

Permitting decisions

Bespoke permit

We have decided to grant the permit for Deepdale Farm Poultry Unit operated by A & C Turkeys Limited.

The permit number is EPR/JP3047QP.

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 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 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 phosphorus 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 installations in their document reference 'Deepdale Farm Poultry Unit – BAT' received on 28/10/2022 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	<p>The Applicant has confirmed it will demonstrate that the installation achieves levels of Nitrogen excretion below the required BAT-AEL by an estimation using manure analysis for total Nitrogen content. The BAT-AELs to be complied with are:</p> <p>Broilers – 0.6 kg N/animal place/year</p> <p>Turkeys - 2.3 kg N/animal place/year.</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 - Phosphorus excretion	<p>The Applicant has confirmed it will demonstrate that the installation achieves levels of Phosphorus excretion below the required BAT-AEL by an estimation using manure analysis for total Phosphorus content.</p> <p>The BAT-AELs to be complied with are:</p> <p>Broilers – 0.25 kg P₂O₅ /animal place/year.</p> <p>Turkeys - 1.0 kg P₂O₅ /animal place/year.</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 24 - Monitoring of emissions and process parameters - Total nitrogen and phosphorus excretion	<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 in their BAT document submitted on 28/10/2022 that they will use estimation by using manure analysis for total nitrogen and phosphorus content.</p>
BAT 25 - Monitoring of emissions and process parameters - Ammonia 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 in their BAT document submitted on 28/10/2022 that ammonia emissions will be calculated using the standard emission factor and reported annually.</p>
BAT 26 - Monitoring of emissions and process parameters - Odour emissions	<p>The approved odour management plan (OMP) includes the following details for on odour monitoring:</p> <ul style="list-style-type: none"> • Staff will conduct sniff tests to coincide with daily stock inspections at the south western installation boundary. • Weekly sniff tests will be carried out at the installation boundary by staff not directly involved in poultry rearing to prevent adaptation.

BAT measure	Applicant compliance measure
	<ul style="list-style-type: none"> The OMP will be reviewed annually or after receiving an odour complaint.
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 in their BAT document submitted on 28/10/2022 that they will use estimation by using manure analysis and report annually for total dust emissions.</p>
BAT 32 - Ammonia emissions from poultry houses - Broilers	<p>The BAT-AEL to be complied with is 0.08 kg NH₃/animal place/year. The Applicant will meet this as the emission factor for broilers is 0.034 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>
BAT 34 – Ammonia emissions from poultry houses - Turkeys	The Operator has confirmed that the installation will comply with BAT 34a.

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 turkeys and therefore an ammonia emission limit value has not been included within the permit.

Ammonia emission controls – BAT conclusion 32

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

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

All new bespoke applications issued after 21st February 2017, including those where there is a mixture of old and new housing, will now need to meet the BAT-AEL.

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 Deepdale Farm Poultry Unit (received 13/06/2023) 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. Key sources of odour pollution are as follows: feed process, litter, carcass removal and storage, wash-down, ventilation, contaminated water.

There is 1 sensitive receptor within 400 metres of the installation boundary, the nearest receptor is located approximately 394 metres to the south west of the installation boundary. 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 Practice 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, received on 13/06/2023, sets out the preventative measures that will be taken at 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:

Feed – only use of pelleted feed and no milling or mixing of feed occurs. Feed deliveries are blown into the storage silos which are protected from damage by crash barriers, using a fully sealed system. Any spillages are immediately cleaned up. The integrity of feed storage is checked daily. Feed is stored for a maximum of three months. Any feed not used during a cycle is the first to be used during the following cycle. Feed is augured into the houses and distributed to the birds via a pan feeding system. Feed storage and delivery infrastructure is checked twice weekly.

Litter – poultry houses have concrete floors to prevent water egress, with bulk wood shavings as litter. Computer-controlled temperature and humidity is monitored daily to ensure litter remains dry and friable. Water is delivered via nipple drinkers fitted with drip cups to reduce spills and leaks to ensure litter is kept dry. Water pressure and the condition of infrastructure is checked daily, with any breakdowns isolated and repaired. The water system is tested at the end of each cycle. At the end of the cycle, houses are kept sealed and minimum

ventilation used pending cleaning. Litter is removed from the houses within one day of de-stocking and moved onto trucks placed inside the doors. Litter on the trucks is sheeted and transported off-site for sale.

Ventilation – walls and ceilings are insulated to prevent condensation. High velocity roof fans are used in all houses to aid air dispersion and are checked by a qualified electrician prior to the start of each cycle. Gable end fans are also used during hot weather. Levels of ventilation are adjusted according to the growth cycle and weather conditions to ensure dry and friable litter and optimal conditions for the birds.

Carcass removal – mortalities are removed from the houses daily in sealed bags, which are placed in locked, vermin-proof, sealed containers and taken off-site a minimum of twice weekly. The containers remain in a shaded area of the site. The carcass storage condition is checked daily and containers disinfected at the end of each cycle.

Wash-down and contaminated water – all wash waters and contaminated waters are diverted into a sealed underground tank pending removal from site. The dirty water tank is empty prior to house wash-down. Houses are washed and disinfected once litter is removed. All cleaning is done by qualified contractors. Within one day of de-littering, exhaust vents are pre-soaked with a low-pressure hose to minimise dust and dirty water release, thus reduce odour. Freeboard space in the dirty water tank is monitored and maintained during wash-down to ensure no spillages. The dirty water tank is fully emptied at the end of each wash down period to prevent stagnation, and is cleaned using DEFRA-approved contractors. Traps and drains are cleaned before and after wash-down, with all waters directed to the dirty water tank. Wash down is avoided at weekends during the summer months, and is suspended if damage to the drainage system or the dirty water tank is identified during daily checks. If odour is identified during washing operations, the dirty water tank is emptied then filled with clean water and agitated to remove stagnation and sediment build-up. Arrangements can be made to remove the contents of the dirty water tank to neighbouring farms in case of emergency.

Yard – site's surfaces are checked daily and cleaned to ensure odour does not arise from spills.

Boiler – not a high risk of odour. Serviced and maintained as per manufacturer's instructions using qualified engineers.

The OMP includes contingency measures to minimise odour pollution during abnormal operations. A list of remedial measures is included in the contingency plan, including triggers for commencing and ceasing use of these measures.

The OMP also provides a suitable procedure in the event that complaints are made to the Operator and includes a complaint form template.

The Operator is required to review the OMP at least every year (as committed to in the OMP), prior to any major changes to operations (to ensure effectiveness) and/or after the Environment Agency has notified the Operator that it has substantiated a complaint and make any appropriate changes to the OMP identified by the review.

Conclusion

The Environment Agency has reviewed the OMP and considers it complies with the requirements of our H4 Odour management guidance note. We agree with the scope and suitability of key measures, but this should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and sufficient. That remains the responsibility of the Operator.

Noise

Intensive farming by its nature involves activities that have the potential to cause noise pollution. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance. Under section 3.4 of this guidance, a Noise Management Plan (NMP) must be approved as part of the permitting determination if there are sensitive receptors within 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 the installation provided with the application lists key potential risks of noise pollution beyond the installation boundary. The main sources of noise from the site are vehicle movements, ventilation, feed process, the generator and biomass boiler, and bird catching.

There are sensitive receptors within 400 metres of the installation boundary as stated above. The Operator has provided an NMP, received on 13/06/2023, as part of the application supporting documentation. The following key measures are contained in the NMP to minimise noise pollution:

Vehicle movements – deliveries, and litter/dirty water removal are carried out during daylight hours. Road surfaces are checked daily, and are kept in good condition to reduce noise which could arise from travelling along uneven ground. All vehicles are fitted with silencers. Large delivery vehicles are used to reduce the number of journeys required. A 10mph speed limit is in force on site, and no idling of engines or reversing alarms are allowed.

Ventilation – the ventilation system is checked daily, and is maintained by a qualified electrician before each cycle, to ensure optimum running. Fans are operated intermittently.

Feed – twice-daily system checks are undertaken to prevent augers running empty. Feed silos are located closest to the direction of travel from the road to reduce vehicle movements. Feed storage and infrastructure is checked twice weekly.

Generator – the generator is tested at 10am on Mondays only, and is wrapped in an acoustic jacket. It is serviced bi-annually.

Biomass boiler – the boiler is inspected daily, and fully serviced by qualified engineers arranged by the boiler supplier.

Bird catching – bird catching is carried out at night-time, with low light levels and by fully trained handlers to reduce stress and panic of the birds. Vehicles are parked close to the house doors to reduce forklift travel.

Washing process – washdown of houses is done during daytime working hours (8am-6pm). Weekends are avoided during summer months. Trailers are parked as close to the doors as possible, drop heights are reduced as much as possible, and pressure washers are situated away from the sensitive receptor.

The NMP provides a suitable procedure in the event of complaints in relation to noise.

The NMP will be reviewed annually or following a substantiated complaint, and any appropriate changes made to the NMP, as identified by the review.

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.

There is one sensitive receptor within 75m, to the north-west of the installation boundary (the nearest point of their assumed property boundary).

The Applicant has provided a dust and bioaerosol risk assessment.

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.

As there are receptors within 100m of the installation, the Applicant was required to submit a dust and bioaerosol management 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 the 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, which will inherently reduce bioaerosols:

Feed – use of oil-coated pellets, with some use of maize to reduce dust. Feed silo vents are covered using duct socks. No milling or mixing of feed is undertaken on site. Use of sealed pipe delivery system into covered hoppers. Pan feeding system is used on a timer to prevent over-feeding. Spills are immediately cleaned up. Silos are inspected twice daily.

Litter – use of extraction fans to reduce dust layer within the houses. Use of dust-extracted shavings, which are mechanically spread rather than blown in to the houses, with tops ups delivered in sealed plastic bales. Optimum stocking levels to prevent over-crowding.

Ventilation – use of high velocity roof fans to aid dispersion. Use of grassy areas beneath the ventilation vents to catch any escaping dust from the roof. Roof outlets and gable end fans are washed down using pressure hoses after each cycle.

Clean-out – there is no double-handling of waste. Vehicles are parked close to the house doors, and trailers are sheeted once full prior to leaving the site. Loader buckets are kept as low as possible to reduce drop-heights.

Boiler – the boiler is serviced as per manufacturer's instructions using a qualified engineer. Boiler ash stored in a sealed, heat-proof container pending removal for disposal with used litter at crop depletion. Daily boiler checks are conducted at the same time as bird checks.

The DMP will be reviewed a minimum of every four years or following a substantiated complaint or any changes to operations.

Conclusion

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

Biomass Boiler

The Applicant is applying to include one biomass boiler with a rated thermal input of 0.9MWth.

The Environment Agency has assessed the pollution risks and has concluded that air emissions from small biomass boilers are not likely to pose a significant risk to the environment or human health providing certain conditions are met. Therefore a quantitative assessment of air emissions will not be required for poultry sites where:

- the fuel will be derived from virgin timber, miscanthus or straw, and;
- the biomass boiler appliance and installation meets the technical criteria to be eligible for the Renewable Heat Incentive, and;
- the aggregate boiler net rated thermal input is less than or equal to 4 MWth, and no individual boiler has a net thermal input greater than 1 MWth, and;
- the stack height must be a minimum of 5 metres above the ground (where there are buildings within 25 metres the stack height must be greater than 1 metre above the roof level of buildings within 25 metres (including building housing boiler(s) if relevant) and;

- there are no sensitive receptors within 50 metres of the emission point(s).

This is in line with the Environment Agency's document "Air Quality and Modelling Unit C1127a Biomass firing boilers for intensive poultry rearing". An assessment has been undertaken to consider the proposed addition of the biomass boiler.

Our risk assessment has shown that the biomass boiler should meet the requirements of the criteria above and is, therefore, considered not likely to pose a significant risk to the environment or human health and no further assessment is required.

Standby generator

The standby generator has a thermal rated input of 0.727MWth, for use in the event of mains power failure. The generator will not be tested more than 50 hours per annum, and will not be used more than 500 hours per annum, averaged over a 3 year period. The generator falls outside of the requirements of the Medium Combustion Plant Directive.

Ammonia

There is one Ramsar site located within 5 kilometres of the installation. There are two Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There is also one Local Wildlife Site within 2 km of the installation.

Ammonia assessment – Ramsar

The following trigger thresholds have been designated for the assessment of European sites:

- If the process contribution (PC) is below 4% of the relevant critical level (CL_e) or critical load (CL_o) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required.
- An in-combination assessment will be completed to establish the combined PC for all existing farms identified within 5 km of the Ramsar.

Detailed modelling [reference 'A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Turkey Rearing Houses at Deepdale Farm, near Chetwyn Heath, in Shropshire', dated 17/10/22] has determined that the PC of ammonia emissions, nitrogen deposition and acid deposition from the application site are over the 1% significance threshold at Midland Meres & Mosses Phase 2 Ramsar and as such, it is not possible to conclude no adverse effect alone. In order for us to make a comparison between the impacts on the Ramsar from the existing under threshold farming scenario and the proposed installation scenario, we have factored up the baseline emission factor in the modelling report to account for the current UK National Atmospheric Emissions Inventory emission factor of 93g-N/livestock-unit/day. We have also factored down the modelled baseline PCs based on bird placement data received from the operator on 29/03/23. The comparison indicates that the PC incremental increase is less than 1% as follows: Ammonia incremental increase is 0.08%, Nitrogen Deposition incremental increase is 0.11% and Acid Deposition incremental increase is 0.06%. In accordance with our process, if the PC incremental increase is 1% or less it is considered insignificant and the changes to the EPR farm activities will not contribute to any significant increase in effects on the Ramsar site. On this basis we agree that the permit variation can be granted.

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.

Screening dated 28/09/2023 was completed using the ammonia screening tool version 4.6. We verified the emission factor used in the detailed modelling report (reference 'A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Turkey Rearing Houses at Deepdale Farm, near

Chetwyn Heath, in Shropshire', dated 17/10/22), however we have taken bird numbers into account and factored this up into reflect the current UK National Atmospheric Emissions Inventory figure of 93g-N/livestock-unit/day. The screenings indicated that emissions from Deepdale Farm Poultry Unit will only have a potential impact on SSSI with a precautionary CL_e of 1µg/m³ if they are within 1,889 metres of the emission source.

Beyond 1,889 metres, the PC is less than 0.2µg/m³ (i.e. less than 20% of the precautionary 1µg/m³ CL_e) and therefore beyond this distance the PC is insignificant. In this case, all SSSI 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 PC is assessed to be less than 20%, the site automatically screens out as insignificant and no further assessment of CL_o 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)*
Aqualate Mere	4,961
Newport Canal	4,690

*Based on AST for worst case scenario of turkeys.

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.

Screening dated 28/09/2023 was completed using the ammonia screening tool version 4.6. We verified the emission factor used in the detailed modelling report (reference 'A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Turkey Rearing Houses at Deepdale Farm, near Chetwyn Heath, in Shropshire', dated 17/10/22), however we have taken bird numbers into account and factored this up into reflect the current UK National Atmospheric Emissions Inventory figure of 93g-N/livestock-unit/day. The screening has indicated that emissions from Deepdale Farm Poultry Unit will only have a potential impact on the LWS sites with a precautionary CL_e of 1µg/m³ if they are within 648 metres of the emission source.

Beyond 648 metres, the PC is less than 1µg/m³ and therefore beyond this distance the PC is insignificant. In this case all LWS 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)*
Mill Pond Sambrook	1,405

*Based on AST for worst case scenario of turkeys.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has been made.
Identifying confidential information	We have identified information provided as part of the application that we consider to be confidential. We have excluded one document from the public register. The decision was taken in accordance with our guidance on confidentiality.
Consultation	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement. The application was publicised on the GOV.UK website. We consulted the following organisations: UK Health Security Agency (UKHSA) Director of Public health Health and Safety Executive Environmental Health Department at Telford and Wrekin Council The comments and our responses are summarised in the consultation section .
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	We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility' Appendix 3. 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.
The site	
Extent of the site of the facility	The Operator has provided plans which we consider are satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	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	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.

Aspect considered	Decision
	<p>There is one Ramsar within 5km of the installation. In addition, there are two Sites of Special Scientific Interest (SSSI) within 5km of the installation, and one Local Wildlife Site (LWS) within 2km of the installation.</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 have no adverse effect on any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have sent a Habitats Regulations Assessment 1 to Natural England ‘for information only.’</p> <p>See key issues section.</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 for the poultry housing and process include the following:</p> <ul style="list-style-type: none"> • Bird houses are insulated and all ventilated using high velocity roof fans of an efflux speed of 11m/s. • Use of gable-end fans during periods of hot weather. • Water for the bird is provided using non-drip nipple drinkers. • Dirty and contaminated water directed into a sealed underground tank. • Clean roof water is directed via french drains into an attenuation pond prior to discharge through a soakaway. Clean drainage systems are not contaminated – during clean-out or in times of incident, diverter valves direct potentiall contaminated waters to the underground dirty water tanks. • Litter is placed in trailers following clean out after crop depletion. Once full, trailers are covered and litter is removed from site. Used litter is not stored at the installation. • No manure is being stored on-site. • Carcasses are stored in sealed, vermin-proof containers and collected a minimum of twice weekly, by a licensed collection agent. • All working areas around the poultry houses are concreted to prevent emissions to ground. <p>Operating techniques for the boiler include the following:</p> <ul style="list-style-type: none"> • The fuel is derived from virgin timber, mischanthus or straw;

Aspect considered	Decision
	<ul style="list-style-type: none"> • The biomass boiler appliance and its installation meets the technical criteria to be eligible; and • The stack is 1m or more higher than the apex of the adjacent buildings. <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs.</p>
Odour management	<p>We have reviewed the odour management plan in accordance with our guidance on odour management.</p> <p>We consider that the odour management plan is satisfactory.</p> <p>See key issues section.</p>
Noise management	<p>We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.</p> <p>We consider that the noise management plan is satisfactory.</p> <p>See key issues section.</p>
Permit conditions	
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>
Raw materials	<p>We have specified limits and controls on the use of raw materials and fuels.</p> <p>We have specified that only virgin timber (including wood chips and pellets), straw, miscanthus or a combination of these, are acceptable. These materials are never to be mixed with or replaced by, waste.</p>
Emission limits	<p>ELVs based on BAT have been set for the following substances.</p> <p>For broilers, the following ELVs have been applied:</p> <ul style="list-style-type: none"> • 0.6 kg N excreted/animal place/year • 0.25 kg P₂O₅ excreted/animal place/year • 0.08 kg NH₃/animal place/year <p>For turkeys, the following ELVs have been applied:</p> <ul style="list-style-type: none"> • Turkeys - 2.3 kg N /animal place/year • 1.0 kg P₂O₅ /animal place/year <p>See key issues.</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 dated 21/02/2017.</p> <p>Based on the information in the application we are satisfied that the Operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>

Aspect considered	Decision
Reporting	<p>We have specified reporting in the permit.</p> <p>We made this decision in accordance with IRPP BAT Conclusions dated 21/02/2017.</p> <p>See key issues.</p>
Operator competence	
Management system	<p>There is no known reason to consider that the Operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Relevant convictions	<p>The Case Management System has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The Operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.</p>
Growth Duty	
Section 108 Deregulation 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 vary this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the Operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received on 01/06/2023 from:
UK Health Security Agency (UKHSA)
Brief summary of issues raised
Note that the main emissions of potential public health significance are those to air comprising of bioaerosols and dust (including particulate matter). Recommendations include assessment of the biomass boiler and standby generator risks within the H1 risk assessment, assessment of bioaerosols and particulate matter via a risk assessment, and check the poultry housing meets BAT which would ensure emissions present a low risk of harm to human health.
Summary of actions taken or show how this has been covered
<p>The operator confirmed the installation and poultry housing will meet, and be operated in accordance with, relevant BAT requirements. The fugitive emission risk assessment and dust management plan have been reviewed and we are satisfied that appropriate measures have been proposed to manage and minimise potential fugitive emissions. This is in accordance with our technical guidance note for intensive farming.</p> <p>Biomass boiler and standby generator specifications have been supplied and assessed as low risk, including in relation to potential dust impact on nearby human receptors. The biomass boiler has been added to Table S1.1 as a directly associated activity as it is supplying heat to the poultry houses.</p> <p>In addition, standard conditions 3.2.1 and 3.2.2 concerning fugitive emissions have been included in the permit. ELVs, monitoring and reporting permit conditions have been added in line with BAT. Key operating techniques documents are listed in Table S1.2 of the permit.</p>

Response received on 05/06/2023 from:
Telford and Wrekin Health Protection Hub
Brief summary of issues raised
Requirement for the site to meet BAT and How to Comply 6.09 guidance, and noise, dust and odour are included in permit conditions. Agreement with recommendations submitted from the UKHSA regarding managing bioaerosols from the installation. Also requested biosecurity is considered during determination and self-assessment checklist for biosecurity is added to permit conditions.
Summary of actions taken or show how this has been covered
<p>Biosecurity falls outside the remit of this permit, therefore we are unable to assess the site's management of this issue, nor can a self-assessment checklist for biosecurity be added to the permit conditions. However, it should be noted that the fugitive risk assessment includes consideration of zoonoses and notifiable diseases, and the operator has confirmed the bird houses are disinfected after each cycle.</p> <p>The operator confirmed the installation and poultry housing will meet, and be operating in accordance with, relevant BAT requirements and this will aid maintaining biosecurity. The fugitive emissions risk assessment and dust management plan have been reviewed and we are satisfied that appropriate measures have been</p>

proposed to manage and minimise potential fugitive emissions. This is in accordance with our technical guidance note for intensive farming.

Biomass boiler and standby generator specifications have been supplied and assessed as low risk, including in relation to potential dust impact on nearby human receptors. The biomass boiler has been added to Table S1.1 as a directly associated activity as it is supplying heat to the poultry houses.

In addition, standard conditions 3.2.1 and 3.2.2 concerning fugitive emissions have been included in the permit. ELVs, monitoring and reporting permit conditions have been added in line with BAT. Key operating techniques documents are listed in Table S1.2 of the permit.