

Permitting decisions

Variation

We have decided to grant the variation for Edenridge Poultry Unit operated by Mrs Molly Richards and Mr Charlie Richards.

The variation number is EPR/JP3331LC/V004.

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 not duly made request 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 'Additional information' and dated 28/10/20.

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 - Broilers	<p>The Applicant has confirmed it will demonstrate it achieves levels of Nitrogen excretion below the required BAT-AEL of 0.8 kg N/animal place/year by an estimation using manure analysis for total Nitrogen content.</p> <p>This confirmation was in response to the Not Duly Made Request for further information, received 28/10/20, 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 - Broilers	<p>The Applicant has confirmed it will demonstrate it achieves levels of Phosphorous excretion below the required BAT-AEL of 0.45 kg P₂O₅ animal place/year by an estimation using manure analysis for total Phosphorous content.</p> <p>This confirmation was in response to the Not Duly Made Request for further information, received 28/10/20, which has been referenced in Table S1.2 Operating techniques of the Permit.</p>

BAT measure	Applicant compliance measure
	Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 24 Monitoring of emissions and process parameters <ul style="list-style-type: none"> - 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 <ul style="list-style-type: none"> - 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 <ul style="list-style-type: none"> - Odour emissions 	The approved OMP includes the following details for on Farm Monitoring and Continual Improvement: <ul style="list-style-type: none"> - The staff will perform a daily check the surrounding area for high levels of odour, as well as this checks will be performed on the surrounding area by persons who do not regularly work on the farm. - Visual (and nasal) inspections of potentially odorous activities will be carried out. - Ammonia monitoring with hand held meter undertaken weekly as a minimum.
BAT 27 Monitoring of emissions and process parameters <ul style="list-style-type: none"> - Dust emissions 	Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions. Example text: The Applicant has confirmed they will report the dust emissions to the Environment Agency annually by multiplying the dust emissions factor for broilers by the number of birds on site. This confirmation was in response to the Not Duly Made Request for further information, received 28/10/20, which has been referenced in Table S1.2 Operating techniques of the Permit.
BAT 32 Ammonia emissions from poultry houses <ul style="list-style-type: none"> - Broilers 	The BAT-AEL to be complied with is 0.01 – 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. 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 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 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.

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:

- Compound feed selection
- Feed delivery and storage
- Ventilation techniques
- Litter conditions and management
- Carcass storage and disposal
- Drinking water systems
- De-stocking
- Cleanout (litter removal)
- Dirty water generation and storage (washout)
- Litter/manure
- Carcass storage
- Dust build up

Odour Management Plan Review

There are a number of sensitive receptors within 400 metres of the installation boundary, however the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 375 metres north of the installation boundary. The sensitive receptors considered for odours exclude the operators' farmhouses and farm worker houses (unlike with bioaerosol assessment which relates to onsite amenity).

The Operator has provided an OMP 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 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:

- Daily monitoring will include sniff testing around the perimeter of the site and at the nearest sensitive receptor points on and off site by persons who do not work regularly on the farm.
- Ammonia monitoring with hand held meter undertaken weekly as a minimum.
- No on-site milling or mixing.
- Feed delivery systems are sealed to minimise atmospheric dust.
- Feeder type based on pan feeders. Daily maintenance checks are made and recorded to minimise waste and maintain aerated bedding.
- Feed deliveries are monitored to avoid dust and manage any spillages.
- Nipple drinkers and drip trays are used to minimise spillage.
- Use of recycled woodchip at a depth of 50mm is selected for its absorbent properties.
- Clean dust deposits around ventilation discharge points every crop with dry blower on regular basis to prevent build up. Material removed with end of crop litter.
- Buildings sealed during and/or after cleanout.
- Building ventilation reduced to a minimum during cleanout.
- All internal areas are blown down to remove any remaining muck resulting in less suspended solid in the wash water.
- Wash water regularly removed from site via vacuum tanker to prevent overflowing.
- Carcasses are collected three times a day and stored in locked sealed bins to avoid leaks.
- Carcass bins located in a cool shaded location away from sensitive receptors prior to collection under the National Fallen Stock Scheme.

The OMP includes a section on odour monitoring. Odour levels on site will be monitored daily to detect abnormally high odour levels. This will consist of sniff tests around the perimeter of the site and at the nearest sensitive receptor points on and off site.

The OMP includes a section on odour complaints procedures that includes step by step actions to be taken by the operator in the event that an odour 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 operator will review the OMP at least once every 4 years or following an environmental agency substantiated complaint 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 (sensitive receptors in this instance excludes properties associated with the farm) 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 provided with the Application lists key potential risks of noise pollution beyond the Installation boundary. These activities are as follows:

- vehicle movements into and around the site
- ventilation systems and operations
- de-populating
- cleanout (machines and loading of trailers)
- standby generators and other mobile plant

Noise Management Plan Review

There are sensitive receptors within 400 metres of the 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 to prevent noise pollution:

- Daily checks of surrounding area by persons who do not work regularly on the farm.
- On site speed restrictions in place for any HGV's
- Machine operators are to work inside buildings.
- External concrete aprons are to be mechanically brushed only, no scraping.
- High pressure air compressors to be positioned within the building being blown down to help reduce external noise through running of engines.
- Fan chimney backdraft shutters are mechanically operated and sit on a tight rubber dampener to minimise movement while non-operational.
- Doors closed and ventilation on minimum speed during 2 day cleanout period.
- Modern low noise pumps requested through the approved contractor.
- Schedule loading so that birds are quickly loaded onto trailers and removed from site once complete.
- Feed deliveries restricted to 8am – 6pm Monday to Saturday.

The NMP includes a section on noise monitoring. Noise levels on site will be monitored daily to detect abnormally high noise levels. This will consist of noise checks on the road into the farm as this passes the closest receptors enabling staff/operators to also notice if there is an elevated noise emission at that point.

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 is 1 sensitive receptor within 100m of the Installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 30 metres to the north of 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 100m 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:

- Internal relevant humidity, temperature and litter quality is to be monitored by farm personnel and recorded on each house card daily.
- No on-site milling or mixing.
- Feed specifications are prepared by the feed compounder's nutrition specialist.
- A feed sample for every load of feed delivered to the site is left and documented for both quality assessment and traceability.
- Feed delivery systems are sealed to minimise atmospheric dust.
- Linked bins so no dust transmitted from blow pipes during filling.
- Any and all spillages are cleaned up immediately with responsibility lying with the operator to ensure required action is taken.
- The ventilation system is designed to efficiently control the exchange of air from inside the building with that of clean air outside.
- General daily inspection of equipment by the operator to ensure equipment is running at full capacity/efficiency.
- High velocity ridge mounted fan allow the air to be exhausted at a greater rate upwards of 11m/s which allowing a better dispersion higher up in the natural air streams.
- Dust extracted recycled woodchip is used for bedding and top up/replacement.
- Where dust falls on gravel areas, the gravel is to be routinely raked over to ensure blinding of areas does not occur.
- Ventilation controls to be used to control the release of dust while still maintaining optimum temperature control throughout the depletion process.
- All internal areas are blown down using high pressure air lances before the litter is removed so areas of trapped dust are minimised.
- Spent litter is loaded onto covered trailers situated on the concrete apron outside of each building.
- Pre-soaking is carried out to dry buildings before high pressure washing commences.
- Automatic jet spray vehicle washing is provided at the entrance to the site.

Conclusion

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 is one Special Area of Conservation site located within 5 kilometres of the installation. There are 6 Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also 6 Local Wildlife Sites (LWS) within 2 km of the installation.

Ammonia assessment – SAC

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 5 km of the SAC.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Edenridge Poultry Unit will only have a potential impact on the SAC site with a precautionary critical level of 1µg/m³ if they are within 3,147 metres of the emission source.

Beyond 3,147m 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 is beyond this distance (see table below) and therefore screens 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 Assessment

Name of SAC	Distance from site (m)
River Axe	4,013

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 km of the SSSI.

Initial screening using the ammonia screening tool version 4.5 has indicated that emissions from Edenridge Poultry Unit will only have a potential impact on SSSI sites with a precautionary critical level of 1µg/m³ if they are within 1,079 metres of the emission source.

Beyond 1,079m the PC is less than 0.2µg/m³ (i.e. less than 20% of the precautionary 1µg/m³ critical level) and therefore beyond this distance the PC is insignificant. In this case all SSSIs 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 20% 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 damage to these sites.

Table 2 – SSSI Assessment

Name of SSSI	Distance from site (m)
Stowell Meadow	1,301
River Axe	4,013
Broom Gravel Pits	4,066
Furley Chalk Pit	4,742
Snowdon Hill Quarry	2,557
Woolhayes Farm	4,381

Ammonia assessment - LWS

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

- If the process contribution (PC) is below 100% of the relevant critical level (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 Edenridge Poultry Unit will only have a potential impact on the LWS sites with a precautionary critical level of 1µg/m³ if they are within 370 metres of the emission source.

Beyond 370m the PC is less than 1µg/m³ and therefore beyond this distance the PC is insignificant. In this case all LWSs are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 3 – LWS Assessment

Name of LWS	Distance from site (m)
Brockfield Bottom	1,783
Farway Farm	1,629
Hook Farm	1,460
Burridge Common	602
Storridge Hill	1,887
Narfords	1,934

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 and Environmental Health – South Somerset Council • Public Health England • Director of Public Health • The Health and Safety Executive <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	The application is not within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.
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</p>

Aspect considered	Decision
	<p>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 an efflux speed of 11 metres per second, and gable end fans. The houses are equipped with nipple drinking systems with drip trays. • Water from the wash out of houses is channelled to an underground collection tank; clean drainage systems are not contaminated. • Used litter is exported off-site for spreading on third party land or for power generation in a third party local AD plant. • All hard standing areas outside are frequently swept clean to reduce dust build up. • Rain water from roofs and yard is discharged via French drains situated between each house and filters into the ground. • Carcasses are removed from the houses daily and stored on-site in locked sealed containers ready for collection by a licensed contractor on a weekly basis for removal under the National Fallen Stock Scheme.
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 those from the template	<p>Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.</p>
Emission limits	<p>Emission Limit Values (ELVs) based on BAT have been set for the following substances:</p> <ul style="list-style-type: none"> • 0.6kg N/animal place/year • 0.25kg P₂O₅/animal place/year • 0.08kg NH₃/animal place/year <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>

Aspect considered	Decision
	<p>These monitoring requirements have been imposed in order to implement the 'Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (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 'Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) BAT Conclusions' as published on 21st February 2017.</p> <p>See the key issues section.</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>
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> <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
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; and
- Environmental Health and Planning – South Somerset Council