Permitting Decisions - Bespoke Permit

We have decided to grant the permit for **Shucknall Poultry Farm** operated by **Freemans of Newent Limited**.

The permit number is **EPR/YP3221SG**.

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.

This permit is for a broiler farm installation with **130,000 broilers** places in four poultry houses with a carcass incinerator directly associated activity.

This farm was historically an under 40,000 broiler breeder facility.

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. The introductory note summarises what the permit covers.

Key issues of the decision

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.

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 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.

We sent out a not duly made request requiring the Applicant to confirm that the new installation complies in full with all the BAT Conclusions measures.

The Applicant has confirmed their compliance with all BAT conditions for the new installation in their BAT document received 27/08/2024, 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 has confirmed it will demonstrate that the installation can achieve levels of nitrogen excretion below the required BAT AEL of **0.6 kg N/animal place/year and** will use BAT 3a technique reducing the crude protein content.

BAT 4 Nutritional management - Phosphorus excretion

The Applicant has confirmed it will demonstrate that the installation can achieve levels of phosphorus excretion below the required BAT AEL of **0.25 kg P_2O_5/animal place/year** and will use BAT 4a technique reducing the crude protein content.

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 manure analysis 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 factors.

BAT 26 Monitoring of emissions and process parameters - Odour emissions

The Applicant has confirmed the following odour monitoring will apply:

- Daily odour checks carried out daily by staff, sniff testing weekly at the site boundary by persons not directly involved with the poultry. Full details in odour management plan.

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 32 Ammonia emissions from poultry houses - Broilers

The BAT AEL to be complied with is **0.08 kg NH_3/animal place/year**. The Applicant will meet this as the emission factor for broilers is 0.024 kg NH_3/animal place/year.

The installation does not include an air abatement treatment facility; hence the standard emission factor complies with 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 **Shucknall Poultry Farm (received 08/08/2024)** 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 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.

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 400 m 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:

- Main broiler rearing
- Feed delivery and storage.
- Poultry house extract ventilation
- Litter management
- Carcass storage and disposal
- Poultry house clean out
- Washing operations
- Fugitive emissions
- Dirty water management

Odour Management Plan Review

There are seventeen sensitive receptors located within 400m of the installation boundary. These are all listed in the OMP.

The closest is approximately 63 metres from the installation boundary to the southwest of the installation.

It should be noted that there have been no odour complaints received by us linked to this farm when operating with same four poultry houses as under threshold broiler breeder farm.

The sensitive receptors that have been considered under odour and noise, does not include the operator's property and other people associated with the farm operations as odour and noise are amenity issues.

The Operator has provided an OMP (submitted 26/08/2024) 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) or Pig Industry Good Practice Checklist (August 2013) as well as the site-specific circumstances at the Installation. 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.

As there is a receptor within 100m, The Applicant has added an additional statement linked to if persistent odour complaints received, they will action additional measures in compliance with Environment Agency review including but not limited to stock numbers reduction.

On the basis of there been no odour complaints we have concluded that the level of OMP provided is satisfactory.

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 measures. 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.

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The OMP also provides a suitable procedure in the event that complaints are made to the Operator. The OMP is required to be reviewed at least every year (as committed to in the OMP) and/or after a complaint is received, and/or after any changes to operations at the installation, whichever is the sooner. 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 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 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.

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”.

Under section 3.4 of the guidance, a Noise Management Plan (NMP) 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 a NMP 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 noise emissions.

There are sensitive receptors within 400 metres of the installation boundary, these are all listed in the NMP and summarised in Odour Management section of this document above.

The Operator has provided a NMP as part of the application supporting documentation, and further details are provided below.

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

- Ventilation Fans
- Feed Deliveries
- Feeding Systems
- Fuel Deliveries
- Alarms Systems
- Bird Catching
- Clean out Operations.
- Maintenance and Repair Work
- Bird Set up and Placement.
- Standby Generator testing

<u>Noise Management Plan Review</u>

The final NMP provided by applicant and assessed below was received as part of the application supporting documentation on 08/08/2024.

The NMP provides a suitable procedure in the event of complaints in relation to noise. The NMP is required to be reviewed at least every year (as committed to in the NMP), however the Operator has confirmed that it will be reviewed if a complaint is received, whichever is sooner. The NMP includes noise control measures and procedural measures.

It should also be noted that for existing farms, having consulted with the Local Authority and our local area compliance team, there are no known historical noise complaints from the under-threshold farm.

We have included our standard noise and vibration condition, condition 3.4.1, in the Permit, which requires that 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 NMP (which is captured through condition 2.3 and Table S1.2 of the Permit), to prevent or where that is not practicable to minimise the noise and vibration.

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

Conclusion

We have assessed the NMP 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 final dust and bioaerosol management plan provided by the applicant and assessed below was received on 01/04/2025.

There are two sensitive receptors within 100m of the installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 5 metres to the north of the 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. litter and feed management/delivery procedures) all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed measures in their dust and bioaerosol management plan to reduce dust (which will inherently reduce bioaerosols) for the following potential risks:

- Feed delivery and storage.
- Ventilation and heating
- Systems
- Litter management
- Carcase disposal
- House clean out.
- Used litter.
- Fugitive emissions

The Applicant has confirmed hedges on eastern side of installation to minimise impact of dust emissions from installation on closest receptor to the east of the installation.

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 is one standby generator with a net thermal rated input of 0.242 MWth and it will not be tested more than 50 hours per year or operated (including testing) for more than 500 hours per year (averaged over 3 years) for emergency use only including testing , as a temporary power source if there is a mains power failure.

Ammonia

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

We have updated the ammonia impact assessment (31/03/2025) to reflect latest ammonia emission factor for broilers of 0.024 kg NH_3/animal place/year.

There are two Special Areas of Conservation (SAC), no Special Protection Areas (SPA) and no Ramsar sites located within 5 kilometres of the installation boundary. There are six Sites of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There are also two Local Wildlife Sites (LWS) and two Ancient Woodlands (AW) within 2 km of the installation boundary.

Ammonia assessment – SAC

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 (CLe) or critical load (CLo) 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 (CLe) or critical loads (CLo) 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.

Initial screening using ammonia screening tool version 4.6 (dated 31/03/2025) has indicated that emissions from Shucknall Poultry Farm will only have a potential impact on the River Wye SAC (England) and River Wye SAC (Wales) with a precautionary CLe of 1 µg/m^3 if they are within **2,893 metres** of the emission source.

Beyond **2,893 m** the PC is less than 0.04 µg/m^3 (i.e. less than 4% of the precautionary 1 µg/m^3 CLe) and therefore beyond this distance the PC is insignificant. In this case all European sites listed below are beyond this distance (see table below) and therefore screens out of any further assessment.

Where the precautionary level of 1µg/m^3 is used and the PC is assessed to be less than 4%, the site automatically screens out as insignificant and no further assessment of CLo is necessary. In this case the 1 µg/m^3 level used has not been

confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely significant effect.

Table 1 – SAC Assessment

Name of SAC	Distance from site (m)
River Wye SAC (England)	4,275
River Wye SAC (Wales)	4,269

Hence 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.

Initial screening using the ammonia screening tool version 4.6 (dated 31/03/2025) has indicated that emissions from Shucknall Poultry Farm will only have a potential impact on SSSIs with a precautionary CLe of 1 μg/m^3 if they are within **1,159 metres** of the emission source.

Beyond **1,159 m** the PC is less than 0.2 μg/m^3 (i.e. less than 20% of the precautionary 1 μg/m^3 CLe) and therefore beyond this distance the PC is insignificant. In this case all SSSIs are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of 1 μg/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 μg/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 2 – SSSI Assessment

Name of SSSI	Distance from site (m)
PERTON ROADSIDE SECTION AND QUARRY	2,088
LITTLE HILL	3,905
HAUGH WOOD	3,925
LUGG AND HAMPTON MEADOWS	4,172
RIVER LUGG	4,275
WOODSHUTS WOOD	4,439

Therefore, no further assessment is required.

Ammonia assessment – LWS / AW

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

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

Initial screening using ammonia screening tool version 4.6 (dated 31/03/2025) has indicated that emissions from Shucknall Poultry Farm will only have a potential impact on the LWS / AW with a precautionary CLe of 1 µg/m^3 if they are within **468 metres** of the emission source.

Beyond **468 m** the PC is less than 1 µg/m^3 and therefore beyond this distance the PC is insignificant. In this case the following LWS / AWs are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 3 LWS / AW Assessment

Site	Distance from site (m)
River Frome LWS	709
WESTHIDE WOOD AW	471
Ennox Orles AW	1,557

Therefore, no further assessment is required.

Woodland on Shucknall LWS assessment

Detailed Modelling Assessment

The Applicant has provided dispersion modelling report and input files for completing this assessment. The modelling report is dated 14/03/2025.

Detailed modelling provided by the Applicant has been audited in detail by our Air Quality Modelling and Assessment Unit (AQMAU) and we have confidence that we can agree with the report conclusions.

The modelling report has determined that the PCs on the LWS listed above for ammonia emissions, nitrogen deposition and acid deposition from the application site are under the 100% significance threshold and can be screened out as having no likely significant effect. See results below.

The following table show the worst-case Process Contribution impact for each habitat sites across the range of the receptors modelled.

Table 4 - Ammonia emissions

Site	Critical level ammonia µg/m³	Predicted PC µg/m³	PC % of critical level
Woodland on Shucknall LWS	1*	0.629	62.9

*CLe 1 applied as protected lichen or bryophytes species were found when checking Easimap layer.

Table 5 – Nitrogen deposition

Site	Critical load kg N/ha/yr *	Predicted PC kg N/ha/yr	PC % of critical load
Woodland on Shucknall LWS	10	4.90	49.0

* Critical load values taken from APIS website (www.apis.ac.uk) - [31/03/2025]

In the absence of specific acid deposition modelling the following PCs were calculated by dividing Nitrogen deposition figures by 14.

Table 6 – Acid deposition

Site	Critical load keq/ha/yr *	Predicted PC keq/ha/yr	PC % of critical load
Woodland on Shucknall LWS	1.61	0.35	21.7

* Critical load values taken from APIS website (www.apis.ac.uk) - [31/03/2025]

No further assessment is required.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

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:

- Herefordshire Council Environmental Protection Department.
- UK HSA
- Department of Public Health
- Health and Safety Executive

The comments and our responses are summarised in the consultation responses section.

Operator

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 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 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.

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.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.
See Ammonia Section in the Key Issues above for more details.

We have sent a HRA1 for information only to Natural England and NRW linked to River Wye SAC England and River Wye SAC Wales as these European sites are within designated 5 km of the installation.

The decision was taken in accordance with our guidance.

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.

We have approved the odour management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The Applicant should keep the plans under constant review and revise them annually or if necessary, sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance ‘Control and monitor emissions for your environmental permit’.

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.

We have approved the noise management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The Applicant should keep the plans under constant review and revise them annually or if necessary, sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance ‘Control and monitor emissions for your environmental permit’.

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.

We have approved the dust and bioaerosol management plan as we consider it to be appropriate measures based on information available to us at the current time. The

applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary, sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit.

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

Emission limits

Emission Limit Values (ELVs) based on Best Available Techniques (BAT) have been added for the following substances:

- Ammonia emissions
- Nitrogen in manure excretion
- Phosphorus in manure excretion.

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.

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.

Reporting

We have specified reporting in the permit for compliance with 2017 Intensive Farming BAT Conclusions, using the methods detailed and to the frequencies specified.

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.

Previous performance

We have checked our systems to ensure that all relevant convictions have been declared.

No relevant convictions were found.

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

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 the way in which we have considered these in the determination process.

The consultation commenced on 13/09/2024 and ended on 11/10/2024.

Responses from organisations listed in the consultation section.

Response received from UKHSA (response date 25/09/2024).

Brief summary of issues raised:

The response summarised key environmental issues for this application (dust, bioaerosols and ammonia atmospheric emissions).

Specific recommendations included:

- Dust Management Plan: concern over local receptors and relevant control in place.
- Dirty Water Tank Management: concern over correct management and prevention of overfilling.
- Accident Management Plan: concerns over sufficient details in place for example linked to fires.
- Complaints Procedure: ensuring correct complaints procedure in place.

Actions taken:

- Dust Management Plan: revised plan submitted with specific controls linked to closest receptor. We are satisfied that this provides adequate controls to minimise dust emissions.
- Dirty Water Tank Management: Additional Information Response provided dated 01/04/2025 gives adequate details of how installation will be operated to not overfill dirty water tankage.
- Accident Management Plan: The Applicant has provided an accident management plan and Emergency Plan covering actions to minimise impact of exceptional incidents including fires.
- Complaints Procedure: suitable complaints procedure in place for odour. For pests and flies we are satisfied that adequate controls are in place and condition 3.6.2 allows for provision of a pest's management plan with a complaints procedure if there are any relevant complaints or concerns.

Response received from Local Council (response date 21/10/2024).

Brief summary of issues raised:

We are satisfied that this provides adequate controls to minimise dust emissions Specific comments include:

- Dust emissions: concerns linked to installation dust emissions and impacts on local residents.
- Scrubber: concern linked to lack of scrubber on poultry house ventilation and associated dust emissions.
- Odour pollution: concerns linked to installation odour pollution risk and impacts on local receptors.

Actions taken.

- Dust emissions: The Dust and Bioaerosol Management Plan has been provided. We are satisfied that this provides adequate controls to minimise dust emissions.
- Scrubber: There is no mandatory BAT requirement for scrubbers linked to dust emissions from poultry house vents under the 2017 Intensive Farming BAT conclusion document. We are satisfied that adequate controls are in place to minimise dust emissions from the installation.
- Odour: The Applicant has provided a robust Odour Management Plan covering both normal operation and poultry house clean out. We are satisfied that this provided adequate controls to minimise odour pollution linked to this installation.

Conclusion

There were no other consultee responses or responses from the general public or other organisations as a result of this consultation.