

## **Environment Agency permitting decisions**

### **Bespoke permit**

We have decided to grant the permit for Park Farm Poultry Unit operated by Mr RAA Pinfield.

The permit number is EPR/FP3530NC/A001

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.

### **Description of the main features of the Installation**

Park Farm Poultry Unit is situated to the south of Dodford village and north east of Bromsgrove, just off the A448. The installation is approximately centred on National Grid Reference SO 93275 71895.

The installation is operated by Mr RAA Pinfield and comprises two poultry houses, numbered one and two, which operate a multi-tier aviary system for free range and barn production laying hens. The poultry houses provide a combined capacity for 56,000 bird places. Free range and barn production laying hens are brought onto the farm at approximately 16 weeks old and are depopulated around 70/80 weeks of age, after the laying cycle has finished. Both poultry houses are ventilated by roof fans with an emission point higher than 5.5 metres above ground level and an efflux speed greater than 7 metres per second. Poultry house one also has gable end fans for use in hot weather and a ranging area. Poultry House two also has part mesh floor which allows air to be drawn out of the building from the lower tier, through the roof fans.

Manure produced by birds on the slatted sections will be collected on a manure belt and removed from the house, usually twice weekly. Manure which is deposited on the litter will be removed at the end of each flock cycle. The manure which is removed on conveyors will be exported from the site for spreading onto separately owned agricultural land.

Roof water for both houses will be directed via gutters and downpipes to a below ground drainage system and ultimately to an open field ditch and off site. There are also french drains on site to assist this process. At the end of the production cycle, used litter is removed from site. The empty houses will then be washed and disinfected ready for the next flock. All clean-out water will be held within 10,000 litre below-ground tanks, one for each house. A diverter valve system is in place and at clean out the divert process is managed by the operator. Clean-out water is taken off site for spreading on separately owned land.

Associated food is stored on the installation in one of six bulk bins. Mortalities are collected daily and stored in sealed, frozen containers.

This permit implements the requirements of the European Union Directive on Industrial Emissions.

## **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 responses

## **Key issues of the decision**

### **Ammonia emissions**

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsar sites located within 10 kilometres of the installation. There are six Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also several Local Wildlife Sites (LWS), Ancient Woodlands (AW), and a National Nature Reserve (NNR) within 2 km of the installation.

Sites within the distance criteria are:-

Fakenham Forest – SSSI  
Little Royal Farm Pastures – SSSI  
Oakland Pastures – SSSI  
Burcott Lane cutting – SSSI  
Hurst Farm Pasture – SSSI  
Upton Warren Pools - SSSI

Chaddesley Woods – NNR

Dodford Dingle – LWS  
Battlefield Brook – LWS  
Great Dodford Meadows – LWS  
Cutpursey Coppice – LWS  
Chaddesley & High Woods Complex – LWS

Valley Wood 1 & 2 - AW  
Randan Wood 1,2,3 & 4 – AW  
Holbourne Wood – AW  
Cutpursey Coppice – AW  
Yarnoldlane Wood – AW

### **Ammonia assessment – SAC/SPA/Ramsar sites**

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsar sites located within 10 kilometres of the installation.

### **Ammonia assessment – SSSIs**

The following trigger thresholds have been applied for assessment of SSSIs. If the process contribution (PC) is below 20% of the relevant critical level (CL<sub>e</sub>) or critical load (CL<sub>o</sub>) then the farm can be permitted with no further assessment. Where this threshold is exceeded an in combination assessment and/or detailed modelling may be required.

Initial screening using Ammonia Screening Tool v4.4 has indicated that emissions from Park Farm Poultry Unit will only have a potential impact on SSSI sites with a precautionary critical level of  $1\mu\text{g}/\text{m}^3$  if they are within 1,624 metres of the emission source.

Initial screening indicates that beyond 1,624 m the PC is less than  $0.2\mu\text{g}/\text{m}^3$  (i.e. less than 20% of the precautionary  $1\mu\text{g}/\text{m}^3$  critical level) and therefore beyond this distance the PC is insignificant. The sites within Table 1 are all beyond this distance and therefore screen out of any further assessment.

**Table 1 – SSSI Assessment**

Name of SSSI	Distance from site (m)
Little Royal Farm Pastures	2,299
Burcott Lane Cutting	3,678
Hurst Farm Pastures	3,774
Upton Warren Pools	4,125

Where the precautionary level of  $1\mu\text{g}/\text{m}^3$  is used, and the process contribution is assessed to be less than 20% the site automatically screens out as insignificant and no further assessment of critical load is necessary. In this case the  $1\mu\text{g}/\text{m}^3$  level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely damage to these sites.

Screening using the detailed modelling (A report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Egg Laying Chicken Houses at Park Farm, Dodford, Bromsgrove, Worcestershire) has indicated that the PC for Oakland pastures is predicted to be less than 20% critical level for ammonia, acid and nitrogen deposition therefore it is possible to conclude no damage. The results of the operators ammonia air dispersion modelling are given in table 2 below. We also found these results can be applied to Fakenham Forest.

The ammonia modelling assessment has been audited by our Air Quality Modelling and Assessment Unit and we have confidence that we can agree with the report conclusions.,.

**Table 2 – Ammonia emissions**

Name of SSSI	Ammonia CLe ( $\mu\text{g}/\text{m}^3$ )	PC ( $\mu\text{g}/\text{m}^3$ )	PC as % of Critical level
Oakland Pasture	1*	0.060	6
Fakenham Forest	1*	0.057	5.7

A precautionary level of  $1\mu\text{g}/\text{m}^3$  has been used during the screen. Where the precautionary level of  $1\mu\text{g}/\text{m}^3$  is used, and the process contribution is assessed to be less than the 20% insignificance threshold in this circumstance it is not necessary to further consider nitrogen deposition or acid deposition critical load values. In these cases the  $1\mu\text{g}/\text{m}^3$  level used has not been confirmed, but it is precautionary.

## **Ammonia assessment - LWS/AW/NNR**

There are five Local Wildlife Sites (LWS), nine Ancient Woodlands (AW) and one National Nature Reserve within 2 km of Park Farm Poultry Unit. The following trigger thresholds have been applied for the assessment of these sites.

1. If PC is <100% of relevant critical level or load, then the farm can be permitted (H1 or ammonia screening tool)
2. If further modelling shows PC <100%, then the farm can be permitted.

For the following sites this farm has been screened out at stage 1, as set out above, using results of the ammonia screening tool v4.4.

Screening using ammonia screening tool v4.4 has indicated that emissions from Park Farm will only have a potential impact on sites with a critical level of  $1 \mu\text{g}/\text{m}^3$  if they are within 563 metres of the emission source. Screening indicates that beyond this distance, the PC at conservation sites is less than  $1 \mu\text{g}/\text{m}^3$ .  $1 \mu\text{g}/\text{m}^3$  is 100% of the  $1 \mu\text{g}/\text{m}^3$  CLe and therefore beyond this distance the PC is insignificant. In this case all LWS/AW/NNR are beyond this distance.

**Table 3 – distance from source**

<b>Site</b>	<b>Distance (m)</b>
Chaddesley Woods	1,954
Dodford Dingle	663
Battlefield Brook	1,247
Great Dodford Meadows	1,453
Cutpursey Coppice	2,152
Chaddesley & High Woods Complex	818
Randan Wood 2	1,396
Randan Wood 1	591
Randan Wood 3	1,950
Valley Wood 1	1,313
Valley Wood 2	1,691

Randan Wood 4	1,518
Yarnoldlane Wood	1,449
Cutpursey Coppice	2,113
Holbourne Wood	1,268

The sites within Table 3 are all beyond this distance and therefore screen out of any further assessment. Therefore it is possible to conclude no significant pollution will occur at these sites and no further assessment is required.

## Annex 1: decision checklist

This document should be read in conjunction with the application, supporting information and permit.

Aspect considered	Justification / Detail	Criteria met Yes
<b>Receipt of submission</b>		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
<b>Consultation</b>		
Scope of consultation	<p>The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.</p> <p>For this application we consulted the following bodies:            Local Authority (planning dept)            Local Authority (Environmental Health dept)            HSE            FSA            PHE            Director of Public Health</p> <p>And internally with GWCL, (see Annex 2)</p>	✓
Responses to consultation and web publicising	<p>The web publicising and consultation responses (Annex 2) were taken into account in the decision.</p> <p>The decision was taken in accordance with our guidance.</p>	✓
<b>Operator</b>		
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.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>European Directives</b>		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
<b>The site</b>		
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p>	✓
Site condition report	<p>The operator has provided a description of the condition of the site.</p> <p>We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED–guidance and templates (H5).</p>	✓
Biodiversity, Heritage, Landscape and Nature Conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .</p> <p>A full assessment of the application and its potential to affect the site(s)/species/habitat has been carried out as part of the permitting process. We consider that the application will not affect the features of the site/species/habitat</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance.</p>	✓
<b>Environmental Risk Assessment and operating techniques</b>		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment [or similar methodology supplied by the operator and reviewed by ourselves], all emissions may be categorised as environmentally insignificant</p>	✓



Aspect considered	Justification / Detail	Criteria met
		Yes
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The proposed techniques for control are in line with the benchmarks contained in Sector Guidance Note EPR6.09 'How to comply with your environmental permit for intensive farming (version 2)' Technical Guidance Note and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques are as follows::</p> <ul style="list-style-type: none"> <li>• Housing design and management will be in accordance with the sector guidance note (SGN) EPR6.09.</li> <li>• Feed selection and use will be in accordance with the sector guidance note (SGN) EPR6.09.</li> <li>• Nipple drinkers are used to reduce wastage of water and maintain dry litter;</li> <li>• All dirty water is collected in storage tanks and taken off site.</li> </ul> <p>The permit conditions ensure compliance with relevant BREFs. We consider that the operating techniques specified in the permit to reflect the BAT for the installation.</p> <p>We, the Environment Agency, have reviewed and approved the Odour Management Plan and consider it complies with the requirements of our H4 Odour management guidance note. We agree with the scope and suitability of key measures but this should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and sufficient. That remains the responsibility of the operator.</p> <p><b>Operating Techniques for insignificant emissions</b></p> <p>Emissions of ammonia have been screened out as insignificant, and so the Environment Agency agrees that the Applicant's proposed techniques are BAT for the installation. (see key issues)</p>	✓
<b>The permit conditions</b>		
Use of conditions	Based on the information in the application, we consider that we do not need to impose conditions other than	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
other than those from the template	those in our permit template, which was developed in consultation with industry having regard to the relevant legislation.	
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.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	✓
<b>Operator Competence</b>		
Environment management system	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.	✓
Relevant convictions	<p>The National Enforcement Database has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The operator satisfies the criteria in RGN 5 on Operator Competence.</p>	✓

## Annex 2: External Consultation and web publicising

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

<i>Response received from</i>
PHE
<i>Brief summary of issues raised</i>
Concerns raised due to close proximity of residential properties.
<i>Summary of actions taken or show how this has been covered</i>
Operator was asked to carry out a bio-aerosol risk assessment and standard conditions were applied.

We also consulted with Local Authority (planning dept)  
Local Authority (Environmental Health dept)  
HSE  
FSA  
Director of Public Health

But received no further responses.

The permit application was also published on the Environment Agency's website (which finished 28/10/15); no comments / representations were received during the web consultation period.