

Permitting decisions

Bespoke permit

We have decided to grant the permit for Red House Farm operated by Ford Farms (Suffolk) Limited.

The permit number is EPR/SP3424SF.

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. The decision checklist summarises the decision making process to show how all relevant factors have been taken into account.

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

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.

We sent out a schedule 5 notice requiring the Applicant to confirm that the new installation complies in full with all the BAT Conclusion measures.

The Applicant has confirmed their compliance with all BAT conditions for the new installations in their document reference Non-tech summary and dated 23/03/24 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 13.0 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 - Phosphorous excretion	The Applicant has confirmed it will demonstrate that the installation achieves levels of Phosphorous excretion below the required BAT-AEL of 5.4 kg P ₂ O ₅ animal place/year by an estimation using manure analysis for total Phosphorous 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	Table S3.3 concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

BAT measure	Applicant compliance measure
phosphorous excretion	
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 on Farm Monitoring and Continual Improvement: <ul style="list-style-type: none"> • The staff will perform a daily boundary walk to check the surrounding area for high levels of odour by means of sniff testing. • Visual and nasal inspections of potentially odorous activities will be carried out.
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 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 > 30kg: 2.6 kg NH3/animal place/year on fully slated floor system. Frequent vacuum removal of slurry every 10 weeks and confirmed pit depth of <800m. Pigs > 30kg: 5.65 kg NH3/animal place/year on solid floor straw bedded.

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 30

The new BAT Conclusions include a set of BAT-AEL's 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.

All new bespoke applications issued after the 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)

The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 were made on the 20 February and came into force on 27 February 2013. These Regulations transpose the requirements of the IED.

This permit implements the requirements of the European Union Directive on Industrial Emissions.

Groundwater and soil monitoring

As a result of the requirements of the Industrial Emissions Directive, all permits are now required to contain a condition relating to protection of soil, groundwater and groundwater monitoring. However, the Environment Agency's H5 Guidance states **that it is only necessary for the operator to take samples** of soil or groundwater and measure levels of contamination where there is evidence that there is, or could be existing contamination and:

- The environmental risk assessment has identified that the same contaminants are a particular hazard; or
- The environmental risk assessment has identified that the same contaminants are a hazard and the risk assessment has identified a possible pathway to land or groundwater.

H5 Guidance further states that it is **not essential for the operator** to take samples of soil or groundwater and measure levels of contamination where:

- The environmental risk assessment identifies no hazards to land or groundwater; or
- Where the environmental risk assessment identifies only limited hazards to land and groundwater and there is no reason to believe that there could be historic contamination by those substances that present the hazard; or
- Where the environmental risk assessment identifies hazards to land and groundwater but there is evidence that there is no historic contamination by those substances that pose the hazard.

The site condition report (SCR) for Red House Farm (dated 14/11/23) 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:

- Odour emissions from feed selection
- Odour emissions from yard areas
- Odour emissions from housing
- Odour emissions from drinking water systems
- Odour emissions from ventilation
- Odour emissions from cleanout
- Odour emissions from carcase storage and disposal

- Odour emissions from feed storage
- Odour emissions from dirty water spreading
- Odour emissions from dust build up

There are eight sensitive receptors within 400m of the installation boundary; the nearest receptor is located approximately 60 metres to the northeast 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 dated 26/03/2024 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:

- Daily checks are carried out during welfare checks to identify high housekeeping odours and monitoring is carried out daily by means of "sniff testing".
- No milling or mixing feeds on site. Feed is reviewed by a professional nutritionist to ensure good performance.
- Feed delivery systems are sealed to minimise atmospheric dust. Dry feeds only used.
- Any spillage of feed around the bin is immediately swept up. Feed stores checked daily.
- Ventilation corresponds to animals' requirements to optimise the housed environment for the pigs and air quality conditions. Air quality is checked as part of minimum twice daily checks on stock.
- Shed 2 is a solid floor management system, therefore pens will be well bedded and scraped out on a regular basis. Bedding used is good quality to reduce odour emissions.
- All other houses are a fully slatted management system. Slurry is removed frequently and will operate 800mm slurry depth criteria. No manure allowed to accumulate above slats. Removal of slurry every 10 weeks.
- Carcasses are placed into lockable containers sited away from sensitive receptors. Weekly inspections for leaks which will be cleaned immediately.
- Carcasses incinerated on site in a licenced incinerator, sited away from sensitive receptors and ash is incorporated into FYM before application to land under a U15 waste exemption.
- The on-site manure store and associated lagoon are located centrally within the installation, and the slurry tank is situated to the West of the installation. In both cases, the stores are thereby screened from the nearest receptors by farm buildings and/or trees and hedges.
- Slurry store is covered by a rigid cover. The slurry lagoon is covered by a floating cover.
- Slurry is spread to operator controlled land following the NVZ regulations, FRfW and Defra Code of Good Agricultural Practice.
- Drainage system utilised to prevent ponding of water in yard areas. Dirty water is removed through sealed systems.
- Removing muck and cleaning out (C&D) occurs within the day of de-stock to prevent muck from drying on and requiring more time and water/energy to remove; and to allow maximum time for the building to dry before restocking. This prevents manures and other organic materials from becoming anaerobic and increasing odour levels.
- Wash water captured either under-slat or draining from the solid floor building to the adjacent midden and associated covered lagoon.

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.

Odour Management Plan Review

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.

Odour Modelling Review

We do not request odour modelling from intensive agriculture applications unless it is being used to check the efficacy of specific abatement techniques. In general, if odour modelling assessments are submitted in support of an EPR intensive agriculture installation application, we will not review it but focus on establishing whether odour management techniques represent Best Available Techniques and ensuring as appropriate the approval of a robust OMP.

In the case of the intensive agriculture sector, odour modelling uncertainties are excessively high - especially in the locations of interest where receptors are close to the farm. This is because, in close proximity, the ratios of the observed peak to mean odour concentrations are high rendering the benchmarks that are typically used for assessment unreliable. This is exacerbated by uncertainties in the model algorithms in the wake regions of buildings that can render predictions indicative only in such locations. Therefore, it is concluded not to make permitting decisions based on odour modelling predictions adjacent to intensive agriculture installations.

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:

- Feeding pigs
- Feed delivery & preparation
- Movement of livestock
- Clean down operations
- Manure & slurry operations
- Ventilation systems
- Deliveries and vehicle movement
- Noise from incinerator
- Standby generator testing
- Alarm systems

There are eight sensitive receptors within 400m of the installation boundary; the nearest receptor is located approximately 60 metres to the northeast of the installation boundary. The Operator has provided a noise management plan (NMP) as part of the Application supporting documentation.

The following key measures are contained in the Applicant's NMP dated 26/03/2024 to minimise noise pollution:

- Noise is assessed during daily inspections.
- Fans have automatic controllers set to maintain optimal environmental conditions.
- Fans maintained and cleaned regularly.
- Slurry tanker filling only when necessary and appropriate, with all equipment regularly serviced.
- Manure spreading has a high output rate to reduce working hours. Engines revs kept to a minimum, with all equipment regularly serviced.
- Delivery lorries are fitted with silencers. No idling of engines is permitted on site and signage to drive slowly.
- Vehicles are well maintained.
- Feed and fuel deliveries are time restricted (07.00- 17.00hrs).
- No milling or mixing of feed on site.
- Pigs fed ad-lib to avoid spikes in noise and pig activity.
- Staff when moving pigs are fully trained and advised of the need to keep noise to a minimum.
- Pigs maintained in stable batches. No shouting. Suitable and gentle handling aids in accordance with Red Tractor assurance standards – i.e. pig boards and rattle paddles or bags; no electric prods.
- Mucking out and washing operations are completed during normal working hours (07.00 - 17.00hrs).
- Maintenance/repairs are carried out during normal working hours (07.00 - 17.00hrs), excepting emergencies/breakdown.
- The standby generator is test run during normal working hours (07.00- 17.00hrs) and the tractor that is used to run the generator runs on an Eco setting to reduce noise.
- Incinerator is used intermittently and shielded from nearest receptors by pig shed to reduce noise.

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 Bio aerosols

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

There are three sensitive receptors within 100m of the installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 10 metres to the east of the installation boundary.

The Applicant has provided a dust and bio aerosol risk assessment dated 26/03/2024.

In addition, guidance on our website concludes that Applicants need to produce and submit a dust and bio aerosol 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 bio aerosol 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:

- Any spillages or leaks are immediately swept up by staff.
- No milling or mixing takes place on-site.
- Dry, pelleted diets are fed, binding dusty ingredients. Fat content is optimised to reduce dust emissions.
- Diets are delivered, via sealed systems, reducing potential for dust release to the atmosphere. Feed systems are fully enclosed through to feed trough.
- Feeding systems are checked by farm staff regularly to ensure no spillages.
- Use of suitable bedding materials, only applicable in shed 2. Bedding is chosen specifically to minimise dust and bioaerosols and is kept clean and dry.
- Ventilation fans are designed to mitigate risk of deposits of dust being made on the roofs (where applicable). Risk of contaminating roof water is thereby reduced. The roofs are monitored and cleaned where applicable to reduce contamination risk further. Visual checks for air quality within the houses is carried out at least three times daily.
- Stock inspections are carried out by trained staff daily.
- Removing muck and cleaning out occurs within the day of de-stock to prevent muck from drying on and requiring more time and water/energy to remove; and to allow maximum time for the building to dry before restocking. This prevents manures and other organic materials from becoming anaerobic and increasing odour levels.
- The slurry collection system works effectively to prevent ponding of slurry, which may release high levels of bioaerosols.
- Yard areas are properly maintained and kept clean. Drainage system in place to prevent pooling of water.
- The incinerator is an APHA approved facility that meets emissions requirements
- Incinerator ash is collected in sealed system and disposed of via incorporation into FYM and application to land, under U15 waste exemption approval.
- Storage and spreading follows NVZ regulations and Defra Code of Good Agricultural Practice; applications are co-ordinated with local weather forecasts and techniques are designed to reduce creation of bioaerosols.

The DMP will be reviewed every year from permit issue date, prior to any major changes to operations (to

ensure effectiveness) or following any complaint.

Conclusion

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

Ammonia

The Applicant has demonstrated that the housing will meet the relevant NH₃ BAT-AEL.

There is one Site of Special Scientific Interest (SSSI) located within 5 km of the installation. There is also one Local Wildlife Site (LWS) within 2 km of the installation. There are no European/Ramsar sites within 5km of the installation boundary.

Ammonia assessment – SSSI

The following trigger thresholds have been applied for assessment of SSSIs:

- If the process contribution (PC) is below 20% of the relevant critical level (CL_e) or critical load (CL_o) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required. An in-combination assessment will be completed to establish the combined PC for all existing farms identified within 5 km of the SSSI.

Initial screening using the ammonia screening tool version 4.6 dated 10/11/2023 has indicated that emissions from Red House Farm will only have a potential impact on SSSI with a precautionary CL_e of 1µg/m³ if they are within 2070 metres of the emission source.

Beyond 2070m 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 the SSSI is 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 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
Hoxne Brick Pitt	1627

No further assessment is necessary

Ammonia assessment – LWS.

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

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

Initial screening using ammonia screening tool version 4.6 dated 10/11/2023 has indicated that emissions from Red House Farm will only have a potential impact on the LWS site with a precautionary CL_e of 1µg/m³ if they are within 853 metres of the emission source.

Beyond 853m the PC is less than 1µg/m³ and therefore beyond this distance the PC is insignificant. In this case the LWS is beyond this distance (see table below) and therefore screen out of any further assessment.

Table 2 – LWS Assessment

Name of LWS	Distance from site (m)
Denham Churchyard	1484

No further assessment is necessary.

Standby Generator

The standby generator has a net thermal rated input of 0.65MWth 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 three-year period. The generator falls outside of the requirements of the Medium Combustion Plant Directive.

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 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>The UK Health Security Agency (UKHSA) Director of Public Health Health & Safety Executive Local Authority – Environmental Health</p> <p>No responses were received.</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 and baseline reporting under the Industrial Emissions Directive.
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
	We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.
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"> • Sheds 1 and 3 are ventilated by side fans. • Sheds 2 and 4 are naturally ventilated. • Shed 5 is ventilated by roof fans. • Sheds 1, 3, 4 and 5 have pigs on fully slatted floor systems with frequent vacuum slurry removal. • Shed 2 is solid floor and straw bedded. • 150t of manure is stored within the installation boundary with one slurry store with a rigid cover and a slurry lagoon with a floating cover. • Manure is spread to operator owned land. • There is a soakaway at the northern end of Shed 1 taking uncontaminated water from roof and yard areas associated with Shed 1. Uncontaminated water from roof areas (via gutters and downpipes) from sheds 2, 3, 4 & 5 and yard areas (via drain inlets and pipework) ultimately drains into the nearby drainage ditch located on the western boundary of the installation. Dirty water is directed to the slurry store. • Carcasses incinerated on site in a licenced incinerator, sited away from sensitive receptors and ash is incorporated into FYM before application to land under a U15 waste exemption. • Slurry is spread to operator controlled land following the NVZ regulations, FRfW and Defra Code of Good Agricultural Practice.
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>

Aspect considered	Decision
	See key issues section.
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.
Emission limits	ELVs and equivalent parameters or technical measures based on BAT have been set for the following substances: <ul style="list-style-type: none"> • Ammonia • Nitrogen • Phosphorous See key issues section.
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 21/02/17. See the key issues section.
Reporting	We have specified reporting in the permit. We made these decisions in order to ensure compliance with Intensive Farming BAT conclusions document dated 21/02/17.
Operator competence	
Management system	There is no known reason to consider that the Operator will not have the management system to enable it to comply with the permit conditions. The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.
Relevant convictions	The Case Management System been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The Operator satisfies the criteria in our guidance on operator competence.
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. 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

Aspect considered	Decision
	<p>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>