

Permitting decisions

Variation

We have decided to grant the variation for the installation comprising Knoxbridge Farm and Tolehurst Farm operated by Fridays Limited.

The variation relates to changes at Tolehurst farm; no changes have been made at Knoxbridge Farm.

The variation number is EPR/KP3333US/V006.

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

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 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 (BAT-AEL) 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 at Tolehurst Farm 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, however we have considered how the applicant will be BAT compliant for their existing housing by 21/02/21 and have included details in the consolidated permit and below.

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 notice requiring the Applicant to confirm that the installation complies in full with all the BAT conclusion measures.

The Applicant has confirmed their compliance with all relevant BAT conditions in their document reference 'Additional information', received on 14/04/20.

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 - Laying hens	The Applicant has confirmed it will demonstrate that the installation achieves levels of Nitrogen excretion below the required BAT-AEL of 0.8 kg N/animal place/year by using a mass balance of nitrogen based on the feed intake, dietary content of crude protein, and animal performance.
BAT 4 - Nutritional management - Phosphorous excretion - Laying hens	The Applicant has confirmed it will demonstrate that the installation achieves levels of Phosphorous excretion below the required BAT-AEL of 0.45 kg P ₂ O ₅ /animal place/year by using a mass balance of phosphorus based on the feed intake, dietary content of crude protein, total phosphorus and animal performance.
BAT 24 - Monitoring of emissions and process parameters - Total nitrogen and phosphorous excretion	Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 25 - Monitoring of emissions and process	Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

BAT measure	Applicant compliance measure
parameters - Ammonia emissions	
BAT 26 - Monitoring of emissions and process parameters - Odour emissions	<p>The approved odour management plan (OMP) includes the following details for odour monitoring:</p> <ul style="list-style-type: none"> • Weekly odour monitoring consisting of sniff tests at the installation boundary as shown in figure 4 of the OMP • If weekly monitoring shows that odours are present or if odour complaints are received this frequency can be increased. • If odour complaints continue then field testing should be conducted using a 'Nasal Ranger Field Olfactometer'.
BAT 27 - Monitoring of emissions and process parameters - Dust emissions	<p>Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.</p> <p>The Operator has confirmed they will report the dust emissions to the Environment Agency annually by multiplying the dust emission factor for pullets and laying hens by the number of birds on site.</p>
BAT 31 - Ammonia emissions from poultry houses - Laying hens	<p>The BAT-AEL to be complied with is:</p> <p>Cage system – 0.08 kg NH₃/animal place/year</p> <p>Non-cage system - 0.13 kg NH₃/animal place/year</p> <p>The Applicant will meet this as the emission factor for laying hens with caged type housing is 0.035 kg NH₃/animal place/year and the emission factor for laying hens with aviary type housing is 0.08 kg NH₃/animal place/year.</p> <p>The Installation does not include an air abatement treatment facility, hence the standard emission factor complies with the BAT AEL.</p>

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 have a BAT-AEL for pullets and therefore an ammonia emission limit value has not been included within the permit for pullets.

Industrial Emissions Directive (IED)

The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 were made on the 20 February 2013 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 Tolehurst Farm (dated 30/11/11) demonstrate 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 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 Tolehurst Farm provided with the Application lists key potential risks of odour pollution beyond the Installation boundary. These activities are as follows:

- Odour from feed delivery and storage
- Ventilation system
- Litter management
- Carcass disposal
- Manure removal
- Poultry house clean out

Odour Management Plan Review

Although there are a number of sensitive receptors within 100 metres of the Tolehurst Installation boundary, the nearest sensitive receptor to the proposed pullet houses is approximately 250 metres to the east. The Operator

has provided an OMP for Tolehurst Farm that has been assessed against the requirements of EPR 6.09 (version 2) Appendix 4 guidance 'Odour Management at Intensive Livestock Installations' and the 'Poultry Industry Good Practise Checklist' version 2, August 2013. We consider that the OMP is acceptable because it complies with the above guidance. The Operator is required to manage activities at Tolehurst Farm in accordance with condition 3.3.1 of the permit and this OMP.

The OMP sets out the preventative measures that will be taken on the Installation as part of the daily management of odour risk at the site. The following key measures are included in the Operator's OMP:

- Weekly sniff tests at the installation boundary; frequency increased if high odour levels are noted or a complaint is received
- Feed blown in to the bins via blower on lorry; on-site maintenance checks ensures that the feed bins are sealed and able to accept deliveries
- No on-site milling or mixing of feed
- Sucker lorry available to deal with large feed spills
- All ventilation systems are monitored and alarms will be triggered if fans trip or do not run
- Ventilation checks are undertaken daily
- Belt clean manure removal is carried out twice per week
- Manure removed in covered trailers; trailers are parked close to the houses
- All manure is exported from site and spread on third party land
- Water is provided via nipple drinkers with drink cups to reduce leakage and spills; nipple lines are checked daily for leaks
- Fresh litter is added as required in order to maintain litter quality
- Carcasses are placed in sealed bags and stored in locked containers (if not incinerated the same day) before incineration on site in an Animal and Plant Health Agency (APHA) approved incinerator
- Following bird depletion, litter removal is usually completed within one day; as soon as the litter is removed, the wash-down process begins
- Dirty water tanks are emptied as soon as the cleaning is finished
- Rear doors are closed during the cleaning process and ventilation is reduced to a minimum or turned off

The OMP includes a section on odour monitoring. Odour levels at Tolehurst Farm will be monitored weekly to detect abnormally high odour levels. This will consist of sniff tests at six separate locations at the boundary. The frequency will be increased if abnormally high odour levels are noted or if a complaint is received.

Conclusion

We, the Environment Agency, have reviewed and approved the OMP and the risk assessment for odour and consider the Operator has complied with the requirements of EPR 6.09 Appendix 4 'Odour management at intensive livestock installation' and 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.

The OMP will be reviewed at least once a year to assess the effectiveness of odour control methods and procedures.

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.”

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

- Use of vehicles, including deliveries
- Feed delivery/systems
- Ventilation system
- Noise from birds
- Alarm system and stand-by generator
- Personnel
- Repairs

There are sensitive receptors within 400 metres of the Tolehurst Installation boundary and so the Operator was required to provide a NMP as part of the Application supporting documentation. The following key measures are contained in the Operator’s NMP for Tolehurst Farm to prevent noise pollution:

- Weekly noise monitoring at the installation boundary; frequency increased if high noise levels are noted or a complaint is received
- Feed deliveries are planned to reduce vehicle movements and to ensure deliveries are made during normal working hours; only in exceptional circumstances will feed be delivered on a weekend
- Bulk bins are designed to take complete loads so the delivery process is as quick and efficient as possible
- Feed lorries undergo daily maintenance checks to ensure they are road worthy and all discharge equipment is running correctly
- Engines are switched off when not in use
- Most vehicle movements will occur during normal working hours
- All drivers are instructed to drive carefully and with consideration for the neighbours; 10mph speed limit in place
- All company owned vehicles are well maintained
- Feed augers have sensors and alarms that detect empty bins to ensure augers do not run when empty
- Noisy fans are turned off as soon as excessive noise develops
- Defect reporting procedures ensure belt conveyors are maintained and run efficiently
- Removal of the birds often takes place at night when the birds are most calm and stress levels can be kept to a minimum; all bird movers follow the industry code of practice in order to minimise stress
- The standby generator is located in sound proofed housing
- Alarm sirens have been disconnected so that no audible signal is given

The NMP includes a section on noise monitoring. Noise levels at Tolehurst Farm will be monitored weekly to detect abnormally high noise levels. This will consist of noise checks at six separate locations at the installation boundary. The frequency will be increased if abnormally high noise levels are noted or if a complaint is received.

The NMP will be reviewed at least every year and/or prior to any major changes to operations or following a substantiated complaint.

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 sixteen sensitive receptors within 100 metres of the Installation boundary at Tolehurst Farm, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 35 metres to the north of the Installation boundary.

Guidance on our website concludes that applicants need to produce and submit a dust and bioaerosol management plan 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 bioaerosol management plan for Tolehurst Farm 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 (as listed below) all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed the following measures in their operating techniques to reduce dust:

- No on-site milling or mixing of feed
- All feed lorries are covered and exhaust pipes on silos are fitted with dust filter boxes
- Feed is transferred in to the poultry houses via sealed pipes
- Any feed spills following deliveries are cleaned up
- Oil levels are carefully monitored to ensure feed is not too dry
- Wheat and barley are the main ingredients in layer feed; these are less dusty than maize
- Feed levels are carefully controlled to minimise wastage
- Straw/sawdust mix bedding is used to minimise dust transmission
- All bedding is applied internally and doors are kept shut throughout
- High velocity roof fans are fitted to all houses
- All manure trailers are covered before leaving the site; trailers are positioned close to the poultry houses to minimise dust

We are satisfied that the measures outlined in the dust and bioaerosol management plan and Application will prevent, and where that is not practicable minimise, dust and bioaerosol emissions from the Installation and prevent significant pollution or harm to human health. We are satisfied that we have sufficient controls within the permit conditions to enable further measures to be implemented should these be required.

Ammonia

There are three Sites of Special Scientific Interest (SSSI) located within 5 km of Tolehurst Farm. There are also four Local Wildlife Sites (LWS) and twenty-nine Ancient Woodlands (AW) within 2 km.

Although this variation includes a significant increase in the number of birds at Tolehurst Farm, the associated redevelopment of the pullet rearing houses actually results in an improvement in the environmental performance of the facility. Using a simple mass balance calculation it can be seen that total ammonia emissions from Tolehurst Farm will decrease by approximately 2% when compared to the 2013 permitted situation (see Table 1 below).

Table 1- Total ammonia emissions (kg/year)

	2013 permit	Proposal
Tolehurst Farm	10,800	10,115 *

*Based on a site specific emission factor for pullets of 0.018 kg NH₃/animal place/year.

The reduction in ammonia emissions is due to the changes in the design of the pullet rearing systems at Tolehurst Farm. The two new houses operate a belt clean manure removal system, with advanced ventilation system, as opposed to the previous litter based floor system. As a result of these changes, the evidence suggests a lower emission factor of 0.018 kg NH₃/animal place/year can be considered reasonable for the following reasons:

- The 2017 BREF presents a range of emission factors for pullets from European studies. Whilst we do not have the raw data from these studies, and none replicate the precise arrangement of the operators' proposals, the data do suggest that an emission factor in the region of < 0.02 kg NH₃/ap/year is achievable.
- Looking at our existing emission factor of 0.06 kg NH₃/ap/year, we recognise this is an out of date figure based on older NAEI data. Using an updated NAEI emission factor of 50.4 gN/lu/day, we achieve a pullet emission factor, (naturally ventilated or mechanically ventilated, fully littered floor, non-leaking drinkers) of 0.45 kg NH₃/ap/year. Applying a reduction factor of 60% for belt removal (a conservative value of what can be achieved by this technique for layer farms, set out in the BREF), we reach a value of 0.018 kg NH₃/ap/year.

The reduction in ammonia emissions achieved at Tolehurst Farm results in betterment at the nearby conservation sites, when compared to the 2013 permitted situation.

The operator has also submitted a detailed ammonia modelling report, reference 'Modelling ammonia emissions at Tolehurst poultry farm,' dated February 2020, which demonstrates a reduction in ammonia emissions at the relevant sensitive receptors when compared with the 2012 modelling report. Following checks of the modelling we have confidence that we can agree with the report conclusions.

The combination of the simple mass balance calculations and the ammonia modelling report support the conclusion that the reduction in ammonia emissions, resulting from the changes at Tolehurst Farm, should have a lesser impact on the sensitive receptors than under the 2013 permitted situation.

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.
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"> • Planning – Tunbridge Wells Borough Council • Environmental Health – Tunbridge Wells Borough Council • Public Health England • The Director of Public Health • The Health and Safety Executive • The Food Standards Agency <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 a plan which we consider is satisfactory, showing the extent of the site of the facility The plan is included in the permit
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 in accordance with our guidance.</p> <p>See the Key issues section.</p>

Aspect considered	Decision
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>
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 include:</p> <ul style="list-style-type: none"> • The houses are ventilated by high velocity roof fan outlets, with emission points higher than 5.5 metres above ground level, with a minimum efflux speed of 7 metres per second, with side inlets and gable end fans. The houses are equipped with nipple drinking systems with cups. • Water from the wash out of houses is channelled to underground collection tanks; clean drainage systems are not contaminated. • Twice weekly manure removal by belt system; used litter is exported off-site for spreading on third party land. • All hard standing areas outside are frequently swept clean to reduce dust build up. • Roof water and uncontaminated yard drainage discharges to drainage ditches via French drains and swales. • Carcasses are collected daily and stored in sealed containers whilst awaiting incineration on site in the dedicated Animal and Plant Health Agency (APHA) approved incinerator.
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 the Key issues section.</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 the Key issues section.</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>
Use of conditions other than	<p>Based on the information in the application, we consider that we do not need to</p>

Aspect considered	Decision
those from the template	impose conditions other than those in our permit template.
Emission limits	<p>ELVs based on BAT have been set for the following substances:</p> <p><u>Knoxbridge Farm (Laying hens in houses KX6 to KX14, KX16 and KX18)</u></p> <p>0.8 kg N/animal place/year</p> <p>0.45 kg P₂O₅ /animal place/year</p> <p>0.08 kg NH₃/animal place/year</p> <p><u>Tolehurst Farm (Laying hens in houses TOL1 and TOL2)</u></p> <p>0.8 kg N/animal place/year</p> <p>0.45 kg P₂O₅ /animal place/year</p> <p>0.13 kg NH₃/animal place/year</p> <p>See the Key issues section.</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 implement the IRPP BAT Conclusions as published on 21st February 2017.</p> <p>The monitoring requirements will apply from 21/02/2021 for existing houses.</p> <p>See the Key issues section.</p>
Reporting	<p>We have specified reporting in the permit.</p> <p>We made these decisions in accordance with the IRPP BAT Conclusions as published on 21st February 2017.</p> <p>See the Key Issues section.</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-</p>

Aspect considered	Decision
	<p>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 on 01/05/20 from
Public Health England (PHE)
Brief summary of issues raised
Public Health England has no significant concerns regarding the risk to the health of the local population from the installation. This is based on the assumption that the permit holder shall take all appropriate measures to prevent or control pollution, in accordance with the relevant sector guidance and industry best practice.
Summary of actions taken or show how this has been covered
The Installation is operated in accordance with 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance and 'The Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs' (IRPP), published on the 21st February 2017.

The following organisations were consulted, however no responses were received:

- The Director of Public Health;
- The Health and Safety Executive;
- The Foods Standards Agency;
- Planning – Tunbridge Wells Borough Council; and
- Environmental Health – Tunbridge Wells Borough Council.