

Environment Agency permitting decisions

Bespoke permit

We have decided to grant the permit for **Haswood Poultry Farm** operated by **Mr Paul Hodgson**.

The permit number is **EPR/CP3339RL**

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

Haswood poultry farm is situated to the east of Staunton and north of Ashleworth. The installation is approximately centred on National Grid Reference SO 81858 28085.

The installation is operated by Mr Paul Hodgson and comprises two poultry houses, numbered one and two, which operate to rear broiler chickens. The two poultry houses provide a combined capacity for 98,000 bird places. Birds will be housed at a day old and depopulated at around 37 days of age with approximately 7 days empty. This will give 7 cycles per annum.

Both poultry houses are ventilated by roof fans with emission points 6 metres above ground level and an efflux speed of 11 metres per second. The houses also have gable end fans, although these are operated infrequently, typically in the summer months.

At depopulation all litter will be removed from the site and exported for use as fertiliser on the operators and third parties land.

Water from the wash out of poultry houses is channelled to an underground collection tank close to the houses to await export off site. Roof water from the houses drains to an attenuation pond before discharging to a series of off-site ditches to the south west.

The land around the site is predominantly agricultural. The surrounding topography is relatively flat. Associated feed is stored on the installation in silos. Mortalities are collected daily and stored in a secure container on site for removal under the National Fallen Stock Scheme. At the end of the cycle the houses are depopulated, washed and disinfected ready for the next cycle.

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

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

Structure of this document

- Key issues If applicable see OI/notes below
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

Key issues of the decision

Industrial Emissions Directive (IED)

The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 were made on the 20 February and came into force on 27 February 2013. These Regulations transpose the requirements of the IED.

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

Groundwater and soil monitoring

As a result of the requirements of the Industrial Emissions Directive, all permits are now required to contain a condition relating to protection of soil, groundwater and groundwater monitoring. However, the Environment Agency's H5 Guidance states **that it is only necessary for the operator to take samples** of soil or groundwater and measure levels of contamination where there is evidence that there is, or could be existing contamination and:

- The environmental risk assessment has identified that the same contaminants are a particular hazard; or
- The environmental risk assessment has identified that the same contaminants are a hazard and the risk assessment has identified a possible pathway to land or groundwater.

H5 Guidance further states that it is **not essential for the Operator** to take samples of soil or groundwater and measure levels of contamination where:

- The environmental risk assessment identifies no hazards to land or groundwater; or
- Where the environmental risk assessment identifies only limited hazards to land and groundwater and there is no reason to believe that there could be historic contamination by those substances that present the hazard; or
- Where the environmental risk assessment identifies hazards to land and groundwater but there is evidence that there is no historic contamination by those substances that pose the hazard.

The site condition report (SCR) for Haswood Poultry Farm (dated 03/09/2015) states the site is on level ground and has been, and is currently used for arable farming. The site is situated in a groundwater and nitrate vulnerable zone. The general drainage is in a south westerly direction. The vehicular access roads are laid to concrete. Underground storage tanks will capture all wash waters, diesel fuel will be stored in a bunded tank/storage tanks. Dead birds will be stored in sealed containers and all feed will be stored in steel galvanised bins. The site condition report demonstrates that there are no hazards or likely pathways to land or groundwater and no historic contamination on site that may present a hazard from the same contaminants. Therefore, on the basis of the risk assessment presented in

the SCR, we accept that they have not provided base line reference data for the soil and groundwater at the site.

Ammonia emissions

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

There are 8 Sites of Special Scientific Interest (SSSI) located within 5 km of the installation, these being Burley Dene Meadows, Coombhill Meadows, Poolhay Meadows, Coombhill Canal, Ashleworth Ham, Wainlode Cliffe, Avenue Meadow and Chanceley Meadow. There are also 4 Local Wildlife Sites and 3 Ancient woodlands within 2 km 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 (CLe) or critical load (CLo) 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 (dated 13/10/2015) has indicated that emissions from Haswood Poultry Farm will only have a potential impact on the SSSI site with a precautionary critical level of $1\mu\text{g}/\text{m}^3$ if they are within 652 metres of the emission source.

Initial screening indicates that beyond 652 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. All the sites are beyond this distance (see table below) and therefore screens out of any further assessment.

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.

Table 1 – distance from source

Site	Distance (m)
Burley Dene Meadows	4,014
Coombhill Meadows	4,381
Poolhay Meadows	2,844
Coombhill Canal	3,468
Ashleworth Ham	1,596
Wainlode Cliffe	3,471
Avenue Meadow	2,285
Chanceley Meadow	4,539

Conclusion

The Total PC's are less than 20 % threshold of the critical load and therefore assessed as no further assessment required.

Ammonia assessment – Local Wildlife Sites and Ancient Woodlands.

There are 4 Local Wildlife Sites (LWS) and 3 ancient woodlands within 2 km of Haswood Poultry Farm 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 version 4 (dated 13/10/2015).

Screening using ammonia screening tool version 4.4 (dated 13/10/2015) has indicated that emissions from Haswood Poultry 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 250 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 $1 \mu\text{g}/\text{m}^3$ CL_E and therefore beyond this distance the PC is insignificant. In this case all LWS are beyond this distance.

Table2 – distance from source

Site	Distance (m)
Mixhill Wood - LWS	706
Course Lawn and Avenue Meadow - LWS	1,828
Corse Wood – LWS	983
Unnamed Ancient Woodland	1,107
Unnamed Ancient Woodland	706

The PC at these sites has been screened as insignificant. No further assessment is required.

For the following sites (within 250 metres of the installation) this farm has been screened out, as set out above, using results of the detailed modelling supplied by the applicant as part of the application (Document reference: *A Report on the Modelling of the Dispersion and Deposition of Ammonia from the proposed poultry houses at Woodside Farm, near Hasfield in Gloucestershire dated 18 July 2015.*)

Detailed modelling provided by the applicant has been reviewed by our Air Quality Modelling and Assessment Unit (AQMAU) and we have confidence that we can agree with the report conclusions.

The applicants' modelling has predicted the following:-

Table 3 - Ammonia emissions

Site	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$	PC % of critical level
Corse Grove LWS & Ancient Woodland	1*	0.656	65.6

A precautionary critical level of $1 \mu\text{g}/\text{m}^3$ has been assigned to this site.

Table 4 – Nitrogen deposition

Site	Critical load kg N/ha/yr [1]	Predicted PC kg N/ha/yr	PC % of critical load
Corse Grove LWS & Ancient Woodland	10	5.109	51.1

Note [1] Critical load values taken from APIS website (www.apis.ac.uk) – applicants designation checked on 03/11/2015 (Broadleaved, Mixed and Yew Woodland.)

The applicant did not supply information for acid deposition process contributions. However estimation for these can be calculated by dividing the PC for Nitrogen deposition by 14:

Table 5 – Acid deposition

Site	Critical load keq/ha/yr [1]	Predicted PC keq/ha/yr	PC % of critical load
Corse Grove LWS & Ancient Woodland	2.64	0.365	13.8

Note [1] Critical load values taken from APIS website (www.apis.ac.uk) – 04/11/2015 (Broadleaved/Coniferous unmanaged woodland)

The PC's at this site are predicted to be less than 100% and is therefore insignificant. No further assessment is required.

Noise and Odour

There are seven sensitive receptors within 400 metres of the installation; the nearest receptor is Woodside Farm 98 metres to the north west of the installation boundary. Woodside Barn is 152 metres north west of the installation boundary. Little Woodside which is situated approximately 130 m to the north east of the installation. There is a residential property – Hill Cottage 250m to the north east of the installation and a further 3 sensitive receptors at around 270 m, 290 m and 345 m to the west, north and south/east respectively.

Woodside Farm and Woodside Barn are not considered as sensitive receptors in that they are occupied by people associated with the farm, therefore it is unlikely that odour and noise will be perceived as a nuisance.

Noise

The applicant has provided an adequate Noise Management Plan (dated September 2015) to support the application. The main sources of noise identified are :-

- Ventilation fans
- Feed deliveries
- Feeding systems
- Fuel Deliveries
- Alarm Systems
- Bird Catching
- Clean out operations
- Maintenance and repairs
- Standby generator testing.

We accept noise management plan accurately covers the key potential noise hazards and control measures for this installation

The overall risk of noise is not significant with careful management.

Odour

The applicant has provided a Odour Management Plan dated September 2015.

The main sources of Odour have been identified as :-

- Manufacture and selection of feed
- Feed delivery and storage
- Ventilation and heating systems
- Litter Management
- Carcase disposal
- House clean out
- Used Litter
- Washing Operations
- Fugitive emissions
- Dirty water management
- Abnormal operations
- Waste storage
- Material storage

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.

Annex 1: decision checklist

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

Aspect considered	Justification / Detail	Criteria met
		Yes
Receipt of submission		
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.	✓
Consultation		
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:</p> <ul style="list-style-type: none"> • Local Authority Environmental Health • Health and Safety Executive • Public Health England as there is a sensitive receptor within 100 metres of the installation boundary- Woodside Farm House. • Director of Public Health as there is a sensitive receptor within 100 metres of the installation boundary- Woodside Farm House. 	✓
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>	✓
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 plans which we consider are satisfactory, showing the extent of the site of the facility. Plans are included in the permit and the operator is	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	required to carry on the permitted activities within the site boundary.	
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 sites/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. A record of our decision is provided in Key Issues – Ammonia assessment. The decision was taken in accordance with our guidance.</p>	✓
Environmental Risk Assessment and operating techniques		
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, all emissions may be categorised as environmentally insignificant.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs.</p> <p>A summary of the standards are provided in referenced Appendix 5: Technical Standards Woodside Farm</p>	✓

Aspect considered	Justification / Detail	Criteria met Yes
	<p>September 2015 supporting the application.</p> <ul style="list-style-type: none"> • Operations will be in accordance with EPR6.09 ‘ How to comply with your environmental permit for intensive farming’ • Feed selection and use is in accordance with EPR 6.09. Protein and phosphorus is reduced over the growing cycle. • Housing design and management is in accordance with EPR 6.09. The housing is well insulated to a U-Value of 0.4W/m²/°C to reduce condensation and heat loss; it also has a damp proof course. The housing is well ventilated with a fully littered floor equipped with a non-leaking drinking system. The houses have high velocity roof extraction fans with side wall inlets for normal ventilation, with gable end fans for cooling purposes during periods of hot weather. Litter is kept loose and friable, it is inspected regularly ensure it does become excessively wet or dry. Temperature in the poultry houses will meet health and welfare needs for the age and number of the birds. The houses are heated by hot water radiators; a computer controls ventilation and heating. • Litter - used litter is not stored at the installation, but is spread on land belonging to the operator Litter is spread to land under a manure management plan in accordance with the code of good agricultural practice. Contingency arrangements are in place with surrounding farms to accept the manure if required. • Fugitive emission - appropriate measures are in place to prevent and minimise fugitive emissions. Areas around building will be kept free from build-up of manure, slurry and spilt feed. Drainage from animal housing and water from cleaning out will be collected in underground storage tanks. • Dust – feed is stored in covered silos, there is no milling or mixing of feed at the site. All feed is delivered to the farm by lorry and blown directly to the feed silos. Feed is piped from the silos to the poultry houses. Ventilation systems are operated to achieve optimum humidity levels for the state of production in all seasonal conditions. The operator has provided a dust management plan as there are receptors within 100 metres of the installation 	

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>boundary.</p> <ul style="list-style-type: none"> • Fallen stock is disposed of in accordance with the current Animal By-Products Regulation. Carcasses will be stored in a sealed vermin proof container. <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>	
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.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	✓
Emission limits	We have decided that emission limits should be not set in the permit.	✓
Operator Competence		
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.	✓
Technical competence	Technical competency is required for activities permitted.	✓
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>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Financial provision	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓

Annex 2: External Consultation and web publicising responses

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

Response received from
Public Health England (30/10/2015)
Brief summary of issues raised
<p>The applicant has submitted risk assessments and management plans to manage fugitive emissions and odours from this site which have been reviewed and accepted to be in accordance with the Environment Agency guidance document. However we are concerned about the close proximity of a number of residential properties that are within 400m of the boundary of this site.</p> <p>We note that the applicant has a management system to capture complaints and we would ask that the regulator ensures the system includes a process for identifying and mitigating the source of any odour following substantiated complaints, and this could include details of any monitoring which might be undertaken.</p> <p>We were unable to establish the condition of the roads to the sheds and would ask that the regulator ensures that they are maintained to minimise fugitive emissions particularly during periods of dry weather.</p> <p>The Regulator needs to be satisfied that the risk assessment has been completed satisfactorily and the odour management plan is sufficient to minimise off site statutory nuisance and have the ability to capture and deal with complaints. The HPA position statement on intensive farming (which has been adopted by Public Health England) describes the main public health risks from this type of activity, which we would expect to be appropriately managed and regulated.</p>
Summary of actions taken or show how this has been covered
<p>As stated the applicant's management system will capture dust complaints and will include a process of identifying and mitigating the source of any odour following substantiated complaints.</p> <p>The Operators risk assessment is satisfactory and covers dust from the following sources;-</p> <ul style="list-style-type: none">• Feed• Bedding• Litter• Ventilation• House cleaning• Bird numbers and• General broiler production