

Permitting decisions

Bespoke permit

We have decided to grant the permit for Redenham Park Farm Poultry Unit operated by Redenham Agriculture Limited.

The permit number is EPR/KP3902LP.

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; and
- shows how we have considered the [consultation responses](#).

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

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

Key issues of the decision

New Intensive Rearing of Poultry or Pigs BAT Conclusions document

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

The BAT Conclusions document is as per the following link:

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

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

There are some new requirements for permit holders. The Conclusions include BAT-Associated Emission Levels (BAT-AELs) for ammonia emissions, which will apply to the majority of permits, as well as BAT-AELs 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 were published.

New BAT Conclusions review

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

The Applicant has confirmed their compliance with all BAT conditions for the new installation in their document reference BAT received with the application duly made on 25/08/21, which has been referenced in Table S1.2 Operating Techniques of the permit.

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	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 an estimation using manure analysis for total nitrogen content. Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 4 Nutritional management - Phosphorus excretion	The Applicant has confirmed it will demonstrate that the installation achieves levels of phosphorus excretion below the required BAT-AEL of 0.45 kg P ₂ O ₅ animal place/year by an estimation using manure analysis for total phosphorus content. 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 - Total nitrogen and phosphorous excretion	Table S3.3 concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

BAT measure	Applicant compliance measure
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 odour monitoring procedure: <ul style="list-style-type: none"> • twice daily olfactory checks coinciding with stock inspections (normally 07.00-10.00 hrs and 16.00-18.00hrs), any abnormalities recorded and investigated • Weekly monitoring by a person not directly involved with the poultry will be undertaken at the site boundary, this will be recorded as no odour, slight, strong and severe, odour detection recorded above slight will result in staff being alerted to implement contingency measures, once implemented retesting will be redone to ensure levels have been reduced. • In the event of complaints being received frequency of monitoring will be increased subject to agreement with Area Officer. • All records will be held on site for inspection.
BAT 27 Monitoring of emissions and process parameters - Dust emissions	Table S3.3 concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions. The Applicant has confirmed they will report the dust emissions to the Environment Agency annually by multiplying the dust emissions factor for laying hens by the number of birds on site.
BAT 31 Ammonia emissions from poultry houses - Laying hens	The BAT-AEL to be complied with is 0.13 kg NH ₃ /animal place/year. The Applicant will meet this as the emission factor for layers with aviary type housing is 0.08 kg NH ₃ /animal place/year. Although the installation includes air abatement treatment facilities, there is no lower BAT AEL for laying hens, 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 31

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

'New plant' is defined as plant first permitted at the site of the farm following the publication of the BAT Conclusions. All new bespoke permits issued after the 21st February 2017, including those where there is a mixture of old and new housing, will need to meet the BAT-AEL for new plant.

Industrial Emissions Directive (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 Redenham Park Farm Poultry Unit (dated 23/03/21) demonstrates that there are no hazards or likely pathway to land or groundwater and no historic contamination on site that may present a hazard from the same contaminants. **Therefore, on the basis of the risk assessment presented in the SCR, we accept that they have not provided base line reference data for the soil and groundwater at the site at this stage and although condition 3.1.3 is included in the permit no groundwater monitoring will be required.**

Odour

Intensive farming is by its nature a potentially odorous activity. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance

(http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297084/geho0110brsb-e-e.pdf).

Condition 3.3 of the environmental permit reads as follows:

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

Under section 3.3 of the guidance an Odour Management Plan (OMP) is required to be approved as part of the permitting process if, as is the case here, sensitive receptors (sensitive receptors in this instance excludes

properties associated with the farm) are within 400m of the installation boundary. It is appropriate to require an OMP when such sensitive receptors have been identified within 400m of the installation to prevent or, where that is not practicable, to minimise the risk of pollution from odour emissions.

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

- Manufacture and selection of feed
- Feed storage and delivery
- Ventilation
- Litter management
- Carcass storage and disposal
- Poultry house clean out

Odour Management Plan Review

A revised odour management plan (OMP) has been provided by the operator as part of the application supporting documentation (received 12/04/22 in response to a request for further information dated 07/04/22).

The Installation is located within 400m of more than 30 sensitive receptors from the installation boundary, and of these, more than 15 within 400m of the poultry houses. The nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 15m west of the installation boundary nearest to houses 1 and 2, and approximately 240m to the west of these poultry houses (the main source of odour). The majority of the receptors within 400m of the poultry houses are to the west of the installation, and all beyond 250m from the poultry housing, with one receptor approximately 350m to the north of the nearest poultry house, and tree to the east approximately 300m or more from the nearest poultry houses. There has been no history of odour complaints for the current operation. The prevailing wind is from the south west, which will reduce the impact on the majority of receptors and measures in place will minimise the risk of odour being a nuisance to the further properties downwind of the poultry housing.

The operator is required to manage activities at the Installation in accordance with condition 3.3.1 of the Permit and its OMP. The OMP includes odour control measures for normal and abnormal operations and contingency measures, including manufacture and selection of feed, feed delivery and storage, inadequate ventilation, litter management, inadequate storage of carcasses, house clean out, transport of litter, washing operations, fugitive emissions, dirty water management, water leaks/pipe failure, bird sickness, waste and chemical storage.

In order to monitor odour emissions on site, there will be twice daily olfactory checks coinciding with stock inspections (normally 07.00-10.00 hrs and 16.00-18.00hrs), any abnormalities recorded and investigated. In addition, weekly monitoring by a person not directly involved with the poultry will be undertaken at the site boundary, this will be recorded as no odour, slight, strong and severe, odour detection recorded above slight will result in staff being alerted to implement contingency measures, once implemented retesting will be redone to ensure levels have been reduced. In the event of complaints being received frequency of monitoring will be increased subject to agreement with Area Officer. All records will be held on site for inspection.

The operator has confirmed in their OMP that it will be reviewed every year from permit issue date, prior to any major changes to operations (to ensure effectiveness) or following any complaint, any changes to OMP or other management plans to be documented dated and signed and Area Officer notified.

The Environment Agency has reviewed the OMP and considers it acceptable. 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.

Conclusion

Although there is the potential for odour pollution from the Installation, the operator's compliance with the permit and its OMP will minimise the risk of odour pollution beyond the Installation boundary. The risk of odour pollution at sensitive receptors beyond the Installation boundary is therefore not considered significant.

Noise

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

Condition 3.4 of the permit reads as follows:

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

There are sensitive receptors within 400 metres of the installation boundary as stated above. The Operator has provided an 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:

- Large and small vehicles travelling to and from the farm
- Large vehicle movement on site – including clean out operations
- Feed transfer from contractor to bins
- Ventilation fans
- Alarm system and standby generator
- Chickens – including catching and removal from site
- Personnel
- Repairs and servicing

Noise Management Plan Review

A revised noise management plan (NMP) has been provided by the operator as part of the application supporting documentation (received 12/04/22 in response to a request for further information dated 07/04/22).

Potential sources of noise have been included as identified in the risk assessment and listed above, and mitigation measures have been put in place.

The operator has confirmed in the NMP that it will be reviewed annually or following changes in operations or infrastructure or a substantiated complaint.

We are satisfied that the manner in which operations are carried out on the installation will minimise the risk of noise pollution.

Conclusion

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 Bioaerosols

The use of Best Available Techniques and good practice will ensure minimisation of emissions. There are measures included within the permit (the 'Fugitive Emissions' conditions) to provide a level of protection. Condition 3.2.1 'Emissions of substances not controlled by an emission limit' is included in the permit. This is used in conjunction with condition 3.2.2 which states that in the event of fugitive emissions causing pollution following commissioning of the installation, the Operator is required to undertake a review of site activities, provide an emissions management plan and to undertake any mitigation recommended as part of that report, once agreed in writing with the Environment Agency.

In addition guidance on our website concludes that applicants need to produce and submit a dust and bioaerosol management plan beyond the requirement of the initial 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.

There are more than 10 sensitive receptors within 100m of the installation boundary located close to the west boundary of the installation. The nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 15m west of the installation boundary nearest to houses 1 and 2, and approximately 240m to the west of these poultry houses.

As there are receptors within 100m of the installation, the Applicant was required to submit a dust and bioaerosol management plan as detailed above.

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 the risk of spillages) all reduce the potential for emissions impacting the nearest receptors. In addition, as the predominant wind is from the south west, the receptors are upwind of all the poultry houses, which in itself will reduce the impact from dust and bioaerosol emissions.

The Applicant has included measures in their dust and bioaerosol management plan to reduce dust, which will inherently reduce bioaerosols, for the following sources:

- Feed deliveries to silos, ingredients and delivery system to poultry houses
- Bedding type, depth and application
- Litter management
- Stock inspections
- Ventilation
- House cleaning operations
- Bird numbers (stocking density)

Conclusion

We are satisfied that the measures outlined in the application will minimise the potential for dust and bioaerosol emissions from the installation.

Ammonia

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites or Sites of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There are 28 other nature conservation sites within 2km of the installation boundary comprising of 18 Local Wildlife Sites (LWS), and 10 Ancient Woodlands (AW).

Ammonia assessment - LWS/AW

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

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

Revised* screening using ammonia screening tool version 4.6 has indicated that emissions from Redenham Park Farm Poultry Unit will only have a potential impact on the LWS and AW sites with a precautionary CL_e of 1µg/m³ if they are within 755 metres of the emission source.

(Revised screening was carried out after revised modelling from the applicant was received, in order to check all sites impacted had been included in the modelling. A revised screening method was used which utilises a more precautionary approach, taking into account laying hens in the ranging areas, which wasn't considered in the initial pre-application screening undertaken).*

Beyond 755m the PC is less than $1\mu\text{g}/\text{m}^3$ and therefore beyond this distance the PC is considered insignificant. In this case the following LWSs and AWs are beyond this distance (see table 1 below) and therefore screen out of any further assessment.

Table 1 – LWS/AW Assessment

Name of LWS/AW	Distance from site* (m)
Collingbourne Wood LWS	2701m
Cockshord, Great Wickheath, Sawpit and Oxdown Copses LWS	2276m
Heaven Corner/Heron's Copse LWS	2735m
Coldridge Wood LWS	1928m
Stert Copse LWS	1976m
Great Perham Copse LWS	2555m
Lower Newdown Copse LWS	2447m
Chapel Copse LWS	1168m
Hill Copse, Appleshaw LWS	1755m
Cunney's Down Copse LWS	870m
Great Copse, Appleshaw LWS	1412m
Long Copse, Appleshaw LWS	1420m
A342 Andover Road, Kimpton LWS	1327m
Littleton Copse, Kimpton LWS	1507m
Unnamed woodland AW	2445m
Unnamed woodland AW	1169m
Coldridge Wood AW	1941m
Cunneys Down Copse AW	872m
Great Perham Copse AW	2612m
Great/Appleshaw Copses AW	1410m
Littleton Copse AW	1491m
Stert Copse AW	1984m

** The distance was calculated from approximate centre point of the installation and the screening assessment included a buffer distance of 750m calculated from the centre point to the furthest point of the installation boundary, to ensure all sites within 2km of the installation boundary had been included in the assessment.*

Detailed ammonia modelling (titled 'A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Free Range Egg-Laying Chicken Houses at Redenham House, Redenham, near Andover in Hampshire' dated 18/04/22 and received 25/04/22) has determined that the PCs at the following LWSs and AWs for ammonia emissions from the application site are under the 100% significance threshold and can be screened out as having no likely significant effect. See results below.

Detailed modelling provided by the Applicant has been audited by our modelling specialists and we have confidence that we can agree with the report conclusions for these sites.

Table 2 - Ammonia emissions

Site	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$	PC % of critical level
Hillfield Copse LWS	1*	0.634	63.4%
Grove Copse, Appleshaw LWS	1*	0.354	35.4%
The Belt LWS	1*	0.473	47.3%
Grove Copse AW	1*	0.354	35.4%
Hillfield Copse AW	1*	0.634	63.4%

** Precautionary CLe of $1 \mu\text{g}/\text{m}^3$ has been used. Where the precautionary level of $1 \mu\text{g}/\text{m}^3$ is used, and the PC is assessed to be less than 100% the site automatically screens out as insignificant, and no further assessment of critical load is necessary. In these cases the $1 \mu\text{g}/\text{m}^3$ level used has not been confirmed, but it is precautionary.

Freeth Copse Relic LWS

The applicant's detailed ammonia modelling has indicated that PCs at Freeth Copse Relic LWS are > 100% threshold for ammonia and nitrogen deposition and therefore cannot be screened out as insignificant. There were no results shown for acid deposition but we have estimated this from the nitrogen deposition PC divided by 14.

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
Freeth Copse Relic LWS	3*	5.901	196.7%

*Critical level of 3 assigned as no threatened lichen or bryophyte layer on Easimap – 19/07/22

Table 4 – Nitrogen deposition

Site	Critical load kg N/ha/yr	Predicted PC kg N/ha/yr	PC % of critical load
Freeth Copse Relic LWS	10*	45.98	459.8%

*Critical load values taken from APIS website (www.apis.ac.uk) – 19/07/22

Table 5 – Acid deposition

Site	Critical load keq/ha/yr	Predicted PC keq/ha/yr	PC % of critical load
Freeth Copse Relic LWS	2.801*	3.284	117.2%

*Critical load values taken from APIS website (www.apis.ac.uk) – 19/07/22

For Freeth Copse Relic LWS we only had limited information about why the site was designated and its current management. Therefore, the Environment Agency consulted with Hampshire Biodiversity Information Centre and Hampshire Council's county ecologist in order to determine:

- the key features for which the site was proposed as an LWS;
- whether the LWS is actively managed to maintain the designated features;
- conservation status of the LWS;
- whether ammonia emissions and/or nitrogen deposition will affect the conservation status of the LWS;
- whether the LWS is likely to be de-designated.

Based upon these consultations we have determined that the site is being actively managed but we haven't found specific conservation objectives in place. In addition the site is sensitive to the effects of airborne ammonia or nitrogen deposition, therefore, ammonia emissions from the farm needed further assessment.

The applicant has included, in their modelling, a comparison of the current predicted PCs with that of the proposal, for ammonia and nitrogen deposition (we have again calculated the acid deposition PC based on the PC for nitrogen deposition divided by 14). The impacts from the existing two houses with gable end fans and no acid scrubber abatement installed are as follows:

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
Freeth Copse Relic LWS	3	9.163	305.4%

Table 4 – Nitrogen deposition

Site	Critical load kg N/ha/yr	Predicted PC kg N/ha/yr	PC % of critical load
Freeth Copse Relic LWS	10	71.39	713.9%

Table 5 – Acid deposition

Site	Critical load keq/ha/yr	Predicted PC keq/ha/yr	PC % of critical load
Freeth Copse Relic LWS	2.801	5.099	182%

This shows that the impacts from the proposed site are approximately 36% lower than those of the existing site. On this basis we agree that the permit can be granted based on a reduction of impacts on this conservation site if the installation becomes operational. However we have included pre-operational conditions, requiring monitoring of the two existing houses (houses 1 and 2) once acid scrubber abatement has been installed to ensure that the proposed reduction can be achieved, before allowing stocking levels to exceed the 40,000 permitted activity level.

No further assessment is necessary

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
Consultation	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <p>Health and Safety Executive</p> <p>Test Valley Borough Council Environmental Health</p> <p>Hampshire County Council Planning Department</p> <p>UK Health Security Agency</p> <p>Director of Public Health</p> <p>The comments and our responses are summarised in the consultation section.</p>
Operator	
Control of the facility	We are satisfied that the Applicant (now the Operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.
The facility	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility'.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
The site	
Extent of the site of the facility	The Operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	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.
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>

Aspect considered	Decision
	<p>We consider that the application will not of itself have a negative effect on any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified. One Local Wildlife Site is already above the critical level/load and a reduction of these impacts is predicted if the installation becomes operational – see Ammonia Section above for further details.</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>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the Operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the Applicant must use are specified in table S1.2 in the environmental permit.</p> <p>The operating techniques are as follows:</p> <ul style="list-style-type: none"> • free range laying hens houses 1 – 5 with aviary system and manure belt removal of litter twice weekly • all manure is exported from the installation for spreading on land owned by the operator or, as a contingency, by third parties • all contaminated water is collected in dirty water tanks and exported off site for spreading on land owned by the operator • roof water and clean yard water drains to soakaways close to poultry houses • wet acid scrubber units used as ammonia abatement on poultry houses 1 and 2 • high velocity roof fans on poultry houses 1 and 2 to be used only as a contingency if one or more acid scrubber is not in use, or for temperature control during times of extreme hot weather • high velocity roof fans on poultry houses 3 – 5 for main ventilation • gable end fans on poultry houses 3 – 5 to be used infrequently for temperature control during times of extreme hot weather • sulphuric acid tanks within each wet acid scrubber unit will be compliant with CIRIA C736 guidance and the tanks will be bunded with a capacity of 125% of the maximum acid storage <p>The proposed techniques for priorities for control are in line with the Intensive Farming Sector Guidance Note EPR6.09.</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>
Noise management	<p>We have reviewed the noise management plan in accordance with our guidance on</p>

Aspect considered	Decision
	<p>noise assessment and control.</p> <p>We consider that the noise management plan is satisfactory.</p>
Permit conditions	
Use of conditions other than those from the template	Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.
Pre-operational conditions	<p>Based on the information in the application, we consider that we need to impose pre-operational conditions.</p> <p>We have included pre-operational conditions PO1 and PO2 in table S1.3 of the permit. PO1 requires the operator to submit their monitoring programme for approval prior to the installation of monitoring equipment and PO2 is to review monitoring and provide alternative mitigation and monitoring if acid scrubbers don't achieve proposed reductions, and prevents operations commencing until the Operator has received written approval from the Environment Agency.</p>
Emission limits	We have decided that emission limits are required in the permit. BAT AELs have been added in line with the Intensive Farming sector BAT conclusions document dated 21/02/17. These limits are included in permit table S3.3.
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 ensure compliance with Intensive Farming BAT conclusions document dated 21/02/17.</p>
Reporting	<p>We have specified reporting in the permit.</p> <p>We made these decisions in order to ensure compliance with Intensive Farming BAT conclusions document dated 21/02/17.</p>
Operator competence	
Management system	<p>There is no known reason to consider that the Operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Relevant convictions	<p>The Case Management System has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The Operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to vary this permit.

Aspect considered	Decision
	<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
UK Health Security Agency (received 26/11/21)
Brief summary of issues raised
<p>The response summarises the application and states that the main emissions of potential public health significance are emissions to air of bioaerosols, dust including particulate matter and ammonia. It states that the applicant outlines a number of mitigation measures in place or proposed including delivery of feed in sealed systems, house bedding and litter management, house ventilation with an acid scrubber system fitted to the 2 current houses; and general inspection and yard maintenance and cleanliness. Although there are residential receptors within 100m of the site boundary (i.e. to the west), the houses are located approximately 250m from off-site residential receptors. It is considered that these measures would be appropriate to ensure that the risks to public health should not be unacceptable.</p> <p>In addition it mentions that that the applicant's bioaerosol assessment notes the potential for dust to have "the potential to reach nearby neighbours and surrounding land during certain weather conditions", however the applicant's dust and bioaerosol management plan doesn't include any proposals for dust monitoring, unlike the odour management plan which proposes site and boundary odour monitoring. It suggests that the regulator may wish to consider the need to recommend the addition of regular monitoring and an outline of actions to be taken if set triggers are met within dust and bioaerosol management plan</p> <p>It also advises that the UKHSA is currently updating its Intensive Farm position paper on bioaerosols and provides more detail for this, and concludes that it is assumed by UKHSA that the installation will comply in all respects with the requirements of the permit, including the application of Best Available Techniques (BAT). This should ensure that emissions present a low risk to human health.</p>
Summary of actions taken or show how this has been covered
<p>Please refer to the dust and bioaerosol section in the Key Issues section of this document.</p> <p>The applicant has provided a dust and bioaerosol management plan (DBMP) and condition 3.2 is included in the permit with regards to fugitive emissions.</p> <p>The Environment Agency has reviewed the DBMP and considers it satisfactory, and this, together with mitigation measures proposed by the Applicant and the location of the sensitive receptors, taking into consideration the predominant wind direction will be from the south west, should reduce the risk to public health at the sensitive receptors.</p> <p>Although there is the potential for dust and bioaerosols from the Installation, the Operator's compliance with its DBMP and permit conditions will minimise the risk to public health beyond the Installation boundary. We are satisfied that the measures outlined in the application will minimise the potential for dust and bioaerosol emissions from the installation.</p> <p>No further action required.</p>

The Health and Safety Executive, Test Valley Borough Council Environmental Health, Hampshire County Council Planning Department and Director of Public Health were also consulted but no responses were received.