

Permitting decisions

Variation

We have decided to grant the variation for Manor Poultry Farm operated by Mr HT Dent and Mrs SR Dent (trading as HT & SR Dent).

The variation number is EPR/JP3431ME/V007.

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

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 housing within variation applications** 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.

This variation determination includes a review only of BAT compliance for new housing introduced with this variation. A BAT review of existing housing compliance with BAT conclusions document is to be the subject of a sector permit review and is beyond the scope of this variation application permit determination.

New BAT conclusions review

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

We have sent out a schedule 5 requiring the Applicant to confirm that the new installation complies in full with all the BAT conclusion measures.

The Applicant has confirmed their compliance with all BAT conditions for the new housing, in their document reference 'BAT compliance confirmation v1' dated 9th July 2018.

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 0.6 kg N/animal place/year for broilers and the required BAT-AEL 2.3 kg N/animal place/year for turkeys by an estimation using manure analysis for total Nitrogen content.</p> <p>This confirmation was in response to the Schedule 5 Notice request for further information, received 9th July 2018, which has been referenced in Table S1.2 Operating Techniques of the Permit.</p> <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 0.25 kg P₂O₅ animal place/year for broilers and 1.0 kg P₂O₅ animal place/year for turkeys, by an estimation using manure analysis for total Phosphorous content.</p> <p>This confirmation was in response to the Schedule 5 Notice request for further information, received 9th July 2018, which has been referenced in Table S1.2 Operating Techniques of the Permit.</p> <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 Odour Management Plan (OMP) includes the following details for on Farm Monitoring and Continual Improvement: <ul style="list-style-type: none"> - Internal humidity, temperature and litter quality is to be monitored by farm personnel and recorded daily. - Weather conditions are monitored and recorded daily, and the use of a mobile monitoring station introduced should any continual problems/complaints arise. - Complaints and subsequent actions will be logged on site. - If requested, in-house ammonia monitoring can be carried out at specific times during the flock cycle to help gauge further background information on odour release. - A 12-month odour monitoring assessment commences from the date of the first bird placement and will ensure that the odour control methods are effective by undertaking sniff tests during potentially odours activities and recording the results.
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.
BAT 32 Ammonia emissions from poultry houses - Broilers	The BAT-AEL to be complied with is 0.08 kg NH ₃ /animal place/year. The Applicant will meet this as the emission factor for broilers is 0.034 kg NH ₃ /animal place/year. Ammonia emissions will be reported annually through estimation using emission factors. The Installation does not include an air abatement treatment facility, hence the standard emission factor complies with the BAT-AEL.
BAT 34 Ammonia emissions from houses for turkeys	There is no BAT AEL to be complied with for the ammonia emission from turkeys. However Table S3.3 Process monitoring does require the operator to report ammonia emissions for turkeys annually through estimation using emission factors. The applicant has confirmed it will use one or a combination of the techniques required in order to comply with this BAT conclusion. The installation will include the following techniques to reduce ammonia emissions: <ul style="list-style-type: none"> - High velocity roof ventilation. - Non-leaking drinking system comprising of nipple drinkers and drip trays. - Drinking systems are checked daily by farm personnel and any abnormalities are recorded and rectified.

In order to reduce total nitrogen and phosphorus excreted and consequently ammonia emissions while meeting the nutritional needs of the animals, the following will be undertaken at the installation

Diet formulation adapted to specific requirements of the production period, as detailed in the Technical Standards document.

Rations are under continual review and contain appropriate enzymes and other additives to minimise nitrogen and phosphorus excretion as well as ammonia.

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. The BAT Conclusions document does not include a BAT-AEL for turkeys and therefore an ammonia emission limit value for this bird type has not been included within the permit. The BAT Conclusions document does however provide a BAT-AEL for broilers, which is therefore included within the permit.

Ammonia emission controls – BAT conclusion 32

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

For variations all new housing on existing farms will need to meet the BAT-AEL.

Industrial Emissions Directive (IED)

The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 were made on the 20th February 2013 and came into force on 27th 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 Manor Poultry Farm (dated 5th April 2018) 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 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 400 metres of the Installation boundary. It is appropriate to require an OMP when such sensitive receptors have been identified within 400 metres 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 relating to odour pollution beyond the Installation boundary. These activities are as follows:

- Manufacture and selection of compound foods
- Feed delivery and storage
- Ventilation techniques
- Litter conditions and management
- Carcass disposal
- Fluctuations in stocking densities (e.g. overcrowding of available bird space)
- Management of drinking water systems
- Destocking of livestock (thinning and final depletion)
- Clean out (litter removal)
- Wash down and disinfection
- Dirty water management

Odour Management Plan Review

This variation application is to authorise the following changes:

- The average cycle length for broiler birds on site has shortened from 54 days to 42 days, increasing the average annual number of broiler bird cycles from six to seven.
- The addition of one poultry house adjacent to, and touching the south side of, existing poultry houses 5-7. This new poultry house (house 8) will be built to the same design and capacity as houses 5-7 and is considered as brand new housing in terms of BAT.
- As a result of the shorter cycle length and the one additional poultry house, the site capacity is increasing from 265,006 to 334,320 broiler bird places.
- The introduction of one optional cycle per year of either 67,000 male turkeys or 132,000 female turkeys, in replacement of an equivalent three cycles of broiler birds over the equivalent length of time (approximately 20 weeks) across all eight houses.
- An extension of the installation site boundary to the south of poultry houses 5-7 to accommodate the new poultry house 8.
- The introduction of a new small scale incinerator to be used for the disposal of fallen stock on site.

The closest relevant human receptor is The Arches at national grid reference NZ 34653 10919 approximately 60 metres west of the installation boundary.

Therefore, an Odour Management (OMP) is formally required under our guidance.

It is noted that no odour complaints have been received regarding the installation to date.

The OMP reference 'Odour management plan v2' dated 12th July 2018, provided as part of a response to a Schedule 5 Notice is considered acceptable having been assessed against the requirements of Integrated Pollution Prevention and Control (IPPC) SRG 6.02 (Farming): Odour Management at Intensive Livestock Installations, the NFU 'Top Tips Guidance and Poultry Industry Good Practice Checklist' and with regard to the site specific circumstances at the installation. The operator is required to manage activities at the installation in accordance with condition 3.3.1 of the environmental permit and this Odour Management Plan.

There is the potential for odour pollution from this installation, however the operator's compliance with their Odour Management Plan, should minimise the risk of odour pollution beyond the installation boundary. The risk of odour pollution at sensitive receptors beyond the installation boundary is not considered significant. 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.

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 400 metres 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 above. The Operator has provided a NMP as part of the Application supporting documentation, and further details are provided 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:

- Operation of ridge roof fans
- Operation of gable end fans
- HGV movements
- Feeding system
- Alarm system
- Broiler birds
- Turkeys
- Clean out operations
- Maintenance and repairs
- Set up and placement
- Standby generator testing

Noise Management Plan Review

There is the potential for noise pollution from this installation, however the operator's compliance with their Noise Management Plan, should minimise the risk of noise pollution beyond the installation boundary.

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.

Dust and Bio aerosols

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 four sensitive human receptors within 100 metres of the Installation boundary, the nearest sensitive receptor Manor Farm farmhouse is touching the installation boundary.

Guidance on our website concludes that applicants need to produce and submit a dust and bio aerosol risk assessment with their applications only if there are relevant receptors within 100 metres of their farm, e.g. the farmhouse or farm worker's houses. 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 bio aerosol 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 (e.g. litter and feed management/delivery procedures) all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed the following measures in their operating techniques to reduce dust:

- Covers over feed silo exhausts to catch exceed fee and dust/bioaerosols
- Feed is moulded into pellets to bound together dusty ingredients
- Feed bins covered with ply-wood constructed top
- Bedding is supplied in bales rather than bulk, and opened in-house instead of being blown in
- Exhaust vent cleaning between cycles

Conclusion

We are satisfied that the measures outlined in the Application will minimise the potential for dust and bio aerosol emissions from the Installation.

Ammonia

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

There is one Site of Special Scientific Interest (SSSI) within 5 kilometres of the installation, and five other nature conservation sites within 2 kilometres comprising of two Local Wildlife Sites (LWS) and three ancient woodlands (AW).

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 (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 5 kilometres of the SSSI.

The following assumptions were used for the screening using the ammonia screening tool version 4.5:

- We accounted for the fact that Houses 5-8 and Houses 1-4 are remote from another. Therefore we calculated the process contribution from both sets of houses separately and added them together to get the results.
- The correct number of birds per area (Houses 5-8 and Houses 1-4) were used, in accordance with the submitted email reference 'Turkey stock levels' from Martyn Jones (dated 10th July 2018).
- The worst case scenario for ammonia emissions was used, which would be 4 cycles of broilers and 1 cycle of female turkeys.
- A batch calculator was used to provide emission factors for broilers and female turkeys based on occupancy levels.

Screening using the ammonia screening tool version 4.5 has indicated that the PC for Neasham Fen SSSI is predicted to be less than 20% of the critical level for ammonia emissions and 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 1 – Ammonia emissions

Site	Ammonia Cle ($\mu\text{g}/\text{m}^3$)	PC ($\mu\text{g}/\text{m}^3$)	PC % critical level
Neasham Fen SSSI	3	0.405	13.5

Neasham Fen SSSI is notified for its geological interest. Most geological sites are not sensitive to ammonia and normally we would not set an ammonia critical level for such sites. However, in this particular instance the specific interest for which the SSSI is notified is a series of buried pollen deposits within the peaty soil. In order to prevent any degradation of the pollen grains due to drying out or changes to the pH of the peat soil, it is considered essential to maintain a cover of fen vegetation in a healthy condition. Natural England therefore recommended that an ammonia critical level of $3\mu\text{g}/\text{m}^3$ should be applied to the Neasham Fen SSSI.

Using the ammonia CLe of 3, the PC comes out as < 20% of the critical level, and therefore Neasham Fen SSSI screens out.

APIS confirmed that the site does not have any habitat interest features (it may have geological interest features which will not be sensitive to acid or nitrogen deposition). Therefore, no critical loads for nitrogen or acid deposition were assigned for this site.

No further assessment is required.

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 (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 Manor Poultry Farm will only have a potential impact on the LWS/AW sites with a precautionary critical level of $1\mu\text{g}/\text{m}^3$ if they are within 954 metres of the emission source.

Beyond 954 metres, the PC is less than $1\mu\text{g}/\text{m}^3$ and therefore beyond this distance the PC is insignificant. In this case the below LWS/AW sites are beyond this distance and therefore screen out of any further assessment.

Table 2 – LWS/AW Assessment

Name of LWS/AW	Distance from site (m)
Hunger Hill Farm LWS	2,387

Bolton Park Wood AW	1,500
Neasham Brickworks LWS	1,063

Neither Dinsdale Wood AW (565 metres from the site) nor an unknown AW (535 metres from the site) screened out due to distance.

There are no sensitive lower plants or bryophytes located in Dinsdale Wood AW, and therefore we considered the CLe for ammonia as $3\mu\text{g}/\text{m}^3$.

Screening using the ammonia screening tool version 4.5 has determined that the PC on the LWS/AW for ammonia emissions/nitrogen deposition/acid deposition from the application site are under the 100% significance threshold, except for nitrogen deposition on the unknown woodland and can be screened out as having no likely significant effect. See results below.

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
Dinsdale Wood AW	3*	1.843	61.4
Unknown AW	3*	2.072	69.1

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

Table 4 – Nitrogen deposition

Site	Critical load kg N/ha/yr. *	Predicted PC kg N/ha/yr.	PC % of critical load
Dinsdale Wood AW	10	9.570	95.7
Unknown AW	10	10.763	107.6

* Critical load values taken from APIS website (www.apis.ac.uk) – 13/07/18

Table 5 – Acid deposition

Site	Critical load keq/ha/yr*	Predicted PC keq/ha/yr.	PC % of critical load
Dinsdale Wood AW	1.534	0.684	44.6
Unknown AW	2.742	0.769	28.0

* Critical load values taken from APIS website (www.apis.ac.uk) – 13/07/18

The PC for ammonia emissions/nitrogen deposition/acid deposition screen out as being < 100% of the critical level and critical loads, and therefore Dinsdale Wood AW screens out. The ammonia emissions and acid deposition for the Unknown AW also screen out as being < 100% of the critical level and critical load. However the nitrogen deposition for this AW was screened at 107.6 of the critical load of 10 kg N/ha/yr.

Given that using the screening tool v4.5 produces conservative results and that this was based on a worst case scenario, it was determined that the nitrogen deposition on the Unknown AW would be very likely to screen out through detailed modelling. We therefore consider that the emission levels are acceptable and 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/Engagement	
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> <ul style="list-style-type: none"> - Darlington Borough Council planning authority - Darlington Borough Council environmental health department - Health and Safety Executive - Public Health England - Director of Public Health <p>The comments and our responses are summarised in the consultation section.</p>
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'.</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 plans which we consider are 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.</p> <p>Please see the key issues section for further information on groundwater and soil condition on site.</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, 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</p>

Aspect considered	Decision
	<p>in accordance with our guidance.</p> <p>The local authority was consulted regarding why two ancient woodland sites were designated, their current management activities and whether they are considered vulnerable to nutrient enrichment and/or the direct toxic effects of airborne ammonia.</p> <p>Please see the key issues section for further information on ammonia emissions and their potential effect on the relevant nearby habitats.</p>
Environmental risk assessment	
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>Please see the key issues section for further information on odour, noise, dust and bioaerosols and ammonia emissions.</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 detail that the sheds have high velocity roof fans and nipple drinkers.</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>Please see the key issues section for further information on the New Intensive Rearing of Poultry or Pigs BAT Conclusions document.</p>
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>Please see the key issues section for further information on odour management.</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>Please see the key issues section for further information on noise management.</p>
Permit conditions	
Updating permit conditions during consolidation	<p>We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit.</p>
Emission limits	<p>ELVs and equivalent parameters or technical measures based on BAT have been</p>

Aspect considered	Decision
	<p>set for the following substances.</p> <p>For broilers:</p> <ul style="list-style-type: none"> - Nitrogen: 0.6 kg N/animal place/year - Phosphorus: 0.25 kg P₂O₅/animal place/year - Ammonia: 0.08 kg NH₃/animal place/year <p>For turkeys:</p> <ul style="list-style-type: none"> - Nitrogen: 2.3 kg N/animal place/year - Phosphorus: 1.0 kg P₂O₅/animal place/year
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> <p>See the key issues of the decision section of this decision document for further information. We made these decisions in accordance with BAT conclusion document dated 21st February 2017.</p>
Reporting	<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 reporting requirements on monitoring data and performance parameters have been imposed in order to comply with the conditions of the permit.</p> <p>See the key issues of the decision section of this decision document for further information. We made these decisions in accordance with BAT conclusion document dated 21st February 2017.</p>
Operator competence	
Management system	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.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>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.</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>

Aspect considered	Decision
	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.

Consultation

The following summarises the responses to consultation with other organisations and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Health and Safety Executive, 19 th April 2018.
Brief summary of issues raised
Confirmation of no comments regarding this application.
Summary of actions taken or show how this has been covered
No action required.

Response received from
Public Health England, 30 th October 2018.
Brief summary of issues raised
Public Health England recommended that the main emissions of potential public health significance are emissions of; <ul style="list-style-type: none">- Bioaerosols- Dust (including particulate matter)- Ammonia They confirmed that the public health impact from emissions to air of ammonia, dust and particulate matter from the expansion of this installation have been assessed as low public health risk. Public Health also confirmed that they assume that the installation will present a low risk to human health if it complies with the requirements of the permit, including the application of BAT.
Summary of actions taken or show how this has been covered
Bioaerosol, dust and ammonia emissions have all been considered within the determination of this variation, and appropriate management plans have been reviewed by ourselves and included within the operating techniques of the varied permit. See the key issues of the decision section of this decision document for further information.