

Permitting Decisions - Bespoke Permit

We have decided to grant the permit for Grange Farm operated by R. H-J. (Farms) Limited.

The permit number is EPR/JP3628LG.

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.

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The installation is operated by R. H-J. (Farms) Limited and comprises four poultry houses, numbered one to four, with minimal heat provided by the adjacent AD plant and LPG heating, which provide a combined capacity of 180,000 broiler bird places.

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.

The Applicant has confirmed their compliance with all BAT conditions for the new installation in their document reference Grange Farm BAT Document and dated 11/07/2025, 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 **0.6kg** 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 **0.25kg** P₂O₅/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 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 NH₃/animal place/year**. The Applicant will meet this as the emission factor for broilers is 0.024 kg NH₃/animal place/year.

The installation does not include an air abatement treatment facility; hence the standard emission factor complies with the BAT AEL.

Detailed assessment of specific BAT measures

Ammonia emission controls – BAT Conclusion 32 broilers

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 broilers.

All new bespoke applications issued after the 21st February 2017, including those where there is a mixture of old and new housing, will now need to meet the BAT AEL.

Industrial Emissions Directive (IED)

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 Grange Farm dated 11/11/2025, 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.

Standby generator

There is standby generator with a net thermal rated input of 0.6MWth 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 combined testing and 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 NH₃ BAT AEL.

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

Ammonia assessment – SSSI

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

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

Initial screening using the ammonia screening tool version 4.6 (dated 11/11/2025) has indicated that emissions from Grange Farm will only have a potential impact on SSSIs with a precautionary CL_e of 1 µg/m³ if they are within **775 metres** of the emission source.

Beyond **775m** the PC is less than 0.2 µg/m³ (i.e. less than 20% of the precautionary 1 µg/m³ CL_e) 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/m³ is used and the PC is assessed to be less than 20%, the site automatically screens out as insignificant and no further assessment of CL_o is necessary. In this case the 1 µg/m³ level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely damage to these sites.

Table 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
Jenkins Carr	2465
Keal Carr	3125
Hundleby Clay Pit	4510

No further assessment is 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:

3.3.1 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.

3.3.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour; and
- (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency."

Under section 3.3 of the guidance, an Odour Management Plan (OMP) is required to be approved as part of the permitting process if, sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the installation boundary.

There are no relevant receptors within 400 metres of the installation boundary, therefore we do not require an Odour Management Plan, however the applicant has provided an Odour Risk Assessment.

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:

3.4.1 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.

3.4.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration; and

(b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency. Under section 3.4 of the guidance, a Noise Management Plan (NMP) is required to be approved as part of the permitting process if sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the installation boundary.

There are no relevant receptors within 400 metres of the installation boundary, therefore we do not require a Noise Management Plan, however the applicant has provided a Noise Risk Assessment.

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

There are no relevant receptors within 100 metres of the installation boundary.

Heating and anaerobic digestion plant

Heating for the poultry houses is primarily supplied by LPG heaters, which account for 75% of the total heat provision. The remaining 25% is delivered by the anaerobic digestion (AD) plant, and the applicant has confirmed that the installation is not the primary user of the heat from the AD plant. As such the Anaerobic Digestion Plant is not technically connected to the installation.

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:

- UKHSA- our usual process is to only consult with UKHSA when there is a requirement for a dust management plan, however due to the consultation responses we felt it prudent to consult with UKHSA given the nature of the concerns.
- Local Council- Environmental Protection Department
- Health and Safety Executive- no response.

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 not satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.

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.

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.

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.

We made these decisions in accordance 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, 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.

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, 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 23/07/2025 and ended on 20/08/2025.

Responses from organisations listed in the consultation section

Response received from UKHSA on 11/08/2025.

Brief summary of issues raised:

The Applicant states there are no neighbouring dwellings within 400m of the installation. While the site is considered low risk to public health the applicant has not provided details of potential ammonia, bioaerosol, or particulate matter (PM10) emissions to atmosphere. The application includes a basic assessment of fugitive emissions to air, land, and water, and mitigation measures, considering noise and vibrations, and odour risk. We recommend the Regulator considers the need for an accident management plan, and an odour/dust management plan if identified to be an issue once operational.

Summary of actions taken:

The Environment Agency covers dust/PM10 emissions and related risk assessment for Intensive Farming installations via a generic risk assessment and where there are sensitive receptors within 100m a Dust and Bioaerosol Management Plan. This is a robust approach that addresses both point source and fugitive emissions and is considered a more comprehensive approach than a quantitative PM10 impact assessment that would not be able to model any relevant emissions.

As there are no sensitive receptors within 100m a Dust and Bioaerosol management plan was not required for this application, which is in accordance with our guidance. There is a generic risk assessment including dust emissions linked to the application, giving control measures to minimise dust emissions from this installation.

Dust complaints/actions

We are satisfied that appropriate measures will be in place to prevent and where that is not practicable minimise emissions. However, the permit allows the Environment Agency to take action in any fugitive emissions are considered to give risk to pollution under permit condition 3.2.2.

Ammonia

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsars within 5km of the installation. There are three Sites of Special Scientific Interest (SSSI) within 5km of the installation. There are no Local Wildlife Sites (LWS), Ancient Woodlands (AW) or Local Nature Reserves (LNR) within 2km. We undertook an ammonia screening assessment for the three SSSIs as per our guidance as part of this application determination, and they both screened out on distance, so no further action was considered necessary.

Odour

As there are no sensitive receptors within 400m an odour management plan was not required for this application, this was in accordance with our guidance. There is a generic risk assessment including odour emissions linked to the application, giving control measures to minimise odour emissions from this installation.

We are satisfied that adequate controls are in place to minimise risk of odour pollution linked to this installation.

The application include an Accident management plan named 'Accident Assessment' dated 11/07/2025.

Receptors are beyond the relevant distances from the installation boundary.

The following conditions within the permit ensure adequate regulatory powers and controls linked to such emissions

- Fugitive emissions : permit conditions 3.2.1/3.2.2
- Odour emissions ; permit conditions 3.3.1/3.3.2

Response received from Lincolnshire County Council on 18/08/2025.

Brief summary of issues raised:

The Council advise that the following recommendations from UKHSA and LCC are considered when determining this application:

- The Applicant provides details of potential ammonia, bioaerosol, or particulate matter (PM10) emissions.
- The Regulator requests that the applicant reports dust complaints.
- The Regulator considers the need for an accident management plan, and an odour/dust management plan if identified to be an issue once operational.

Summary of actions taken:

- We are satisfied that the information provided is sufficient to enable us to make our determination and do not require any further information to make our permit determination. No further information is required.
- In the event that complaints relating to dust are received directly by us, we will investigate the complaint and take relevant action as we consider appropriate for each specific complaint. This may include notifying the Local Authority if there are substantiated complaints. While we cannot require the operator to inform the Local Authority, they may choose to do so voluntarily.
- As outlined in our response to UKHSA, we will continue to review the requirement for an Accident Management Plan, Noise Management Plan, and Odour Management Plan as part of our ongoing compliance monitoring.

Representations from local MPs

Response received from The Rt Hon Victoria Atkins MP on 31/10/2025.

Brief summary of issues raised: Concerns for emissions to air and dust emissions.

Summary of actions taken: See response to Air Emission concerns in our response to the Coalition Against Factory Farming section below and actions taken to address impacts from dust emissions under UKHSA response above.

Representations from community and other organisations

Response received from: Coalition Against Factory Farming (CAFF) on 19/08/2025 and 20/08/2025.

Brief summary of issues raised and summary of actions taken:

1. Inconsistency of site address.

The discrepancy in the site address resulted from an administrative error during its publication on Citizen Space. Following the submission of the application to the Environment Agency, the applicant amended the site location. However, all application documents advertised on Citizen Space reflected the correct, updated address aside from the front page of the advert. The determination was based on this revised information. Consequently, we are confident that sufficient and accurate details were available throughout the consultation process to enable members of the public and relevant organisations to make an informed response.

2. The planning application is for 180,000 broilers whilst the EPR application is for 200,000 broilers.

The EPR pre-application assessment and application determination for this installation were based on a proposed capacity of 200,000 broiler birds as detailed, within all the relevant application forms provided by the Applicant.

Accordingly, the environmental impact has been evaluated in relation to this number. Planning and environmental permitting are separate but complimentary regimes. Any operator will need to comply with both. Therefore, if planning is granted for a lower number of birds, the operator will need to comply with that restriction. Any capacity included in the permit is the maximum they can house they do not have to house that number. Housing a lower number of birds would not affect our assessment.

The Applicant changed the proposal to 180,000 broiler birds on 10/11/2025, therefore all application documents were changed to reflect this and the ammonia screening updated. Therefore the final application and related documents for this EPR permit are consistent with the planning application for this site.

3. Concerns for BAT Conclusions compliance.

The Applicant has confirmed that the installation will meet the requirements of 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 (version 2) and the BAT conclusions, and we consider this will be the case. We are satisfied that the installation complies with the 2017 Intensive Farming BAT conclusions, as we have outlined in our assessment detailed within the Key Issues section of this document. The Installation will be checked as part of compliance visits by our site inspector and any concerns raised will need to be addressed by the Operator to ensure compliance with the permit.

4. Concerns for animal welfare.

The Environment Agency is not the relevant regulatory body covering animal welfare. The Environment Agency is responsible for ensuring that the emissions from the activities at the Installation do not have an unacceptable impact on the environment or human health. The principal regulator for animal health is the Animal and Plant Health Agency (APHA), whose main purpose is to safeguard animal and plant health for the benefit of people, the environment and the economy.

5. Concerns for the impact of the installation on surrounding sensitive receptors.

Human health receptors

As outlined in the key issues section of this document there are no relevant receptors within relevant screening distances linked to odour, noise and dust impacts. We have selected these distances on a precautionary basis. Given that the operator is applying Best Available Techniques (BAT), we do not anticipate unacceptable impacts or the need for further detailed assessment, nor any additional requirements that might otherwise be triggered by these distances. As such we consider the impact of this installation on local human receptors to be

minimised via the controls listed in the relevant environmental risk assessments and the impacts linked to this installation on the human health of local residents to be satisfactory.

Ammonia habitat receptors

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsars within 5km of the installation. There are three Sites of Special Scientific Interest (SSSI) within 5km of the installation. There are no Local Wildlife Sites (LWS), Ancient Woodlands (AW) or Local Nature Reserves (LNR) within 2km. The key issues section of this document summarises our ammonia habitat assessment. The conclusion is that no further action was required due to initial screening using the ammonia tool (v4.6, 10/06/2025) shows emissions from Grange Farm could only affect SSSIs within 775m of the source (precautionary CLe $1 \mu\text{g}/\text{m}^3$). Beyond this distance, the PC is $<0.2 \mu\text{g}/\text{m}^3$ ($<20\%$ of CLe) and therefore insignificant. All SSSIs are beyond 775m so no further assessment is required.

6. The permit should be twin tracked with the planning application.

The decision whether to twin track the applications is a matter for the operator. We have a legal duty to determine applications made to us under the EPR regulations and we are satisfied that we have sufficient information to do so and to complete the determination.

7. Concerns that intensive poultry units cause environmental harm due to manure impacts and greenhouse gases.

The Environment Agency will carry out compliance visits to this installation once the farm is operational, if any concerns and issues are found during these compliance visits, appropriate enforcement action will be taken. Our compliance team will require the new operator to complete a climate change assessment, which we will then review. All manure exported from the installation is sold to a third-party. The land where manure/slurry may be stored, or spread is not part of the installation. The Environmental Permitting Regulations (EPR) scope of regulation is limited to preventing significant pollution from emissions from the Installation. Emissions are substances released from the Installation whilst something exported in a controlled manner for subsequent use elsewhere is not considered an emission.

Furthermore, BAT Conclusions 3 and 4 of the 2017 Intensive Farming BAT Conclusions require the Operator to adopt a nutritional strategy to reduce the levels of Nitrogen and Phosphorous within excreted manure and demonstrate they are meeting the BAT associated excretion levels given in table 1.1 and table 1.2 of the BAT conclusions document. The Applicant has confirmed they have checked the relevant levels and can comply with them. They will also be required to calculate or analyse manure and/or slurry to estimate N and P excretion and

report this to the Environment Agency annually. We are satisfied that the Applicant will comply with all the relevant BAT conclusions including those linked to manure monitoring and emission limits.

The site boundary for permitted farms typically includes the livestock housing, any yard and range areas and associated infrastructure but does not routinely include wider adjacent land. And whilst on farm slurry and manure management, yard run off and drainage are regulated by the permit, the spreading of manures and slurry to land (and the associated potential for water quality impacts) is primarily regulated through separate regulatory regimes namely the Nitrate Pollution Prevention Regulations and Farming Rules for Water.

8. Odour issues from farming operations, and bad odours coming from the anaerobic digester on operator owned land and manure spreading.

In the case of odour, there are no sensitive receptors within 400m of the installation boundary so we did not require an odour management plan to be submitted as part of the application. We are satisfied that the application of BAT and the standard odour condition are sufficient. An odour management plan can be requested in future if considered necessary. The key issues section above summarises our assessment to confirm that the Anaerobic Digestion Plant is not technically connected to this installation and hence is not part of this installation. In conclusion we are satisfied that adequate controls are in place to minimise odour pollution risk from the installation.

9. Noise issues from farming operations, and noise coming from the anaerobic digester on operator owned land.

In the case of noise, there are no sensitive receptors within 400m of the installation boundary so we did not require a noise management plan to be submitted as part of the application. We are satisfied that the application of BAT and the standard noise condition are sufficient. A noise management plan can be requested in future if considered necessary. The key issues section above summarises our assessment to confirm that the Anaerobic Digestion Plant is not technically connected to this installation and hence is not part of this installation. In conclusion we are satisfied that adequate controls are in place to minimise noise pollution risk from the installation.

10. Concerns for emissions to air.

Our approach to dust and bioaerosol environmental control is to require a dust and bioaerosol management plan for intensive farming installations with receptors within 100 metres of the Installation boundary. This is an agreed approach with former Public Health England (now UKHSA) and the Environment

Agency. This is a robust approach requiring the listing of both point and fugitive emissions and listing of controls to minimise impact on human health.

The risk assessment criteria of 100 metres from the boundary is set out in our Intensive Farming risk assessment guidance a link to which is attached:

<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>

The intensive farming sector Best Available Techniques (BAT) Reference Document, BREF does not require us to set particulate matter (PM) limits. In addition to this, the impact assessed is considered acceptable so we do not consider it necessary to set site specific emission limit values for particulates.

11. Concerns regarding water abstraction.

Water abstraction licencing and controls are a separate regime outside the scope of the EPR regulations and hence the scope of the application for this installation.

12. Concerns that intensive poultry units present an elevated risk of avian influenza outbreaks.

The birds will be kept indoors at all times so therefore it is extremely unlikely that birds within the houses will contract Avian flu. Effective biosecurity measures will also ensure that the likelihood of disease will be low. We have consulted the UK Health Security Agency (UKHSA) on the Application in line with our guidance and their comments can be seen above. They have not raised any concerns with regards to zoonotic diseases. Our compliance team will take relevant action in the event of any avian flu outbreak. We are satisfied that the risk of pollution of the environment or harm to human health from the activities of the site are not likely to be significant.

13. History of non-compliance with planning conditions for other parts of operator owned land.

We are satisfied that the operator will comply with the permit conditions, as the Best Available Techniques (BAT) requirements have been incorporated into the permit and the operator has confirmed adherence to these. Supporting evidence has been provided demonstrating their capability to meet BAT standards.

Furthermore, compliance with the Permit will be monitored by the Environment Agency's local Environment Management team. Any breach in Permit conditions is an offence and would be subject to appropriate enforcement action in accordance with the Environment Agency Enforcement and Sanctions Guidance, which can be viewed at Environment Agency enforcement and sanctions policy - GOV.UK (www.gov.uk)

<https://www.gov.uk/government/publications/environment-agency-enforcement-and-sanctions-policy/environment-agency-enforcement-and-sanctions-policy>).

The local council, not the Environment Agency, is the relevant competent authority for all matters linked to the planning application for the site.

Representations from individual members of the public

Responses received between 19/08/2025 and 20/08/2025. An additional public response was received on 24/10/2025.

Brief summary of issues raised:

1. Inconsistency of site address.
2. The planning application is for 180,000 broilers whilst the EPR application is for 200,000 broilers.
3. Concerns for BAT Conclusions compliance.
4. Concerns for animal welfare.
5. Concerns for the impact of the installation on surrounding sensitive receptors.
6. The permit should be twin tracked with the planning application.
7. Concerns that intensive poultry units cause environmental harm due to manure impacts and greenhouse gases.
8. Odour issues in from farming operations, and bad odours coming from the anaerobic digester on operator owned land and manure spreading.
9. Noise issues from farming operations, and noise coming from the anaerobic digester on operator owned land.
10. Concerns for emissions to air.
11. Concerns regarding water abstraction.
12. Concerns that intensive poultry units present an elevated risk of avian influenza outbreaks.
13. Concerns for increased traffic noise through neighbouring villages and narrow roads in which makes large vehicles difficult to pass.

Summary of actions taken:

Consideration of points 1-12 are covered in our Coalition Against Factory Farming (CAFF) consultation response actions detailed above.

13. Traffic Concerns

Consideration of increased traffic movements beyond the Installation boundary is outside the scope of the Environment Agency regulatory responsibility under the EPR Regulations as it is not an emission from the installation.

Such traffic noise assessment may be a material consideration for the planning application.