Permitting Decisions - Variation

We have decided to grant the variation for **Great Westwick Farm Poultry Unit** operated by **Crown Chicken Limited.**

The variation number is **EPR/TP3837MY/V006.**

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.

Overview:

- Operator is changing from 100,000 pullets to 179,166 broilers.
- Updated ventilation confirmed as high ventilation fans on all poultry houses. No other changes to the poultry houses or their locations.
- New LPG heaters on all poultry houses.
- New heat exchanges on all poultry houses.
- New mobile egg macerator, added as a directly associated activity.
- Administration change linked to remove farmhouse from boundary; added initially in error, no installation operations within this land area.
- Updated site drainage plan details including improvements to lightly contaminated water surface attenuation.
- Small increase in installation boundary.
- Historic carcass incinerator removed from installation.

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
- explains why we have also made an Environment Agency initiated variation
- 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

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 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.

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

The Applicant has confirmed their compliance with all BAT conditions for the new housing in their supporting information document reference (add reference) dated 02/09/25 and odour monitoring within Odour Management Plan (OMP) dated 30/07/25, which have been referenced in Table S1.2 - Operating Techniques, of the permit.

The following is a more specific review of the measures the Applicant has applied to ensure compliance with the above key BAT measures:

BAT 3 Nutritional management - Nitrogen excretion

The Applicant has confirmed it will demonstrate that the installation can achieve levels of nitrogen excretion below the required BAT AEL of **0.6** kg N/animal place/year for broilers and will use BAT 3a technique reducing the crude protein content.

BAT 4 Nutritional management - Phosphorus excretion

The Applicant has confirmed it will demonstrate that the installation can achieve levels of phosphorus excretion below the required BAT AEL of **0.25** kg P_2O_5/animal place/year for broilers 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 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:

• The staff will perform a daily boundary walk to check the surrounding area for high levels of odour. Checks will also be performed on the surrounding area by persons who do not regularly work on the farm.

• Visual (and nasal) inspections of potentially odorous activities will be carried out.

• 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 factors.

BAT 32 Ammonia Emissions - Broilers

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

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

Industrial Emissions Directive (IED)

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

Groundwater and soil monitoring

As a result of the requirements of the Industrial Emissions Directive, all permits are now required to contain a condition relating to protection of soil, groundwater and groundwater monitoring. However, the Environment Agency's H5 Guidance states that it is only necessary for the Operator to take samples of soil or groundwater and measure levels of contamination where there is evidence that there is, or could be existing contamination and:

- The environmental risk assessment has identified that the same contaminants are a particular hazard; or
- The environmental risk assessment has identified that the same contaminants are a hazard, and the risk assessment has identified a possible pathway to land or groundwater.

H5 Guidance further states that it is **not essential for the Operator** to take samples of soil or groundwater and measure levels of contamination where:

- The environmental risk assessment identifies no hazards to land or groundwater; or
- Where the environmental risk assessment identifies only limited hazards to land and groundwater and there is no reason to believe that there could be historic contamination by those substances that present the hazard; or
- Where the environmental risk assessment identifies hazards to land and groundwater but there is evidence that there is no historic contamination by those substances that pose the hazard.

The site condition report (SCR) for this installation dated 27/03/26, 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.

Changes summary

- Increase in boundary linked to new surface water attenuation French drains.
- A farmhouse was historically included in the installation boundary in error and the area around the farmhouse has no link to the installation. As this is an administration error and no installation activities have ever taken place within this land area, we have removed this area from the installation boundary, with no risk of groundwater and land contamination.

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 and relevant control measures to minimise impact of such risks.

There are four sensitive receptors located within 400m of the installation boundary. The closest receptors are two receptors 305 metres from the installation to the west-southwest of the installation.

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 30/07/25) 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), 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. No response was received and no concerns raised by the Local Authority.

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 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 and relevant control measures to minimise impact of such risks.

Noise Management Plan Review

The NMP provided by applicant and assessed below was received as part of the application supporting documentation on 30/07/25.

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. No response was received and no concerns raised by the Local Authority.

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 dust and bioaerosol management plan provided by the applicant and assessed below was received on 30/07/25.

There are two sensitive receptors within 100m of the installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is on the actual installation boundary to the southwest of the installation. Also, the other receptor is close by being 10 metres to southeast of the installation boundary.

In the guidance mentioned above it states that particulate concentrations fall off rapidly with distance from the emitting source. This fact, together with the proposed good management of the installation (such as keeping areas clean from build-up of dust and other measures in place to reduce dust and the risk of spillages e.g. litter and feed management/delivery procedures) all reduce the potential for emissions impacting the

nearest receptors. The Applicant has confirmed measures in their dust and bioaerosol management plan to reduce dust (which will inherently reduce bioaerosols).

Conclusion

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 0.378 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.

Heat exchangers

Heat exchangers are being fitted on all five poultry houses with this application.

All condensate from the heat exchangers will be directed to dirty water tanks. The operation and maintenance of the heat exchangers will be in accordance with manufacturer's instructions.

The Applicant has not claimed a reduction of ammonia emissions from the use of heat exchangers beyond the standard broiler emission factor.

Ammonia

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

There is one Special Area of Conservation (SAC), four Special Protection Areas (SPA) and three Ramsar sites located within 5 km of the installation boundary. In addition, there are four Sites of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There are no Local Wildlife Sites (LWS), Ancient Woodlands (AW), National Nature Reserves (NNR) or Local Nature Reserves (LNR) within 2 km of the installation boundary.

Overview

The change from 100,000 pullets to 179,166 broilers is to be actioned via internal infra-structure changes alone.

The size and location of the poultry houses is unchanged and no new poultry houses are added. Overall, the ventilation type is improving from medium velocity to high velocity extraction fan ventilation.

The use of heat exchangers without any bespoke monitoring evidence, as is the case here, does not change the use of standard broiler factor of 0.024 kg NH_3/animal place/year.

Assessment

The applicant revised their application to ensure lightly contaminated water attenuation (27/3/26) and a small increase in installation boundary (response received 31/3/26).

Overall, the housing locations are not changing and the centre of emissions hence has not changed from original assessment (National Grid Reference TM 98876 96756) with a small increase in buffer distances for the proposal.

Therefore, we have completed a final assessment in two parts as per below:

- Initial assessment to confirm which habitat sites screen out based on distance.
- Process contribution comparison: we have completed a process contribution baseline versus proposal review to ensure PCs are not increasing at all other relevant habitat sites.

SAC/SPA/Ramsar Sites

Initial screening using the ammonia screening tool version 4.6 (ASTv4.6), dated 14/04/26, has indicated that emissions from this installation will only have a potential impact on the SPA / Ramsar sites with a precautionary CLe of 1 µg/m^3 if they are within **2,157 metres** of the emission source.

Beyond **2,157 m** the PC is less than 0.04 µg/m^3 (i.e. less than 4% of the precautionary 1 µg/m^3 CLe) and therefore beyond this distance the PC is insignificant. In this case all SPA / Ramsars are beyond this distance (see table below) and therefore screens out of any further assessment.

Where the precautionary level of 1µg/m^3 is used and the PC is assessed to be less than 4%, the site automatically screens out as insignificant and no further assessment of CLo is necessary. In this case the 1 µg/m^3 level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely significant effect.

Table 1 – SAC/SPA/Ramsar Assessment

Name of SAC/SPA/Ramsar	Distance from site (m)
Dengie (Mid-Essex Coast Phase 1) (SPA)	2956
Dengie (Mid-Essex Coast Phase 1) (Ramsar)	2956

No further assessment required.

Further comment

In addition to the above SPA/Ramsar screening , a review of the outputs from the ASTv4.6 confirms there is no increase in the PCs linked to this proposal relative to current permit baseline.

Process Contribution comparison

Screening using the ASTv4.6 (dated 14/04/26) has determined that the proposal PCs for the following European /Ramsar sites are not increasing relative to the current permit baseline:

Table 2 – Ammonia emissions

Site	Predicted PC µg/m^3
Essex Estuaries (SAC) Baseline	0.182
Essex Estuaries (SAC) Proposal	0.095
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (SPA) Baseline	0.182
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (SPA) Proposal	0.095
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (Ramsar) Baseline	0.182
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (Ramsar) Proposal	0.095
Outer Thames Estuary (SPA) Baseline	0.172
Outer Thames Estuary (SPA) Proposal	0.090
Foulness (Mid-Essex Coast Phase 5) (SPA) Baseline	0.085
Foulness (Mid-Essex Coast Phase 5) (SPA) Proposal	0.046
Foulness (Mid-Essex Coast Phase 5) (Ramsar) Baseline	0.085
Foulness (Mid-Essex Coast Phase 5) (Ramsar) Proposal	0.046

Table 3 – Nitrogen deposition

Site	Predicted PC kg N/ha/yr
Essex Estuaries (SAC) Baseline	0.944
Essex Estuaries (SAC) Proposal	0.493
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (SPA) Baseline	0.944
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (SPA) Proposal	0.493
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (Ramsar) Baseline	0.944
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (Ramsar) Proposal	0.493
Outer Thames Estuary (SPA) Baseline	0.894
Outer Thames Estuary (SPA) Proposal	0.467
Foulness (Mid-Essex Coast Phase 5) (SPA) Baseline	0.443
Foulness (Mid-Essex Coast Phase 5) (SPA) Proposal	0.239
Foulness (Mid-Essex Coast Phase 5) (Ramsar) Baseline	0.443
Foulness (Mid-Essex Coast Phase 5) (Ramsar) Proposal	0.239

Table 4 – Acid deposition

Site	Predicted PC keq/ha/yr
Essex Estuaries (SAC) Baseline	0.067
Essex Estuaries (SAC) Proposal	0.035
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (SPA) Baseline	0.067
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (SPA) Proposal	0.035
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (Ramsar) Baseline	0.067
Crouch & Roach Estuaries (Mid-Essex Coast Phase 3) (Ramsar) Proposal	0.035
Outer Thames Estuary (SPA) Baseline	0.064
Outer Thames Estuary (SPA) Proposal	0.033
Foulness (Mid-Essex Coast Phase 5) (SPA) Baseline	0.032
Foulness (Mid-Essex Coast Phase 5) (SPA) Proposal	0.017
Foulness (Mid-Essex Coast Phase 5) (Ramsar) Baseline	0.032
Foulness (Mid-Essex Coast Phase 5) (Ramsar) Proposal	0.017

Conclusion

The above process contribution comparison concludes that the PCs will be less for the new proposed broiler scenario, when compared to the existing pullet scenario for all habitat sites.

Overall, therefore, this variation results in no increase in ammonia process contributions from the installation and hence no further assessment is required.

Sites of Special Scientific Interest

Initial screening using the ASTv4.6 (dated 14/04/26) has indicated that emissions from this installation will only have a potential impact on SSSIs, with a precautionary CLe of 1 µg/m^3 if they are within **745 metres** of the emission source.

Beyond **745 m** the PC is less than 0.2 µg/m^3 (i.e. less than 20% of the precautionary 1 µg/m^3 CLe) and therefore beyond this distance the PC is insignificant. In this case all SSSIs are] beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of 1 µg/m^3 is used and the PC is assessed to be less than 20%, the site automatically screens out as insignificant and no further assessment of CLo is necessary. In this case the 1 µg/m^3 level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely damage to these sites.

Table 3 – SSSI Assessment

Name of SSSI	Distance from site (m)
Crouch and Roach Estuaries SSSI	1219
Foulness SSSI	1967
Dengie SSSI	3004
Goldsands Road Pit (SSSI)	3517

No further assessment is required.

Decision considerations

Confidential information

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

Identifying confidential information

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

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:

- Health and Safety Executive
- UK HSA
- Department of Public Health; Essex County Council
- Essex County Council Environmental Health Department

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

The regulated facility

We considered the extent and nature of the facilities at the site in accordance with RGN2 ‘Understanding the meaning of regulated facility’.

The extent of the facilities 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 shows the location of the part of the installation to which this permit applies on that site. The plan is included in the permit.

Site condition report

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

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances, we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

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

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

There are SAC, SAP and Ramsar sites within the relevant screening distance from this installation. However, the variation leads to no increase in impacts on these local habitat sites and hence there is no requirement for submission of a relevant Habitats Regulation Assessment (HRA).

See Ammonia section in the Key Issues above for more details.

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’.

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 permit.

Improvement programme

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

There are no new improvement programmes as a result of this variation.

Emission limits

Emission limits have been amended to ensure relevant broiler chicken limits are included in the permit variation.

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 added to ensure evidence of compliance with broiler emission limit values as listed in the permit.

These monitoring requirements have been imposed in order to ensure compliance with Intensive Farming BAT Conclusions document dated 21/02/2017.

Reporting

We have amended reporting in the permit linked to monitoring requirements for broilers.

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.

Previous performance

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

No relevant convictions were found.

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 **05/09/25** and ended on **03/10/25.**

Responses from organisations listed in the consultation section

Response received from UKHSA dated 18/09/25

Brief summary of issues raised: General response confirming that the main emissions from such an installation with potential public health significance are emissions to air of bioaerosols, odour, dust including particulate matter and ammonia.

No specific concerns raised.

Summary of actions taken: No specific actions required. The response makes a general statement which we can confirm that all relevant BAT measures are complied with. See details in BAT assessment within our key issues section of this decision document.

There were no other responses from any of the other external body consultees.

Representations from community and other organisations

Fifty identical responses received based on a template provided by the Coalition Against Factory Farming (CAFF)

Brief summary of issues raised, and actions taken:

1. General application response. General objection to application with no specific reasoning or detailed comment.

The Environment Agency is the relevant regulatory authority for Environmental Permitting Regulations (EPR) applications. The key issues section of this decision document detailed our determination assessment of this EPR application.

We are confident that we have covered all relevant assessment criteria and are satisfied that in conclusion the installation environmental impacts are acceptable to allow the issuing of this variation.

2. Requirement for an Environmental Impact Assessment (EIA).

An EIA is required as part of any planning application. The applicant did not submit an EIA as part of the Environmental Permitting Regulations (EPR) application. We are satisfied we have sufficient information to determine the Application and have

carried out an assessment of the environmental impact of the installation as part of the Permit determination.

3. Bird increase and relevant manure increase. Specific reference to material change under Town and Country Planning Act 1990.

The Town and Country Planning Act is linked to planning applications under the authority of the local council and not part of the Environment Agency responsibility linked to the EPR permit variation application.

Bird numbers

The increase in bird numbers is greater than 40,000 and hence has triggered an external consultation in line with EPR requirements.

The environmental impact assessment has been based on the accurate bird numbers.

Manure

No manure is stored within the Installation boundary; all manure is exported from the Installation. The land where manure may be stored or spread does not form part of the installation and so manure exported from the installation for storage and spreading outside the installation is outside the scope of our determination. The 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. The latter includes manure and litter removed as part of poultry house cleanouts.

The installation boundary for permitted farms typically includes the livestock housing, any yard and associated infrastructure but does not routinely include wider adjacent land. 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 Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations (Farming Rules for Water), and, in designated areas, the Nitrate Pollution Prevention Regulations.

4. General concern linked to increase in environmental impacts.

The application represents a significant intensification with serious consequences to the amenity of local people, public health, the environment, and the animals. Increases in odours, dust, ammonia, pollution, traffic, manure, waste, dirty water, greenhouse gas emissions, and the impacts on people, sensitive and protected habitats, rivers and the climate, must all be assessed.

Actions taken

This is not a planning consultation; we have assessed this permit application under the Environmental Permitting (England and Wales) Regulations 2016. In accordance with our guidance, the Applicant submitted an odour and noise management plans, as outlined in the key issues section above. Measures to mitigate the potential risks from

odour and noise emissions have been identified in these plans. The use of BAT and good practice will ensure the risk of odour and noise pollution from the installation is minimised. Furthermore, standard condition 3.3.1 concerning odour and standard condition 3.4.1 concerning noise have been included in the permit.

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 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 at https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit. The key issues section of this decision document outlines our assessment of the Applicant dust and bioaerosol management plan. We are satisfied that measures are in place to minimise impacts of dust from this installation.

The Applicant submitted a general risk assessment dated 30/07/25 detailing measures to prevent significant emissions from the site, in accordance with our technical guidance note for intensive farming and the BAT Conclusions document. These measures include the use of appropriate ventilation systems, appropriate housing design and management, containment of feedstuff and management of poultry litter. We are satisfied that these measures will mitigate emissions to prevent a significant impact from the site. Furthermore, standard condition 3.2.1 concerning fugitive emissions has been included in the permit.

In terms of manure, our response to response 3 above covers measures to minimise impacts from manure originating from this installation.

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.

In terms of installation ammonia emissions impacts on local habitat sites we have confirmed there is no increase in impacts linked to this variation application .The Ammonia section within Key Issues section of this document provides the details of our relevant assessment.

The Environmental Permitting Regulations (EPR) scope of regulation is limited to preventing significant pollution from emissions from the Installation.

5. Water discharges from the installation.

We are satisfied that the applicant has complied with our “Intensive farming: comply with your environmental permit” guidance to minimise impacts of clean water discharges to local water courses.

In particular the installation includes relevant attenuation measures in place to ensure dust entrapment linked to lightly contaminated water discharges from the installation boundary.

6. Recent cases have placed stringent obligations on factory farming developments such as this one. Following Finch v Surrey County Council [2024] UKSC 20, a project specific greenhouse gas assessment calculation is required for EIA.

This legal case is limited to impact on planning applications. The Environment Agency is not the legal regulator for such applications and hence this legal case has no bearing on our determination decision under EPR.

7. Furthermore, following R (Animal Equality UK) v North East Lincolnshire Borough Council [2025] EWHC 1331 (Admin), animal welfare is a material planning consideration.

This case law is outside of the scope of the Environment Agency regulatory responsibility under EPR.

8. Ammonia and nitrogen deposition from the proposed 179,166 broiler unit concerns linked to impact on specific local European/Ramsar Sites and local Sites of Special Scientific Interest.

We have completed an ammonia assessment linked to variation application ; see Key Issues section of this decision document.

We have concluded based on the ammonia assessment within the Key Issues section, that the installation's ammonia emissions will be reduced for the new proposed broiler scenario, when compared to the existing pullet scenario.
Therefore, we are satisfied that the impacts are acceptable, and no further assessment is required.

9. Paragraph 193(c)of the National Planning Policy Framework (2024) states that local planning authorities should refuse developments that would result in the loss or deterioration of irreplaceable habitats such as saltmarsh, unless there are wholly exception reasons, which there are not here.

We are satisfied that the variation application leads to no increase in environmental impacts on all relevant local habitat sites. The stated Policy Framework is linked to planning application decisions.

We have assessed the impacts of all potential pollutants that could arise from the proposed permissions on the relevant protected habitats in line with our duties, which includes the saltmarsh and concluded that there is no increase in installation impacts linked to this variation application.

10. The Environment Agency should refuse this application.

We are confident that we have covered all relevant assessment criteria and are satisfied that the installation environmental impacts are acceptable to allow the issuing of this variation.

Representations from individual members of the public

Thirty-two responses were received from individual members of the public. These raised many of the same issues as previously addressed. The subject title confirms issues raised and below is our response. Only those issues additional to those already considered are listed below.

1.Unpleasant smells, poisoning of waterways, animal welfare.

This site already has a permit, and as this is an increase in poultry numbers more than 40,000, we have treated this application as a substantial variation. This means it is advertised and consulted externally in the same way as a new permit application would be. This in in accordance with our guidance.

We have reviewed the odour impacts, and we are satisfied that Applicant Odour Management Plan is sufficient to ensure controls are in place to minimise risk of odour pollution from this installation. As detailed in response 5 above (Water discharges from the installation) we are satisfied that relevant controls are in place to minimise risk of installation impact on relevant local surface water courses

Animal welfare considerations are beyond the regulatory scope of the Environment Agency and beyond scope of EPR regulations.

2. General opposition to the application and generic issues raised linked to animal welfare.

We are confident that all relevant environmental risk assessments have been completed for this installation in compliance with the EPR regulations. The conclusion of this assessment is that relevant control measures are in place to ensure the environmental impacts from this installation are acceptable.

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.

3. Twin tracking requested for planning and permitting applications.

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 Environmental Permitting Regulations (EPR) and we are satisfied that we have sufficient information to do so and to complete the determination.

4. Disease risk/cross contamination.

The birds will be kept indoors at all times so therefore it is extremely unlikely that they will contract Avian flu. Effective biosecurity measures will also ensure that the likelihood of disease will be low. We are satisfied that the risk of pollution of the environment or harm to human health from the activities at the site are not likely to be significant. Our compliance team will ensure all relevant precautions are actioned in the event of any cases of Avian flu.