

Environment Agency permitting decisions

Substantial Variation

We have decided to issue the variation for **Roads Farm Poultry Unit** operated by **Mr Richard Howat**.

The variation number is **EPR/EP3736ZE/V002**

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.

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.

Structure of this document

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising.

Key Issues

Overview

The operator is applying for a change in farm usage from egg laying hens to egg laying pullets.

The original permit EPR/RP3832MT was for 146,000 egg laying hens in three poultry houses

Since then the installation has been transferred to the current operator Mr Richard Howat. The

farm has been converted for **220,000 egg laying pullets**.

This increase is above the scheduled activity section 6.9 A (1) (a) (i) threshold of 40,000. Therefore in line with our regulatory guidance this is a substantial variation (Substantial Changes RGN No.8 Guidance).

The operator has submitted an overall environmental assessment for the installation covering odour, noise and ammonia emissions.

In addition the operator has provided a revised technical standards document for the farm operation in line with our EPR 6.09 Intensive Farming Technical Guidance Note.

The key permit changes for this variation are as follows:

- S1.1 activities table updated for new bird numbers and change to egg laying pullets.
- S1.2 operating techniques table updated for techniques linked to new egg laying pullets and larger bird numbers.

Ammonia Emissions

There are four Special Areas of Conservation (SAC), / Special Protection Areas (SPA), / Ramsar sites located within 10km of the installation (Ramsar/SAC Site Severn Estuary plus SAC sites Wye Valley and Forest of Dean BAT Site, River Wye and Wye Valley Woodlands). There are also twelve Sites of Special Scientific Interest (SSSI) located within 5 kilometres of the installation plus fourteen other sites including Local Wildlife Site (LWS)/Ancient Woodlands (AW), within 2km of the installation.

We have carried out a pre-screening assessment on operator application environmental impacts.

This is based on usage of our Ammonia Screening Tool AST v.4.3.

The operator has submitted detailed modelling with their application. Modelling has been completed with ADMS Version 5.

The overriding factor is a reduction of ammonia mass emissions from the installation with the introduction of this variation. The figure for pullets (rearing) of 0.06 kg-NH₃/bird place/year has been used to calculate the ammonia emission rates for the farm operating basis after this variation.

The reduction of emissions is based on a basic mass balance before and after this variation.

The original EPR/RP3832MT application was based on caged layer deep pit (0.29 kg NH₃ /place/year ammonia emission factor).

In addition this variation introduced high velocity ridge fans whilst original permit included side fan outlets

Mass balance review is as below:

Permit	Animal/ Housing Type	Emission Factor	Bird Places	Ammonia Emissions kg NH ₃ /year
Original Permit	Egg Laying Hens Cage with deep pit manure storage beneath	0.29	146,000	42340
			Total	42,340

Permit	Animal/ Housing Type	Emission Factor	Bird Places	Ammonia Emissions kg NH ₃ /year
Proposed Permit Variation	Egg Laying Pullets	0.06	220,000	13,200
			Total	13,200

Conclusion

As the overall ammonia mass emissions will reduce to 31% of overall permit levels as a result of this proposal, it was not necessary to reconsider the impacts upon the nature conservation sites within the relevant screening distance criteria.

Odour

There is one sensitive receptor within 400 metres of the installation boundary and therefore an odour management plan has been prepared. The details are as follows:

- Roads House; 190 metres approximately from the installation boundary.
- Other properties within 400 metres are owned by the operator and are occupied by the farm owner and management staff and therefore are not formally classified as sensitive receptors.

There is no history of odour complaints linked to the existing poultry house facility. The poultry house ventilation high velocity roof fans will minimise the risk of potential odour beyond the installation boundary.

A revised Odour Management Plan (OMP) has been submitted with this application.

The OMP consists of:

- Appendix S7 initial OMP in variation EPR/EP3736ZE/V002 application
- Duly making response more detailed OMP including list of sensitive receptors and more details on control measures for odour pollution minimisation to cover poultry checklist criteria including litter management, ventilation design, bird management, poultry shed design and shed cleaning details plus carcass disposal details.

Overall there is the potential for odour pollution from the installation. However the risk of odour pollution beyond the installation boundary is considered insignificant.

Annex 1: decision checklist

Aspect considered	Justification / Detail	Criteria met
		Yes
Operator		
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
The site		
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. There is no change to the installation boundary and hence the installation plan has not been amended.	✓
Site condition report	The operator has provided a description of the condition of the site in the original permit application RP3832MT (EPR/RP3832MT/A001); this variation has no change to the installation boundary As such the site condition report is not required to be reviewed unchanged. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED – guidance and templates (H5).	✓
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within the relevant distance criteria of sites of heritage, landscape or nature conservation, and/or protected species or habitat. A full assessment of the application and its potential to affect the sites has been carried out as part of the permitting process. We consider that the application will not affect the features of the sites. Please refer to section 'Ammonia Assessment' in Key Issues above. Based on reduced ammonia mass emissions with this variation and this being an environmental improvement no further assessment is required. The decision was taken in accordance with our guidance.	✓
Environmental Risk Assessment and operating techniques		
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory. The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment, all emissions may be categorised as environmentally not significant. Details of ammonia emissions and odour emissions assessment are included in key issues section of this document	✓
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The duly making response covers more details on technical guidance for farm facilities: <ul style="list-style-type: none"> • Ventilation design includes poultry shed temperature control to suit bird age. • All sheds will be re-insulated and all have concrete floors • For each shed there is contained feed silos • All dirty water is washed to one of two new 18 m³ 	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>underground tanks of sufficient capacity for new bird numbers.</p> <ul style="list-style-type: none"> • Clean water from sheds roofs and yards is sent to a single soak away. • Manure is not stored on site. The operator has already in place a manure management plan for manure spread off site including land owned by themselves • Carcass incinerator included within original permit application RP3832MT (EPR/RP3832MT/A001) has been removed with this variation. All mortalities are recorded, frozen and collected weekly in line with the National Fallen Stock Scheme. <p>Table S1.2 has been updated with the variation changes.</p> <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions, and ELVs deliver compliance with BAT-AELs.</p>	
The permit conditions		
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process. These descriptions are specified in the Operating Techniques table S1.2 in the permit.</p>	✓
Operator Competence		
Environment management system	<p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.</p>	✓

Annex 2: Consultation and Web Advertising.

Summary of responses to consultation and the way in which we have taken these into account in the determination process

Response received from
Forest of Dean Council Planning Department (received 04/08/14)
Brief summary of issues raised
<p>The council has no main concerns about the application.</p> <p>The single comment was linked to flies and manure management.</p>
Summary of actions taken or show how this has been covered
<p>The removal of deep pit within poultry houses will minimise risk of residence time of manure and resultant flies. Experience of new systems operating already under regulated activity threshold of 40,000 birds backs this up.</p>

No other consultation responses received.

This proposal was also publicised on the Environment Agency's website for 20 working days but no representations were received during this period.