

# Statement of Agricultural Benefit

## – Cilrhue Farm & Cyttir Bach



**Applicant:** Mr Daniel James and Mrs Carys James (Stepside Agricultural Contractors)

**Permit:** SR2010 No4: mobile plant for land-spreading

**Permit number:** EPR/AB3891CX

### Agricultural benefit statement is prepared by:

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This agricultural benefit statement has been prepared based on information provided by Stepside Agricultural Contractors. It is made on the understanding that all information provided is correct and representative of the fields to which the material is to be applied and of the waste material to be applied.

### Farm addresses:

Cilrhue Farm, Boncath, Pembrokeshire, SA37 0HS

Cyttir Bach, Blaenannerch, Cardigan, Ceredigion, SA43 2AJ

### Waste to be applied:

Waste Code	Waste Description	Physical Form	Waste Producer
02 05 02	Waste from the dairy products industry – sludges from on-site effluent treatment	Liquid	Dairy Partners, Newcastle Emlyn
02 05 02	Waste from the dairy products industry – sludges from on-site effluent treatment	Liquid	Volac/Sensient, Felinfach
02 05 02	Waste from the dairy products industry – sludges from on-site effluent treatment	Liquid	First Milk, Haverfordwest

### Application:

- Fields Cilrhue 2, 7, 8 & 15 to 20 will be spread in February – April 2026 prior to first cut silage and following silage cuts May – September 2026. Spreading of these grass fields will be split into up to 3 applications & the total of all applications will not exceed the max application rate for each field as listed in table 1. Each individual application will not exceed 50t/ha in any one application to a field.
- Field Cyttir Bach 7 will be spread in February – April 2026 prior to first cut silage, and following silage cuts and in advance of periods of grazing May – September 2026. Spreading of this grass field will be split into up to 3 applications & the total of all applications will not exceed the max application rate for each field as listed in table 1. Each individual application will not exceed 50t/ha in any one application to a field.
- Fields Cilrhue 1, 13 & 14 will be spread into the growing winter barley crops in March – May 2026. This may be split into up to 2 applications & the total of all applications will not exceed the max application rate for each field as listed in table 1. Each individual application will not exceed 50t/ha in any one application to a field (or the maximum application rate given in Table 1 where lower).
- Spreading of the liquid sludge will be carried out in accordance with the Code of Good Agricultural Practice, The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 and in accordance with the requirements of the deployment and Environmental Permitting Regulations.
- NRW will be informed at least 48 hours prior to any spreading commencing and no spreading will occur within 48 hours of forecasted heavy rainfall.
- The liquid sludge is delivered by HGV road tankers and discharged into a nurse tank, slurry bag or concrete under floor covered slurry store in building at Cilrhue Farm. Only liquid sludge as specified in this deployment is to be stored in the nurse tanks & slurry bag at the proposed locations prior to spreading. The concrete under floor covered slurry store in building at Cilrhue Farm will be completely empty of cattle slurry before being used and there will be no mixing of waste.

### Application (continued):

- The nurse tanks are purpose built AW Trailers nurse tanks with designated fill and empty valves that can be shut by gate valves and locked off in the event of temporary overnight storage if the tank contains liquid to ensure secure storage. The tanks fill from the top via internal pipework with a 'swanneck' reducing chances of any spills when decoupling connecting pipes after filling. The empty valve allows the tanks to be completely emptied to the bottom. The tanks are sealed with roofs to prevent odour, rainwater entering a tank and for safety, and can be vented if required. A lifting axle in the middle allows the tanks to be positioned and lowered so the whole tank is on the ground.
- The Labaronne Citaf self-supporting slurry bag is for temporary storage and is purpose built, sealed, can be vented and has designated fill and empty valves and is sited on a suitable flat area. The bag has a 10 year manufacturer guarantee: 100% against all material (technical fabric) and manufacturing (welding) defects. The technical fabric is composed of polyester coated with PVC and protected with an anti UV treatment on both sides. The bag has a life expectancy of 20 years +. The liquid is pumped into the bag from lorry using lay flat hose connected to the bag fill valve. There are 2 gate valves in sequence over a metre apart and a non return valve. The bag features a number of degassers with anti-odour filters. The slurry bag will have a soil bund around the perimeter and will be fenced to prevent access & damage.
- The concrete under floor covered slurry store in building at Cilrhue Farm is impermeable and covered with a slatted floor.
- The liquid sludge is spread from the temporary storage onto the deployed fields at the required timings as stated above. This is done by either umbilical method with the liquid delivered to tractor in deployed fields pumped through hose and spread by dribble bar applicator mounted onto the back of the tractor, or a tractor and vacuum tanker with dribble bar applicator. The dribble bar applicator places the liquid in bands onto the surface of the ground. This spread method is effective in limiting odour generation & nutrient losses associated with higher trajectory spread methods such as splash plate. Spreading is undertaken with the use of flow meters to ensure correct rates are applied.
- The maximum application rate in Table 1 for each field will be split into multiple applications where it's over 50t/ha. Each individual application will not exceed 50t/ha in any one application to a field (or the maximum application rate given in Table 1 where lower).
- **Waste will not be stored or spread in combination (i.e. only one waste stream per field).**

### Benefits from waste application:

- The analysis and nutrient content of the waste are shown in the waste analysis attachments.
- The waste is a source of nitrogen, phosphate, potassium, sulphur, sodium, calcium and organic matter. The waste can be beneficially used to replace a proportion of bagged mineral fertiliser.
- The risk of sulphur deficiency has been estimated as 'High' based on the soil texture and expected winter rainfall (RB209). The crop requirements are 25-120kg SO<sub>3</sub>/ha. The amount of available sulphur supplied by the wastes at the proposed maximum application rates is 2-8kg SO<sub>3</sub>/ha.
- The addition of sodium will improve the palatability of grass and is important in the diet for livestock health.
- The recommended maximum application rates are shown in Table 1 and have been made on a field by field basis using The Nutrient Management Guide (RB209).

### Materials applied in previous 12 months:

The fields within this deployment application have received the rates (t/ha) of materials as in 'Table 4 - Previous Land Treatment' within the previous 12 months.

It's considered that the nutrients applied from these applications were for the requirements of previous crops and the material within this deployment is applied for the next crops.

**Nutrients supplied by this application:**

Rates of application (t/ha)	Nitrogen kg/ha		Phosphate (P <sub>2</sub> O <sub>5</sub> ) kg/ha		Potash (K <sub>2</sub> O) kg/ha		Magnesium (MgO) kg/ha		Sulphur (SO <sub>3</sub> ) kg/ha	
	Total	Available	Total	Available	Total	Available	Total	Available	Total	Available
Dairy Partners liquid sludge @ 37 t/ha	89	18	54	32	12	10	3	0	14	3
Dairy Partners liquid sludge @ 55 t/ha	132	26	80	48	19	15	4	0	21	4
Dairy Partners liquid sludge @ 97 t/ha	233	47	141	85	33	26	7	1	38	8
Dairy Partners liquid sludge @ 100 t/ha	240	48	145	87	34	27	8	1	39	8
Volac/Sensient liquid sludge @ 45 t/ha	50	10	54	32	57	46	7	1	9	2
Volac/Sensient liquid sludge @ 66 t/ha	73	15	79	48	84	67	10	1	13	3
Volac/Sensient liquid sludge @ 98 t/ha	108	22	118	71	125	100	15	1	20	4
Volac/Sensient liquid sludge @ 150 t/ha	165	33	180	108	191	153	23	2	30	6
First Milk liquid sludge @ 57 t/ha	108	22	55	33	13	11	2	0	17	3
First Milk liquid sludge @ 83 t/ha	158	32	79	48	19	15	4	0	24	5
First Milk liquid sludge @ 100 t/ha	190	38	96	57	23	19	4	0	30	6
First Milk liquid sludge @ 126 t/ha	239	48	121	72	29	23	5	1	37	7
Estimated Availability	20%		60%		80%		10%		20%	

**Table 1: Field, Soil & Cropping Details, Fertiliser Recommendations and Application Rates**

Field Ref.	Soil Type	Spreadable Area (ha)	Previous Crop	Next Crop	Nitrogen		Phosphate			Potash			Magnesium	
					SNS	N Required (kg/ha)	P Index	P <sub>2</sub> O <sub>5</sub> Required (kg/ha)	Crop Use (Offtake) (kg/ha)	K Index	K <sub>2</sub> O Required (kg/ha)	Crop Use (Offtake) (kg/ha)	Mg Index	MgO Required (kg/ha)
<b>Cilrhue Farm</b>														
Cilrhue 1	Medium soils	4.90	Grass 3 cuts silage	Winter barley	1	170	3	0	55	2+	40	68	2	0
Cilrhue 2	Medium soils	3.00	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	3	20	80	2+	190	282	2	0
Cilrhue 7	Medium soils	2.70	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	0	140	80	1	320	282	2	0
Cilrhue 8	Medium soils	2.80	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	2	80	80	2-	280	282	2	0
Cilrhue 13	Medium soils	2.00	Grass 3 cuts silage	Winter barley	1	170	0	115	55	1	100	68	2	0
Cilrhue 14	Medium soils	3.10	Grass 3 cuts silage	Winter barley	1	170	1	85	55	1	100	68	2	0
Cilrhue 15	Medium soils	1.50	Wholecrop winter rye	Grass 3 cuts silage	Moderate	250	2	80	80	2+	190	282	2	0
Cilrhue 16	Medium soils	3.80	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	3	20	80	3	90	282	2	0
Cilrhue 17	Medium soils	2.40	Wholecrop winter rye	Grass 3 cuts silage	Moderate	250	2	80	80	1	320	282	2	0
Cilrhue 18	Medium soils	4.60	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	3	20	80	2+	190	282	2	0
Cilrhue 19	Medium soils	2.80	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	2	80	80	1	320	282	2	0
Cilrhue 20	Medium soils	2.70	Grass 3 cuts silage	Grass 3 cuts silage	Moderate	250	2	80	80	1	320	282	2	0
<b>Cyttir Bach</b>														
Cyttir Bach 7	Medium soils	7.20	Grass 2 cuts silage & grazing	Grass 2 cuts silage & grazing	Moderate	205	0	125	65	0	320	228	2	0
<b>TOTAL</b>		<b>43.50</b>												

Nutrient requirements based on:  
 Grass 2 cuts silage (23t FW/ha at 1st cut, 15t FW/ha at 2nd cut), silage 25% DM, totalling 1.7kg/t P<sub>2</sub>O<sub>5</sub> and 6.0kg/t K<sub>2</sub>O removed in offtake + grazing  
 Grass 3 cuts silage (23t FW/ha at 1st cut, 15t FW/ha at 2nd cut, 9t FW/ha at 3rd cut), silage 25% DM, totalling 1.7kg/t P<sub>2</sub>O<sub>5</sub> and 6.0kg/t K<sub>2</sub>O removed in offtake  
 Expected DM yields of grass 9-12t/ha, good grass growth class  
 Winter barley 6.5t/ha straw removed

Field Ref.	Dairy Partners, Newcastle Emlyn - liquid sludge						Volac/Sensient, Felinfach - liquid sludge						First Milk, Haverfordwest - liquid sludge					
	N Applied - Waste (kg/ha)	P <sub>2</sub> O <sub>5</sub> Applied - Waste (kg/ha)	K <sub>2</sub> O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes	N Applied - Waste (kg/ha)	P <sub>2</sub> O <sub>5</sub> Applied - Waste (kg/ha)	K <sub>2</sub> O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes	N Applied - Waste (kg/ha)	P <sub>2</sub> O <sub>5</sub> Applied - Waste (kg/ha)	K <sub>2</sub> O Applied - Waste (kg/ha)	MgO Applied - Waste (kg/ha)	Application Rate (t/ha)	Total Tonnes
<b>Cilrhue Farm</b>																		
Cilrhue 1	**18	*54	*12	*3	37	181	**10	*54	*57	*7	45	220	**22	*55	*13	*2	57	279
Cilrhue 2	**26	*80	*19	*4	55	165	**15	*79	*84	*10	66	198	**32	*79	*19	*4	83	249
Cilrhue 7	**48	**87	**27	*8	100	270	**33	**108	**153	*23	150	405	**48	**72	**23	*5	126	340
Cilrhue 8	**26	*80	*19	*4	55	154	**15	*79	*84	*10	66	185	**32	*79	*19	*4	83	232
Cilrhue 13	**48	**87	**27	*8	100	200	**22	**71	**100	*15	98	196	**38	**57	**19	*4	100	200
Cilrhue 14	**47	**85	**26	*7	97	301	**22	**71	**100	*15	98	304	**38	**57	**19	*4	100	310
Cilrhue 15	**26	*80	*19	*4	55	82	**15	*79	*84	*10	66	99	**32	*79	*19	*4	83	125
Cilrhue 16	**26	*80	*19	*4	55	209	**15	*79	*84	*10	66	251	**32	*79	*19	*4	83	315
Cilrhue 17	**26	*80	**15	*4	55	132	**15	*79	**67	*10	66	158	**32	*79	**15	*4	83	199
Cilrhue 18	**26	*80	*19	*4	55	253	**15	*79	*84	*10	66	304	**32	*79	*19	*4	83	382
Cilrhue 19	**26	*80	**15	*4	55	154	**15	*79	**67	*10	66	185	**32	*79	**15	*4	83	232
Cilrhue 20	**26	*80	**15	*4	55	149	**15	*79	**67	*10	66	178	**32	*79	**15	*4	83	224
<b>Cyttir Bach</b>																		
Cyttir Bach 7	**48	**87	**27	*8	100	720	**33	**108	**153	*23	150	1080	**48	**72	**23	*5	126	907
<b>TOTAL</b>						<b>2970</b>						<b>3763</b>						<b>3994</b>

**Waste will NOT be spread or stored in combination (i.e. one waste stream per field)**

\* Total nutrient content of waste used on P, K or Mg index 2 or above

\*\* Available nutrient content of waste used on P, K or Mg index 0 or 1

The assumed availability of total nutrients in the Dairy Partners, Volac/Sensient & First Milk liquid sludges are N 20%, P<sub>2</sub>O<sub>5</sub> 60%, K<sub>2</sub>O 80%, MgO 10%, SO<sub>3</sub> 20%

## Potential negative impacts from this application and mitigation measures planned:

### Waste composition & receiving soils

- Potentially Toxic Elements: The supplied concentrations at the proposed application rates are all significantly lower than the maximum permissible levels detailed in the Sludge (Use in Agriculture) Regulations for biosolids applied to agricultural land, which is believed to be a suitable comparison for wastes applied to agricultural land.
- Physical contaminants: The wastes are produced by managed processes. The wastes do not contain physical contaminants.
- Oils, fats & grease: The Dairy Partners liquid sludge contains 1.77% oils, fats & grease. Application at this percentage is unlikely to have detrimental effects on plant growth which can be seen with wastes containing 4% content or more. As a precaution the sludge will be surface applied with low trajectory dribble bar applicator which places the liquid sludge in bands on surface to reduce leaf contact, and the max application rate for each grass field will be split into up to 3 applications where the max application rate is over 50t/ha.
- Waste pH: Although the Dairy Partners & First Milk liquid sludges are slightly acidic, they're weakly buffered and unlikely to result in a change in soil pH. The slightly acidic nature is most probably associated with the presence of food based organic acids. Acidic food-based wastes are routinely applied to agricultural land without adverse effects on crop health, or significant decreases in soil pH. Use of the wastes will be carefully monitored, through low rates of individual application and close monitoring of crop health, for any adverse signs resulting from acidity around roots.
- BOD: The BOD of the Volac / Sensient liquid sludge is low and below the range for cattle slurry (10-20,000 mg/l). The BOD of the First Milk liquid sludge is within the range for cattle slurry. The BOD of the Dairy Partners liquid sludge is in the range for pig slurry (20-40,000 mg/l). Consequently, the environmental risks applying these wastes will be similar to that of the materials mentioned. To mitigate the pollution risk to watercourses the wastes will not be applied at a rate greater than 50 t/ha in a single application (or the maximum application rate given in Table 1 where lower). The proposed method of application, no-spread zones and precautions as stated in this document should be sufficient to minimise the pollution risk to manageable levels.
- Soils have been sampled to 7.5cm depth for permanent grass fields & to 15cm depth for temporary grass & arable fields with a 'half cheese' corer soil sampler walking a 'W' pattern across each field collecting approx. 25 sub samples per field.
- Receiving soils have been analysed and are suitable for application at the proposed application rates.

### Operations

The fields in this deployment have been designated as 'medium risk' following site checks on the proximity to surrounding protected areas (e.g. SSSIs) and groundwater source protection zones. On the basis of 'medium risk' the proposed operation will be subject to the generic risk assessment for deploying mobile plant under a SR2010 No.4. The potential risks associated with the application of waste on this deployment have been identified as;

- Potential run-off after application: The waste will be applied following the Code of Good Agricultural Practice. The maximum application rate for each field where over 50t/ha will be split into multiple applications and will not exceed 50t/ha in any one application to a field (or the maximum application rate given in Table 1 where lower). The fields will be spread using precision spreading dribble bar equipment with no spreading areas enforced as per maps.
- All handling of the waste will be in accordance to current regulations and relevant mitigation strategies will be adopted.
- Odour may potentially be emitted from the spreading of the waste – to mitigate odour generation all handling of waste will be done in accordance to current regulations and relevant mitigation strategies will be adopted. Waste will be spread with low trajectory dribble bar applicator. This is an efficient method to prevent odour transmission & nutrient losses associated with higher trajectory spread methods such as splash plate. If any odour complaints are received, further odour mitigation methods will be implemented in accordance with the site-specific odour management plan.
- Spillages: all spillages will be reported immediately to NRW.
- No waste will be spread within 10m of any ditch, pond or surface water, within 50m of any spring, well, borehole, or reservoir that supplies water for human consumption or farm dairies.
- Waste will be spread on delivery (or securely stored as stated above). Operators will aim to empty spreading equipment before the end of each working day to avoid overnight storage of waste in machinery.

- Regular servicing of all machinery is conducted and spreading equipment is annually calibrated. To prevent waste being held in faulty machinery replacement spreading equipment will be available.
- Spreading machinery will travel over the field in a direction which will most easily allow the machinery to turn within the boundaries of the field. Any spreading equipment will be turned off prior to turning at the end of each run.
- Machinery turns will be routed to avoid rutting and wheel slip. The turns will not be executed on any buffer strips.
- There will be sufficient trained staff available to ensure that the operation continues throughout operational hours (i.e. there will be sufficient cover for illness, holiday etc.).
- Rights of way have been marked on the spread risk maps. There are footpaths in fields Cilrhue 1 & 2.
- Scheduled monuments - Blaenannerch Round Barrow is approximately 270 metres at the nearest point from field Cyttir Bach 7 and Airfield Perimeter Defences at Blaenannerch is approximately 160 metres at the nearest point from field Cyttir Bach 7.
- Weather conditions will be monitored prior to spreading with wind speed and direction assessed.
- Consideration for the public and local residential receptors will be taken into account.

**Signed:** Robert Tucker

**Date:** 07/10/2025