Permitting decisions

Variation

We have decided to grant the variation for Vantage Farm Poultry Unit operated by Mr Michael Harrison.

The variation number is EPR/AP3331CA/V003.

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 provides a record of the decision making process. It:

- highlights key issues in the determination
- summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account
- shows how we have considered the consultation responses

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

Read the permitting decisions in conjunction with the environmental permit and the variation notice. The introductory note summarises what the variation covers.

Key issues of the decision

Change to application

The following aspects of the variation application (EPR/AP3331CA/V003) were withdrawn during the determination process:

- To increase the permitted number of broilers on the site from 350,000 to 500,000.
- To add two new poultry sheds to accommodate the increase in bird numbers.
- To extend the eastern site boundary.

The change to the application was requested by the applicant on 10/02/18 (email reference: Application Variation Changes to Application).

Poultry litter burners

This variation is to include a 1.394 MWth poultry litter burner. This is in addition to the existing 3 biomass boilers with an aggregated thermal rated input not exceeding 2.985 MWth.

The European Union (EU) has recently amended the Animal By-Products Regulations (ABPR) effectively recognising that poultry manure can be defined as a by-product. From 15 July 2014, unprocessed poultry manure can be burnt in a burner meeting the requirements of the ABPR on the site where the poultry manure is produced. Where this is the case the Animal and Plant Health Agency (APHA) regulate the burner under the

ABPR. Where the burner is installed on an installation under the Environmental Permitting Regulations (EPR) and the heat and electricity is utilised by the farm it is deemed to be a directly associated activity (DAA). The Environment Agency regulate the emissions from the burner within the Environmental Permit for the installation but approval from APHA is required in order to operate the burner at the installation.

The Environment Agency (EA) is satisfied that the poultry manure used in the proposed burner(s) can be classed as an animal by-product.

Habitat Assessment

The poultry litter storage tonnage has been added to the ammonia screening tool (AST) for the farm. This has been included in the Ammonia assessment section below.

Human Health Assessment

If the litter is a by-product, all heat from the burner is utilised by the poultry sheds and the proposed litter burner meets the following criteria, no further assessment of the combustion emissions will be required where all of the following criteria are met:

- the boiler has an ABPR permit issued by the APHA;
- no individual boiler has a net thermal input greater than 1MWth;
- the aggregated thermal input capacity of all boiler units is less than 5MW net thermal input.
- stack emission velocity at or greater than 20m/s;
- stack height at least 11 m above ground and 1.5m above the roof level of the boiler house and nearby buildings; and
- there are no sensitive receptors within 50m of the emission points(s) where the aggregated net rated thermal input is greater than 2MWth

The Environment Agency's risk assessment has shown that the poultry litter burner does not meet the requirements above, and are therefore further assessment is required.

Air Emissions Modelling

The applicant's assessment of the impact of site activities on air quality is set out in the Application. The assessment comprises the dispersion modelling of emissions to air from the operation of the poultry litter burner and 3 existing biomass burners.

This section of the decision document deals primarily with the dispersion modelling of emissions to air from the stacks and the impact on local air quality. These assessments predict the potential effects on local air quality from the Installation's stack emissions using the ADMS (version 5) dispersion model, which is a commonly used computer model for regulatory dispersion modelling.

Meteorological data for the assessment comprises 4 years continuous monitoring (2013 to 2016). The impact of the terrain surrounding the site and buildings upon plume dispersion was considered in the dispersion modelling. As well as calculating the peak ground level concentration, the applicant has modelled the concentration of key pollutants at a number of specified locations within the surrounding area.

The pollutants considered in the assessment are those associated with combustion activities, namely nitrogen oxides, sulphur dioxide, PM10 and carbon monoxide. We are satisfied that there is no need to consider any other pollutants, as the fuel is poultry litter.

Human receptors

Table 1 shows the maximum modelled ground concentration of nitrogen oxides, sulphur dioxide PM10 and carbon monoxide from the operation of the poultry litter burner and biomass boilers.

Table 1 Maximum modelled ground concentrations of nitrogen oxides, sulphur dioxide, PM10 and carbon monoxide.

Pollutant	ES	Process Contribution (PC)		Background concentration Note [1]	Predicted Environmental Concentration (PEC)	
	µg/m³	µg/m³	% of ES	µg/m³	µg/m³	% of ES
NO_2 (annual)	40	6.95	17.37	7.45	14.40	36.00%
NO_2 (1-hour)	200	105.96	52.98	14.91	120.87	60.44%
SO_2 (24-hour mean)	125	4.19	3.41	Note [2]	Note [2]	Note [2]
SO_2 (1-hour mean)	350	28.15	8.04	Note [2]	Note [2]	Note [2]
SO_2 (15-min mean)	266	28.78	10.82	5.32	34.10	12.82%
PM10 (annual)	40	1.85	4.62	13.77	15.62	39.05%
PM10 (24-hour mean)	50	8.01	16.01	27.53	35.54	71.08%
CO (8-hour mean)	10,000	0.05	0.52	Note [2]	Note [2]	Note [2]

Note [1] - The background concentration is taken as twice the long term background level for Short Term Environmental Quality Standard (EQS) / Environmental Assessment Level (EAL) standards referenced to an hourly averaging value.

Note [2] - Where the PC is less than 1% of the long term Environmental Standard (ES) or less than 10% for a short term Environmental Standard, the impact is considered to be insignificant. In these cases, we consider that examination of the PEC is not necessary.

From the table above, carbon monoxide (8-hour mean) and sulphur dioxide (24-hour mean and 1-hour mean), can be screened out as insignificant, in that the short term process contribution is less than 10% of the short term ES.

Although the other pollutants did not screen out as insignificant, we consider that it is unlikely that these emissions will give rise to significant pollution in that the predicted environmental concentration (PEC) is well below 100% (taking expected modelling uncertainties into account) of both the long term and short term ES.

Impact on Habitats sites, SSSIs and other conservation sites

The following Habitat sites (i.e. Special Areas of Conservation, Special Protection Areas and Ramsar) is located within 10 km of the Installation:

- Brown Moss (SAC)
- Midland Meres & Mosses - Phase 1 (Ramsar)

There are no Sites of Special Scientific Interest (SSSI) located within 2 km of the Installation. The following non-statutory local wildlife and conservation sites are located within 2 km of the Installation:

- Moreton Wood (Local Wildlife Sites)
- Hodnet Bypass route (Local Wildlife Sites)

Toxic contamination

Table 2 below shows the critical levels for the protection of vegetation and ecosystems based on the Environment Agency Guidance on Air Quality Assessment.

Table 2 – Critical levels for the protection of vegetation and ecosystems

Critical level	NO_2 (µg/m³)	SO_2 (µg/m³)
Long term	30	10 Note [1] , 20 Note [2]
Short term	75	--

Note [1] - annual mean for sensitive lichen communities & bryophytes and ecosystems where lichens & bryophytes are an important part of the ecosystem's integrity.

Note [2] - annual mean for all higher plants (all other ecosystems).

The applicant's comparison of process contribution against the relevant critical levels (CLe) for the protection of vegetation and ecosystems is shown for the worst case statutory habitat site in Table 3.

Table 3 – Maximum modelled concentrations of NOx and SO_2 at Brown Moss (SAC)

Parameter	PC ($\mu g/m^3$) Note [1]	PC as % of CLe	Background concentration ($\mu g/m^3$)	PEC	PEC as % of CLe
NO_2 (long term)	0.012	0.04	Note [2]	Note [2]	Note [2]
NO_2 (short term)	Note [3]	Note [3]	Note [2]	Note [2]	Note [2]
SO_2 (long term)	0.001	0.01	Note [2]	Note [2]	Note [2]

Note [1] - PC at the most sensitive statutory conservation site (Brown Moss SAC).

Note [2] - Where the PC is less than 1% of the long term critical level or less than 10% of the short term critical level, the impact is considered to be insignificant. In these cases, we consider that the examination of the PEC is not necessary.

Note [3] - An assessment of short term NO_2 was not provided by the applicant. However the worst case impact upon a habitat was assessed by AQMAU and was found to not exceed the relevant critical level.

The modelling information provided by the applicant has predicted that emissions of NOx and SO_2 are lower than 1% of the long-term, and 10% of the short-term critical level at the Brown Moss SAC. The emissions can therefore be screened out as insignificant.

Nutrient nitrogen enrichment

Table 4 below represents the predicted nitrogen deposition rates at the Brown Moss SAC. The lower, more conservative range of the critical load (3 kgN/ha/yr) has been used to assess deposition at the habitat site. The background concentrations for nutrient nitrogen for Brown Moss SAC were obtained from the UK Air Pollution Information System (APIS) website.

Table 4 – Modelled nitrogen nutrient deposition rates for the protection of vegetation and ecosystems

Site	Critical Load (CLo) kgN/ha/yr	PC deposition kgN/ha/yr Note [1]	PC as % of CLo	Background N deposition kgN/ha/yr	PEC deposition kgN/ha/yr	PEC as % of CLo
Brown Moss SAC	3	0.002	0.06	Note [2]	Note [2]	Note [2]

Note [1] - PC for the most sensitive statutory conservation site (Brown Moss SAC).

Note [2] **-** Where the PC is less than 1% of the long term critical load or less than 10% of the short term critical load, the impact is considered to be insignificant. In these cases, we consider that the examination of the PEC is not necessary.

The modelled process contributions to nutrient nitrogen deposition rates are below 1% of the indicative critical load at the worst case statutory designated habitat Brown Moss SAC. The emissions are therefore screened out as insignificant.

Acidification

Table 5 below represents the predicted acid deposition rates at the Brown Moss SAC. The applicant obtained the acidity critical loads for the receptors representing the Brown Moss SAC through APIS.

Table 5 – Modelled acid deposition rates for the protection of vegetation and ecosystems at Brown Moss SAC

Site	Critical Load (CLo) keq/ha/yr	PC deposition keq/ha/yr Note [1]	PC as % of CLo	Background N deposition keq/ha/yr	PEC deposition keq/ha/yr	PEC as % of CLo
Brown Moss SAC	0.2	0.000	0.15	Note [2]	Note [2]	Note [2]

Note [1] - PC for the most sensitive statutory conservation site (Brown Moss SAC).

Note [2] **-** Where the PC is less than 1% of the long term critical load or less than 10% of the short term critical load, the impact is considered to be insignificant. In these cases, we consider that the examination of the PEC is not necessary.

The modelled process contributions to acid deposition rates are below 1% of the indicative critical load at the worst case statutory designated habitat Brown Moss SAC. The emissions are therefore screened out as insignificant.

We are satisfied that the application is low risk. The Environment Agency can conclude no likely significant effect from exceedances of the relevant critical levels for NOx or SO2 and critical loads for nutrient nitrogen and acid deposition at the Brown Moss SAC.

Assessment of other conservation sites

Conservation sites are protected in law by legislation. The Habitats Directive provides the highest level of protection for SACs and SPAs. Domestic legislation provides a lower but important level of protection for SSSIs. Finally the Environment Act provides more generalised protection for flora and fauna rather than for specifically named conservation designations. It is under the Environment Act that we assess other sites (such as local wildlife sites) which prevents us from permitting something that will result in significant pollution; and which offers levels of protection proportionate with other European and national legislation. However, it should not be assumed that because levels of protection are less stringent for these other sites that they are not of considerable importance. Local sites link and support EU and national nature conservation sites together and hence help to maintain the UK's biodiversity resilience.

For SACs, SPAs, Ramsars and SSSIs we consider the PC and the background levels in making an assessment of impact. In assessing these other sites under the Environment Act, we look at the impact from the Installation alone in order to determine whether it would cause significant pollution. This is a proportionate approach, in line with the levels of protection offered by the conservation legislation to protect these other sites (which are generally more numerous than Natura 2000 or SSSIs) whilst ensuring that we do not restrict development.

Critical levels and loads are set to protect the most vulnerable habitat types. Thresholds change in accordance with the levels of protection afforded by the legislation, therefore the thresholds for SAC, SPA and SSSI features are more stringent than those for other nature conservation sites. We would generally conclude that the Installation is not causing significant pollution at these other sites if the PC is less than the relevant critical level or critical load, provided that the applicant is using BAT to control emissions.

The applicant has assessed the dispersion of important pollutants against critical level criteria for the protection of vegetation and ecosystems which is summarised in the following tables. The values shown represent the worst for any of the receptors for each pollutant.

Table 6 – Modelled concentrations of NO_2 and SO_2 for the protection of vegetation and ecosystems

Pollutant	CLe (µg/m^3)	PC (µg/m^3)[1]	PC as % of CLe
SO_2	20 (LT)	0.33	0.16
NO_x	75 (ST)	[2]	[2]
	30 (LT)	0.321	1.07
Note [1] - PC is given as the worst case of results for all conservation sites within 2 km of the Installation –Moreton Wood (LWS). Note [2] - An assessment of short term NO_2 was not provided by the applicant. However the worst case impact upon a habitat was assessed by AQMAU and was found to not exceed the relevant critical level.			

The applicant has assessed the critical loads for nitrogen and acid deposition against critical load criteria for sites as obtained from APIS which is summarised in the following table. The values shown represent the worst for any of the receptors for each parameter. The tables above show that the PCs are below the critical levels or loads. We are satisfied that the Installation will not cause significant pollution at the sites of conservation.

Table 7 – Modelled nutrient nitrogen and acid deposition rates for the protection of vegetation and ecosystems

Pollutant	CLo (kg N/ha/yr)	PC[1] kg N/ha/yr	PC as % of CLo
Nitrogen deposition	10	0.044	0.44
Acid deposition	2.0	0.007	0.36
Note [1] - PC is given as the worst case of results for all conservation sites within 2 km of the Installation - Moreton Wood (LWS).			

The tables above show that the PCs are below the critical levels or loads. We are satisfied that the Installation will not cause significant pollution at the sites. As modelling and assessment has demonstrated that the predicted ground level environmental concentrations of pollutants in the area even at a maximum will not compromise any Air Quality Standards, then we are satisfied that the operation of the facility will not compromise the integrity of the above sites.

Ammonia

The applicant has demonstrated that the housing will meet the relevant NH_3 BAT-AEL.

As part of the variation, the site will store an estimated 3,000 tonnes per annum of poultry litter. An ammonia assessment is therefore required.

There is one Special Area(s) of Conservation (SAC), and one Ramsar site located within 10 kilometres of the installation. There are no Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also two Local Wildlife Sites (LWS) within 2 km of the installation.

Ammonia assessment – SAC & Ramsar

The following trigger thresholds have been designated for the assessment of European sites:

- If the process contribution (PC) is below 4% 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 assessment alone and in combination is required.
- An in combination assessment will be completed to establish the combined PC for all existing farms identified within 10 km of the SAC / Ramsar.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Vantage Farm Poultry Unit will only have a potential impact on the SAC / Ramsar sites with a precautionary critical level of 1µg/m^3 if they are within 6,846 metres of the emission source.

Beyond 6,846 m the PC is less than 0.04µg/m^3 (i.e. less than 4% of the precautionary 1µg/m^3 critical level) and therefore beyond this distance the PC is insignificant. In this case the SAC and Ramsar are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of 1µg/m^3 is used, and the process contribution is assessed to be less than 4% the site automatically screens out as insignificant and no further assessment of critical load is necessary. In this case the 1µg/m^3 level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely significant effect.

Table 8 – SAC / Ramsar Assessment

Name of SAC/SPA/Ramsar	Distance from site (m)
Brown Moss	8,134
Midland Meres and Mosses Phase 1	8,134

Ammonia assessment – LWS

The following trigger thresholds have been applied for the assessment of these sites:

- If the process contribution (PC) is below 100% of the relevant critical level (CLe) or critical load (CLo) then the farm can be permitted with no further assessment.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Vantage Farm Poultry Unit will only have a potential impact on the LWS sites with a precautionary critical level of 1µg/m^3 if they are within 1,023 metres of the emission source.

Beyond 1,023 m the PC is less than 1µg/m^3 and therefore beyond this distance the PC is insignificant. In this case one LWS is beyond this distance (see table below) and therefore screen out of any further assessment.

Table 9 – LWS Assessment

Name of SAC/SPA/Ramsar	Distance from site (m)
Hodnet Bypass Route	2,214

Screening using the ammonia screening tool version 4.5 has determined that the PC on the LWS for ammonia emissions and nitrogen deposition from the application site are under the 100% significance threshold and can be screened out as having no likely significant effect. See results below. The APIS website (www.apis.ac.uk) identified that this arable and horticultural habitat would not be sensitive to acid deposition, so this has not been assessed.

Table 10 - Ammonia emissions

Site	Critical level ammonia µg/m^3	Predicted PC µg/m^3	PC % of critical level
Moreton Wood	3*	1.756	58.5

* CLe 3 applied as no protected lichen or bryophytes species were found when checking Easimap layer

Table 11 – Nitrogen deposition

Site	Critical load kg N/ha/yr. *	Predicted PC kg N/ha/yr.	PC % of critical load
Moreton Wood	10	9.123	91.2

* Critical load values taken from APIS website (www.apis.ac.uk) – 26/04/17.

No further assessment is required.

Decision checklist

Aspect considered	Decision
Receipt of application	
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 confidentiality.
Consultation	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement. The application was publicised on the GOV.UK website. We consulted the following organisations: • Local authority environmental protection department • Public Health England • The relevant Director of Public Health The comments and our responses are summarised in the consultation section.
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. The plan is included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports. The variation includes a new area to the west of the poultry sheds, which will be the location of the poultry litter burner, litter storage and two bunded diesel tanks. The previous use for the new area of land was arable and grazing. There has been no noted visual/olfactory evidence of existing contamination. The new site areas are located within a Nitrate Vulnerable Zone. The proposed site surfacing and drainage are acceptable methods for preventing land contamination.
Biodiversity, heritage, landscape and nature conservation	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat. We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process. We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified. We have not consulted Natural England on the application. The decision was taken in accordance with our guidance. Please see the Poultry Litter Burner and Ammonia section of the key issues for further information.

Aspect considered	Decision
Environmental risk assessment	
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory. Please see the key issues for further information on emissions to air. Please see 'Odour management' and 'Noise management' sections below for further information on those specific emissions. **Dust and bioaerosols** The use of Best Available Techniques and good practice will ensure minimisation of emissions. There are measures included within the Permit (the 'Fugitive Emissions' conditions) to provide a level of protection. Condition 3.2.1 'Emissions of substances not controlled by an emission limit' is included in the Permit. This is used in conjunction with condition 3.2.2 which states that in the event of fugitive emissions causing pollution following commissioning of the Installation, the Operator is required to undertake a review of site activities, provide an emissions management plan and to undertake any mitigation recommended as part of that report, once agreed in writing with the Environment Agency. There are sensitive receptors within 100 metres of the Installation boundary. Guidance on our website concludes that applicants need to produce and submit a dust and bioaerosol risk assessment with their applications only if there are relevant receptors within 100 metres of their farm. Details can be found via the link below: www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols. As there are receptors within 100 metres of the Installation, the Applicant was required to submit a dust and bioaerosol risk assessment in this format. In the guidance mentioned above it states that particulate concentrations fall off rapidly with distance from the emitting source. This fact, together with the proposed good management of the Installation such as keeping areas clean from build-up of dust, and other measures in place to reduce dust and risk of spillages all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed the following measures in their operating techniques to reduce dust from the new litter activities: • The new poultry litter storage area remains sealed at all times except when being filled (approx. every 7 weeks). Litter storage is kept under negative pressure and the air is drawn into the building for combustion purposes; • use of suitable bedding materials; • litter removed carefully during cleanout minimising dust; and, • spillages of litter on yard areas during cleanout swept up. We are satisfied that the measures outlined in the Application will minimise the potential for dust and bioaerosol emissions from the Installation. The permit maintains a requirement for the operator to carry out bioaerosol monitoring and submit to the Environment Agency a report demonstrating the levels of bioaerosol emissions from the site. This requirement is part of Improvement Condition IC1 which is shown in Table S1.3 of the permit, which was added as part of the previous variation V002. This is still outstanding.
Operating techniques	
General operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility. The operating techniques that the applicant must use are specified in table S1.2 in the environmental

Aspect considered	Decision
	permit.
Odour management	We have reviewed the odour management plan in accordance with our guidance on odour management. We consider that the odour management plan is satisfactory. The site has previously had substantiated odour complaints from nearby receptors. Due to the addition of the poultry litter burner and associated litter storage, the Operator has provided and updated Odour Management Plan (OMP) and further information with regards to the litter handling and storage. The poultry litter fuel store is designed to contain the estimated 420 tonnes of poultry litter produced every crop cycle. The doors of the fuel store will be opened approximately once every 7 weeks. There is an enclosed conveying system delivering fuel to the combustor, so there will be no further handling of the litter once it has been deposited. The fuel store will be kept under negative pressure, so air will be pulled from the fuel store into the combustion plant. The fuel store has two off weather louvres with back draught dampers (non-return) that will allow fresh air into the fuel store to maintain a constant pressure within the fuel store. The litter will continue to be transported from the sheds in covered vehicles. The following changes were made to the OMP: • The OMP has included the NFU Good Practice Checklist measures and demonstrated the ability to meet all relevant requirements. • In accordance with the BAT conclusions, the OMP for a site with substantiated odour complaints should include a review of historical odour incidents and remedies and the dissemination of odour incident knowledge. • Litter transported to litter burning building, all litter removed immediately. • Litter store sealed immediately following each trailer delivery. • Storage litter building operated under negative pressure system, with air being drawn in through building for the combustion process of the boiler, reducing fugitive emissions. • All trailers sheeted before leaving fill position. • Avoidance of double handling. • Any surplus litter removed from site used on operators own land, stored in temporary field heaps not within 400m of sensitive receptors. • Additional olfactory monitoring points have been included for the litter burning / storage. • As a contingency – if there are substantiated odour complaints due to the litter burning or storage, then the operator will stop using the burner until the odour issues are identified and corrected, in agreement with the Environment Agency. We are satisfied that the measures outlined in the Odour Management Plan and the technical specification of the poultry litter burner, as stated in the document referenced ‘Chicken Litter storage and fuel handling’ (dated 10/02/18) will not result in an increase in odour emissions from the Installation. The Odour Management Plan has been improved to identify odour monitoring at the site and appropriate contingency measures.
Noise management	We have reviewed the noise management plan in accordance with our guidance on noise assessment and control. We consider that the noise management plan is satisfactory. We have assessed the NMP and the H1 risk assessment for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 ‘Noise management at intensive livestock installations’. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution / nuisance.

Aspect considered	Decision
Permit conditions	
Raw materials	We have specified limits and controls on the use of raw materials and fuels. This variation includes a poultry litter burner within the permit. As a result fuel for on farm combustion unit has been added to Table S2.1 of the permit, with the specification that it must be unprocessed poultry manure generated on site.
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions. We have imposed a Pre-operational Condition (PO1) to ensure that the operator submits the Animal and Plant Health Authority (APHA) approved certification for the installation's poultry litter boiler, before it becomes an operational part if the site. This has been included in Table S1.4 of the permit.
Emission limits	We have decided that emission limits are required in the permit. BAT AELs have been added accordance with Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) was published on the 21st February 2017. These limits are included in Table S3.4 of the permit.
Monitoring	We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. We made these decisions in accordance with Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) was published on the 21st February 2017.
Reporting	We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. We made these decisions in accordance with Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) was published on the 21st February 2017.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit. Paragraph 1.3 of the guidance says: "The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation." We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections. We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent

Aspect considered	Decision
	across businesses in this sector and have been set to achieve the required legislative standards.

Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public, and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Shropshire Council, on 28/11/17
Brief summary of issues raised
Shropshire Council have received 8 odours complaints about the site in the past 2 years suggesting there may be existing odour concerns. The addition of poultry buildings and biomass boiler at this site may cause significant odour issues to those in close proximity to the proposed additions. Better equipment could be used to reduce odour, ammonia and noise. PM10 should be assessed in relation to the new sheds and boilers.
Summary of actions taken or show how this has been covered
The two new sheds and increase in bird numbers were withdrawn from this application on the 10/02/18. In relation to the poultry litter burner, a detailed air quality assessment was provided by the applicant. This was reviewed within the key issues section of this document. The potential odour emissions from the poultry litter burner has also been addressed within the odour management section of the decision checklist.

Representations from individual members of the public.

Brief summary of issues raised
History of odour problems. Noxious ammonia based gases. The poultry litter burner has been installed without planning permission. Human health / respiratory effects from the farm.
Summary of actions taken or show how this has been covered
The two new sheds and increase in bird numbers were withdrawn from this application on the 10/02/18. In relation to the poultry litter burner, a detailed air quality assessment which considers the human health of the nearby properties was provided by the applicant. This was reviewed within the key issues section of this document. The potential odour emissions from the poultry litter burner and litter storage has also been addressed within the odour management section of the decision checklist. Planning permission for the poultry litter burner can not be considered as part of our determination for the environmental permit.