

Permitting decisions

Bespoke permit

We have decided to grant the permit for Park Mill Farm Pig Unit operated by Mr Derek Colin Garrett, Mrs Victoria Louise Garrett, Mrs Jane Garrett (trading as EJ Garrett and Partners).

The permit number is EPR/DP3339JD.

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. The introductory note summarises what the permit covers.

Key issues of the decision

New Intensive Rearing of Poultry or Pigs BAT Conclusions document

The new Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) was published on the 21st February 2017. There is now a separate BAT Conclusions document which will set out the standards that permitted farms will have to meet.

The BAT Conclusions document is as per the following link

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D0302&from=EN>

Now the BAT Conclusions are published all new installation farming permits issued after the 21st February 2017 must be compliant in full from the first day of operation.

There are some new requirements for permit holders. The conclusions include BAT Associated Emission Levels for ammonia emissions which will apply to the majority of permits, as well as BAT associated levels for nitrogen and phosphorous excretion.

For some types of rearing practices stricter standards will apply to farms and housing permitted after the new BAT Conclusions are published.

New BAT conclusions review

There are 34 BAT conclusion measures in total within the BAT conclusion document dated 21st February 2017.

The Applicant has confirmed their compliance with all BAT conditions for the new installations in their document reference Document 007 Non-Technical Summary and dated 20/03/18.

The following is a more specific review of the measures the Applicant has applied to ensure compliance with the above key BAT measures.

BAT measure	Applicant compliance measure
BAT 3 - Nutritional management Nitrogen excretion	<p>The Applicant has confirmed it will demonstrate it achieves levels of Nitrogen excretion below the required BAT-AEL of 13 kg N/animal place/year by an estimation using manure analysis for total Nitrogen content.</p> <p>In order to reduce total nitrogen excreted and consequently ammonia emissions while meeting the nutritional needs of the animals the following will be undertaken at the Park Mill Farm Pig Unit;</p> <ul style="list-style-type: none">• Multiphase feeding strategy will be implemented as detailed in the Technical Standards. <p>Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.</p>
BAT 4 Nutritional management Phosphorous excretion	<p>The Applicant has confirmed it will demonstrate it achieves levels of Phosphorous excretion below the required BAT-AEL of 5.4 kg P₂O₅ animal place/year by an estimation using manure analysis for total Phosphorous content.</p> <p>In order to reduce phosphorus excreted and consequently ammonia emissions while meeting the nutritional needs of the animals the following will be undertaken at the Park Mill Farm Pig Unit;</p> <ul style="list-style-type: none">• Multiphase feeding strategy will be implemented as detailed in the Technical Standards. <p>Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.</p>

BAT measure	Applicant compliance measure
BAT 24 Monitoring of emissions and process parameters - Total nitrogen and phosphorous excretion	Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions.
BAT 25 Monitoring of emissions and process parameters - Ammonia emissions	Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 26 Monitoring of emissions and process parameters - Odour emissions	The approved OMP includes the following details for on Farm Monitoring and Continual Improvement: <ul style="list-style-type: none"> • Daily house-keeping, house and yard management; • Daily removal of manure and temporary storage under cover awaiting removal from the site for spreading off-site; • Weekly collection of carcasses for disposal; • House clean-out only conducted quickly at the end of the production cycle;
BAT 27 Monitoring of emissions and process parameters - Dust emissions	Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions. The Applicant has confirmed they will report the dust emissions to the Environment Agency annually for Fattening Pigs.
BAT 30 Ammonia emissions from pig houses	The Applicant has confirmed it will demonstrate it achieves levels of ammonia below the required BAT-AEL for the following pig types: Pigs > 30kg: 5.65 kg NH ₃ /animal place/year. The Installation does not include an air abatement treatment facility, hence the standard emission factor complies with the BAT AEL.

More detailed assessment of specific BAT measures

Ammonia emission controls

A BAT Associated Emission Level (AEL) provides us with a performance benchmark to determine whether an activity is BAT.

Ammonia emission controls – BAT conclusion 30.

The new BAT conclusions include a set of BAT-AEL's for ammonia emissions to air from animal housing for pigs.

'New plant' is defined as plant first permitted at the site of the farm following the publication of the BAT conclusions.

All new bespoke applications issued after the 21st February, including those where there is a mixture of old and new housing, will now need to meet the BAT-AEL.

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 Park Hill Farm (dated 20/03/18) demonstrates that there are no hazards or likely pathway 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 at this stage and although condition 3.1.3 is included in the permit no groundwater monitoring will be required.**

Odour

Intensive farming is by its nature a potentially odorous activity. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance (http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297084/geho0110brsb-e-e.pdf).

Condition 3.3 of the environmental permit reads as follows:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour."

Under section 3.3 of the guidance an Odour Management Plan (OMP) is required to be approved as part of the permitting process, if as is the case here, sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the Installation boundary. It is appropriate to require an OMP when such sensitive receptors have been identified within 400m of the installation to prevent, or where that is not practicable, to minimise the risk of pollution from odour emissions.

The risk assessment for the Installation provided with the Application lists key potential risks of odour pollution beyond the Installation boundary. These activities are as follows:

- Feed delivery, storage and spillages;

- Daily house-keeping and house management;
- Manure storage, management and spillages;
- Carcass disposal;
- House wash-out at the end of the production cycle;
- Dirty water management; and
- Unventilated housing due to power failure.

Odour Management Plan Review

The odour management plan (OMP) identifies the five potential receptors within 400 metres of the permit boundary. The five sensitive receptors to odour within 400 metres of the installation are Kington Mead Farm (South West), Park Mill Farm House (North), Emlin Park House (West), Watch Oak Lodge (South East) and Kington House (South West). The nearest receptor, Kington Mead Farm, is located approximately 253 metres of the installation.

The Operator is required to manage the installation activities in accordance with condition 3.3.1 of the permit and the OMP. Operations with the most potential to cause an odour emissions have been assessed as those listed above. The Odour Management Plan covers control measures, in particular, procedural controls addressing feed management, manure storage, ventilation, daily house-keeping and management, storage and weekly collection of carcasses, washing out operations, and dirty water management.

We, the Environment Agency, have reviewed and approved the Odour Management Plan. The Operator's compliance with the OMP will minimise the risk of odour pollution beyond the installation boundary and the risk of odour pollution at sensitive receptors. 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.

Noise

Intensive farming by its nature involves activities that have the potential to cause noise pollution. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance. Under section 3.4 of this guidance a Noise Management Plan (NMP) must be approved as part of the permitting determination, if there are sensitive receptors within 400m of the Installation boundary.

Condition 3.4 of the Permit reads as follows:

Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable to minimise the noise and vibration.

There are sensitive receptors within 400 metres of the Installation boundary as stated in the Odour section above. The Operator has provided a noise management plan (NMP) as part of the Application supporting documentation, and further details are provided in the Noise Management Plan review section below.

The risk assessment for the Installation provided with the Application lists key potential risks of noise pollution beyond the Installation boundary. These activities are as follows:

- Feed deliveries and automated feeding system;
- Pig delivery and removal;
- Building ventilations;
- Clean out operations;
- Manure loading and transport;
- Maintenance and repairs of site roads;
- Set up and placement of buildings; and
- Site attendance by staff and visitors.

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.

Noise Management Plan Review

The Operator is required to manage the installation activities in accordance with condition 3.4.1 of the permit and the NMP. Operations with the most potential to cause noise emissions have been assessed as those listed above. The NMP covers measures, in particular, procedural controls addressing vehicle movement, feed transfer and feeding system, fan ventilation operation, pig delivery and removal, on-site noise from staff and visitors, and maintenance and repair work.

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.

Ammonia

The applicant has demonstrated that the housing will meet the relevant NH3 BAT-AEL.

There are 13 Special Area(s) of Conservation (SAC), /Special Protection Area(s) (SPA), /Ramsar sites located within 10 kilometres of the installation. There are 4 Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also 11 Local Wildlife Site(s) (LWS), /Ancient Woodland(s) (AW) within 2 km of the installation.

Ammonia assessment – SAC/SPA/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 (CL_e) or critical load (CL_o) 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/SPA/Ramsar.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Park Mill Farm Pig Unit will only have a potential impact on the SAC/SPA/Ramsar sites with a precautionary critical level of 1µg/m³ if they are within 5,312 metres of the emission source.

Beyond 5,312m the PC is less than 0.04µg/m³ (i.e. less than 4% of the precautionary 1µg/m³ critical level) and therefore beyond this distance the PC is insignificant. In this case the SAC/SPA/Ramsars are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of 1µg/m³ 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/m³ level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely significant effect

Table 1 – SAC/SPA/Ramsar Assessment

Name of SAC/SPA/Ramsar	Distance from site (m)
Wye Valley Woodlands (SAC)	9,650
Wye Valley & Forest of Dean Bat Site (SAC)	9,491
Wye Valley Woodlands (SAC)	9,772
River Wye (SAC)	7,927
Wye Valley Woodlands (SAC)	9,648
Wye Valley and Forest (SAC)	9,488

Severn Estuary (Wales) (SAC)	8,342
River Wye/Afon Gwy (SAC)	7,932
Severn Estuary (Wales) (SPA)	8,342
Severn Estuary (Wales) (Ramsar)	8,342

Screening using the ammonia screening tool version 4.5 has determined that the process contributions of ammonia emissions and nitrogen deposition from the application site are over the 4% threshold, and are therefore potentially significant. An in combination assessment has been carried out. There are 2 other farms acting in combination with this application. A detailed assessment has been carried out as shown below.

A search of all existing active intensive agriculture installations permitted by the Environment Agency has identified the following farms within 10 km of the maximum concentration point for Severn Estuary SAC/SPA/Ramsar.

Table 2 – In combination farms assessment for Ammonia emissions

Name of Farm	PC $\mu\text{g}/\text{m}^3$ *	Critical level $\mu\text{g}/\text{m}^3$	PC as % of critical level
Park Mill Farm Pig Unit	0.403	3	4.6
Power Station Farm	0.078	3	13.4
Jobes Green Farm	0.139	3	2.6
Total PC	0.62		18.1

* The predicted process contributions for each of the farms listed above are calculated using the Environment Agency's ammonia screening tool version 4.5. The values are conservative in their estimate of process contribution and thus predict a greater impact than would be predicted if detailed modelling was undertaken for each farm.

Table 3 – In combination farms assessment for nitrogen deposition

Name of Farm	PC $\mu\text{g}/\text{m}^3$	Critical load kg N/ha/yr*	PC as % of critical load
Park Mill Farm Pig Unit	2.092	15	4.8
Power Station Farm	0.404	15	13.9
Jobes Green Farm	0.723	15	2.7
Total PC	3.219		18.8

* Critical load values taken from APIS website (www.apis.ac.uk) – 31/10/17

NOTE – The predicted process contributions for each of the farms listed above are calculated using the Environment Agency's ammonia screening tool version 4.5. The values are conservative in their estimate of process contribution and thus predict a greater impact than would be predicted if detailed modelling was undertaken for each farm.

Table 2 and 3 shows that the total process contribution at Severn Estuary SAC/SPA/Ramsar from all farms in combination is 18.1% for ammonia emissions and 18.8% for nitrogen deposition. In line with Environment Agency guidelines, where the total PC is less than 20% of the critical level/load, in combination impacts can be considered as having no adverse effect. The total PC for Severn Estuary SAC/SPA/Ramsar from all farms is 18.1% for ammonia emissions and 18.8% for nitrogen deposition, and therefore we have concluded no adverse effect from in combination impacts at the SAC/SPA/Ramsar.

Ammonia assessment – SSSI

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 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 5 km of the SSSI.

Initial screening using the ammonia screening tool version 4.5 has indicated that emissions from Park Mill Farm 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 2,218 metres of the emission source.

Beyond 2,218m 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. In this case the SSSIs are beyond this distance (see table below) and therefore screen 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 4 – SSSI Assessment

Name of SSSI	Distance from site (m)
Brinkmarsh Quarry SSSI	4,667
Tytherington Quarry SSSI	4,264
Buckover Road Cutting SSSI	3,929

Screening using the ammonia screening tool version 4.5 has indicated that the PC for Severn Estuary SSSI is predicted to be less than 20% of the critical level for ammonia emissions/nitrogen deposition/acid deposition therefore it is possible to conclude no damage. The results of the ammonia screening tool version 4.5 are given in the tables below.

Table 5 – Ammonia emissions

Site	Ammonia Cle ($\mu\text{g}/\text{m}^3$) [1]	PC ($\mu\text{g}/\text{m}^3$)	PC % critical level
Severn Estuary SSSI	3	0.139	4.6

Note [1] A Critical level of $3\mu\text{g}/\text{m}^3$ has been selected using the best information available. The results would still screen out at the more conservative critical level of $1\mu\text{g}/\text{m}^3$.

Table 6 – Nitrogen deposition

Site	Critical load kg N/ha/yr. [1]	PC kg N/ha/yr.	PC % critical load
Severn Estuary SSSI	15	0.723	4.8

Note [1] Critical load values taken from APIS website (www.apis.ac.uk) – 31/10/17

Table 7 – Acid deposition

Site	Critical load keq/ha/yr. [1]	PC keq/ha/yr.	PC % critical load
Severn Estuary SSSI	1.63	0.052	3.2

Note [1] Critical load values taken from APIS website (www.apis.ac.uk) – 31/10/17

Ammonia assessment - LWS/AW

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 (CL_e) or critical load (CL_o) then the farm can be permitted with no further assessment.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Park Mill Farm Pig Unit will only have a potential impact on the LWS and AW sites with a precautionary critical level of 1µg/m³ if they are within 926 metres of the emission source.

Beyond 926m the PC is less than 1µg/m³ and therefore beyond this distance the PC is insignificant. In this case the following LWS and AW are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 8 – LWS/AW Assessment

Name of SAC/SPA/Ramsar	Distance from site (m)
Fields south of Stoneyard Lane LWS	2,148
Kingswood LWS	1,759
Rockhampton Rhine LWS	1,710
Severn Estuary SSSI (part of) - Oldbury Pill LWS	1,385
Rhine at Oldbury Naite LWS	1,982
Kington Grove LWS	1,852
Stock Grove and Cole's Brake LWS	1,792
Stock Grove/ Coles Brake LWS	1,793
Kington Grove LWS	1,851

Park Mill Covert LWS and AW

The applicant's detailed modelling (reference: A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Pig Rearing Houses at Park Mill Farm, Thornbury in South Gloucestershire, dated: 08/03/18) showed that emissions from Park Mill Farm Pig Unit would result in the PC exceeding the critical level for ammonia and critical load for nitrogen deposition.

As there was limited information on Park Mill Covert LWS and AW, about why the site was designated and its current management, the Environment Agency consulted with the Local Authority, The Forestry Commission and Avon Wildlife Trust to determine whether the habitat was still required to be included within ammonia assessment.

None of the consultees had further information about the Park Mill Covert LWS and AW, and could not determine why it was originally designated, the current condition of the habitat, or whether it was vulnerable to the direct toxic effects of airborne ammonia and nutrient enrichment. The applicant confirmed that the Park Mill Covert LWS and AW was owned by a family member of the operator, and it was confirmed by the applicant that the habitat was not actively managed for conservation purposes.

The site currently operates without the need for an environmental permit with up to 2,000 pigs >30kg in two sheds. The operator has confirmed through a mass balance calculation (reference: Proposed and existing with standard factors and batch calculator, dated: 24/10/18) that the proposed emissions of ammonia from Park Mill Farm Pig Unit, with 4,000 pigs between 7 and >30kg in four sheds (termed a 'batch' system), will reduce from the current level of emissions from the site by approximately 10%.

This is achieved by the site changing from a grower system (all pigs >30kg) to a weaner-to-grower 'batch' system (pigs now brought on to site at 7kg). As pigs at smaller sizes produce less ammonia, this reduces the total annual ammonia emitted from the farm.

Further reductions are achieved due to a 2% reduction in crude protein levels of the pig's feed (reference: RFI Response - Reduced crude protein diets, dated: 24/04/18), which would reduce the ammonia emissions by an estimated 20% at the source. Table 9 below provides a comparison of the current ammonia emissions and the proposed permitted emissions, which is estimated to result in a 10.3% total emissions (kg NH₃) per year.

Table 9 – Comparison of ammonia emissions between the current emissions and proposed permitted emissions

Site Scenario	Emission source	Number	Emission Factor [2]	Total emissions (kg NH ₃ / year)
Current	Pigs >30kg	2,000	2.97	5,940
	Farm yard manure (tonnes)	120	1.49	178.8
			Total	6118.8
Permitted	Pigs batch system [1]	4,000	1.328 [3]	5312
	Farm yard manure (tonnes)	120	1.49	178.8
			Total	5490.8
			Estimated reduction	10.3%

Note [1] – the batch system is for the introduction of pigs on site at 7kg, which are then reared to approximately 100kg in weight.

Note [2] – the emission factor for pigs is provided as kg NH₃ / animal place / year, and the emission factor for manure is provided as kg NH₃ / tonne / year).

Note [3] – the emission factor has been calculated using the Environment Agency's 'batch calculator' tool, and has also taken into account the crude protein reduction of the feed.

Due to the proposed reductions from the current level of ammonia emissions, we determine that the emission from the farm would be acceptable.

No further assessment is necessary.

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.
Consultation	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> • Health and Safety Executive • Environmental Protection (South Gloucestershire Council) <p>The comments and our responses are summarised in the consultation section.</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 our guidance on legal operator for environmental permits.
The facility	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation'.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
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	<p>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 and baseline reporting under the Industrial Emissions Directive.</p> <p>See key issues section of the decision document for further information.</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>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.</p> <p>We consider that the application will not affect any sites of nature conservation,</p>

Aspect considered	Decision
	<p>landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p> <p>See key issues section of the decision document for further information.</p>
Environmental risk assessment	
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>As there are no receptors within 100m of the Installation, the Applicant was not required to submit a dust and bioaerosol risk assessment in this format. The risk assessment for the Installation provided with the application lists key management techniques to prevent, minimise and manage the risks of dust from site operations. These techniques are as follows:</p> <ul style="list-style-type: none"> • The use of enclosed and wet feed system; • Minimising the production of dust through use of no bedding; and • Good house-keeping and regular cleaning of dust to prevent build-up within buildings. <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> <p>See key issues section of the decision document for further information.</p>
Operating techniques	
General operating techniques	<p>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.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p> <p>The operating techniques are as follows:</p> <ul style="list-style-type: none"> • Computer controlled ventilation system in new houses; • Use of solid floor straw based system; • The daily cleaning of feed passageway, and temporary storage of manure under cover prior to export off site; • Storage of dirty and wash water in dirty water pits; • Clean roof water is piped to a field pond soakaway; • Use of wet feed, automated feed system with formulated diet to match the growth stage of pigs; • The use of nipple drinkers and monitored water consumption; and • The storage and collection of carcasses by licensed deadstock collection service. <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</p>

Aspect considered	Decision
	represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs.
Odour management	<p>We have reviewed the odour management plan in accordance with our guidance on odour management.</p> <p>We consider that the odour management plan is satisfactory.</p> <p>See key issues section of the decision document for further information.</p>
Noise management	<p>We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.</p> <p>We consider that the noise management plan is satisfactory.</p> <p>See key issues section of the decision document for further information.</p>
Permit conditions	
Emission limits	<p>ELVs and equivalent parameters or technical measures based on BAT have been set for the following substances.</p> <ul style="list-style-type: none"> • Ammonia: 5.65 kg NH₃/animal place/year; • Phosphorus: 5.4 kg P₂O₅ animal place/year; and • Nitrogen: 13 kg N/animal place/year <p>See key issues section of the decision document for further information.</p>
Monitoring	<p>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.</p> <p>These monitoring requirements have been imposed in order to comply with the relevant BAT measures.</p>
Reporting	<p>We have specified reporting in the permit.</p> <p>We made these decisions in accordance with the relevant BAT measures.</p>
Operator competence	
Management system	<p>There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Relevant convictions	<p>The Case Management System 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 our guidance on operator competence.</p>
Financial competence	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.</p>
Growth Duty	
Section 108 Deregulation	<p>We have considered our duty to have regard to the desirability of promoting</p>

Aspect considered	Decision
Act 2015 – Growth duty	<p>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 vary this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“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.”</p> <p>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.</p> <p>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 across businesses in this sector and have been set to achieve the required legislative standards.</p>

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
Environmental Protection (South Gloucestershire Council) on 21/05/2018
Brief summary of issues raised
No issues raised.
Summary of actions taken or show how this has been covered
No action taken.

No response received from
Health and Safety Executive
Brief summary of issues raised
No comments received.
Summary of actions taken or show how this has been covered
No action required.