

# Permitting decisions

## Variation

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We have decided to grant the variation for Longbelt Farm Poultry Unit operated by Noble Foods Limited.

The variation number is EPR/YP3432MK/V010.

This variation is to reduce the number of laying birds from 916,585 to 505,080 places, and modify poultry houses 2 and 3, changing the housing system from vertical tiered cages with manure belt and forced air drying to a non-caged system, multi-tier with twice weekly belt removal using heat exchangers for forced air drying of manure.

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

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

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

# Key issues of the decision

## New Intensive Rearing of Poultry or Pigs BAT Conclusions document

There is no new housing as a result of this variation. A full assessment of compliance with the relevant BAT conclusions was completed for variation EPR/YP3432MK/V007, issued on 18/11/2020.

The operator has submitted a revised BAT compliance document in support of this variation application and confirmed they meet all relevant BAT-AELs and narrative BAT.

## Industrial Emissions Directive (IED)

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

### Odour

This variation does not increase the risk of odour from the site and there has been no history of odour complaints due to the site, so a revised odour management plan was not requested.

### Noise

This variation does not increase the risk of noise from the site and there has been no history of noise complaints due to the site, so a revised noise management plan was not requested.

### Dust and bioaerosols

This variation does not increase the risk of dust and as there has been no history of dust complaints due to the site a revised dust management plan was not requested.

### Standby generators

There are two standby generators located on the installation, for use in the event of mains power failure, both with a net thermal rated input of 3.584MWth. The generators will not be tested for more than 52 hours per annum and will not be used for more than 500 hours per annum (emergency use and testing), averaged over a 3-year period. As the individual generators each have a thermal input capacity exceeding 1 MWth, they fall within the requirements of the Medium Combustion Plant Directive and monitoring requirements have been added to the Permit in accordance with our guidance.

### Refurbishment of poultry houses 2 and 3

As part of the variation, the operator is refurbishing poultry houses 2 and 3, changing the housing system from a vertical tiered cage system, with manure belt and forced air drying, to a non-caged system, multi-tier with twice weekly belt removal, using heat exchangers for forced air drying of manure. The operator submitted a revised 'Bird forecast' document on 26/11/2024, detailing the timescales for the refurbishment work and associated bird numbers at each stage of this work.

A site-specific emission factor (EF) of 0.068 kg NH<sub>3</sub>/animal place/year was agreed for variation EPR/YP3432MK/V007; it was agreed this EF was also appropriate for this variation. This EF is higher than the EF for layers in a vertical tiered caged system, 0.048 kg NH<sub>3</sub>/animal place/year. A review of ammonia emissions has been completed for the period whilst the refurbishment work is being carried out, and the proposed reduction in bird numbers offsets the higher EF. We have concluded that at no time during this work will ammonia emissions exceed the current baseline.

Improvement condition IC1 has been included in the permit with reference to this work (see below).

## Heat exchangers

Heat exchangers will be fitted to poultry houses 1 to 3, as part of the refurbishment. The operator is proposing to install a bund next to each house to capture the condensate and pump it to an IBC at the rear of the sheds (north side of the building, manure store side), awaiting removal and disposal off-site by a licensed contractor. The timescales for completion of this work are 28/02/25 for house 2 and 31/03/25 for houses 1 and 3.

Improvement conditions IC2a and b have been included in the permit with reference to this work (see below).

## Improvement programme

Table S1.3 of the Permit has been amended to remove old Improvement Conditions, IC1 to IC4, which were marked as complete under variation EPR/YP3432MK/V007.

A new Improvement Condition, IC1, has been added to Table S1.3 of the Permit to ensure the proposed changes to poultry houses 2 and 3 are completed in-line with the revised 'Bird forecast' document, submitted on 26/11/2024. As part of this variation, the Operator is refurbishing poultry houses 2 and 3, changing the housing system from a caged system to a non-caged, multi-tier system. IC1 requires the Operator to submit a written report providing evidence this work has been completed, in accordance with the proposals and timeframes.

New Improvement Conditions IC2a and b have been added to Table S1.3 of the Permit, requiring the operator to submit a written report for approval, containing evidence that the measures to capture, and dispose of, condensate from the heat exchangers have been completed as detailed in the proposals submitted on 19/12/2024, in accordance with guidance.

## Pre-operational measures

Table S1.4 has been removed from the Permit. Pre-operational measures PO1 and PO2, were marked as complete under variation EPR/YP3432MK/V007.

## Ammonia

There is one Special Area of Conservation (SAC) located within 5 kilometres of the installation. There are five Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also 11 Local Wildlife Sites (LWSs), 2 Ancient Woodlands (AWs), and 1 Local Nature Reserves (LNR) within 2 km of the installation.

The operator's proposals to refurbish poultry houses 2 and 3, changing the housing system from a vertical tiered cage system, with manure belt and forced air drying, to a non-caged system, multi-tier with twice weekly belt removal, and reduce bird numbers from 916,585 to 505,080 places, results in a reduction in ammonia emissions at each of the two stages of the refurbishment. This can be demonstrated via a simple mass balance calculation:

### Current permitted situation

House 1 –  $105,102 * 0.068^{[1]}$  Kg NH<sub>3</sub>/bird/year = 7,146.94 Kg NH<sub>3</sub>

Houses 2 – 6 –  $811,483 * 0.035^{[2]}$  Kg NH<sub>3</sub>/bird/year = 28,401.90 Kg NH<sub>3</sub>

Manure storage –  $600t * 2.38^{[2]}$  Kg NH<sub>3</sub> / tonne = 1,428 Kg NH<sub>3</sub>

**Total emissions = 36,976.84 Kg NH<sub>3</sub>**

### Stage 2 proposal (refurbishment of house 2)

Sheds 1 and 2 –  $208,000 * 0.068^{[1]}$  Kg NH<sub>3</sub>/bird/year = 14,144 Kg NH<sub>3</sub>

Sheds 3 to 6 –  $350,215 * 0.048^{[3]}$  Kg NH<sub>3</sub>/bird/year = 16,810 Kg NH<sub>3</sub>

Manure storage –  $600t * 2.68^{[3]}$  Kg NH<sub>3</sub> / tonne = 1,608 Kg NH<sub>3</sub>

**Total emissions = 32,562 Kg NH<sub>3</sub>**

Stage 3 proposal (refurbishment of house 3)

Sheds 1 to 3 –  $328,000 * 0.068^{[1]}$  Kg NH3/bird/year = 22,304 Kg NH3

Sheds 4 to 6 –  $177,080 * 0.048^{[3]}$  Kg NH3/bird/year = 8,499.84 Kg NH3

Manure storage –  $600t * 2.68^{[3]}$  Kg NH3 / tonne = 1,608 Kg NH3

**Total emissions = 32,411.84 Kg NH3**

Notes

[1] Site specific emission factor (EF) agreed for variation EPR/YP3432MK/V007

[2] Based on previous EF

[3] Based on revised EF published 29/12/24

As such, we are proceeding with the permit variation on an emissions reduction basis.

No further assessment is required.

# Decision checklist

Aspect considered	Decision
<b>Receipt of application</b>	
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.
<b>The facility</b>	
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>
<b>The site</b>	
Extent of the site of the facility	The Operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Biodiversity, heritage, landscape and nature conservation	<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> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p> <p>See <a href="#">key issues</a> section.</p>
<b>Environmental risk assessment</b>	
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>
<b>Operating techniques</b>	
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>
<b>Permit conditions</b>	
Updating permit conditions during consolidation	We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of

Aspect considered	Decision
	protection as those in the previous permit.
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.
Improvement programme	<p>Based on the information in the application, we consider that we need to impose an improvement programme.</p> <p>We have imposed an improvement programme to ensure that the proposed changes are completed within the agreed timescale.</p> <p>See <a href="#">key issues</a> section.</p>
Emission limits	There has been no change to emission limits as part of this variation.
Monitoring	Monitoring requirements in line with the Medium Combustion Plant Directive have been added to the Permit for the two standby generators.
Reporting	Reporting requirements have been added to the Permit to ensure compliance with the Medium Combustion Plant Directive.
<b>Operator competence</b>	
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.
<b>Growth Duty</b>	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>