# Permitting Decisions – Variation and part surrender

We have decided to grant the variation for Bridge House Farm Pig Unit operated by Bridge House Farm Limited.

The variation number is EPR/QP3831MX/V006.

The partial surrender number is EPR/QP3831MX/S008.

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.

Variation and partial surrender to change the installation boundary with a change in site layout, remove the pullet and layer activities and associated land from the permit, add a new building, muck store and new earth tanked lagoon and a change in pig numbers. Production pigs more than 30kg increasing from 2,760 (including 5 boars) to 8,128 places (including 40 boars), sows increasing from 658 to 1,602 places and pigs 7 to 30kg decreasing from 3,160 to 3,040 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 and the variation notice.

# Key issues of the decision

## Partial surrender

We have agreed to the partial surrender of the land associated with the Bridge House Layers and Bridge House Pullet poultry operations. They have decided to surrender the poultry operations due to poor financial returns which has led to a complete decommissioning of both poultry sites over a number of years. All poultry related permitting activities have ceased.

The site condition report received with the partial surrender shows there are no known pollution incidents and there are no visual signs of any pollution at the old poultry sites. The site condition report states there are no sources of potential pollution as the site has been completely cleaned and renovated. A site visit was conducted by our site compliance team, who confirmed no pollution risks were identified and potential pollution sources (including spent litter and feed) had been removed from the areas to be surrendered. All wash water tanks had been sealed with concrete.

We are satisfied that the necessary measures have been taken to avoid a pollution risk and the poultry land is of a satisfactory state for 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 housing in their document reference 'BAT review June 2025' and dated 13/06/2025', 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:

4.0 kg N/animal place/year for weaners (rearing of pigs up to 30 kg)

13.0 kg N/animal place/year for fattening pigs (production pigs (over 30 kg)

30.0 kg N/animal place/year for farrowing sows (including suckling piglets) and mating and gestating sows.

They will use BAT 3b 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:

2.2 kg $P_2O_5$/animal place/year for weaners (rearing of pigs up to 30 kg)

5.4 kg $P_2O_5$/animal place/year for fattening pigs (production pigs (over 30 kg)

15 kg $P_2O_5$/animal place/year for farrowing sows (including suckling piglets) and mating and gestating sows.

They 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.

Or

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.

The Operator confirmed they would like to keep both options in table S3.3 in their response to further information on 28/10/2025.

**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 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 to 30kg: 0.53 $NH_3$/animal place/year for fully slatted floors (FSF).
- Pigs > 30kg: 2.6 kg $NH_3$/animal place/year for FSF and frequent slurry removal and 5.65 kg $NH_3$/animal place/year for solid floor.
- Farrowers: 5.6 kg $NH_3$/animal place/year for FSF and frequent slurry removal.
- Sows: 2.7 kg $NH_3$/animal place/year for FSF and frequent slurry and 5.2 kg $NH_3$/animal place/year for solid floor.

## Detailed assessment of specific BAT measures

**Ammonia emission controls – BAT Conclusion 30**

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

Most of the ammonia emission factors are below the BAT AEL’s so will comply with the BAT AEL’s, apart from the following:

Sows on FSF within the Sow Service Building which have an emission factor of 3.29 $NH_3$/animal place/year and a BAT AEL of 2.7 $NH_3$/animal place/year. As part of the non-duly made response the Operator provided evidence that at 20% crude protein reduction can be applied to the emission factor which gives an emission factor of 2.352 $NH_3$/animal place/year, which is below the BAT AEL so will comply.

Production pigs >30kg on FSF within the Grower Building 1, Grower Building 2, Finisher Building 1, Finishing Building 2 and Finishing Building 3 which have an emission factor of 2.813 $NH_3$/animal place/year and a BAT AEL of 2.6 $NH_3$/animal place/year. As part of the non-duly made response the Operator provided evidence that at 20% crude protein reduction can be applied to the emission factor which gives an emission factor of 2.250 $NH_3$/animal place/year, which is below the BAT AEL so will comply.

## 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 Bridge House Farm dated July 2025 (and received 18/08/2025 under the partial surrender application), 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 3.3.1 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.

There are no relevant receptors within 400 metres of Bridge House Farm Pig Unit installation boundary. Condition 3.3.2 has been added to the permit to ensure an OMP is provided if odour problems arise from this site in the future.

## 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 3.4.1 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 no relevant receptors within 400 metres of Bridge House Farm Pig Unit installation boundary. Condition 3.4.2 has been added to the permit to ensure an NMP is provided if noise problems arise from this site in the future.

## 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 Bridge House Farm Pig Unit installation boundary therefore a dust and bioaerosol management plan was not required.

## Standby generator

There is one standby generator with a net thermal rated input of 0.55 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 are no Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsars or Sites of Special Scientific Interest (SSSI) located within 5 kilometres (km) of the installation boundary. There are three Local Wildlife Sites (LWS) within 2 km of the installation boundary.

## Ammonia assessment – LWS

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

- If the process contribution (PC) is below 100% of the relevant critical level (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 20/10/2025) has indicated that emissions from Bridge House Farm Pig Unit will only have a potential impact on the LWS with a precautionary CLe of 1 µg/$m^3$ if they are within 1,398 m of the emission source.

Beyond 1,398 m the PC is less than 1 µg/$m^3$ and therefore beyond this distance the PC is insignificant. In this case all LWS are beyond this distance (see table below) and therefore screen out of any further assessment.

**Table 1 – LWS Assessment**

| Site | Distance from site (m) |
|---|---|
| Grand Union Canal - Watford | 2,050 |
| Grand Union Canal - Welton | 2,296 |
| Watford Lock Ponds | 2,551 |

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:

- Health and Safety Executive
- West Northamptonshire Council Environmental Health

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 plans which we consider to be satisfactory, showing the extent of the site facilities.

The plans are included in the permit.

## Site condition report

The Operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports.

We have advised the Operator what measures they need to take to improve the site condition report.

## 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.

## 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

There are historic improvement programmes carried over from the previous permits and are now confirmed to be completed.

## 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.

## 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 30/06/2025 and ended on 28/07/2025.

## Responses from organisations listed in the consultation section

Response received from West Northamptonshire Council Environmental Health (10/07/2025).

Brief summary of issues raised: No comments

Summary of actions taken: No further action required.

The Health and Safety Executive were also consulted but no responses were received.