under normal operating conditions. Based on the application and provided that the applicant complies with the relevant SEPA Guidance and all other relevant PPC Guidance Notes and Regulations, Food Standards Scotland considers it unlikely that there will be any unacceptable effects on the human food chain from the emissions from this installation.
Health Board:	NHS Highland: No response
Local Authority	Highland Council: response 07/10/2025 This Service has no record of any previous complaints regarding noise or odour from the existing poultry unit. While the new unit represents a doubling in size of the operation it is not significantly closer to sensitive receptors and this Service would not expected it to result in noise or odour issues on the understanding that the mitigation measures identified in the noise and vibration avoidance plan (NVAP) and odour management plan (OMP) will be implemented in full.
Scottish Water	N/A

Health and Safety Executive	N/A
NatureScot	Response: 10/10/2025 Our appraisal, of the information provided, in particular Scenarios 4a and 4d (*The existing and proposed poultry houses and ranges at Meikle Geddes Farm and the proposed poultry house and range at Milton of Kilravock)* would conclude LSE for - Cawdor Wood SAC, Inner Moray Firth SPA, Loch Flemington SPA, Inner Moray Firth RAMSAR, and Moray and Nairn Coast RAMSAR. In addition to noting the Darnaway and Lethen Forest SPA query above and the potential for LSE. Overall, I believe we would conclude, no AESI for the European protected areas and RAMSAR listed above. The various underlying SSSI have been considered within the above assessment. Further information was shared with NatureScot as there were no values for SPA Darnaway and Lethen Forest in the original submission. Response received 10/11/2025 Scenario 4a now confirms, for Nitrogen, the PC<1%CL and therefore the contribution from the development is de minimis and can be screened out of any further assessment. It worth noting APIS currently has background values for the SPA ranging from 8.3 to 8.9 kgN/ha/yr for Nitrogen deposition on forest meaning the PEC is higher than the CL (5 kgN/ha/yr).

Discretionary Consultation required? (if yes provide justification and details below, otherwise delete row)	**No**
Enhanced SEPA Consultation required? (if yes provide justification and details below, otherwise delete row)	**No**
"Off site" consultation required (if yes provide justification and details below, otherwise delete row)	**No**
Transboundary Consultation required? (if yes provide justification and details below, otherwise delete row)	**No**
Is Public Participation Consultation Required? (if yes provide justification and details below, otherwise delete rows below)	**Yes**

STATEMENT ON THE PUBLIC PARTICIPATION PROCESS

The Pollution Prevention and Control (Public participation)(Scotland) Regulations 2005 requires that SEPA's draft determination of this application be placed on SEPA's website and public register and be subject to 28 days' public consultation. The dates between which this consultation took place, the number of representations received and SEPA's response to these are outlined below.

Date SEPA notified applicant of draft determination	14/01/2026
Date draft determination placed on SEPA's Website	14/01/2026
Details of any other 'appropriate means' used to advertise the draft. Seek advice from the communication department	
Date public consultation on draft permit opened	14/01/2026
Date public consultation on draft permit consultation closed	
Number of representations received to the consultation	

Date final determination placed on the SEPA's Website	
Summary of responses and how they were taken into account during the determination:	
Summary of responses withheld from the public register on request and how they were taken into account during the determination: **REMOVE THIS BOX FROM ANY VERSION OF THIS DOCUMENT TO BE PLACED ON THE WEBSITE OR PUBLIC REGISTER. RETAIN IN THE VERSION FOR THE WORKING FILE.**	
Officer:	CO

3 Administrative determinations
Determination of the Schedule 1 Activity
As detailed in the application and supporting documentation.
Determination of the Stationary Technical Unit to be permitted
As detailed in the application and supporting documentation.
Determination of Directly Associated Activities
As detailed in the application and supporting documentation.
Determination of Site Boundary
As detailed in the application and supporting documentation.
Officer: CO

4 Introduction and Background

4.1 Historical Background to the activity and variation

The application by WD Stephen & Co. is for a free range egg production farm located on agricultural land 4.5km south west of Nairn.

Meikle Geddes Farm (Free Range Eggs) has an existing house which houses 32,000 free range laying birds and are proposing the erection of an additional shed housing 32,000 free range laying birds to take the total number to 64,000 in a multi storey aviary system.

The site is located at Ordnance Survey national grid reference NH 8652 5224. The area is a Drinking Water Protected Area (DWPA) (Groundwater).

The applicant is required to demonstrate that the poultry housing units are designed having regard to the following principles outlined in the BREF and the BAT Conclusions:

- reducing the ammonia-emitting surface;
- removing the manure frequently to an external store (e.g., with belt removal systems);
- quickly drying the manure;
- using surfaces which are smooth and easy to clean;

- lowering the indoor temperature and ventilation as much as animal welfare and/or production
  allow.

The proposals for the new housing demonstrate that the chosen design addresses the above principles.

4.2 Description of activity

The activity proposed is rearing poultry intensively in an installation with more than 40,000 places as described in Part A of Section 6.9 (a) of Schedule 1 of the Regulations.

WD Stephen & Co. proposes to have 64,000 places for free range laying hens in a multi-tier aviary housing system.

Directly Associated Activities include:

- Feed delivery and storage
- Water storage
- Chemical storage
- Manure handling / Collection, storage and removal of manure off-site
- Dirty water storage
- Storage of fallen stock for disposal
- Management of lightly contaminated surface water

4.3 Outline details of the Variation applied for

N/A New permit application.

4.4 Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61.

None

4.5 Identification of important and sensitive receptors

Ammonia

SEPA must assess the amount of ammonia and nitrogen that will be deposited on designated features within 10km of the installation.

Meikle Geddes Farm (Free Range Eggs) is within 10 kilometres of 18 Nature Scot designated sites as follows:

Receptors	Distance from site	Designation
Kildrummie Kames	1706m NW of site	SSSI
Cawdor Wood	3138m SW of site	SSSI
Cawdor Wood	3138m SW of site	SAC
Moray Firth	4624m N of site	SPA
Moray Firth	4624m N of site	SAC
Inner Moray Firth	5032m NW of site	SPA
Whiteness Head	5032m NW of site	SSSI
Loch Flemington	5209m W of site	SPA

Moray and Nairn Coast	6506m NE of site	SPA
Culbin Sands| Culbin Forest and Findhorn Bay	6506m NE of site	SSSI
Culbin Bar	7605m NE of site	SAC
Muckle Burn| Clunas	8687m SE of site	SSSI
Ardersier Glacial Deposits	8907m NW of site	SSSI
Carn nan Tri-tighearnan	9158m SW of site	SAC
Carn nan Tri-tighearnan	9158m SW of site	SSSI
Darnaway and Lethen Forest	9351m E of site	SPA
Moray and Nairn Coast	6506m NE of site	Ramsar wetlands
Inner Moray Firth	8468m NW of site	Ramsar wetlands

Refer to Sections 5.2 and 6 for an assessment of the impact of the proposal on the identified designated sites.

PM_{10}

Where sensitive receptors are located within 250 metres of a poultry unit, SEPA requires the Applicant to screen emissions of particulate matter to establish whether the emission will cause any air quality objectives to be breached.

The siting of the nearest dwelling to the new Poultry Unit, (gable end outlets) is Meikle Geddes Farm house which is approximately 465m east of the building. There are no other properties within 250m.

Officer:	CO

5 Key Environmental Issues

5.1 Summary of significant environmental impacts

SEPA aims to control environmental impacts arising from intensive agriculture activities through permit conditions and by the requirement for the Operator to comply with BAT as indicated in the SFIR.

Potential environmental impacts from intensive agriculture activities include:

- Ammonia emissions
- Manure and slurry storage
- Surface water drainage
- Protection of soil and groundwater
- Odour
- Noise
- Chemical use
- Fuel containment
- Energy efficiency
- Waste minimisation, storage and disposal
- Resource utilisation
- Environmental management systems

The potential impacts from the proposed activity and how they will be managed are addressed in the sections below.

5.2 Emissions to Air

Point Source emission to air:

The main point source of emissions to air from Meikle Geddes Farm (Free Range Eggs) will be from the housing units, ventilation system and the generator in the form of ammonia, dust and combustion gases.

Ammonia (BAT 23 & 31)

Ammonia can be carried on the air and deposited in lochs and ponds causing eutrophication. It is assessed that the main point source of ammonia from the installation will be from the housing ventilation system. To quantify the amount of ammonia which will be emitted, SEPA use DEFRA-approved emission factors. The emission factors are specific to each housing system. Some housing systems are more efficient than others and will result in a lower emission factor.

The proposed housing at Meikle Geddes Farm (Free Range Eggs) meets the description in BAT Conclusion 31 (b) (4) 'manure belts (in case of aviary).

There are duties placed on SEPA for the protection of designated sites under The Conservation (Natural Habitats, &c.) Regulations 1994 and the Nature Conservation (Scotland) Act 2004. Meikle Geddes Farm (Free Range Eggs) lies within 10 kilometres of 18 designated sites, (please see Section 4.5 of this Decision Document).

SEPA uses the Simple Calculation of Atmospheric Impact Limits (SCAIL) model to assess the impact of ammonia emissions and nitrogen and acid deposition on designated sites. SCAIL has been run for this proposal using the ammonia emission factor for free range laying hens of 0.09 kg NH3/bird place/year (ammonia produced by an average sized bird) which accounts for 10% spent on the range and 90% of their time indoors.

SCAIL failed for the following sites:

- Cawdor Wood SSSI & SAC
- Inner Moray Firth SPA
- Whiteness Head SSSI
- Loch Flemington SPA
- Moray and Nairn Coast SPA
- Culbin Sands| Culbin Forest and Findhorn Bay SSSI
- Carn nan Tri-tighearnan SAC
- Darnaway and Lethen Forest SPA

SEPA considered what mitigation the applicant had proposed to prevent or minimise emissions.
The standard emission factors used assume a crude protein content in feed of 17% and it is accepted that for every 1% reduction in dietary crude protein, there will be a corresponding reduction in ammonia emissions of 10%.

The applicant confirmed that the average crude protein content in feed over the 69 week cycle gives an average of 15.866% crude protein which allows a reduction in the standard emission factor of 11.34%. No other mitigation was proposed.

Therefore it could not be concluded that it is beyond reasonable doubt that there is no adverse effect on site integrity (SAC/SPA)/likely damage (SSSI) and further assessment was required.

In order to ensure that all impacts have been considered the applicant is required to identify all other plans and projects which require consent/agreement from a competent authority and where SCAIL

screening for the project alone fails (i.e. is above 4% of the PC and 100% of the PEC), must be included in the appropriate assessment for relevant protected sites. This includes, recently consented, in the planning/permitting system (including permitted development) or at pre-application stages where emission information is known, within the screening distance of the protected site (10km) and not in the APIS background. SEPA required detailed modelling in combination with those from another proposal at Milton of Kilravock, located approximately 3km to the southwest of Meikle Geddes Farm (Free Range Eggs). No other relevant projects were identified at the time of application.

The modelling results considered 16 scenarios:

Below are the modelled process contributions (PCs) for what SEPA considers to be the best case and worst case (very conservative approach) scenarios (4a and 4d) for both ammonia and nitrogen deposition and Predicted Environmental Concentrations (PECs) as a percentage of the CL and Cle.

AMMONIA

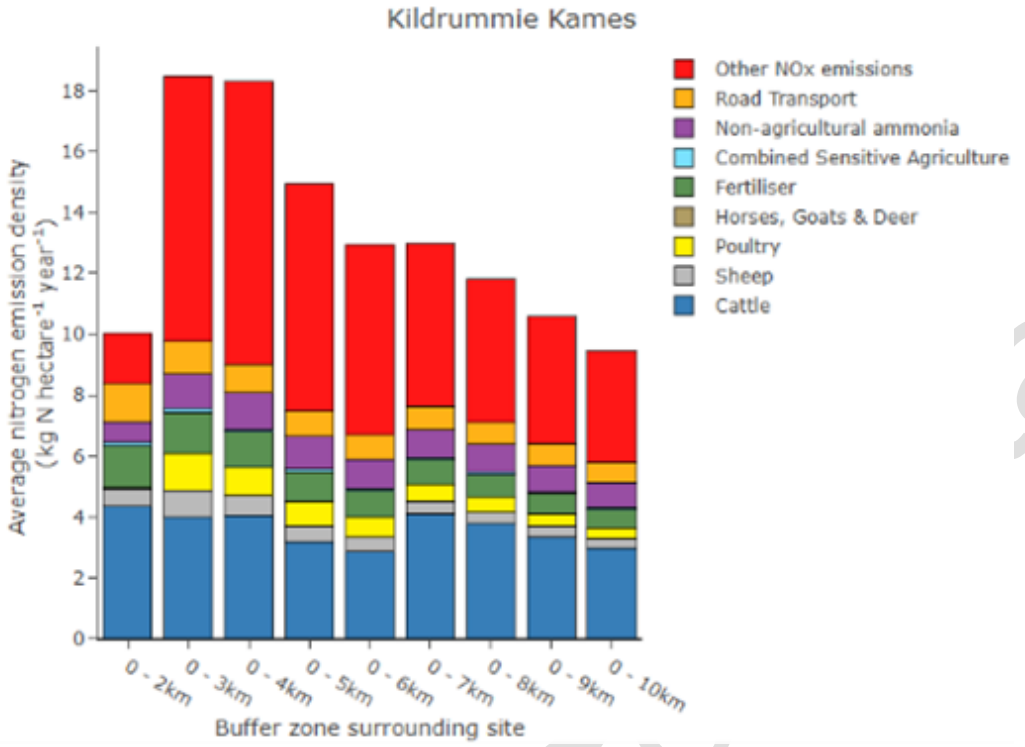
			4a						4d				
	Name	Cle	PC	% PC of Cle	Background	PEC	%PEC of Cle	SEPA %PEC of Cle	PC	Background	PEC	SEPA % PC of Cle	SEPA %PEC of Cle
19	Kildrummie Kames SSSI	3	0.163	5.43	0.6	0.763	17.4	25	0.617	0.6	1.22	20.57	41
20	Kildrummie Kames SSSI	3	0.122	4.08	0.6	0.722	22.55	24	0.429	0.6	1.03	14.30	34
21	Kildrummie Kames SSSI	3	0.042	1.4	0.6	0.642	19.86	21	0.134	0.6	0.73	4.47	24
22	Kildrummie Kames SSSI	3	0.036	1.22	0.6	0.636	19.68	21	0.103	0.6	0.70	3.43	23
23	Kildrummie Kames SSSI	3	0.014	0.46	0.6	0.614	18.93	20	0.035	0.6	0.64	1.17	21
24	Kildrummie Kames SSSI	3	0.006	0.19	0.6	0.606	18.65	20	0.017	0.6	0.62	0.57	21
25	Kildrummie Kames SSSI	3	0.021	0.69	0.6	0.621	19.16	21	0.063	0.6	0.66	2.10	22
26	Kildrummie Kames SSSI	3	0.013	0.42	0.6	0.613	18.89	20	0.029	0.6	0.63	0.97	21
27	Kildrummie Kames SSSI/Loch Flemington SPA	3	0.011	0.37	0.6	0.611	18.84	20	0.027	0.6	0.63	0.90	21
28	Cawdor Wood SSSI/SAC	1	0.027	2.71	0.4	0.427	39.71	43	0.085	0.4	0.49	8.50	49
29	Cawdor Wood SSSI/SAC	1	0.016	1.56	0.4	0.416	38.56	42	0.072	0.4	0.47	7.20	47
30	Cawdor Wood SSSI/SAC	1	0.011	1.13	0.4	0.411	38.13	41	0.042	0.4	0.44	4.20	44
31	Cawdor Wood SSSI/SAC	1	0.01	1.03	0.4	0.41	38.03	41	0.073	0.4	0.47	7.30	47
32	Carn nan Tri-tighearnan SSSI/SAC	1	0.001	0.12	0.2	0.201	16.82	20	0.011	0.2	0.21	1.10	21
33	Carn nan Tri-tighearnan SSSI/SAC	1	0.001	0.14	0.2	0.201	16.84	20	0.007	0.2	0.21	0.70	21
34	Darnaway And Lethen Forest SPA	NA				0			0.007				
35	Darnaway And Lethen Forest SPA	NA				0			0.01				
36	Whiteness Head SSSI / Moray Firth SAC / Inner Moray Firth SPA/Ramsa	3	0.01	0.34	0.4	0.41	14.17	14	0.024	0.4	0.42	0.80	14
37	Whiteness Head SSSI / Inner Moray Firth SPA/Ramsar	3	0.006	0.2	0.4	0.406	14.03	14	0.013	0.4	0.41	0.43	14
38	Whiteness Head SSSI / Inner Moray Firth SPA/Ramsar	3	0.003	0.11	0.4	0.403	13.94	13	0.008	0.4	0.41	0.27	14
39	Culbin Sands, Culbin Forest And Findhern Bay SSSI	1	0.009	0.87	0.6	0.609	48.87	61	0.03	0.6	0.63	3.00	63
40	Culbin Sands, Culbin Forest and Findhern Bay SSSI / Moray Firth SAC /	1	0.009	0.92	0.6	0.609	48.92	61	0.028	0.6	0.63	2.80	63
41	Culbin Sands, Culbin Forest and Findhern Bay SSSI / Moray Firth SAC /	1	0.006	0.62	0.6	0.606	48.62	61	0.022	0.6	0.62	2.20	62
42	Whiteness Head SSSI / Moray Firth SAC/SPA	3	0.004	0.14	0.4	0.404	13.97	13	0.01	0.4	0.41	0.33	14
43	Moray Firth SAC/SPA	3	0.013	0.44	0.4	0.413	12.41	14	0.029	0.4	0.43	0.97	14
44	Moray Firth SAC/SPA	3	0.016	0.53	0.4	0.416	12.49	14	0.055	0.4	0.46	1.83	15
45	Moray Firth SAC/SPA	3	0.014	0.47	0.4	0.414	12.44	14	0.049	0.4	0.45	1.63	15
46	Culbin Sands, Culbin Forest and Findhern Bay SSSI / Moray Firth SAC /	1	0.009	0.9	0.6	0.609	48.9	61	0.03	0.6	0.63	3.00	63
47	Culbin Sands, Culbin Forest and Findhern Bay SSSI / Moray Firth SAC /	1	0.006	0.62	0.6	0.606	48.62	61	0.023	0.6	0.62	2.30	62

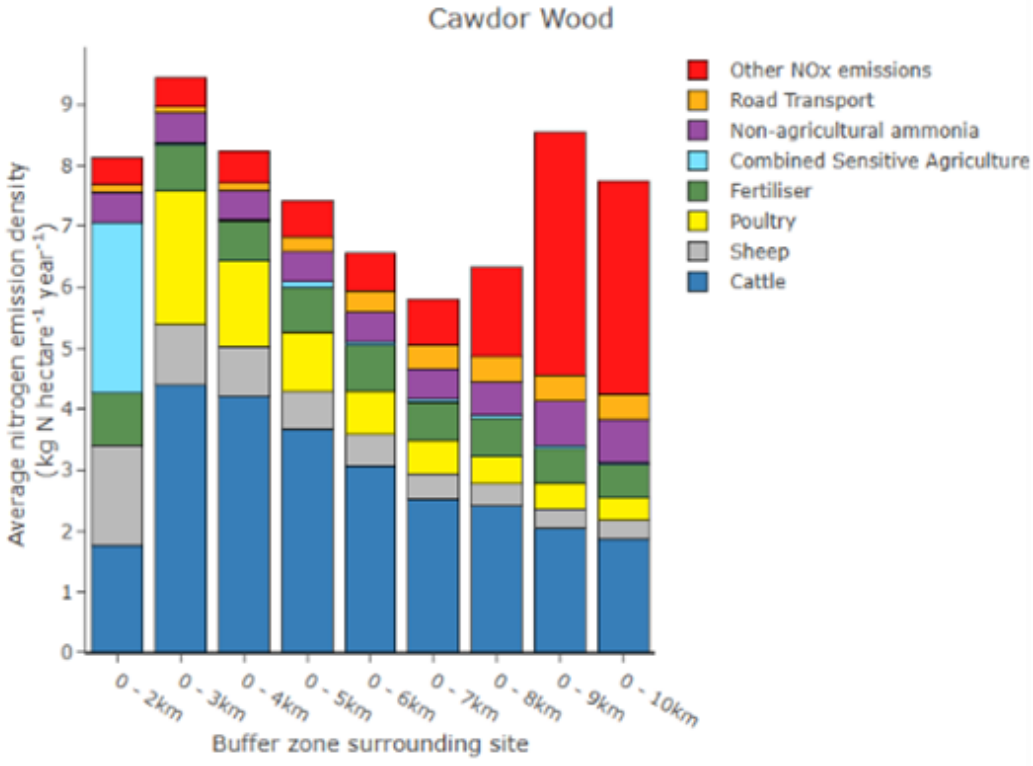
N Dep

			4a							4d				
	Name	Cl	PC	Applicant % PC of Cl	Applicant Background	SEPA Background	SEPA PEC	SEPA % PC of Cle	SEPA %PEC of Cl	PC	Background	PEC	SEPA % PC of Cle	SEPA %PEC of Cl
19	Kildrummie Kames SSSI	15	1.27	8.47	5.1	5.1	6.37	8.47	42.47	4.8	5.1	9.9	32.00	66
20	Kildrummie Kames SSSI	15	0.95	6.36	5.1	5.1	6.05	6.33	40.33	3.34	5.1	8.44	22.27	56
21	Kildrummie Kames SSSI	15	0.33	2.18	5.1	5.1	5.43	2.20	36.20	1.05	5.1	6.15	7.00	41
22	Kildrummie Kames SSSI	15	0.28	1.89	5.1	5.1	5.38	1.87	35.87	0.8	5.1	5.9	5.33	39
23	Kildrummie Kames SSSI	15	0.11	0.71	5.1	5.1	5.21	0.73	34.73	0.27	5.1	5.37	1.80	36
24	Kildrummie Kames SSSI	15	0.04	0.29	5.1	5.1	5.14	0.27	34.27	0.14	5.1	5.24	0.93	35
25	Kildrummie Kames SSSI	15	0.16	1.07	5.1	5.1	5.26	1.07	35.07	0.49	5.1	5.59	3.27	37
26	Kildrummie Kames SSSI	15	0.1	0.66	5.1	5.1	5.20	0.67	34.67	0.23	5.1	5.33	1.53	36
27	Kildrummie Kames SSSI/Loch Flemington SPA	15	0.09	0.58	5.1	5.1	5.19	0.60	34.60	0.21	5.1	5.31	1.40	35
28	Cawdor Wood SSSI/SAC	6	0.21	3.52	5.1	9.16	9.37	3.50	156.17	0.66	9.16	9.82	11.00	164
29	Cawdor Wood SSSI/SAC	6	0.12	2.03	5.1	9.16	9.28	2.00	154.67	0.56	9.16	9.72	9.33	162
30	Cawdor Wood SSSI/SAC	6	0.09	1.47	5.1	9.16	9.25	1.50	154.17	0.32	9.16	9.48	5.33	158
31	Cawdor Wood SSSI/SAC	6	0.08	1.34	5.1	9.16	9.24	1.33	154.00	0.57	9.16	9.73	9.50	162
32	Carn nan Tri-tighearnan SSSI/SAC	5	0.01	0.12	5.1	5.1	5.11	0.20	102.20	0.06	5.1	5.16	1.20	103
33	Carn nan Tri-tighearnan SSSI/SAC	5	0.01	0.14	5.1	5.1	5.11	0.20	102.20	0.04	5.1	5.14	0.80	103
34	Darnaway And Lethen Forest SPA				5.1	5.1					5.1	5.1		
35	Darnaway And Lethen Forest SPA				5.1	5.1					5.1	5.1		
36	Whiteness Head SSSI / Moray Firth SAC / Inner Moray Firt	5	0.05	1.06	5.1	5.1	5.15	1.00	103.00	0.12	5.1	5.22	2.40	104
37	Whiteness Head SSSI / Inner Moray Firth SPA/Ramsar	5	0.03	0.61	5.1	5.1	5.13	0.60	102.60	0.07	5.1	5.17	1.40	103
38	Whiteness Head SSSI / Inner Moray Firth SPA/Ramsar	5	0.02	0.33	5.1	5.1	5.12	0.40	102.40	0.04	5.1	5.14	0.80	103
39	Culbin Sands, Culbin Forest And Findhern Bay SSSI	5	0.04	0.90	5.1	9.16	9.20	0.80	184.00	0.15	9.16	9.31	3.00	186
40	Culbin Sands, Culbin Forest and Findhern Bay SSSI / Mor	5	0.05	0.95	5.1	9.16	9.21	1.00	184.20	0.15	9.16	9.31	3.00	186
41	Culbin Sands, Culbin Forest and Findhern Bay SSSI / Mor	5	0.03	0.65	5.1	9.16	9.19	0.60	183.80	0.12	9.16	9.28	2.40	186
42	Whiteness Head SSSI / Moray Firth SAC/SPA	5	0.01	0.11	5.1	5.1	5.11	0.20	102.20	0.01	5.1	5.11	0.20	102
43	Moray Firth SAC/SPA	10	0.02	0.17	5.1	5.1	5.12	0.20	51.20	0.04	5.1	5.14	0.40	51
44	Moray Firth SAC/SPA	10	0.02	0.20	5.1	5.1	5.12	0.20	51.20	0.07	5.1	5.17	0.70	52
45	Moray Firth SAC/SPA	10	0.02	0.18	5.1	5.1	5.12	0.20	51.20	0.06	5.1	5.16	0.60	52
46	Culbin Sands, Culbin Forest and Findhern Bay SSSI / Mor	5	0.05	0.94	5.1	9.16	9.21	1.00	184.20	0.16	9.16	9.32	3.20	186
47	Culbin Sands, Culbin Forest and Findhern Bay SSSI / Mor	5	0.03	0.64	5.1	9.16	9.19	0.60	183.80	0.12	9.16	9.28	2.40	186

Nb. SEPA applied NDep the higher background for woodland to some sites which the report does not.

The following images provide an indication of total N emission sources Kildrummie Kames and Cawdor Wood. It shows the latest available estimates of N emission activity (currently 2021) both in terms of nitrogen deposition and ammonia data, summarised for concentric buffer zones of 0 - 2 km to 0 – 10km from the designated site.





For example, the largest contributor to emissions within 5km of Kildrummie Kames is other NOx emissions from combustion, industrial point sources, waste, other transport, solvents, offshore and

energy production. The largest contributor to emissions within 5km of Cawdor wood is combined sensitive agriculture.

NatureScot were asked to comment on the results, specifically the critical loads and levels applied and they concluded that there was no adverse impact on site integrity but advised that consideration should be given to further mitigation measures such as appropriate ventilation systems and tree planting around the immediate proposal area.

The applicant has proposed to plant the free-range area with trees and shelter belts will be planted at each gable end of the poultry houses. Once mature, the trees will act as a shelter belt for ammonia emissions affording greater protection of the surrounding environment.

Dust (PM10) (BAT 11)

Dust from poultry houses mainly originates from feathers, skin particles and used litter and to a lesser extent from feed and bedding.

PM10 dust particles (particulate matter 10 micrometres of less in diameter) are subject to statutory air quality standards. In Scotland, air quality objectives are set out in the Air Quality (Scotland) Regulations 2000 (as amended).

Where sensitive receptors are located within 250 metres of a poultry unit, SEPA requests that the applicant screens the emission of particulate matter to establish whether the emission will cause any air quality objectives to be breached.

The siting of the nearest dwelling to the new Poultry Unit is Meikle Geddes Farm house which is approximately 465m east of the building. There are no other properties within 250m.

As there are no sensitive receptors located within 250 metres of the proposed poultry site, SEPA has assessed the risk to human health as acceptable.

Diesel generator

It is a requirement of the animal welfare regulations that the birds have adequate heating and ventilation at all times. The site will be powered by wind turbines, 2x 11Kw, and 1 x15Kw. In addition, there is Photo-voltaic cells for both the existing and the new houses at 200Kw each. Mains grid electricity is a secondary source of energy on site.

In the event of a power failure, back-up diesel generators will be used. SEPA are aware that diesel generators can give rise to dense fume, especially at start up, or if the generator is poorly maintained. SEPA would expect the operator to use BAT particularly with regard to servicing and maintenance to minimise visible emissions and particulates from the exhaust. The generator will be tested periodically.

One generator is located inside the central services section on a concrete floor within the first (original) building. It will have internally bunded diesel storage which meets the requirements of the Water Environment (Controlled Activities) (Scotland) Regulations 2011, as amended.

One generator is located at the north end of the second building and is sited on a concrete pad within a covered enclosure. It will have internally bunded diesel storage which meets the requirements of the Water Environment (Controlled Activities) (Scotland) Regulations 2011, as amended.

Appropriate management procedures should be in place to prevent spillages reaching surface water drainage features.

Fugitive emissions to air:
BAT 1 & 11

Potential fugitive emissions to air include the release of dust and ammonia during cleaning or fallen stock removal, and from the birds themselves. SEPA accepts that some fugitive releases are unavoidable, for example, unplanned releases due to an unforeseen incident; others such as poor cleaning practices can be controlled through the relevant management techniques. SEPA views fugitive releases to air from these activities as an indication of process or maintenance issues and would require any defects to be reported and rectified as soon as possible.

- Manure will be managed through a regular removal process using automated manure belts to designated collection points. The manure will be placed in covered trailers and transported directly off-site. There will be no storage of manure on site.
- Litter is removed from site in covered trailers in accordance with the manure management plan.
- Feed bins will be fitted with cyclone particle containment and mitigation to contain dust emissions as per the requirement in BAT 11.

Although not specifically covered by conditions within the permit, maintenance issues are covered by the PPC Regulations under Regulation 22 which requires the use of BAT. SEPA seeks to reduce these occurrences by requiring operators to record maintenance issues and demonstrate a high degree of environmental management over the activities they undertake. SEPA has a number of regulatory instruments it can use to gain compliance should the operator fail to comply.

SEPA does not have any specific policies in relation to bioaerosols from IA processes. There are currently no health criteria values available for interpreting the results of bioaerosol monitoring. Routine monitoring would be required at receptors within 250 metres should appropriate criteria for assessment be identified.

Odour:

BAT 1, 12 & 13

Primary odour issues from intensive poultry rearing are ammonia from housing and manure management with potential for additional odours from the use of chemicals and disinfectants. The permit holder must utilise BAT to prevent, or where that is not possible, minimise odour from the installation.

SEPA acknowledges that odour from intensive agriculture installations can give rise to complaints and requires operators to undertake odour assessments, and to formulate and implement an Odour Management Plan to reduce the impact on the local environment.

In order to prevent, or where that is not practicable, to reduce odour emissions from a farm, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (BAT 1). An Odour Management Plan (BAT 12) has been submitted with the application and will be implemented on site with details of reduction of odour emissions in accordance with BAT 13.

The permit will require that offensive odours are not emitted beyond the site boundary.

5.3 Emissions to Water

Point Source Emissions to Surface Water and Sewer:

Foul drainage

There are no public sewers in the vicinity of Meikle Geddes Farm (Free Range Eggs) and therefore there will be no discharge to sewer. There is a small septic tank serving the site. Disposal of residual settled sewage will be to a soakaway.

The foul drainage system is not considered part of the Permitted Installation. This would be authorised under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended). The

onus is on the applicant to ensure that all drainage to the foul effluent system is in compliance with the CAR Regs and does not cause environmental harm or impeded the function of the system.

Surface water drainage

The application proposes a Sustainable Drainage System (Rural SuDS) designed to comply with the CREW Rural SuDS Guide (Rural Sustainable Drainage Systems: A Practical Design and Build Guide for Scotland's Farmers and Landowners) (CREW), considered BAT for intensive agriculture installations.

All drainage from the new site will go through a swale system. Drainage on both sides of the new building will be provided by French drain interception systems to convey lightly contaminated drainage from the new scratch area to the treatment swales via solid pipes. Lightly contaminated roof water will be flow attenuated through retention in the external scratch area. Drainage will ultimately be directed to the Mill Lade.

The swale will also attenuate flow and prevent adding 'surge' to the catchment hydrograph through the installation of leaky weirs, although the area is not recognised as being in a flood risk zone. An overflow will be installed at the end of the swale directing extensive or storm flows to the Mill Lade (Tributary of the River Nairn). On most occasions however, virtually all flows to the swales will soakaway, being above the local water table height by approx. 1 metre.

The capacity calculations submitted for the swales have demonstrated adequate storage for this purpose.

Drainage will be conveyed to the swale via sealed pipes. Surface water run-off from the housing unit roofs, scratch areas and low-contamination yards will be piped to the swale. The location of the swale is shown in the site plan, to the south-west of the new housing unit. Mill Lade (River Nairn) runs parallel to the swale.

Rainwater from the main access road (hardcore) will drain sideways to the adjacent grassed range area. Wheel spraying will remain at the site entrance and delivered by a knapsack spray, preventing any run-off.

Interception drains will be constructed to serve the concrete pads across the north end of the new building and connected to the drainage from the external scratch area delivering drainage to the swales. Both sides of the new building will be provided by French drain type interception systems to convey lightly contaminated drainage from the new scratch area to the treatment swales. Roof water will also be classed as lightly contaminated and will be flow attenuated through retention in the external scratch area.

The installation of a Sustainable Drainage System to treat surface and yard runoff via swales adheres to the guidelines in the CREW Rural SuDS Guide, considered BAT for IA permitted installations.

SuDS will be designed in line with the CREW RURAL SuDS Practical Guide and are suitably sized to treat the relevant drainage areas. Therefore, there should be no emission in relation to SuDS treatment and so the permit does not contain discharge conditions or limits. Should SEPA become aware of an issue with the SuDS, e.g. evidence that contaminated run off being discharged to the SuDS or discoloration of a nearby watercourse, action will be taken under condition 3.3.1 "Unless specified elsewhere in this authorisation, there must be no individual source emissions from the authorised place to the water environment, air or land."

Point Source Emissions to Groundwater:

There shall be no direct point source emissions to groundwater as a consequence of this application. The applicant has demonstrated that the swales are designed in line with SEPA advice and are sufficiently sized. If maintained properly, they will provide sufficient treatment of lightly contaminated run off and therefore this is not considered to be a point source discharge to groundwater.

The houses will be cleaned approximately every 14 to 15 months once they have been emptied. The houses will be washed down between flocks and wash water will be collected in undergound, sealed dirty water tanks, one at each housing unit. Wash water is pumped out by vacuum tanker and taken off-site. The two tanks are 20m3. As is the case with manure, once outside the boundary of the PPC site, washwater must be applied to land in compliance with the Water Environment (Controlled Activities) (Scotland) Regulations 2011 General Binding Rule 18 (GBR18). No wash water applied to land on permitted site.

Underground tanks must be regularly inspected and maintained to prevent unauthorised emissions to soil and groundwater.

Wheel spraying

For biosecurity onsite, wheel washing will be carried out with knapsack sprayer at the site entrance. This is accepted as low risk as there is very little residual run off. Spraying will be undertaken a minimum of 10m from any drainage feature. There is no wheel wash facility on site.

Fugitive Emissions to Water:

BAT 1 & 6

There are several potential sources which could lead to fugitive emissions to water. These include, poorly maintained surfaces and drainage systems, bird delivery and collection, and lack of care during cleaning of the housing units, all of which can lead to contamination of surface waters.

SEPA views fugitive releases as avoidable and can usually link these incidents to either operational error or negligence. SEPA seeks to reduce these occurrences by requiring the permit holder to implement BAT and provide training to relevant staff in environmental issues and exercising a high degree of environmental management and continual maintenance of the activities they undertake.

The applicant will install SuDS to treat lightly contaminated drainage which shall be designed to be fit for purpose and meeting BAT.

A knapsack sprayer will be used to disinfect vehicle wheels when arriving at or leaving site. Areas of spraying must be at least 10m away from surface water drains.

5.4 Noise

BAT 9 & 10

Noise at the permitted installation is covered by Section 2.9 of the SFIR which is considered by SEPA to meet BAT Conclusions 9 & 10 which the operator is required to have regard to when operating an intensive agriculture site under the PPC Regulations.

The Permit and SFIR recognise that noise can give rise to complaints. The operator is required to undertake noise assessments and produce a Noise Management Plan to prevent or minimise the impact on the local environment.

The predominant source of noise from poultry housing units is generated from the ventilation systems. Other sources of noise related to this type of activity can include filling of feed bins, vehicle movements in and around the site and the placement and removal of the birds. The latter two are considered unlikely to cause issues as these activities will take place for such short durations as well as being infrequent. Routine maintenance of fans will also prevent noise and the noise management plan will address any issues that should arise and will be updated as stipulated in the permit.

A Noise Management Plan has been submitted with the application and will be implemented on site. The permit will require that noise which has a significant impact on the environment, people or property is not emitted beyond the site boundary.

5.5 Resource Utilisation

Water use

BAT 5

Water use within the food production sector is primarily an animal welfare issue as the operator of the installation is required under other legislation to provide an adequate supply of clean water for both the welfare of the birds and to undertake adequate cleaning of infrastructure.

It is up to the operator to demonstrate the use of BAT to minimise water usage, but SEPA does directly regulate water use through permit conditions requiring the operator to minimise water consumption and explore options for minimisation.

The greatest volume of water consumed is drinking water for the birds. The main source of water is from the mains water supply. Water will be delivered to poultry via non drip, low pressure watering nipples with drip cups with computer controlled drinking water system installed for minimal leakage and ensuring dry litter.

There will be 20,000 litres of water stored on site in 2 separate tanks in case of mains failure. This is sufficient for the 64,000 birds on site: 200l/ 1000 =12m3/day=4,672m3/yr

Water is also used for cleaning the poultry units at the end of the cycle. The housing units are washed down with high pressure and disinfected before the introduction of the next flock. Wash water for each house is captured and drained to sealed storage tanks of 20m3 capacity.

Energy use and generation

BAT 8

A computer-controlled system maintains the temperature within the housing units. This is directly linked to the ventilation system to prevent over-heating and lack of free ventilation. SEPA recognises that energy usage is dependent on several factors outwith the control of the operator who has to maintain the welfare of the birds in extremes of weather.

All of the site's electricity will be provided by wind turbines, 2x 11Kw, and 1 x15Kw. In addition, there is Photo-voltaic cells for both the existing and the new houses at 200Kw each. Mains grid electricity is a secondary source of energy on site. There are two stand by diesel generators, one for each of the houses of <1MW.

Ventilation systems are all computer controlled and optimised to minimise energy use whilst maintaining welfare standards. High efficiency ventilation will be installed and the new house will be insulated with insulation in the roof to 200mm and insulated to side walls of 100mm. All lighting in the new houses will contain LED lighting.

A permit condition requiring the formal systematic assessment of energy consumption on site will require the operator to identify where efficiencies can be made.

The site will not be covered by a Climate Change Agreement.

Raw Materials Selection and Use

All applicants applying for PPC Part A permits are required to examine their Raw Materials usage and seek ways to reduce their impact on the environment. The standard permit condition requiring the formal

assessment of resource utilisation on site will require the operator to identify where any efficiencies can be made and demonstrate continuing improvement.

Chemicals:

Chemicals used in poultry rearing include cleaning and disinfection chemicals, pesticides, rodenticides, herbicides, insecticides and fungicides. All of these chemicals are required to be DEFRA approved. Once onsite, chemicals will be contained in the bunded, secure cabinets. Just in Time procedures are used where possible to minimise substances stored on site. Procedures are in place to absorb any spillage and ensure appropriate disposal.

Veterinary Medicines:
Veterinary medicines are stored in secure, bunded storage on site. Just in Time procedures are used where possible to minimise substances stored on site. Procedures are in place to absorb any spillage and ensure appropriate disposal.

Diesel:
Diesel is stored within the bunded generators and there is no separate storage on site. Filling of tanks will be manual via jerry cans.

- Generator 1 has a 662-litre internal bund. It is sited on a concrete floor inside the Central Services section.
- Generator 2 has 270-litre internal bund. It is sited on a concrete pad within a covered enclosure.

The fuel storage is compliant with The Water Environment (Miscellaneous) (Scotland) Regulations 2017. A filling protocol is in place and monitoring is carried out.

Water:
Water is sourced from the mains network and stored in tanks at the site. Water is used to supply drinking water to the birds and for washing down the housing units at depletion. Water consumption is monitored.

Feed (BAT 3 & 4):
Feed will be supplied to the site, pre-mixed, into fully enclosed silos each fitted with cyclone particle containment and mitigation and protected from vehicle collision. Feed will then be transported into the feed chain systems by augers. This is computer controlled to maximise uptake by birds and minimise waste.

No feed mixing or milling is done at site and feed specification is prepared by a nutrition specialist and supplied by UFAS accredited mills so that only approved ingredients are used. This will ensure that the correct feed is given in regard to the weight and age of hens. A record of all feedstuffs used, including manufacturer/miller, ingredients and quantity purchased will be kept by the operator.

SEPA is satisfied that this meets the requirements of SFIR and BAT.

Litter:
Wood shavings will be used as bedding litter at the beginning of each flock cycle and topped up as required. Litter is brought onsite as required and no additional litter is stored onsite.

5.6 Waste Management and Handling

Waste Minimisation

As a commercial operation, SEPA believes it is in the interest of both the company and the environment to minimise waste on the site, as a result SEPA encourages all IA PPC sites to examine their Raw Materials usage and seek ways to reduce their impact on the environment.

Standard permit conditions require the operator to minimise waste and where possible develop and implement recycling or recovery strategies. Records will be kept on site of all waste streams and the

source, quantity and disposal routes taken. This data will be reviewed every 4 years in the resource efficiency report required in the permit.

It is not anticipated that there will be much waste generated by the site. Packaging such as plastic, paper and cardboard will be collected and stored in the Central Services Area and sent for recycling as appropriate. General farm waste will also be stored and uplifted by an appropriately licensed contractor.

Waste Handling

Mortalities will be stored in line with industry best practice. All fallen stock will be removed immediately and bagged and removed to house freezer on the same day. When appropriate, these are transferred to satellite freezer at the main Meikle Geddes farmstead (off permitted site but classed as satellite installation), from where they are transferred to licenced contractor. All disposal of carcasses will be undertaken in accordance with the Animal By-Products (Enforcement)(Scotland) Regulations 2013.

Foot baths are located around the site for all personnel entering poultry zones. The foot baths have lids and therefore will not overtop in wet weather. Spent disinfectant will be disposed of into the underground wash water tank. Where a disinfectant or effluent from cleaning may contain list I or II substances, wash water must be exported from site and disposed of at a suitably licenced facility. When a disinfectant does not contain list I or II substances, wash water can be spread to land in accordance with Water GBR 18.

Underground wash water storage tanks will be used to collect contaminated water from the poultry housing cleaning process. The wash water will be spread to land outwith the permitted installation. The wash water tanks must be inspected routinely to ensure their integrity.

It is inevitable that a small number of eggs will end up in the litter and manure within poultry housing and will result in waste eggs being spread to land out with the permitted installation with the litter and manure, but the volume should be minimal and is considered by SEPA to be unavoidable.

Adding waste/broken eggs to the litter or manure after the eggs have been removed from the bird area, for example from grading/sorting facilities and packing stations, changes the status of the litter and manure and it all becomes a waste which will need to be collected and disposed of by an authorised waste contractor.

Waste/broken eggs must be collected, stored and disposed of appropriately. Broken eggs are a CAT 3 waste. If there is no facility on site to handle broken eggs the following procedure should be followed:

- Collect broken eggs in a plastic lined bucket / bin.
- Freeze in the plastic liner (in the fallen stock freezer is ok).
- Arrange for uplift as required by an authorised CAT 3 waste contractor

Hen manure is removed twice weekly via enclosed muck belts and stored in a covered trailer before being removed offsite for spreading on land outwith permitted site or transported to other farms in need of organic fertiliser. All litter is transported off-site in covered trailers.

The volume of other wastes stored on the site is minimal and all will be considered in the relevant section of the resource efficiency assessment required under the standard permit condition. The onus of Duty of Care shall apply to all waste management at the installation. The Duty of Care required under section 34(7) of the Environmental Protection Act 1990 (as amended) is a statutory duty which must be complied with by anyone who produces, keeps, imports or manages controlled waste in Scotland.

Waste Recovery or Disposal

As a commercial operation, SEPA believes it is in the interest of both the company and the environment to minimise waste on the site, as a result SEPA encourages all IA PPC sites to examine their Raw Materials usage and seek ways to reduce their impact on the environment. Standard permit conditions require the operator to minimise waste and where possible develop and implement recycling or recovery

strategies. Records will be kept on site of all waste streams and the source, quantity and disposal routes taken. This data will be reviewed every four years in the resource efficiency report required in the permit.

5.7 Management of the site

Environmental Management System

Good site management is a requirement not only of the PPC Regulations & BREF but also the Food Safety Act 1990, regulated by the Food Standards Agency, and the Animal Welfare Act 2006. Agricultural installations are subject to regulatory controls requiring Operators to operate installations to a high standard both to ensure welfare of animals and to protect products entering the food chain.

BAT 1 requires that the permitted activity is operated in accordance with an environmental management system (EMS). The BREF requires that in order to improve the overall environmental performance, the EMS should incorporate the following key features:

- Management commitment
- Environmental policy
- Financial planning and investment
- Relevant procedures (training, record keeping, maintenance, emergency procedures)
- Checking performance (monitoring, preventative action, auditing)
- Review
- Continual improvement
- Benchmarking
- Noise Management Plan
- Odour management Plan

BAT 2 requires good housekeeping to prevent or reduce the environmental impact and improve overall performance. This includes training, routine maintenance and an emergency plan.

The applicant has indicated that the installation will be operated in full compliance with Section 2.1 of SFIRs requiring an appropriate person and deputy, a management system, competent staff, and record keeping.

Accidents and their Consequences

The PPC Regulations specifically preclude SEPA from adding conditions to a Permit regarding the Health and Safety of Staff or workers on-site; however should an accident or incident occur that is likely to pose a risk to the environment or harm to human health in the wider community then SEPA would require, under the conditions of the permit, that not only must the Operator take action to limit the immediate environmental impact but where necessary implement changes to try to ensure that the event does not happen again.

In general, all accidents or incidents likely to cause pollution and all complaints to the site regarding nuisance emissions are required by Schedule 7 of the Permit to be recorded and dependent on the severity, notified to SEPA. Emergency preparedness and response (incident prevention and mitigation) are required as per BAT 1 as part of the Environmental Management System for the site.

The applicant has prepared an Incident Prevention and Mitigation Plan with appropriate actions designed to minimise the environmental impact of any polluting releases.

Closure

In order to ensure that the site can be returned to its pre-PPC Permit state, SEPA have required the applicant detail any pre-application problems prior to permitting so that a site surrender report can be compared with the Site Condition and Baseline Reports. Surrender of the permit is by an application to

SEPA who have to be satisfied that the requirements of Regulation 19 of the PPC Scotland Regulations 2012 (as amended) are complied with.

As per the PPC Regulations the applicant shall need to remediate the site where required to the levels cited in the baseline report (please see Section 5.8 below for more information)

The location for the new building is on a greenfield site.

The operator has agreed to meet Section 2.15 of the SFIR for Decommissioning.

5.8 Site Condition report

The application contains a Site Condition Report (SCR) and Baseline Report as per Regulation 48 of the PPC Regulations.

The Water Resource Unit within SEPA have highlighted that the water feature in the northwest of the site should be sampled prior to commencing operations at the site. No baseline groundwater monitoring or soil sampling has been undertaken. However, further investigation by the operator shows that there is no "water body" as shown on the OS map. No watercourses run onto the site from outwith the site boundary. The WRU are happy that if the water feature does not exist, then it is OK to not be included as part of routine monitoring. The area should be looked at during site inspections.

A single sampling round of three water samples was undertaken for pH, SS, BOD, COD, NH3, NO3, PO4, Conductivity, Cl. Monitoring only covered locations on the mill lade upstream and downstream of the site, and showed no significant impact from current operations.

"Mill Lade"	pH	Susp. Solids	BOD	COD	NH3	NO3	PO4	Conduct.	Cl
WMP 1 u/s Distillery	7.75	<2	<1	12	<0.2	7.5	<0.02	143	16.4
WMP 2 U/s Site	7.27	<2	<1	12.6	<0.2	8.9	<0.02	163	19.6
WMP 3 D/s Site	7.53	<2	<1	14.4	<0.2	10.3	<0.02	166	20.2

The stated site condition is broadly acceptable given the history of the site i.e. arable farmland and former airfield. However, WRU note that the potential for historical or diffuse pollution to be present, given the agricultural setting, including adjacent existing poultry operations, and past land use, has not been taken into account.

There is a groundwater abstraction (CAR/L/1011509) for Royal Brackla Distillery ~200 from the PPC site boundary and ~750m from the proposed new shed which has not been included in current incident management processes. Although the abstraction is upgradient, there is still the potential for it to interact with the site due to its relatively close proximity to the site and the general hydrogeological setting. This is now factored into the site's incident management procedures.

Initially no consideration for site flooding had been included in the application. The site is within the mapped flood risk areas for the River Nairn so site management procedures should factor this risk in. The operator shared updated risk assessment, with vulnerable features of the site having raised platforms to mitigate any flood risk. Rainfall attenuation on the roof areas prevents exacerbation of local flood risk. Council planning had passed the existing site, taking on board flood risk areas that had been identified. The new site has been located to avoid flood risk area.

The permit will require annual surface water quality monitoring by the operator which should include the water feature in the northwest of the site. Soil monitoring will be at the minimum frequency of 10 years.

5.9 Monitoring

Air

SEPA places a lot of emphasis on self-monitoring and record keeping to assess operational conditions and environmental performance. The operator is required within the permit to undertake odour and noise assessments. General monitoring of the site is also covered in the Permit to assess operational conditions and environmental performance.

Various permit conditions require the operator to monitor the level of inputs and the volume of outputs, to consider how changes made benefit the environment.

The 2017 BREF introduces the following additional monitoring requirements:

1. The total nitrogen and total phosphorus excreted in manure
2. Ammonia emissions to air
3. Dust emissions
4. Process parameters

The European Commission during deliberations around the revised BREF, accepted the proposal from the UK Technical Working Group to estimate emissions by using DEFRA approved emission factors to comply with monitoring requirements for 1-3 above.

Water

No surface water monitoring required. There shall be no direct point source emissions to surface water from any part of the permitted activities. The applicant has demonstrated the swale is designed in line with SEPA advice and is sufficiently sized. If maintained properly, it will provide sufficient treatment of all lightly contaminated run off so that this is not considered to be a point source discharge to surface water.

Soil and Groundwater

There shall be no direct point source emissions to soil or groundwater from any part of the permitted activities. Fuel storage (emergency generators) will be appropriately bunded inspected and maintained.

The applicant has demonstrated the swale is designed in line with SEPA advice and is sufficiently sized. If maintained properly, it will provide sufficient treatment of all lightly contaminated run off so that this is not considered to be a point source discharge to soil or groundwater.

Wash water will be collected and contained in compliant tanks with suitable capacity for one wash out cycle.

Routine Soil (every 10 years) and Groundwater (every 5 years) is required by the permit.

Any issues highlighted as a result of this routine monitoring would generate further investigation or mitigation.

Waste

As a commercial operation, SEPA believes it is in the interest of both the company and the environment to minimise waste on the site, as a result SEPA encourages all IA PPC sites to examine their Raw Materials usage and seek ways to reduce their impact on the environment. Standard permit conditions require the operator to minimise waste and where possible develop and implement recycling or recovery strategies. Records will be kept on site of all waste streams and the source, quantity and disposal routes taken. This data will be reviewed every 4 years in the resource efficiency report required in the permit.

5.10 Consideration of BAT and compliance with BAT-Cs if appropriate

SEPA published its view of “indicative” BAT relating to intensive agricultural operations in its Standard Farming Rules (SFIR). SFIR’s are based on the BAT Reference Document (BREF) for Intensive Agriculture Installations published by the European IPPC Bureau in 2017.

These SFIR's have been used throughout this permit to benchmark farming activities.

The permit application indicates that the installation will be operated in accordance with Best Available Techniques.

6 Other Legislation Considered

Nature Conservation (Scotland) Act 2004 & Conservation (Natural Habitats &c.) Regulations 1994

Is there any possibility that the proposal will have any impact on site designated under the above legislation? If yes, provide information on the action and justification below:	**No**
Refer to Section 5.2 above	
Screening distance(s) used	10 Kilometres as per the SEPA Nature Conservation Procedure Guidance (NCP-P-01)
Is there any other legislation that was considered during determination of the permit (for example installations that may be impacted by the requirements of legislation involving Animal By Products, Food Standards, Waste, WEEE regulations etc). If yes, provide information on the legislation, action and justification below:	**Yes**

The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR):
This primarily applies to land spreading activities that will be taking place out with the site boundary and will be regulated under GBR18.

The requirements for the generator oil storage under these Regulations are met. There are no conflicts with ongoing CAR regulation of this process.

The SUDS systems to treat surface water drainage have potential to impact groundwater and therefore SuDS design must be in accordance with the CREW Rural SuDS Guide. See Section 5.3.

Animal By-Products (Enforcement) (Scotland) Regulations 2013:
Regulates carcass disposal. Carcass storage is a Directly Associated Activity (DAA) in the permit.

Medium Combustion Plant Directive (MCPD):
For all proposed plant >1MW regulated as DAA on IA installations, BAT will apply and SEPA should complete Local Air Quality Management and Nature Conservation Habitat screening. If required, SEPA will impose monitoring of emissions within four months and then every three years with ELVs from Process Guidance Note 1/3 or the MCPD.

There is no proposed plant >1MW on site at the time of permit issue.

Environmental Authorisation (Scotland) Regulations 2018 (EASR):

From 1st November 2025, water, waste management, and industrial activities are regulated under Environmental Authorisation (Scotland) Regulations 2018. As this application was made prior to this date, it has been determined under the previous regulations.

Officer	CO

7 Environmental Impact Assessment and COMAH	
How has any relevant information obtained or conclusion arrived at pursuant to Articles 5, 6 and 7 of Council Directive 85/337/EEC on the assessment of the effects certain public and private projects on the environment been taken into account?	
N/A	
How has any information contained within a safety report within the meaning of Regulation 7 (safety report) of the Control of Major Accident Hazards Regulations 1999 been taken into account?	
N/A	
Officer:	CO

8 Details of the permit	
Do you propose placing any non standard conditions in the Permit?	**No**
Do you propose making changes to existing text, tables or diagrams within the permit?	**No**
Officer:	CO

9 Emission Limit Values or Equivalent Technical Parameters/Measures	
Are you are dealing with either a permit application, or a permit variation which would involve a review of existing ELVs or equivalent technical parameters?	**No**
Officer:	CO

10 Peer Review	
Has the determination and draft permit been Peer Reviewed?	**Yes**
Comments made:	
• Updated glossary of terms • Typo relating to number of designated sites • Updated Table 6 in draft permit.	
Officer:	Spec II

11 Final Determination
Issue of a Permit - Based on the information available at the time
Issue a Permit – Based on the information available at the time of the determination SEPA is satisfied that • The applicant will be the person who will have control over the operation of the installation/mobile plant, • The applicant will ensure that the installation/mobile plant is operated so as to comply with the conditions of the Permit, • The applicant is a fit and proper person (specified waste management activities only), • Planning permission for the activity is in force (specified waste management activities only),

- That the operator is in a position to use all appropriate preventative measures against pollution, in particular through the application of best available techniques.
- That no significant pollution should be caused.