

Permitting Decisions - Variation

We have decided to grant the variation for Upper and Lower Pig Units at Crockway Farm operated by Crockway Farms Limited.

The variation number is EPR/YP3136ZQ/V006.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision-making process. It

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision considerations](#) section to show how the main 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.

Key issues of the decision

Variation application

This substantial variation is to change the livestock numbers to enable the installation to become a nursery only, with an increase of sows and reduction of finisher pigs to below threshold. There are 3 new finisher houses at the Lower unit (B20 – B22) and the additional house added at the last variation (V005) formerly named PRB20 is now named B23 and has moved location slightly from the last proposal. It also introduces two new slurry tanks in an extended installation boundary and the removal of the slurry lagoon. See the permit introductory note for specific livestock number details.

Intensive Rearing of Poultry or Pigs BAT Conclusions document

The Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) was published on 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 and redeveloped housing within variation applications issued after 21st February 2017 must be compliant in full from the first day of operation. Existing housing BAT compliance has been subject to a sector review, however for some reviewed permits, only generic limits have been included and individual housing should now be considered. Existing housing if redeveloped with changes to housing location or expansion beyond existing footprint is classed as new plant.

There are some additional requirements for permit holders. The BAT 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 apply to farms and housing permitted after the BAT Conclusions were published.

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 housing in their document reference Technical Standards (dated 10/01/2024, submitted with their application duly made 28/05/2024), 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 3 Nutritional management - Nitrogen excretion

The Applicant is required to demonstrate they can achieve levels of nitrogen excretion below the required BAT-AEL for the following pig types:

- Pigs 7 – 30kg: 4.0 kg N/animal place/year
- Pigs > 30kg: 13.0 kg N/animal place/year
- Sows: 30.0 kg N/animal place/year
- Farrowers: 30.0 kg N/animal place/year

and they have confirmed a multiphase feeding strategy will be implemented.

BAT 4 Nutritional management - Phosphorus excretion

The Applicant is required to demonstrate they can achieve levels of phosphorus excretion below the required BAT-AEL for the following pig types:

- Pigs 7 – 30kg: 2.2 kg P₂O₅/animal place/year
- Pigs > 30kg: 5.4 kg P₂O₅/animal place/year
- Sows: 15.0 kg P₂O₅/animal place/year
- Farrowers: 15.0 kg P₂O₅/animal place/year

and they have confirmed a multiphase feeding strategy will be implemented.

BAT 24 Monitoring of emissions and process parameters - Total nitrogen and phosphorus excretion

Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

This will be verified by means of using a mass balance of nitrogen and phosphorus based on the feed intake, dietary content of crude protein and animal performance and reported annually.

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.

The Applicant has confirmed they will report the ammonia emissions to the Environment Agency annually by utilising estimation by using emission factor

BAT 26 Monitoring of emissions and process parameters - Odour emissions

The approved odour management plan (OMP) includes the following details for on Farm Monitoring and Continual Improvement:

- Daily monitoring is carried out by the farm staff as part of daily pig monitoring, a walk around the bottom of the unit closest to the nearest sensitive receptors is carried out. If unusual high levels of odour are detected this is reported back to the farm manager who will then investigate. Identification of the reason and source of the increased odour will then lead to the appropriate course of action to bring odour levels back down to normal. If increase odour is detected this will be recorded in the complaints form and investigated as per the complaint's procedure. No recording or written report is carried out if no excess odour is detected.

BAT 27 Monitoring of emissions and process parameters - Dust emissions

Table S3.3 of the permit 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 utilising estimation by using emission factors.

BAT 30 Ammonia emissions from pig houses

The Applicant has confirmed it will demonstrate that the installation achieves levels of ammonia below the required BAT-AEL for the following pig types:

- Pigs 7 – 30kg: **0.53** NH₃/animal place/year.
- Pigs > 30kg: **2.6** kg NH₃/animal place/year.
- Sows: **2.7** kg NH₃/animal place/year.
- Farrowers: **5.6** kg NH₃/animal place/year

We accept that the usage of current emission factors plus usage of crude protein levels to lower emissions beyond standard emission factors ensure compliance with all the above BAT-AELs

More detailed assessment of specific BAT measures

Ammonia emission controls – BAT conclusion 30 (pigs)

A BAT Associated Emission Level (AEL) provides us with a performance benchmark to determine whether an activity is BAT. The BAT Conclusions

include a set of BAT AELs for ammonia emissions to air from animal housing for pigs.

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

For variations all new housing on existing farms will need to meet the BAT-AEL. Existing housing BAT compliance has been subject to a sector review.

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 operator has provided updated sections 4 – 6 of site condition report (SCR) for Crockway Farm with their application duly made on 28/05/2024 and these 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 for the additional land. **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 management

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.

Odour Management Plan Review

There are several sensitive receptors located within 400m of the installation boundary, as listed below (please note, the distance stated is only an approximation from the Installation boundary to the assumed boundary of the property):

1. Woodside (two properties, business dwelling) – approximately 35m to the south of Lower unit installation boundary.
2. Several residential properties to the south of the Lower unit boundary, the nearest being approximately 95m from the installation boundary.
3. The Plot – residential property approximately 340m to the southeast of the Lower unit
4. Garden Cottage - residential property approximately 400m to the east of the Upper unit installation boundary.

The sensitive receptors that have been considered under odour and noise do not include any properties occupied by people associated with the farm operations as odour and noise are amenity issues.

The Operator has provided a revised OMP (submitted 27/09/2024, in support of the application duly made on 28/05/2024) and this has been assessed against the requirements of 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 (version 2), Appendix 4 guidance 'Odour Management at Intensive Livestock Installations' and our Top Tips Guidance and Poultry Industry Good Practice Checklist (August 2013) as well as the site-specific circumstances at the Installation, including that the predominant wind direction is from the south west, and the receptors are located to the south, southeast or east of the installation and therefore not directly downwind of the operation. We consider that the OMP is acceptable because it complies with the above guidance, with details of odour control measures, contingency measures and complaint procedures described below.

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 and procedural controls to reduce odour. The Operator has identified the potential sources of odour as well as the potential risks and problems, and detailed actions taken to minimise odour including contingencies for abnormal operations.

The OMP also provides a suitable procedure in the event that complaints are made to the Operator. The OMP will be reviewed at least every year or in the event of any building or management changes or on the outcome of any substantiated complaints.

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.

Although there is the potential for odour pollution from the Installation, the Operator's compliance with its OMP and permit conditions 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.

Conclusion

We have assessed the OMP and odour risk assessment and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 4 'Odour 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 odour pollution/nuisance.

Noise management

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 under the 'Odour' section. 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 refers to noise impacts on humans from the production of pigs, and then points to the NMP for mitigation/management measures.

Noise Management Plan Review

A revised NMP was provided by applicant and assessed below (received 27/09/2024).

The sensitive receptors have been listed under the 'Odour' section. The sensitive receptors that have been considered under odour and noise and do not include any properties owned or occupied by people associated with the farm operations as odour and noise are amenity issues.

Operations with the most potential to cause noise nuisance have identified in the NMP. The NMP provides a suitable procedure in the event of complaints in relation to noise. The NMP will be reviewed at least every year or in light of any building and management changes, and on the outcome of investigations into the causes of any future noise complaints, if any occur.

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

We have assessed the NMP 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 management

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 including 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 plan in this format. The revised dust and bioaerosol management plan provided by applicant and assessed below was received on 27/09/2024, in support of the application duly made on 28/05/2024.

There are two sensitive receptors within 100m of the installation boundary, comprising of a business located in buildings approximately 35m to the south of the Lower unit installation boundary, and a residential property 95m to the south of the Lower unit installation boundary.

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. feed management/delivery procedures) all reduce the potential for emissions impacting the nearest receptors. In addition, the predominant wind direction is from the southwest, and the receptors are located to the south of the installation. The Applicant has confirmed measures in their dust and bioaerosol management plan to reduce dust (which will inherently reduce bioaerosols) for the potential risks.

Conclusion

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

Standby Generator

There are two standby generators at the installation, the one located at the Upper unit has a net thermal rated input of 0.2 MWth and the one at the Lower unit has a net thermal input of 0.3 MWth, both will not be tested more than 50 hours per year or operated/tested for more than 500 hours per year (averaged over 3 years) for emergency use only as a temporary power source if there is a mains power failure.

Ammonia

There is one Special Area of Conservation (SAC) within 5km of the installation. In addition, there are four Sites of Special Scientific Interest (SSSI) within 5km of the installation and twelve other nature conservation sites within 2km comprising of one National Nature Reserve (NNR), seven Local Wildlife Sites (LWS) and four ancient woodlands.

The Applicant has submitted detailed ammonia modelling to demonstrate there will be no increase in ammonia emissions as a result of the changes brought about by this variation, and therefore no increase in impacts at nature conservation sites which do not screen out below the relevant thresholds.

Ammonia assessment – SAC/SPA/Ramsar

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

- If, using the Ammonia Screening Tool (AST v4.6) 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, detailed ammonia modelling is required, and, if the PC from such modelling is below 1% of the relevant critical level (CL_e) or critical loads (CL_o) then the farm can be permitted with no further assessment.
- Where the PC (after modelling) exceeds 1%, further detailed assessment is required, taking into consideration the ammonia and nitrogen background concentrations and may also require an in-combination assessment.
- Where an in-combination assessment is required, the combined PC for all relevant existing permitted installations identified within 5 km of the SAC/SPA/Ramsar will be considered, together with impacts from other local plans, projects, and non-permitted farms which could act in-combination. The in-combination assessment is limited to those impacts not already included in the relevant background emission baseline.

Screening using the AST4.6 on 06/09/2024 indicated that the SAC within 5km of the installation boundary did not screen out < 4%. The Applicant submitted detailed ammonia modelling (referenced ‘A report on the modelling of the dispersion and deposition of ammonia from the existing and proposed pig rearing houses at Crockway Farm Pig Unit, near Maiden Newton in Dorset.’ and dated 28/01/2024) which has compared the current V005 permitted livestock numbers and slurry storage with the proposal and this has indicated that the PCs of ammonia emissions and nitrogen deposition at the SAC are not increasing as a result of the proposal.

Detailed modelling provided by the Applicant has been audited in detail by our air quality modelling team and they confirmed that, whilst we can't use the Applicant's conclusions in the report, we can use their PCs for permit determination. They found marginal reductions for the PCs in the proposal, likely within modelling uncertainties therefore did not agree with the modelling report's conclusions as they could not conclude there will be a notable reduction. However, as we can use the PCs for the determination, we conclude that there will be no increase in impacts from the proposal.

The worst-case modelled PCs are summarised in the tables below at the SAC:

Table 1 – Ammonia emissions

Site	Baseline PC µg/m ³	Predicted PC µg/m ³
Cerne & Sydling Downs SAC	0.422	0.407

Table 2 – Nitrogen deposition

Site	Baseline PC kg N/ha/yr	Predicted PC kg N/ha/yr
Cerne & Sydling Downs SAC	2.19	2.11

The modelling report did not include PCs for acid deposition but given that it is directly proportional to nitrogen deposition (we can estimate it by dividing the PC for nitrogen deposition by 14), we can agree that as there is no increase in PCs for nitrogen deposition, the same can be concluded for acid deposition.

We conclude that for ammonia, nitrogen deposition and acid deposition impacts on this specific SAC, linked to the variation application lead to no increase in PCs from the baseline.

No further assessment is required.

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 (CLe) or critical load (CLo) 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 using the ammonia screening tool version 4.6 (dated 06/09/2024) has indicated that emissions from Upper and Lower Pig Units at Crockway Farm will only have a potential impact on SSSIs with a precautionary CLe of $1\mu\text{g}/\text{m}^3$ if they are within 2,103 metres of the emission source.

Beyond 2,103m the PC is less than $0.2\mu\text{g}/\text{m}^3$ (i.e. less than 20% of the precautionary $1\mu\text{g}/\text{m}^3$ CLe) and therefore beyond this distance the PC is insignificant. In this case two SSSIs are beyond this distance (see table 3 below) and therefore screen out of any further assessment.

Where the precautionary level of $1\mu\text{g}/\text{m}^3$ is used and the PC is assessed to be less than 20%, the site automatically screens out as insignificant and no further assessment of CLo is necessary. In this case the $1\mu\text{g}/\text{m}^3$ 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 3 – SSSI Assessment

Name of SSSI	Distance from site (m)
Langford Meadow SSSI	2,112
Sydling Valley Downs	3,810

Detailed modelling submitted by the Applicant, dated 28/01/2024 and received with the application duly made on 28/05/2024, has indicated that the PC for Court Farm, Sydling SSSI is predicted to be less than 20% of the CLe of 1 µg/m³ for ammonia emissions therefore it is possible to conclude no damage. The results of the modelling are given in table 4 below.

The ammonia modelling assessment has been audited in detail by our Air Quality Modelling and Assessment Unit and we have confidence that we can agree with the PCs.

Table 4 – Ammonia emissions

Site	Ammonia CLe (µg/m ³)	PC (µg/m ³)	PC % critical level
Court Farm, Sydling SSSI	1*	0.069**	6.9

*A precautionary CLe of 1 µg/m³ has been assigned to this site. Where a CLe of 1 µg/m³ is used and the PC is assessed to be less than the 20% threshold it is not necessary to further consider nitrogen deposition or acid deposition CLo values. In this case, the 1 µg/m³ level used has not been confirmed, but it is precautionary.

** It was noted that the location of the receptor for this result was not at the closest point to the farm, however results for other receptors closer to the farm indicated that the PC for this SSSI would still be well below the 20% threshold.

Detailed modelling submitted by the Applicant has indicated that the PC for Hog Cliff SSSI is predicted to be greater than 20% of the CLe of 1 µg/m³ for ammonia emissions. The modelling has been audited in detail by our air quality modelling team and they confirmed that, whilst we can't use the Applicant's conclusions in the report, we can use their PCs for permit determination. They found marginal reductions for the PCs in the proposal, likely within modelling uncertainties therefore did not agree with the modelling report's conclusions as they could not conclude there will be a notable reduction. However, as we can use the PCs for the determination, we conclude that there will be no increase in impacts from the proposal.

The worst-case modelled PCs are summarised in the tables below at Hog Cliff SSSI:

Table 5 – Ammonia emissions

Site	Baseline PC $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$
Hog Cliff SSSI	0.422	0.407

Table 6 – Nitrogen deposition

Site	Baseline PC kg N/ha/yr	Predicted PC kg N/ha/yr
Hog Cliff SSSI	3.29	3.17

The modelling report did not include PCs for acid deposition but given that it is directly proportional to nitrogen deposition (we can estimate it by dividing the PC for nitrogen deposition by 14), we can agree that as there is no increase in PCs for nitrogen deposition, the same can be concluded for acid deposition.

We conclude that for ammonia, nitrogen deposition and acid deposition impacts on this specific SSSI, linked to the variation application, lead to no increase in PCs from the baseline.

No further assessment is required.

Ammonia assessment - LWS/AW/LNR

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

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

Screening using ammonia screening tool version 4.6 (dated 06/09/2024) has indicated that emissions from Upper and Lower Pig Units at Crockway Farm will only have a potential impact on the LWS, AW and NNR sites with a precautionary CLe of $1\mu\text{g}/\text{m}^3$ if they are within 741m of the emission source.

Beyond 741m the PC is less than $1\mu\text{g}/\text{m}^3$ and therefore beyond this distance the PC is insignificant. In this case all LWS and AW are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 7 – LWS/AW/LNR Assessment

Name of LWS/AW/LNR	Distance from site (m)
Langcombe Bottom LWS	1,416
Southover Bottom LWS	1,522
Plain Bottom LWS	1,660
Metlands Wood AW	1,731
Lampert's Farm AW	1,865
Sydling Water Hill AW	1,926
Grimstone Down AW	1,932
Hyde Crook AW	795
Unnamed woodland AW	1,342
Metlands Wood AW	1,753
Park Coppice AW	1,757

Hog Cliff NNR did not screen out and the modelling did not include this as a receptor, however it overlaps Cerne & Sydling SAC and Hog Cliff SSSI therefore the PC was used from the modelling for this (modelling report dated 28/01/2024, received with the application duly made on 28/05/2024). This has determined that the PC on the Hog Cliff NNR for ammonia emissions from the application site is under the 100% significance threshold. See results below.

The ammonia modelling assessment has been audited in detail by our Air Quality Modelling and Assessment Unit and we have confidence that we can agree with the PCs.

Table 8 - Ammonia emissions

Site	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$	PC % of critical level
Hog Cliff NNR	1*	0.407	40.7

*A CLe of $1 \mu\text{g}/\text{m}^3$ has been assigned to this site, as there is an overlapping layer of threatened lichens and bryophytes on our Easimap system. Where a CLe of $1 \mu\text{g}/\text{m}^3$ is used and the PC is assessed to be less than the 100% threshold it is not necessary to further consider nitrogen deposition or acid deposition CLo values.

No further assessment is required.

Decision considerations

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

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- UK Health Security Agency (UKHSA)
- Health and Safety Executive (HSE)
- Environmental Health, Dorset Council
- Director of Public Health, Dorset Council

The comments and our responses are summarised in the [consultation responses](#) section.

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'.

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

The Operator has provided a plan which we consider to be satisfactory, showing the extent of the site facilities.

The plan is included in the permit.

Site condition report

The Operator has provided updated sections of the site condition report, which we consider is satisfactory. See 'Groundwater and soil monitoring' section in Key issues above for more detail.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances, we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

See Ammonia section in the Key Issues above for more details.

Environmental risk

We have reviewed the Operator's assessment of the environmental risk from the facility.

The Operator's risk assessment is satisfactory.

General operating techniques

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.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

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 The Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) published on 21st February 2017.

Odour management

We have reviewed the odour management plan in accordance with our guidance on odour management.

We consider that the odour management plan is satisfactory, and we approve this plan.

See Key Issues section 'Odour management' for further details.

The plan has been incorporated into the operating techniques table S1.2.

Noise management

We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.

We consider that the noise management plan is satisfactory, and we approve this plan.

See Key Issues section 'Noise management' for further details.

The plan has been incorporated into the operating techniques table S1.2.

Dust and bioaerosol management

We have reviewed the dust and bioaerosol management plan in accordance with our guidance on emissions management plans for dust.

We consider that the dust and bioaerosol management plan is satisfactory and we approve this plan.

See Key Issues section 'Dust and bioaerosol management' for further details.

The plan has been incorporated into the operating techniques S1.2.

Improvement programme

There were historic improvement conditions carried over from the previous permits which were confirmed to be completed in the last variation, therefore these have now been removed from the consolidated permit.

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 21/02/2017. These limits are included in table S3.3 of the permit.

Monitoring

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.

These monitoring requirements have been imposed in order to ensure compliance with Intensive Farming BAT conclusions document dated 21/02/2017.

Reporting

We have specified reporting in the permit, using the methods detailed and to the frequencies specified.

We made these decisions in order to ensure compliance with the Intensive Farming sector BAT conclusions document dated 21/02/2017.

Management system

We are not aware of any reason to consider that the Operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on Operator competence and how to develop a management system for environmental permits.

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 grant this permit variation.

Paragraph 1.3 of the guidance says:

“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.”

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.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards

applied to the Operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

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

The consultation opened on 19/06/2024 and closed on 17/07/2024.

Responses from organisations listed in the consultation section

Response received from UK Health Security Agency (UKHSA) (received 15/07/2024).

Brief summary of issues raised:

They confirmed the main emissions of potential public health significance are emissions to air of bioaerosols, dust including particulate matter and ammonia. They concluded that, in their opinion, given the measures outlined within the presented risk assessments are implemented, there is no significant risk to health.

However, they recommended the following:

1. Whilst there are mitigation measures within their dust management plan, it would be advantageous to see a specific bioaerosol management plan.
2. The EA may wish to enquire with the applicant about a complaints procedure in their dust management plan.
3. The EA may wish to enquire about dust monitoring details.
4. For releases to surface and groundwaters, the EA may require further information regarding any specific identified point source or fugitive emissions and how these will be mitigated.
5. In the submitted accident management plan, they identify risks but do not give measures to mitigate or manage them, therefore the EA may wish to enquire about this.
6. Whether the column 'significance of negative impacts' in their environmental risk assessment is for when mitigation is in place or not.
7. The EA may wish to enquire about odour monitoring which is not included in their odour management plan.

Summary of actions taken:

1. The dust management plan is acceptable as a dust and bioaerosol management plan as the Operator has included measures in their plan to reduce dust (which will inherently reduce bioaerosols).

2. The dust and bioaerosol management plan includes a complaints procedure which is satisfactory.
3. We requested that the applicant submit a revised dust and bioaerosol management plan which includes details of dust monitoring (received 27/09/2024).
4. We requested more details regarding site drainage, and revised drainage plans for each unit (received 07/10/2024) which has provided more clarity on emissions to ground and surface waters, which we have assessed and we are satisfied that adequate mitigation is in place.
5. We requested an accident risk assessment, and received this on 27/09/2024, and we are satisfied that measures to mitigate or manage risks highlighted are satisfactory. We do not routinely request to see the accident management plan, therefore do not require this to be amended, as it will be checked during compliance inspections.
6. We have accepted that the significance of negative impacts is considered to be without mitigation measures in place, and that mitigation measures proposed are satisfactory and will reduce any potential impacts.
7. We requested that the applicant submit a revised odour management plan which includes details of odour monitoring (received 27/09/2024).

Response received from Environmental Health, Dorset Council (received 16/07/2024).

Brief summary of issues raised: They confirmed they had no comments in relation to this variation

Summary of actions taken: No action required.

We did not receive responses from HSE or the Director of Public Health, or any representations from other bodies.