Woodend Farming Partnership
Woodend Farm

Permit Application

PPC/A/5011690

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

This application by Woodend Farming Partnership is for a new PPC Permit (PPC/A/5011690) due to the expansion of the free range egg business and corresponding increase in bird numbers at Woodend Farm, Duns, Berwickshire. There are currently two operational hen sheds on site with a combined capacity of 32,000 free range hens (16,000 birds in each shed). The business is proposing to add an additional 32,000 capacity hen shed, bringing the total capacity on the farm to 64,000 places for free range hens. The site is located at NT 7581 5146. The permit application is made under Schedule 1 Section 6.9 Part A paragraph (a) of the Pollution Prevention and Control Scotland Regulations 2012.

The sheds will be designed to minimise ammonia emissions, roofs and walls will be insulated to retain heat and reduce condensation. All lighting in the new shed will be low energy LED. All sheds will be built on an impermeable base.

Temperature and ventilation will be fully automated to ensure bird welfare and energy efficiency are optimised. Existing house 1 is ventilated by gable end exhaust fans, existing house 2 and the proposed new house 3 will use high velocity roof fans (the high velocity fans are positioned on the eastern and western ends of the buildings respectively).

A range of renewable energy is utilised on site including: solar panels, wind turbine and biomass boilers. Mains electricity will only be used if required. Diesel will be stored on site in integrally bunded tanks only for the two emergency back-up generators.

Deadstock will be stored in line with industry best practice. Bird carcasses will be held in a freezer and then transferred to a lidded container for regular collection by a specialist contractor.

The sheds will be multi tiered aviary systems with birds introduced around 16 weeks old. The birds will remain in the houses until about 15 – 17 months later when they will be depleted. Once emptied the sheds are deep cleaned and wash water is pumped from collection sumps to sealed containment (IBC) prior to being applied to land out with the site boundary. Turnaround typically lasts 3-5 weeks, allowing for full washdown, drying and salmonella clearance prior to restocking.

The installation of a Sustainable Drainage System (SuDS) in the form of a wetland has been proposed to treat all water from the roof, concrete pad and gravel area surrounding the house. The drainage system proposed adheres to the guidelines of the Rural Sustainable Drainage Systems A Practical Design and Build Guide for Scotland's Farmers and Landowners, published by Scotland's Centre of Expertise for Waters (CREW), considered BAT for IA permitted installations.

Feed will be stored outside in silos sited on hardstanding and augured into the sheds directly. Feed is mixed weekly in the feed store and delivered via mobile mixer to the silos. The silos are fitted with dust suppression. Feed formulations are continuously optimised to apply crude protein reductions and minimise excess nitrogen.

An area of tree shelterbelt has already been established around the existing houses 1 & 2 and the operator is proposing to install a similar planting on the range of the new house 3.

Manure will be removed via manure belts twice per week to the manure store where it will be processed through Bokashi fermentation. This fermentation process is designed to minimise ammonia emissions, stabilise nutrients and produce a high value fertiliser. Manure will also be dried on the belts by forced air drying which is proven to reduce ammonia emissions.

Collectively, these measures are intended to prevent and reduce the production and release of ammonia, odours and dust from the shed, to prevent liquid washings escaping to the environment and to manage the waste produced on site. The permit application indicates that the installation will be operated in accordance with Best Available Techniques.

Nature Scotland were consulted on the ammonia assessment provided with the application and highlighted the high levels of nitrogen deposition in relation to the nearby designated sites. SEPA have considered this advice from NatureScot and the mitigation proposed at Woodend.

1. forced air manure belt drying
2. reduced dietary crude protein levels
3. we are supportive of the proposed Bokashi manure fermentation/treatment,
4. additional tree planting

Although adverse effect has not been ruled out by NatureScot, we feel that the applicant has proposed BAT to minimise emissions and considering the source apportionment data for Langtonlees Cleugh SSSI and the other significant contributions in the area, we are minded to grant the application.

The applicant has been made aware that any future proposals of expansion in this area will need to demonstrate that there will be no net increase on the current emission levels and therefore no additional burden on Langtonlees Cleugh SSSI.

Determination was therefore to issue the Permit PPC/A/5011690 based on the application submitted.

Glossary of Terms
BAT - Best Available Techniques BREF – Best Available Techniques Reference Document BAT-C – Best Available Technique Conclusions CO – Coordinating Officer CREW - Centre of Expertise for Waters ELV – Emission Limit Value EASR – Environmental Authorisation (Scotland) Regulations 2018 IBC – Intermediate Bulk Container SSSI – Site of Specific 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**
The Berwickshire News	**02/10/2025**	**Yes**
Edinburgh Gazette	**30/09/2025**	**Yes**
Officer Checking advert: CO		
No of responses received	None	
Summary of responses and how they were taken into account during the determination:		
N/A		
Summary of responses withheld from the public register on request and how they were taken into account during the determination:		
N/A		
Is PPC Statutory Consultation Required? (if no delete rows below)		**Yes**
Food Standards Agency:	Response received 30/09/2025 – 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 Borders – No response received
Local Authority	Scottish Borders Council – No response received
Scottish Water	N/A
Health and Safety Executive	N/A
NatureScot	Response received 20/10/2025. **NatureScot response:** We agree with SEPA's conclusion that the emissions are high and that they could contribute to environmental damage at some designated sites. The analysis below uses data from the tables above and the APIS website. <u>Site Summary</u> • **Langtonlees Cleugh SSSI** – potentially significant damage from ammonia and nitrogen • **River Tweed SAC (and SSSI)** – Likely Significant Effect from nitrogen and ammonia • Greenlaw Moor SSSI – no impact on the site • Dogden Moss SAC – increase in nitrogen and ammonia levels are within acceptable limits, although background nitrogen deposition significantly exceeds the Critical Load • Abbey St Bathans SSSI – increase in nitrogen deposition is within acceptable limits, although background deposition exceeds the Critical Load. No impact from ammonia. • Crook Burn, Dyeshaugh SSSI – no impact of the proposal on this site <u>Langtonlees Cleugh</u> (receptor site E1) Langtonlees Cleugh SSSI is notified for its woodland habitat and is about 1.5 km northwest of Woodend. The background nitrogen concentration of 20 kg N ha yr is twice the site's minimum Critical Load and is higher than the maximum CL for the habitat type. Current nitrogen deposition levels are likely to be damaging, and the predicted 17% process contribution is significant. The background ammonia concentration is 0.9 ug m3 is significantly lower than the site's Critical Level of 3 ug m3. The PEC for this site 1.178 ug m3, again lower than the CLe. However, the SSSI's citation notes the importance of the site's lichen flora, including some species that are rare in the Borders. Lichens typically have a Cle of 1 ug m3. Although the habitat overall may not be affected by ammonia, the lichen flora could be damaged by the additional ammonia release. At 39%, the PC of Woodend is significant, and elevates the background ammonia level above the Cle for lichens. Furthermore, lichens tend to be damaged at deposition rates greater than 6 kg N ha yr. Current nitrogen loading, and the predicted increase in nitrogen deposition rates, are likely to damage lichens in addition to any damage caused by ammonia. <u>River Tweed SSSI/SAC</u> (receptors E14 and E19)

	The APIS website does not provide CL(e) data for the River Tweed SSSI/SAC but information from a separate PPCA consultation (regarding a pig facility at Slighhouses, about 10 km to the northeast of Woodend) allows us to make some comment about the Woodend proposal. That consultation assumes a Critical Load of 10 kg N ha yr and a Critical Level of 1 ug m3 for ammonia, because of the presence of the rare river jelly lichen in the vicinity. River jelly lichen is noted as part of the biological assemblage of the SAC (Conservation Advice Package, p10: https://sitelink.nature.scot/site/8369). As a rare species it also contributes to the site's local distinctiveness. Other lichens occur in the river and similarly contribute to the SAC's character and quality. Receptors E14 and E19 have a PEC above 12 kg N ha yr, i.e. 20% above the assumed CL for the river. With a PC above 7% of the CL, we can assume Likely Significant Effect from the Woodend proposal. For ammonia, the PEC of 1.3 ug m3 is 30% higher than the Cle for lichens. The Process Contribution of over 13% of the Cle is also high. The absence of formal Critical Loads and Levels for the River Tweed SAC is problematic, however the precautionary principle should apply. With PEC and PC above the assumed thresholds it is reasonable to conclude Likely Significant Effect. This conclusion is supported by recent river surveys indicating significant growth of algae across the catchment, suggesting a negative impact from current river nutrient levels. Greenlaw Moor SSSI and Dogden Moss SAC (receptor site E8) The wider part of Greenlaw Moor is notified for its birds and geology, so can be screened out from this analysis. Dogden Moss on the west side of Greenlaw Moor is the most sensitive part of the SSSI and is also designated as an SAC. E8 is the closest receptor site to Dogden Moss. The PEC for nitrogen is about 12.5 kg N ha yr, at a location with a Critical Load of only 5 kg N ha. The PC would be about 1.7%, which is generally within acceptable limits based on SCAIL modelling. Although the background concentration of ammonia is at the Critical level for the SAC (c1 ug m3), we consider that the proposal at Woodend is too far from Dogden Moss to make a material difference. No impact on Greenlaw Moor or Dogden Moss. Abbey St Bathans SSSI (receptors E10-E12) The CL for nitrogen is 10 kg N ha yr. Although the PEC for this site is over 19 kg N ha yr, the process contribution is around 2%. Based on SCAIL modelling, this is within acceptable limits. The Cle for this SSSI is 1 ug m3 because of its notified lichen feature. At around 0.95 ug m3, the PEC is close to the Cle but does not exceed it. At up to 2.7% of the Cle, the process contribution is within acceptable levels. Crook Burn, Dyeshaugh SSSI (Receptor E9)

	The Critical Load for this site is 15 kg N ha yr, with a PEC of 10.8, so there should be no impact on this site. The Cle for the site 1 ug m3, with a PEC of 0.7 ug m3, so there should be no impact of the proposal on this site. **(Refer to section 6 of this decision document for further discussion with Nature Scot regarding air emissions, critical levels and mitigation)**

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**

Date SEPA notified applicant of draft determination	13/01/2026
Date draft determination placed on SEPA's Website	13/01/2026
Details of any other 'appropriate means' used to advertise the draft. Seek advice from the communication department	
Date public consultation on draft permit opened	13/01/2026
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:	

3 Administrative determinations

Determination of the Schedule 1 Activity

As detailed in the application

Determination of the Stationary Technical Unit to be permitted

As detailed in the application

Determination of Directly Associated Activities

As detailed in the application

Determination of Site Boundary

As detailed in the application

Officer:	CO

4 Introduction and Background

4.1 Historical Background to the activity and variation

Woodend farming Partnership currently has two operational hen sheds on site with a combined capacity of 32,000 free range hens (16,000 birds in each shed). The application for a PPC permit is sought due to the business proposing to add an additional 32,000 capacity hen shed, bringing the total capacity on the farm to 64,000 places for free range hens.

4.2 Description of activity

Rearing poultry intensively in an installation with more than 40,000 places for poultry.

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

Woodend farm is within 10 km of the following designated sites:

- Langtonlees Cleugh SSSI
- Greenlaw Moor SPA
- Greenlaw Moor Ramsar
- River Tweed SAC
- Dogden Moss SAC
- River Tweed SSSI
- Abbey St Bathans Woodlands SSSI
- Crook Burn, Dysehaugh SSSI
- Oxendean Burn SSSI **(Screened out Geological)**
- Whiteadder Water SSSI **(Screened out Geological)**
- Lintmill Railway Cutting SSSI **(Screened out Geological)**

The sensitive receptors highlighted within 250m of the installation were as follows:

Woodend Farmhouse	NT 75955_51537
Houses 1&2	NT 75898_51546
Orchard House	NT 75977_51625
Houses 3,4&5	NT 76001_51346

Officer:	CO

5 Key Environmental Issues

5.1 Summary of significant environmental impacts

SEPA have identified a number of potential environmental impacts which need to be assessed. These are identified as follows:

Emissions to Air: Ammonia, dust (PM10) and odour.
Emissions to Land: Waste, faecal matter and nutrient inputs to land.
Emissions to Water: Surface water discharge to surface water and indirect to groundwater.
Other emissions: Noise
Associated risks: Fuel and chemical storage

SEPA aims to control these through the conditions contained in the permit and by the requirement on the operator to comply with BAT as indicated in the SFIR.

5.2 Emissions to Air

Point Source emission to air:

Ammonia (BAT 23 & 31)

Ammonia released from livestock manures and slurries and the nitrogen deposition resulting from ammonia emissions, can negatively affect biodiversity. When atmospheric ammonia is emitted from agricultural sources, it can either be deposited directly (dry deposition) or transported within the atmosphere and be later deposited through rain or snow (wet deposition). At locations close to the source the predominant is for dry while wet is predominant further away.

Certain habitats and species are particularly susceptible. Bog and peatland habitats are made up of sensitive lichens and mosses which can be damaged even at low concentrations. The direct toxic effect on vegetation can result in the loss of such sensitive species which can then cause changes in animal and insect species composition. Deposition can also lead to soil acidification and leaching of excess nitrogen into the ground and surface waters causing eutrophication. The main point source ammonia emission will come from the ventilation exhaust fans on each shed.

Ammonia from poultry housing can give rise to adverse impacts to sensitive habitats located downwind. Ammonia is emitted via ventilation outlets. The following measures relating to housing unit design will be adopted to prevent or minimise emissions to air:

- The new house will be double skinned, fully insulated and built on an impermeable concrete base.
- An automated system dispenses feed into feeders to minimise feed wastage through spillage.
- Non drip, low pressure nipple drinkers used to reduce wastage and maintain dry manure, thus reducing emissions of ammonia and odours.
- Manure will be dried on manure belts by forced air and removed via the belts twice per week to the manure store where it is processed through the Bokashi fermentation method.
- Computer controlled automated exhaust fans to ensure the internal environment is kept stable and at optimum. Aside from flock requirements, automated control of ventilation and humidity also helps to keep manure dry.

An ammonia assessment was included in support of the permit application. The report presented “in combination” scenarios taking account of emissions from existing and proposed houses, associated outdoor ranging areas and manure store at the installation site as well as emissions from the proposed houses and slurry stores at nearby Slighhouses pig farm. See section 6 below for a detailed description of the modelling assessment and results.

Bokashi fermentation: This process is designed to minimise ammonia emissions, stabilise nutrients and produce high value fertiliser for arable land. Poultry litter will be removed from the shed and mixed with a carbon-rich bulking agent (chopped straw and woodchip). The mixture is then treated with a liquid mixture of microorganisms to initiate anaerobic fermentation. After mixing the material is immediately sealed in an AgBag in the fields for approximately 12 weeks. The applicant states that bagging the material and adding straw helps bind the nitrogen and reduce losses into the atmosphere. They also suggest adding straw contributes to soil organic content helping to sequester carbon, improve soil structure and support beneficial microbial activities.

Although the applicant is proposing tree planting this was not taken account as a mitigation option in the ammonia assessment and no reduction was applied for tree shelterbelts. As such the conditions relating to tree planting were not included in the permit.

Dust (BAT 11):

PM10 and PM 2.5 dust particles are subject to statutory air quality standards. These standards have been specified to reduce health effects and environmental risks to an acceptable level. Air quality limits and averaging periods are set out in the Air Quality Standards (Scotland) Regulations 2010. In addition to the air quality standards, Scotland has air quality objectives which are set out in the Air Quality (Scotland)Regulations 2000 (as amended).

Where sensitive human health receptors are located within 250m of a poultry unit, SEPA requests the Applicant screens the emissions of particulate matter to establish whether the emission might cause any air quality standards to be breached. In the case of Woodend 4 sensitive receptors were identified within 250m of the proposal:

Woodend Farmhouse	NT 75955_51537
Houses 1&2	NT 75898_51546
Orchard House	NT 75977_51625
Houses 3,4&5	NT 76001_51346

H1 criteria was used to screen the proposal for both receptors. Inputs and results were provided to SEPA from the applicant. The proposal passes screening at stage 2 for all sensitive receptors. Results:

		LONG TERM PM10 - Annual mean (18 µg/m3)						SHORT-TERM PM10 - Daily mean (50 µg/m3)						OUTCOME
		STAGE 1		STAGE 2				STAGE 1	STAGE 2					
RECEPTORS	NAME	PC PM10 (µg/m3)	PM10 Background (µg/m3)	PM10 PEC (µg/m3)	PM10 EAL (µg/m3)	PC % EAL	PEC % EAL	PC PM10 (µg/m3)	PC PM10 (µg/m3)	PM10 Background (µg/m3)	PM10 PEC (µg/m3)	PM10 EAL (µg/m3)	PC % EAL	
1	Farmhouse	1.30	10.4	11.7	18	7.22%	65.00%	4.64	4.64	20.8	25.44	50	9.28%	Passes at Stage 2
2	1&2	1.40	10.4	11.8	18	7.78%	65.56%	4.96	4.96	20.8	25.76	50	9.92%	Passes at Stage 2
3	Orchard House	1.11	10.4	11.51	18	6.17%	63.94%	4.38	4.38	20.8	25.18	50	8.76%	Passes at Stage 2
4	3,4&5	1.33	10.73	12.06	18	7.39%	67.00%	4.73	4.73	21.46	26.19	50	9.46%	Passes at Stage 2

Stage 1		
Short-term:	The short-term PC is less than 10% of the short-term standard. The short-term standard is 50µg/m³.	
	10% of the short-term standard =	**5.00**
Long-term	The long-term PC is less than 1% of the long-term standard. The long-term standard is 18µg/m³.	
	1% of the long-term standard =	**0.18**
Stage 2		
Short-term	The short-term PC is less than 20% of the short-term standard minus twice the long-term background.	
	Long-term background: receptors 1-3	**10.4**
	Criteria for receptors 1-3	**<5.84**
	Long-term background: receptor 4	**10.73**
	Criteria for receptor 4	**<5.71**
Long-term	The long-term PEC is less than 70% of the long-term standard. The long-term standard is 18µg/m³.	
	70% of the long-term standard =	**12.60**

Fugitive emissions to air:

(BAT 1 & 11)

There are a number of potential fugitive emissions to air. These include the release of dust and ammonia during cleaning or opening of the poultry sheds for fallen stack removal and also from the birds themselves. Whilst SEPA accepts that some fugitive releases are unavoidable e.g. unplanned releases due to an unforeseen incident: others such as poor cleaning out 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.

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.

Bioaerosols:
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 250m should appropriate criteria for assessment be identified.

Odour:

(BAT 1, 12 & 13)

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

SEPA has identified that the potential odour issues from the existing sheds and the proposed new shed are ammonia and general poultry smells, with secondary odours from the use of any chlorinated cleaning materials or disinfectants to clean the sheds.

BAT 1 requires the permit holder to produce an Odour Management plan having regard to BAT 12 detailing odour techniques and reduction of odour emissions in accordance with BAT 13.

An Odour Management Plan has been submitted with the application and will be implemented on site. 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:

There are no public sewers within the vicinity of Woodend Farm and therefore there will be no discharges to sewer.

Domestic wastewater will be directed to the existing septic tank, this system is separate from any wash water system and will be regulated under The Water Environment (Controlled Activities) (Scotland Regulations) 2011 (as amended). The foul effluent system is not considered part of the Permitted Installation. The onus is on the applicant to ensure that all drainage to the foul effluent system is in compliance with regulatory requirements and does not cause environmental harm or impede the function of the system.

Roof and surface water including the concrete pad area and the 6m width gravel area around the shed from the proposed new house will be directed to a new wetland via a settlement tank. Drainage will be conveyed to the wetland from the tank by a sealed pipe. The installation of a Sustainable Drainage System to treat lightly contaminated drainage via a new wetland is in line with the CREW SuDS Guide, considered BAT for IA permitted installations.

The lightly contaminated areas from the existing two sheds are treated by pre-existing swales, the applicant supplied designs and information on these treatment systems on 03/12/2025.

SUD's 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 variation does not contain discharge conditions or limits. Should SEPA become aware of an issue with the SuDS, e.g. evidence that contaminated run being discharged to the SuDS or discoloration of a nearby watercourse, action will be taken under condition 3.31 "Unless specified elsewhere in this authorisation, there must be no individual source emissions from the authorised place to the water environment, air or land"

The applicant confirmed by email on 03/12/2025 that wash water from the packing area will be directed to a sealed tank and will not access the domestic septic tank drainage system. The wash water would be taken off site to be spread to land out with the site boundary.

Point Source Emissions to Groundwater:

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

Wash down is approximately once every 1.5 years. The applicant confirmed that wash water is pumped from collection sumps to sealed containment (IBC) prior to being applied to land out with the site boundary. As is the case with manure, once outside the boundary of the PPC site, wash water must be applied to land in compliance with the The Water Environment (Controlled Activities) (Scotland Regulations) 2011 (as amended) General Binding Rule 18 (GBR18).

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

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 contaminating surface waters, lack of care during cleaning of the chicken sheds and diesel tank filing and associated bund emptying.

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 and preparation of spray should be in a bunded area.

5.4 Noise

Noise (BAT 1, 9 & 10)

SEPA acknowledges that noise from intensive agriculture installations can give rise to complaints and requires operators to formulate and implement a Noise Management Plan to reduce the impact on the local environment. The predominant source of noise from poultry units is generated from the ventilation systems. Other sources of noise related to this type of activity can include vehicle movements in and around the site and the placement and removal of birds. The latter two are considered as being unlikely to cause issues as the activities will take place for such short durations as well as being infrequent. Regular maintenance of fans will prevent noise, and the Noise Management Plan will address any issues that should arise and will be regularly reviewed as stipulated by the permit.

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.

A Noise Management Plan has been submitted with the application and will be implemented on site. Permit condition 2.8.1 requires that 'emissions from the Permitted Installation shall be free from noise and vibration at levels likely to cause pollution, as perceived by an Authorised Person outside 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. Water meters will be installed and consumption will be recorded and reported to SEPA in line with permit requirements.

The greatest volume of water consumed is drinking water for the birds. Fresh water will be delivered to poultry via low leak nipple drinkers.

Energy use and generation

(BAT 8)

Welfare of the birds largely dictates energy use, but the new shed will be built to BAT including insulation lighting and ventilation.

A computer-controlled system maintains the temperature within the housing units. Energy will be generated onsite by a variety of sources: 495 kW Solar PV, 950 kW multifuel biomass boiler, 75 kW wind turbine and two emergency back up Diesel Generators <1mW. Mains electricity from the National Grid will only be used as a back up if required.

Raw Materials Selection and Use

Annual use of raw materials will be considered in the Resource Utilisation Assessment required under standard permit condition 8.2. The operator will be expected to assess the use of each raw material and identify any major changes, losses or areas where efficiencies can be made and report the assessment and resulting actions taken to SEPA every four years.

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. The application site report states that all chemicals are stored securely on site in designated stores.

Agricultural Fuel Oil:
AFO (also known as red diesel) is stored within the bunded generators and the two integrally bunded tanks in the generator shed. The bunded tanks and generators will meet the requirements of the Water Environment (Miscellaneous) (Scotland) Regulations 2017.

Water:
Water is wholly from mains supply. (Scottish Water). Water is used to supply drinking water to the birds.

Feed **(BAT 3 & 4):**

Feed is mixed weekly in the feed store using raw materials and minerals stored on site with specific diet formulas tailored to the life stages of the bird. Formulas are provided by the specialist nutrition company (Harbro). 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. Raw materials are stored in the feed shed and in the grain shed. Finished feed mix is delivered to feed silos by Harbro's Tropper (Mobile mixer. Silos are equipped with dust cyclones.

Bedding:
Clean wood shavings will be used on the floor of the poultry houses as bedding material for livestock at the start of each flock. Bedding material will not be stored on site and will only be delivered to site for use as required.

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

Waste Handling

Dead stock will be removed regularly to a secure freezer in the locked store prior to being transferred offsite by a licensed contractor to be disposed of in accordance with the Animal By-Products (Enforcement) (Scotland) Regulations 2013.

Foot baths are located at various locations around the site. The foot baths have lids and will therefore not overtop in wet weather. The applicant confirmed spent disinfectant will be collected in line with wash water arrangements and will be spread to land out with the site boundary. Where a disinfectant or effluent from cleaning may contain list I or II substances, washwater must be exported from site and disposed of at a suitably licenced facility. When a disinfectant does not contain list I or II substances, washwater can be spread to land in accordance with CAR GBR 18.

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.

The application originally stated that a quantity of broken eggs would be composted with the manure/Bokashi process. They have since clarified that this is not the case and that breakages inside poultry houses are minimal and are managed with bedding. Eggs broken during grading or cleaning are bagged, frozen and collected by SB&Co as Category 3 waste, with uplift records available. No post-collection eggs will enter Bokashi or manure.

The application states that Biomash ash will be spread to land as a soil conditioner. Providing this material remains on farm and does not leave the installation SEPA will not consider it waste, however, if it is sent off site in future it will require to be registered under EASR for use of waste for soil improvement.

The volume of other wastes stored on the site is minimal and will be considered in the relevant section of the Resource Utilisation Assessment required under the standard permit condition 8.2. 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 4 years in the resource efficiency report required in the permit.

5.7 Management of the site

Environmental Management System

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
- Odour management plan
- Noise 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 the SFIR's.

Accidents and their Consequences

(BAT1)

The Pollution Prevention and Control (Scotland) Regulations 2012 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 doesn't happen again.

In general, all accidents or incidents likely to cause pollution and all complaints to the site regarding nuisance emissions are required by 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.

Closure

Standard conditions in the permit will be appropriate for this installation including the production of a Decommissioning Plan. The operator has agreed to meet Section 2.15 of the SFIR for Decommissioning.

The location for the new building is on a greenfield site. The applicant has provided Site and Baseline reports for the proposed extension to the poultry operations.

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.

See comments in section 5.8 below on baseline report.

5.8 Site Condition report

The location for the new building is on a greenfield site. The applicant has provided Site and Baseline reports for the proposed extension to the poultry operations.

No soil or groundwater samples were provided in support of the baseline report. It is determined that further information about the site is required prior to operations commencing namely baseline water quality monitoring upstream and downstream of the installation. This will be included as an upgrade condition within the permit. The applicant has been made aware of the requirement for water samples to be submitted prior to the operation of the proposed new sheds.

5.9 Monitoring

Air

SEPA places a lot of emphasis on self-monitoring and record keeping to assess operational conditions and environmental performance.

Various permit conditions require the operator to monitor the level of inputs and the volume of outputs and to consider how changes made benefit the environment these conditions will remain in place following the variation. 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 the monitoring requirements for 1-3 identified 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 are sufficiently sized. If maintained properly, they 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 generator) will be appropriately bunded inspected and maintained.

The applicant has demonstrated the SUDs 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 sealed tanks at each 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:	**Yes**

An ammonia assessment was included in support of the permit application. The report presented "in combination" scenarios taking account of emissions from existing and proposed houses, associated outdoor ranging areas and manure store at the installation site as well as emissions from the proposed houses and slurry stores at nearby Slighhouses pig farm.

The in combination assessment shows the highest results are:

Receptor	NH3 PC	NH3 PEC	NDep PC	NDep PEC
E1			17.86	
E7				253.64
E14	16.7			
E19		137.6		

The results of the assessment took into consideration a reduction in the standard emission factor for belt drying and crude protein adjustment. As the results were high SEPA could not rule out that the proposal would have no adverse effect on the integrity of any SAC or SPA/Ramsar Site, or no likely damage to any SSSI's Natural features therefor the Agency consulted Nature Scotland for advice.

A further Teams meeting was held with [redacted] (Nature Scot) on 28/10/2025 to discuss the results and mitigation proposed by the applicant.

Nature Scot advised that the protected areas within the 10 km radius of the proposal, with the exception of Langtonlees Cleugh SSSI, could all either be screened out or were low risk and unlikely to result in significant adverse impacts on site integrity.

They agree that ammonia can be screened out at Langtonlees Cleugh however they highlighted the level of nitrogen deposition. The N Dep PC is 17.86% of the Critical Load and background nitrogen concentration significantly exceeds the critical load for the habitat and for its lichen communities. It amounts to an increase in N dep of c9% which they feel represents a 'potentially significant' additional pollution burden.

SEPA have considered this advice from NatureScot and the mitigation proposed at Woodend.

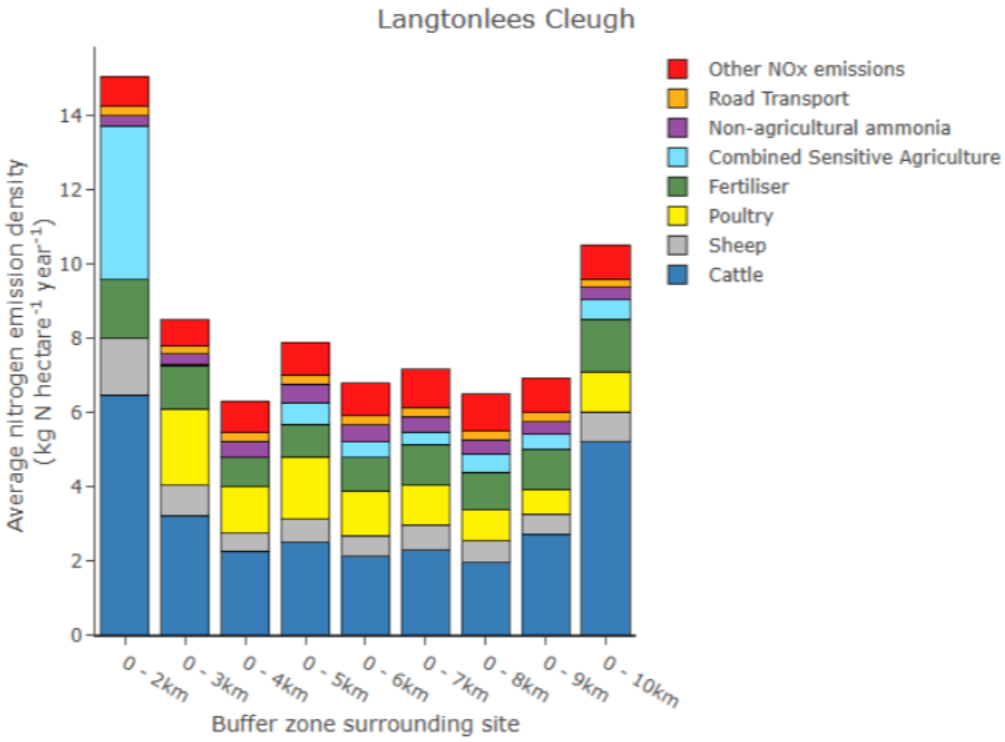
1. forced air manure belt drying
2. reduced dietary crude protein levels
3. we are supportive of the proposed Bokashi manure fermentation/treatment,
4. additional tree planting

Although adverse effect has not been ruled out by NatureScot, we feel that the applicant has proposed BAT to minimise emissions and considering the source apportionment data for Langtonlees Cleugh SSSI (see below) and the other significant contributions in the area, we are minded to grant the application.

The applicant has been made aware that any future proposals of expansion in this area will need to demonstrate that there will be no net increase on the current emission levels and therefore no additional burden on Langtonlees Cleugh SSSI.

Source Apportionment N Langtonlees Cleugh:

Within a 0 – 2km buffer zone of the site boundary, **N emissions are estimated at 15.1 kg N per hectare per year**. Emissions associated with **Cattle** are the largest contributor of local emissions (within 2km).



Screening distance(s) used	10km
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 (as Amended)
Regulation of Domestic waste water and land spreading of wash water and manures under General Binding Rules.

The Environmental Authorisations (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.

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 4 months and then every 3 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.

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:	
• Clarifications re address and authorised person • Clarification on report submission text • Correction to location plan title	
Officer:	CO

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.