

## Natural Resources Wales Permitting Decisions

**Mrs Jacqueline Heather Mountford  
(Lower Trederwen Farm Broiler  
Unit)**

**Decision Document**

## Application for a Normal Variation

**The application number is: PAN-027234**

**The permit variation number is: EPR/BB3395ZM/V003**

**The applicant / operator is: Mrs Jacqueline Heather Mountford**

**The Installation is located at: Lower Trederwen Farm Broiler Unit, Lower Trederwen Farm, Arddleen, Llanymynech, Powys, SY22 6RZ**

### Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

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# 1. Executive summary

## 1.1. Application summary

This permit variation is to remove the existing 1.1MW net thermal input woodchip biomass boiler from the permit and replace it with two wood chip boilers (ETA eHack 240 EP) which will burn virgin timber, straw, miscanthus or a combination of these. The net thermal input for one of these biomass boilers is 287 kWh. The 1.1MW boiler currently on the permit was never actually installed on the site.

## 1.2. Our decision

We have decided to issue the variation for Lower Trederwen Farm Broiler Unit operated by Mrs Jacqueline Heather Mountford.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

# 2. Receipt of the application

The application was received on 16/10/2024, with updated application documents submitted on 26/11/2025. In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- An updated site plan to confirm emission point locations
- Updated application forms to fill in incomplete sections
- Updated Environmental Risk Assessment to include missing information
- Confirmation of location and stack heights for the new boilers
- Confirmation of eligibility for exemption from the requirement to provide an air emissions assessment for the biomass boilers

Two letters requesting this information were sent to the applicant on 23/12/2025 and 16/01/2026. Upon receipt of this information, on 28/01/2026, we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it

necessarily contained all the information we would need to complete that determination.

### 3. Confidential information

The applicant made no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

### 4. Legislation

The variation will be issued, under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in issuing the variation, a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions. NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources

As the EPR regulator for Part A1 installations in Wales, NRW are required to determine any duly made Part A1 permit applications. This means that we must decide either to grant, or to refuse the variation based upon an objective assessment of the proposals against the detailed legal requirements of EPR. Our public participation statement<sup>1</sup>

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<sup>1</sup> [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

gives more information on what can, and cannot, be taken into account when making our permitting decision.

The application, and this decision document, only considers the permitting of the facility under EPR as described throughout the document. We only assess the installation and its impacts and cannot take into consideration indirect impacts which are not as a direct result of activity within the installation boundary.

Any proposed development and wider associated activities will be required to be compliant with all relevant and applicable law, for example, environmental law, health and safety law, planning law. This other legislation acts largely independently of EPR (although they may be inter-related). Such other matters are beyond both the scope of this document, and of our regulatory remit and expertise and are not relevant to our EPR permitting decision. Ensuring compliance with all other regulation and obtaining any required consents (such as planning permission) is the responsibility of those undertaking the development and is regulated by the relevant appropriate authority for each.

Our decision on whether to issue or refuse an EPR permit is defined by legal requirements. In our decision-making, we must ensure that our determination considers all relevant statutory requirements and provides the required level of protection to the environment. This involves assessment of impacts to air, water, land and any ecological receptors from the proposed activities.

NRW's function as the environmental permitting authority under EPR only extends to the control of sources of pollution, within the boundary of the regulated facility, which are capable of being controlled under the environmental permit. In addition, and so as to comply with its general public law duty, NRW's decisions must be reasonable, proportionate and procedurally correct.

The potential for pollution through the land use of a proposal is assessed through the planning application. The LPA is responsible for considering whether the location of the development is appropriate. NRW is an advisor to the Local Planning Authority (LPA).

## 5. Consultation

No consultation has been carried out on this application because it is not a new bespoke or substantial variation application. This decision was made in accordance the Environment Permitting Regulations (EPR), our statutory Public Participation Statement<sup>2</sup> and our Regulatory Guidance.

## 6. Requests for information

An informal information request was made via email. This related to providing an updated site plan.

A copy of the e-mail requesting further information was placed on our public register as were the responses when received.

## 7. The Installation

### 7.1. The permitted activities

The regulated facility is currently an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- Section 6.9 A(1)(a) Rearing of poultry or pigs intensively in an installation with more than 40,000 places for poultry

An installation may also comprise “directly associated activities”, which at this Installation include:

- Dirty water tanks – temporary storage of wash down water.
- Biomass boiler – with a maximum rated thermal input of 1.1MW.
- Fuel storage – storage of fuel in a bunded tank.
- Exhaust air scrubbing units – treating of air ventilation from the poultry houses by dry scrubbing.

Together, these listed and directly associated activities comprise the Installation.

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<sup>2</sup> [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

## 7.2. Changes to the installation

The applicant is proposing to replace the existing directly associated activity (DAA) comprising the 1.1 MWth biomass boiler with another DAA comprising two 287 kWth boilers. As with the existing DAA, the proposed boilers will be fuelled by virgin timber, straw, miscanthus or a combination of these. The applicant has stated that the 1.1 MWth boiler was never installed on the site. There are no changes proposed to the site boundary or to any other aspects of the site's activities, although the site plan has been updated slightly to correct where it was not previously to scale. The operator's name has also been updated to correct a previous typo.

## 8. Operation of the installation

### 8.1. Operator competence

The applicant is the sole operator of the Installation. We are satisfied that the applicant is the person who will have control over the operation of the Installation after the variation is issued; and that they will be able to operate the Installation so as to comply with the conditions included in the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator<sup>3</sup>.

#### Relevant Convictions

The applicant has declared they have no relevant convictions.

NRW's COLINS Database has been checked to confirm there are no relevant convictions.

No relevant convictions were found.

#### Financial Provision

The applicant has declared they have no current or past bankruptcy or insolvency proceeding against them.

There is no known reason to consider that the operator will not be financially able to comply with the permit. The decision was taken in accordance with RGN 5 on Operator Competence.

### 8.2. Environmental Management System

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<sup>3</sup> [RGN 1 Understanding the meaning of 'operator' \(naturalresources.wales\)](#)

The applicant has stated in the application that they will implement an Environmental Management System (EMS) that will meet the requirements for an EMS in our “How to comply with your environmental permit” guidance<sup>4</sup>.

The applicant has submitted a summary of the EMS with their application. The applicant has stated that there will be no changes to the EMS as a result of the variation application to replace the permitted biomass boiler with two smaller biomass boilers.

We have reviewed the application and are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

### **8.3. Operating techniques**

There are no changes proposed to the operating techniques as a result of this variation application due to it being an application to replace a 1.1 MWth permitted biomass boiler with smaller (2 x 287kWth) biomass boilers. The operating techniques will remain the same as currently permitted.

The applicant has provided the technical specification for the proposed biomass boilers, a non-technical summary and an updated site plan. The applicant has stated that there will be no changes to the EMS, energy efficiency measures, site boundary, raw material inventory or site closure plan as a result of this application, and therefore they have not been included in the application.

We have specified that the applicant must operate the permit in accordance with descriptions in the application. See section 12 of this document for more information on how we have incorporated the application/variation into the permit and how emission limit values have been set.

## **9. The site**

### **9.1. Site Plan**

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<sup>4</sup> [Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

The applicant has provided an updated plan which we consider is satisfactory, showing the new emission points. This has been updated to correct a previous version where the area including the site office and car park were not at the correct scale and so the boundary has been updated to reflect the actual site layout to scale. This was deemed a low risk change due to the nature of the activities carried out on the altered area of the site plan – i.e. no permitted activities or directly associated activities.

The updated plan will be included in the permit and the operator will be required to carry on the permitted activities within the site boundary.

## **9.2. Site Condition Report**

The proposal does not include the addition of any land and so a Site Condition Report was not required to support this application.

## **10. Environmental Risk Assessment**

Regulated activities can present different types of risk to the environment, these include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, water, sewer and discharges to ground or groundwater, global warming potential and generation of waste. All these factors have been considered during our determination and the relevant risks from this proposal are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of emissions from the Installation on human health and the environment and what measures we are requiring ensuring a high level of protection.

In line with our guidance, the applicant has provided an environmental risk assessment with the application which identifies the sources of key risks from the variation, possible pathways and receptors. This risk assessment provided by the applicant will be discussed in further detail below.

The applicant has stated that replacing the 1.1 MW biomass boiler with two smaller biomass boilers will not increase risks in terms of odour, noise, fugitive emissions,

ammonia, or accident/emergency planning. The modern design, compliance with EU standards, and integrated safety features ensure that environmental and safety performance remains robust and within regulatory limits. We are satisfied that there are no adverse changes to these risks and as a result there are no anticipated adverse environmental or human impacts as a result of this application to vary the permit.

### **10.1. Assessment of impact on air quality**

A poultry farm does not need to do an assessment of air emissions for a biomass boiler<sup>5</sup> if:

- the fuel comes from virgin timber (whole trees and woody parts of trees), clean non-virgin timber (any timber or timber product that has not been treated), straw or miscanthus (also called elephant grass)
- the biomass boiler appliance and its installation complies with standards equivalent to the now closed Renewable Heat Incentive scheme

As the boiler net rated thermal input is more than 0.5MWth, it must also meet all of the following:

- the aggregate boiler net rated thermal input is less than or equal to 4MWth
- no individual boiler has a net thermal input greater than 1MWth
- the stack height is at least 5 metres above the ground and may need to be higher if there are buildings within 25 metres – the stack must extend above the roof level of any building by at least 1 metre
- there are no receptors within 50 metres of the emission points

The applicant has confirmed that the above measures will be met and therefore we are satisfied that an air emissions assessment is not required to support this variation application.

### **10.2. Assessment of impact to surface and ground water**

The proposal does not include a discharge to surface or ground water.

### **10.3. Emissions to sewer**

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<sup>5</sup> [Intensive farming risk assessment for your environmental permit - GOV.UK](https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit)

The proposal does not include a discharge to sewer.

#### **10.4. Fugitive emissions**

The application states that the measures which in place to prevent and minimise fugitive emissions will ensure that there will be no increase in fugitive emissions due to the change in use of the two smaller boilers compared to the existing single boiler.

There are no sensitive receptors to dust within 100m of the permit boundary.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

Permit condition 3.2.1 requires that emissions of substances not controlled by emission limits (i.e., fugitive emissions) shall not cause pollution. Condition 3.2.2 requires that a management plan shall be developed if pollution is subsequently identified.

### **11. Impact on National Site Network Sites, SSSIs and non-statutory sites**

As discussed in section 10, an assessment of the emissions to air is not required for this variation application and the application does not include any other changes to emissions. Therefore, an assessment of the impacts on National Site Network Sites, SSSIs and non-statutory sites is not required.

### **12. The Permit Conditions**

#### **12.1. Incorporating the variation**

There have been no changes to emissions limits and associated monitoring and reporting requirements for this variation.

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including additional information received as part of the duly making process.

These descriptions have been specified in the Operating Techniques table in the permit.

### **12.2. Monitoring**

There will be no changes to monitoring requirements as a result of the variation.

### **12.3. Reporting**

There will be no changes to reporting requirements as a result of the variation.