Permitting Decisions - Variation

We have decided to grant the variation for Wheaton Aston Farm Pig Unit operated by Belmont Farms Limited.

The variation number is EPR/BP3709LB/V003 and the partial surrender number is EPR/BP3709LB/S004.

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.

The variation and partial surrender changes are listed in full within the permit introductory note, but include the addition of two new slurry stores, with a change in site layout and pig numbers. The two circular concrete slurry stores should be built within 6 months of this notice being issued.

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

Partial surrender

We have agreed to the partial surrender to reduce the installation boundary and to remove the redundant pig houses from the north of the site. These buildings were washed out and cleaned to ensure risk of pollution was minimised. The buildings have been removed and this part of the site is no longer part of the pig unit operation. Slurry lagoon 2 will remain within the installation boundary as they need to complete construction of the new tanks to replace it, this lagoon can be removed with a future partial surrender. Slurry lagoon 1 remains within the installation boundary long-term.

The site condition report shows there are no known pollution incidents and there are no visual signs of any pollution. We are satisfied that the necessary measures have been taken to avoid a pollution risk to a satisfactory state for the partial surrender.

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.

All new and redeveloped housing applied for in a permit variation must be compliant with the BAT Conclusions from the first day of operation. The BAT compliance of any existing housing 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. Any existing housing that undergoes redevelopment with changes to housing location or expansion beyond the 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 pig housing in their document reference BAT Compliance document received 12/11/2024, 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 4.0 kg N/animal place/year for weaners (rearing of pigs up to 30kg), 13.0 kg N/animal place/year for fattening pigs (production pigs over 30kg), 30.0 kg N/animal place/year for farrowing sows (including suckling piglets) and mating and gestating sows, and will use BAT 3b multiphase feeding with a diet formulation adapted to the specific requirements of the production period 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 2.2 kg P_2O_5/animal place/year weaners (rearing of pigs up to 30kg), 5.4 kg P_2O_5/animal place/year for fattening pigs (production pigs over 30kg), 15 kg P_2O_5/animal place/year for farrowing sows (including suckling piglets) and mating and gestating sows, and will use BAT 4a multiphase feeding with a diet formulation adapted to the specific requirements of the production period 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 using a mass balance calculation 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 factors.

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:

• Visual (and nasal) inspections of potentially odorous activities will be carried out daily by farm staff, with a walk around the west of the unit closest to the nearest sensitive receptors.

• 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 increased odour is detected this will be recorded in the complaints form and investigated as per the complaint's procedure.

• In the event of odour complaints being received the Operator will notify the Environment Agency and make a record of the complaint. The Operator will undertake the necessary odour contingency as required.

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 NH_3/animal place/year.
- Pigs > 30kg: 2.6 kg NH_3/animal place/year.
- Sows: 2.7 kg NH_3/animal place/year on fully slatted floor (FSF).
- Sows: 5.2 kg NH_3/animal place/year on solid floor straw system.
- Farrowers: 5.6 kg NH_3/animal place/year.

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.

Detailed assessment of BAT AELs

Pig housing

The emission factors for Pigs 7 – 30kg is 0.443 NH_3/animal place/year, for farrowers is 4.62 NH_3/animal place/year and sows on straw is 3.29 NH_3/animal place/year, these are all below the BAT AELs so will comply.

For the production pigs over 30kg the emission factor is 2.813 NH_3/animal place/year, which is more than the 2.6 NH_3/animal place/year BAT AEL. The Applicant has demonstrated that with 20% crude protein reduction the standard emission factor can be reduced to 2.250 NH_3/animal place/year which will comply with the BAT AEL.

For the sows on FSF the emission factor is 2.94 NH_3/animal place/year, which is more than the 2.7 NH_3/animal place/year BAT AEL. The Applicant has demonstrated that with 9.7% crude protein reduction the standard emission factor can be reduced to 2.655 NH_3/animal place/year which will comply 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 Wheaton Ashton Farm Pig Unit dated 09/07/2024, 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 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:

- Effects of diet on odour & ammonia emissions
- Manure storage
- Slurry separator
- Slurry storage
- Cleanliness of yard areas
- All housing and management
- Spreading slurry
- Animal carcasses
- AD and CHP unit
- Feed storage and feed distribution
- Dust
- Cleaning out
- Unexpected problems/flooding/disease/loss of power/slurry storage

Odour Management Plan Review

There are twenty two 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. Residential property – approximately 25m west of the Installation boundary.

2. Residential property – approximately 28m west of the Installation boundary.

3. Residential property – approximately 32m west of the Installation boundary.

4. Residential property – approximately 41m west of the Installation boundary.

5. Residential property – approximately 52m west of the Installation boundary.

6. Residential property – approximately 121m southwest of the Installation boundary.

7. Residential property – approximately 121m southwest of the Installation boundary.

8. Residential property – approximately 143m west of the Installation boundary.

9. Residential property – approximately 235m southeast of the Installation boundary.

10. Residential property – approximately 235m southwest of the Installation boundary.

11. Residential property – approximately 310m north of the Installation boundary.

12. Residential property – approximately 313m southeast of the Installation boundary.

13. Residential property – approximately 314m southeast of the Installation boundary.

14. Residential property – approximately 317m southeast of the Installation boundary.

15. Residential property – approximately 320m north of the Installation boundary.

16. Residential property – approximately 340m south of the Installation boundary.

17. Residential property – approximately 340m south of the Installation boundary.

18. Residential property – approximately 345m southeast of the Installation boundary.

19. Residential property – approximately 349m southeast of the Installation boundary.

20. Residential property – approximately 353m north of the Installation boundary.

21. Residential property – approximately 368m southeast of the Installation boundary.

22. Residential property – approximately 375m southwest of the Installation boundary.

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 17/06/2025) 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.

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.

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 odour complaints at this site.

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 as stated under the 'Odour' section. 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:

- Feeding pigs
- Feed delivery
- Pig moving
- Pig loading, in and out
- Delivery of supplies and materials
- Slurry tanker and filling and emptying
- Vehicles operating within installation boundaries
- Ventilation fans
- AD biogas plant
- Unexpected problems/flooding/loss of fuel/staff absences
- Site infrastructure
- Standby generator

Noise Management Plan Review

The final NMP provided by applicant and assessed below was received as part of the application supporting documentation on 25/06/2025.

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 at this site.

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 workers' 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 17/06/2025.

There are five sensitive receptors within 100m of the installation boundary which are all associated with Belmont Farms, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 25 metres to the west of the installation boundary, and approximately 98 metres from the nearest pig house.

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:

- Pig Feed
- Pig bedding
- Pig ventilation
- Pig house and cleaning
- AD and CHP unit

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 0.2 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 as a temporary power source if there is a mains power failure.

Ammonia

The Applicant has demonstrated that the housing will meet the relevant NH_3 BAT AEL.

There is one Special Area of Conservation (SAC) site located within 5 kilometres (km) of the installation boundary. There three Sites of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There are also twelve Local Wildlife Sites (LWS), Ancient Woodlands (AW) and National Nature Reserves (LNR) 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.

Following the receipt of an application, the determination may require an additional, more detailed assessment of the installation's impact on the SAC including, if appropriate, consideration of impacts of other local plans, projects, and non-permitted farms which could act in-combination. It may also include consideration of the condition of the SAC and the background concentrations at the sites for ammonia, nitrogen deposition and acid deposition. This potential additional assessment is required to take into consideration recent case law.

The trigger level for completing the additional assessment during determination will be if the process contribution exceeds 1% of the critical level/loads. Following

further detailed assessment, we may require the applicant to ensure ammonia emissions do not result in a process contribution at any SAC that exceeds 1%. We will contact the Applicant when duly making if we require any additional information to assess whether to issue or refuse the variation.

Screening using detailed modelling

Further to this the detailed modelling provided by the applicant ('A report on the Modelling of the Dispersion and Deposition of Ammonia from the Pig Rearing at Wheaton Aston Farm Pig Unit, Little Onn, near Church Easton in Staffordshire', dated 14/02/2025) shows a decrease in impact between the baseline EPR/KP3537MX/V002 and the proposed linked to this variation application at Mottey Meadows SAC, using the worst case highest figures from the modelling report.

The existing facility is permitted to house 8,450 pigs (a mixture of sows, production pigs over 30kg and pigs up to 30kg) across 24 naturally ventilated buildings with either solid straw or fully slatted floors, as well as two slurry lagoons with floating covers. The baseline scenario for this assessment was audited by our air quality modelling team, using both old and new emission factors and the lower baseline PCs were used.

This variation involves: reducing the total number of pigs at the facility; removing fifteen of the existing buildings; changing the flooring and ventilation types of some of the nine remaining buildings; and installing two slurry tanks. There will be a maximum of 4,001 pigs at the proposed facility, including 2,296 sows, 1,200 production pigs over 30kg, 500 pigs up to 30kg and five boars. The slurry tanks will have solid covers, one slurry lagoon will have a floating LECA ball cover, and the other slurry lagoon will have a low-tech cover. The slurry lagoon with the low-tech cover is going to be decommissioned with this variation once the two new slurry tanks have been installed, but it has been included for the proposal as a worst case scenario.

The reduction in emissions from the installation, as described above, is demonstrated by a reduction in PCs as follows:

Table 1 – Mottey Meadows SAC

Mottey Meadows SAC	**Process contribution Ammonia (µg/m^3)**	**Process contribution Nitrogen deposition (kg N/ha/yr)**	**Process contribution acid deposition (keq/ha/yr)** [2]
Current permit [1]	0.922	4.787	0.3419
Proposal [1]	0.383	1.989	0.1421
Percentage reduction	58.46%	58.45%	58.44%

Notes

[1] These figures are taken from the detailed modelling report directly. To check the validity of the applicant's prediction they have been audited by our air quality modelling team using ADMS (version 6) based on the consultants modelling files and including sensitivity analysis as follows:

We have audited the modelling and completed some sensitivity testing and have confirmed for the proposed scenario, sensitivity to the current (new) emission factor results in lower predictions than the consultant's with the old emission factors, however this does not change the conclusions. For both the baseline and proposed scenarios, our checks indicate that the consultant's numerical predictions with the old emission factors are a reasonable worst-case.

[2] for acid deposition based on 1/14th of the maximum nitrogen deposition PC provided in Tables 6a and 6b of the ammonia modelling report ('A report on the Modelling of the Dispersion and Deposition of Ammonia from the Pig Rearing at Wheaton Aston Farm Pig Unit, Little Onn, near Church Easton in Staffordshire', dated 14/02/2025).

Comparison conclusions:

Detailed modelling provided by the Applicant has been audited by our air quality modelling team. We have confidence that we can agree with the report conclusions, our checks indicate that the consultants numerical predictions with the old emission factors are a reasonable worst case.

On this basis we agree that the variation can be issued based on a reduction of impacts on this conservation site.

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 18/07/2025) has indicated that emissions from Wheaton Aston Farm Pig Unit will only have a potential impact on SSSIs with a precautionary CLe of 1 μg/m^3 if they are within 2,754 metres of the emission source.

Beyond 2,754 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 the following 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)
Belvide Reservoir SSSI	4,623
Allimore Green Common SSSI	4,734

Mottey Meadow SSSI - ammonia

The detailed modelling provided by the applicant ('A report on the Modelling of the Dispersion and Deposition of Ammonia from the Pig Rearing at Wheaton Aston Farm Pig Unit, Little Onn, near Church Easton in Staffordshire', dated 14/02/2025) shows a decrease in impact between the baseline EPR/KP3537MX/V002 and the proposed linked to this variation application at Mottey Meadows SSSI, using the worst case highest figures from the modelling report.

The reduction in emissions from the installation, is demonstrated by a reduction in PC for ammonia as follows (see SAC section above for details on the baseline and proposed scenarios):

Table 3 – Mottey Meadows SSSI ammonia

Mottey Meadows SSSI	Process contribution Ammonia (µg/m^3)
Current permit [1]	0.922
Proposal [1]	0.383
Percentage reduction	58.46%

Notes

[1] These figures are taken from the detailed modelling report directly. To check the validity of the applicant's prediction they have been audited by our air quality modelling team using ADMS (version 6) based on the consultants modelling files and including sensitivity analysis as follows:

We have audited the modelling and completed some sensitivity testing and have confirmed for the proposed scenario, sensitivity to the current (new) emission factor results in lower predictions than the consultant's with the old emission factors, however this does not change the conclusions. For both the baseline and proposed scenarios, our checks indicate that the consultant's numerical predictions with the old emission factors are a reasonable worst-case.

Comparison conclusions:

Detailed modelling provided by the Applicant has been audited in detail by our air quality modelling team. We have confidence that we can agree with the report conclusions, our checks indicate that the consultants numerical predictions with the old emission factors are a reasonable worst case.

On this basis we agree that the variation can be issued based on a reduction of impacts on this conservation site.

Mottey Meadow SSSI - nitrogen deposition

The detailed modelling ('A report on the Modelling of the Dispersion and Deposition of Ammonia from the Pig Rearing at Wheaton Aston Farm Pig Unit, Little Onn, near Church Easton in Staffordshire', dated 14/02/2025) has indicated that the PC for Mottey Meadows SSSI is predicted to be less than 20% of the CLe for nitrogen deposition therefore it is possible to conclude no damage.

The ammonia modelling assessment has been audited in detail by our air quality modelling team and the consultants conclusions for ecological sites can be used for permit determination.

Table 4 – Nitrogen deposition

Site	Critical load kg N/ha/yr *	PC kg N/ha/yr	PC % critical load
Mottey Meadows SSSI	10	1.989	19.89

* Critical load values taken from APIS website (www.apis.ac.uk) – 11/06/2025

Mottey Meadow SSSI - acid deposition

Screening using the ammonia screening tool version 4.6 (dated 18/07/2025) has indicated that the PC for Mottey Meadows SSSI is predicted to be less than 20% of the CLe for nitrogen deposition and acid deposition therefore it is possible to conclude no damage. The results of the ammonia screening tool version 4.6 are given in Table 5.

Table 5 – Acid deposition

Site	Critical load keq/ha/yr *	PC keq/ha/yr	PC % critical load
Mottey Meadows SSSI	5.071	0.485	9.6

* Critical load values taken from APIS website (www.apis.ac.uk) – 11/06/2025

No further assessment is required.

Ammonia assessment – LWS / AW / NNR

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 18/07/2025) has indicated that emissions from Wheaton Aston Farm Pig Unit will only have a potential impact on the LWS, AW or NNR sites with a precautionary CLe of 1 $\mu g/m^3$ if they are within 1,116 m of the emission source.

Beyond 1,116 m the PC is less than 1 $\mu g/m^3$ and therefore beyond this distance the PC is insignificant. In this case the following LWS and AW are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 6 – LWS / AW Assessment

Site	Distance from site (m)
Whitehouse Farm (south-east of) LWS	1,500
Hollowdine Pits LWS	1,563
Gorse Lane Hedgerows LWS	1,573
Marston Coppice and Wet Croft Plantation LWS	1,679
Port Coppice and Mitton Ponds LWS	1,735
High Onn Wood LWS	2,224
High Onn Wood AW	2,223

Screening using the ammonia screening tool version 4.6 (dated 18/07/2025) has determined that the PC on the LWS and NNR 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.

Table 7 - Ammonia emissions

Site	Critical level ammonia µg/m^3	Predicted PC µg/m^3	PC % of critical level
Mottey Meadows NNR	3*	1.303	43.4
The Rookery LWS	3*	2.869	95.6
Gorse Covert LWS	3*	2.411	80.4
Tinker Pits LWS	3*	1.270	42.3
Shropshire Union Canal (Wheaton Aston)	3*	1.042	34.7

* CLe 3 applied as no protected lichen or bryophytes species were found when checking Easimap layer.

Table 8 – Nitrogen deposition

Site	Critical load kg N/ha/yr *	Predicted PC kg N/ha/yr	PC % of critical load
Mottey Meadows NNR	10	6.767	67.7
Tinker Pits LWS	10	6.595	66.0
Shropshire Union Canal (Wheaton Aston)	10	5.413	54.1

* Critical load values taken from APIS website (www.apis.ac.uk) – 11/06/2025

Table 9 – Acid deposition

Site	Critical load keq/ha/yr *	Predicted PC keq/ha/yr	PC % of critical load
Mottey Meadows NNR	5.071	0.483	9.5
The Rookery LWS	1.855	1.064	57.4
Gorse Covert LWS	1.89	0.895	47.4
Tinker Pits LWS	1.890	0.471	24.9
Shropshire Union Canal (Wheaton Aston)	1.855	0.387	20.9

* Critical load values taken from APIS website (www.apis.ac.uk) – 11/06/2025

The detailed modelling ('A report on the Modelling of the Dispersion and Deposition of Ammonia from the Pig Rearing at Wheaton Aston Farm Pig Unit, Little Onn, near Church Easton in Staffordshire', dated 14/02/2025), has not included The Rookery LWS and Gorse Covert LWS. As part of our audit sensitivity checks we included these sites as additional receptors and concluded that the nitrogen deposition PC at these two LWSs will be below 100% significance threshold and can be modelled out as having no likely significant effect.

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. No responses were received.

We consulted the following organisations:

- UK Health Security Agency (UKHSA)
- Director of Public Health
- Health and Safety Executive
- Local Authority Environmental Protection – Staffordshire County Council

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 plan/s which we consider to be satisfactory, showing the extent of the site facilities.

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 not consulted Natural England.

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.

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 protection as those in the previous permits.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

There are historic improvement programmes carried over from the previous permits, we cannot confirm if these have been completed at this time so they have been carried over to the new variation with the original dates. This will be assessed by the Area Compliance Team as soon as possible.

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.

We only review a summary of the management system during determination. The applicant submitted their full management system. We have therefore only reviewed the summary points.

A full review of the management system is undertaken during compliance checks.

Previous performance

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

Relevant convictions were found and declared in the application. We considered relevant convictions as part of the determination process.

A copy of the post-conviction plan (dated 18/01/2012) was submitted with the application. However, our guidance states that we only need to consider the post-conviction plan for new applications and transfers so not required in this case.

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. OBJ

Consultation Responses

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

The consultation commenced on 05/03/2025 and ended on 02/04/2025.

Responses from organisations listed in the consultation section

Response received from UK Health Security Agency 26/03/2025

Brief summary of issues raised: We have no major concern regarding the risk to health of the local population from the installation, providing the site is well managed and regulated. It is assumed by UKHSA that the installation will comply in all respects with the requirements of the permit, including the application of Best Available Techniques (BAT). This should ensure that emissions present a low risk to human health.

Summary of actions taken: We are satisfied that this installation will comply with the relevant BAT conclusions (2017), and will be managed and regulated as appropriate in relation to the permit.

The Health and Safety Executive, Director of Public Health, Staffordshire County Council Environmental Protection were also consulted but no responses were received.