

Mr Paul Wright
35 Dale Street
5th Floor
Manchester
M1 2HF

Our ref: PAN-031585

Your ref: YP3632EM

Date: 29/06/2026

Dear Mr Wright

We need more information about your application

Application reference: PAN-031585
Operator: 2 Sisters Food Group Ltd
Facility: Sandycroft Poultry Processing

Thank you for your application received on 28/01/2026. We have started to assess your application but unfortunately there is information missing which we require for it to be determined. Your application is therefore not duly made.

Please see the sections below for further details on missing information:

Best Available Techniques and Operating Techniques

Thank you for providing an assessment of the operating procedures and techniques in accordance with the reference document "Best Available Techniques in the Slaughterhouses and Animal By-products Industries dated December 2023." As this document was published after 2021, it has not been formally adopted into UK law due to the EU Withdrawal Act 2018. While not bound by the latest post 2021 EU regulations, the UK still considers and benchmarks European and International best practices when developing our own standards.

The most recently applicable standards are found in the reference document "Best Available Techniques in the Slaughterhouses and Animal By-products Industries dated May 2005". As such, please confirm that the responses provided to the Slaughterhouse and Animal By-products Industries (2005) BAT conclusions in the BAT Assessment submitted in support of your previous application (PAN-020545) are still applicable. If there has been any changes due to the increased throughput then this should be represented in an updated BAT Assessment. The relevant BAT Assessment will be attached with this letter for reference.

Environmental Risk Assessment

You need to identify and consider all risks for the increase in throughput, as well as the new chiller unit. The assessment should also include containment provisions for the increased volume of wastes produced and stored, for example secondary containment provisions for

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

the blood trough and tank, and sludge tank. Where you believe existing documentation remains fit-for-purpose please provide justification to support this.

Not all environmental risks have been assessed sufficiently in the submitted environmental risk assessment. In section 2 of the document titled "410.066696.00001_ERA", NRW's guidance is highlighted when discussing what should be considered in the ERA. The following is then stated:

"This ERA will implement a qualitative assessment of amenity and accidents, odour, noise, fugitive emissions and potential environmental accidents".

Please include the excluded parameters in an updated ERA. As stated in our guidance ([Natural Resources Wales / How to carry out a risk assessment for an Environmental Permit](#)), if you do not think any of them are significant risks, you will need to state why in your permit application.

Noise Impact Assessment

It is stated in Section 9 of the Noise Impact Assessment that:

"The context assessment has shown that the impacts identified in the BS 4142 assessment remain at a significant adverse level at 35 Church View, however the implementation of mitigation (i.e. acoustic barriers) will assist in reducing the previously identified impact significantly".

However, the results indicate that the barriers have had no positive impact on noise levels at this receptor, and minimal impact at the remaining receptors. Please provide further evidence/ justification that the acoustic barriers have successfully mitigated the impacts as detailed in the NIA.

Emissions to Air

The proposal includes an increase in operation from 6 to 7 days. Please confirm if an air quality risk assessment is required for the increase in emissions from the two boilers, as per the GOV.UK website here: [Air emissions risk assessment for your environmental permit - GOV.UK](#). If an assessment is not required, please give your reasons.

Effluent Treatment Plant (ETP)

Confirm the increase in the total daily volume of the discharge in m³ at emission point S1, and confirm that the existing effluent treatment plant is capable of processing the increase in volume of effluent.

Noise Management Plan (NMP)

Please provide an updated Noise Management Plan which represents the updated number of birds processed at the site and the new refrigeration system. Can you also confirm the increase in daily vehicle movements on site following the proposal.

Table 3-7 Waste Streams & Animal By Products of document BATOT

We note that this information is from 2021. Is this the most recent information, if not please update and resubmit the table confirming the most up to date information

Can you also submit the following:

- Drainage plan
- FF002 Blood Handling Procedure
- Emergency Preparedness and Response Procedure
- Spillage Response Plan.
- Trade Effluent Discharge Consent for S1.

Please reply within 10 working days from the date of this letter. If we don't hear from you we must return your application and fee. We will keep 14% of the charge to cover the cost of the

assessment work done.

If you email or write to us please quote the application reference PAN-031585 on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter..

Please quote our reference if you contact us. If you have any questions please phone me on 0300 065 3580 or email elliott.lamond@naturalresourceswales.gov.uk.

Yours sincerely

Elliott Lamond
Permitting Officer