Permitting Decisions - Bespoke Permit

We have decided to grant the permit for Badcocks Farm Poultry Unit operated by G.S.T. Limited.

The permit number is EPR/EP3228LA.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

This is a new bespoke permit for 105,600 broilers in 3 poultry houses. All three poultry houses are ventilated by high velocity extraction roof fans with an emission point higher than 5.5 metres above ground level and an efflux speed greater than 11 metres per second. This farm is an existing under threshold turkey farm with two poultry houses, one of these houses is being replaced with the addition of a third poultry house. A mobile macerator is a directly associated activity.

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 a separate BAT Conclusions document which sets out the standards that permitted farms have to meet.

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 the BAT section within their document reference “summary, technical standards & control measures” supporting document dated November 2025 and received 02/12/2025, 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 0.6 kg N/animal place/year and will use a combination of the techniques for reducing the crude protein content.

BAT 4 Nutritional management - Phosphorus excretion

The Applicant has confirmed it will demonstrate that the installation can achieve levels of phosphorus excretion below the required BAT-AEL of 0.25 kg

P_2O_5/animal place/year and will use a combination of the techniques for 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:

• Farm Manager responsible for monitoring routine actions to minimise odour and odour risks are implemented and maintained by farmworkers, drivers and contractors.

• Farm Manager responsible for site tour every day including perimeter check for any abnormal elevated odour level, especially any with the potential to cause annoyance at sensitive receptors. 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 emission factors.

BAT 32 Ammonia emissions from poultry houses - Broilers

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

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

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 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 Badcocks Farm Poultry Unit received 02/12/2025, 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.

Odour management

Intensive farming is by its nature a potentially odorous activity. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance.

Condition 3.3 of the environmental permit reads as follows:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the Operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour."

Under section 3.3 of the guidance, an Odour Management Plan (OMP) is required to be approved as part of the permitting process if, as is the case here, sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the installation boundary. It is appropriate to require an OMP when such sensitive receptors have been identified within 400m of the installation to prevent or, where that is not practicable, to minimise the risk of pollution from odour emissions.

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

- Effect of diet
- Odour from feed delivery and storage
- Odour from problems with housing ventilation system
- Odour from gable end fans
- Odour from wet litter
- Odour issues in destocking
- Odour issues removing litter
- Odour issues with washout
- Odour issues with dirty water
- Macerator
- Carcass disposal
- Biosecurity
- Waste

Odour Management Plan Review

There are nine sensitive receptors located within 400m of the installation boundary, as listed below (please note, the distance stated is only an approximation from the Installation boundary to the assumed boundary of the property):

1. Public right of way – approximately 0m east of the Installation boundary.

2. Residential property – approximately 30m south of the Installation boundary.

3. Residential property – approximately 30m south of the Installation boundary.

4. Residential property – approximately 35m south of the Installation boundary.

5. Residential property – approximately 70m south of the Installation boundary.

6. Residential property – approximately 95m south of the Installation boundary.

7. Residential property – approximately 390m west of the Installation boundary.

8. Residential property – approximately 395m west of the Installation boundary.

9. Residential property – approximately 395m west of the Installation boundary.

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

The Operator has provided an OMP (submitted 17/04/2026) 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 (see consultation response below), there are no known historical odour complaints at this site.

The OMP also provides a suitable procedure in the event that complaints are made to the Operator. The OMP is required to be reviewed at least every year (as committed to in the OMP) and/or after a complaint is received, and/or after any changes to operations at the installation, whichever is the sooner. The OMP includes contingency measures to minimise odour pollution during abnormal operations. A list of remedial measures is included in the contingency plan, including triggers for commencing and ceasing use of these measures.

As there are sensitive receptors within 100m of the installation boundary, we asked for a more robust OMP. This included the following statement being added to the OMP "If substantiated odour complaints are received over a one-month period without resolution to odour problem a formal action plan with measures and timescales for relevant odour issues shall be presented to the Environment Agency for approval".

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. These activities are as follows:

- Noise from large delivery vehicle travelling to and from farm
- Noise from small vehicles travelling to and from farm
- Noise from automatic feeding equipment
- Noise from ventilation fans
- Noise from gable end fans
- Vehicles and machinery onsite
- Macerator
- People noise
- Destocking
- Removing litter
- Noise from emergency back-up generator

Noise Management Plan Review

The final NMP provided by applicant and assessed below was received as part of the application supporting documentation on 17/04/2026.

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 (see consultation response below), there are no known historical noise complaints at this site.

We have included our standard noise and vibration condition, condition 3.4.1, in the Permit, which requires that emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the Operator has used appropriate measures, including, but not limited to, those specified in any approved NMP (which is captured through condition 2.3 and Table S1.2 of the Permit), to prevent or where that is not practicable to minimise the noise and vibration.

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

Conclusion

We have assessed the NMP for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 ‘Noise management at intensive livestock Installations’. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution/nuisance.

Dust and bioaerosols management

The use of Best Available Techniques and good practice will ensure minimisation of emissions. There are measures included within the permit (the ‘Fugitive Emissions’ conditions) to provide a level of protection. Condition 3.2.1 ‘Emissions of substances not controlled by an emission limit’ is included in the permit. This is used in conjunction with condition 3.2.2 which states that in the event of fugitive emissions causing pollution following commissioning of the installation, the Operator is required to undertake a review of site activities, provide an emissions management plan and to undertake any mitigation recommended as part of that report, once agreed in writing with the Environment Agency.

In addition, guidance on our website concludes that Applicants need to produce and submit a dust and bioaerosol management plan beyond the requirement of the initial risk assessment, with their applications only if there are relevant receptors within 100 metres including the farmhouse or farm workers' houses. Details can be found via the link below:

www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols.

As there are receptors within 100m of the installation, the Applicant was required to submit a dust and bioaerosol management plan in this format. The final dust and bioaerosol management plan provided by the applicant and assessed below was received on 02/12/2026.

There are seven sensitive receptors within 100m of the installation boundary, the nearest point of their assumed property boundary is approximately 5 metres to the south of the installation boundary, and approximately 16 metres from the nearest poultry house (the Operator resides in this property). There is also a public right of way that borders the installation boundary to the east of the installation boundary.

In the guidance mentioned above it states that particulate concentrations fall off rapidly with distance from the emitting source. This fact, together with the proposed good management of the installation (such as keeping areas clean from build-up of dust and other measures in place to reduce dust and the risk of spillages e.g. litter and feed management/delivery procedures) all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed measures in their dust and bioaerosol management plan to reduce dust (which will inherently reduce bioaerosols) for the following potential risks:

- Dust from manufacture and feed selection
- Dust from feed delivery and storage
- Dust and bioaerosols from ventilation fans
- Gable end fans
- Dust issues with litter quality
- Dust issues with bird activity
- Dust issues during destocking
- Dust issues removing litter
- Washout

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 0.129 MWth; 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. The generator falls outside of the requirements of the Medium Combustion Plant Directive.

Mobile macerator

A mobile macerator is operated within the installation boundary for maceration of dead-in-shell and non-viable eggs. The macerator is contained inside a small, covered trailer. There are no point source emissions to air, water or land from operation of the macerator. Operation of the macerator is limited to normal day time hours (07.00-23.00hrs) in the working week (Monday to Friday and Saturday morning but exclusive of public & bank holidays). The macerator arrives on site the day after egg hatching and is only in use for a maximum of 1 hour per day. The macerated material, plus a small volume of dirty water from cleaning and disinfecting the macerator, is stored in secure containers in the storage area to minimise odour and flies and is frequently removed under the National Fallen Stock Scheme.

The mobile macerator is used for a limited period of time; however, the maceration process has the potential for environmental impact linked to odour pollution. It is also technically connected to the intensive farming scheduled activity through processing of rejected eggs and unviable chicks from the installation. The maximum time usage of the macerator is 1 hour per day the actual maximum operational capacity is limited to 4.7 tonnes per day. This is controlled via the addition of the macerator as a directly associated activity with the above stated operational capacity limit in Table S1.1 of the permit. Controls to minimise odour emissions resulting from operation of the macerator have been included in the OMP. The OMP plus operating techniques for the macerator have been included in Table S1.2 of the Permit.

Ammonia

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

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

Ammonia assessment – LWS / AW

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

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

Initial screening using ammonia screening tool version 4.6 (dated 20/03/2026) has indicated that emissions from Badcocks Farm Poultry Unit will only have a potential impact on the LWS and AW sites with a precautionary CLe of 1 µg/m^3 if they are within 250 m of the emission source.

Beyond 250 m the PC is less than 1 µg/m^3 and therefore beyond this distance the PC is insignificant. In this case most of the LWS and AW are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 1 – LWS / AW Assessment

Site	Distance from site (m)
Whitehouse Spring LWS	538
Stebbing Green LWS	1,276
Boxted Wood LWS	1,371
St Peter and St Paul Churchyard, Bardfield Saling LWS	1,694
Parsonage Farm Meadow LWS	1,737
Barn End LWS	1,829
Hall Farm Meadows LWS	1,833
Stebbing – The Downs Special Roadside Verge LWS	2,078
Whitehouse Spring AW	538
Boxted Wood AW	1,371

Screening using detailed modelling ('A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing Turkey Rearing Houses and Proposed Chicken Rearing Houses at Badcocks Farm Poultry Unit, Saling Road, near Stebbing in Essex dated June 2025) has determined that the PC on the Mousin Wood LWS and AW for ammonia emissions, nitrogen deposition and acid deposition from the application site for the proposed broilers are under the 100% significance threshold and can be screened out as having no likely significant effect. See results below.

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

Table 2 - Ammonia emissions

Site	Critical level ammonia µg/m^3	Predicted PC µg/m^3	PC % of critical level
Mouslin Wood LWS	3*	0.873	29.09
Mouslin Wood AW	3*	0.873	29.09

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

Table 3 – Nitrogen deposition

Site	Critical load kg N/ha/yr *	Predicted PC kg N/ha/yr	PC % of critical load
Mouslin Wood LWS	10	6.80	68.00
Mouslin Wood AW	10	6.80	68.00

* Critical load values taken from APIS website (www.apis.ac.uk) – 20/03/2026

Table 3 – Acid deposition

Site	Critical load keq/ha/yr *	Predicted PC keq/ha/yr	PC % of critical load
Mouslin Wood LWS	10.986	0.486	4.42
Mouslin Wood AW	10.986	0.486	4.42

* Critical load values taken from APIS website (www.apis.ac.uk) – 20/03/2026
** for acid deposition based on 1/14th of the maximum nitrogen deposition PC provided in Table 6b of the ammonia modelling report ('A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing Turkey Rearing Houses and Proposed Chicken Rearing Houses at Badcocks Farm Poultry Unit, Saling Road, near Stebbing in Essex' dated June 2025)

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:

- UK Health and Security Agency
- Director of Public Health
- Uttlesford District Council Environmental Health
- Health and Safety Executive

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

Operator

We are satisfied that the applicant (now the Operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

The regulated facility

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

The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

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.

Odour management

We have reviewed the odour management plan in accordance with our guidance on odour management.

We consider that the odour management plan is satisfactory, and we approve this plan.

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

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

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

Noise management

We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.

We consider that the noise management plan is satisfactory, and we approve this plan.

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

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

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

Dust and bioaerosol management

We have reviewed the dust and bioaerosol management plan in accordance with our guidance on emissions management plans for dust.

We consider that the dust and bioaerosol management plan is satisfactory and we approve this plan.

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

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

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

Emission limits

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.

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 07/01/2026 and ended on 04/02/2026.

Responses from organisations listed in the consultation section

Response received from: UK Health Security Agency (UKHSA) (22/01/2026).

Brief summary of issues raised:

1. Although mitigation measures are present for reducing the risk of accidents/incident hazards, an accident management plan is not included. The Environment Agency may wish to ensure they are satisfied with these measures.
2. If there are sensitive receptors within 100m of the installation boundary a bioaerosol risk assessment is required.
3. It is assumed the installation will comply in all respects with the requirements of the permit, including the application of Best Available Techniques (BAT). This should endure that emissions present a low risk to human health.

Summary of actions taken:

1. We do not need to see a full accident management plan at permit application stage; this will be assessed by future compliance visits on site. We are satisfied that an accident management plan will be in place as stated within the Environment Management Systems document.
2. The Applicant has submitted a dust and bioaerosol management plan on 02/12/2025 as there are sensitive receptors within 100m. We are satisfied with this document, and it is referenced with Table S1.2 - Operating Techniques, of the permit.
3. There is no reason to believe that the Operator will not comply with the permit. The Applicant has confirmed their compliance with all BAT conditions for the new installation in their BAT section of ‘Summary, technical standards and control measures’, supporting document dated November 2025, which has been referenced in Table S1.2 - Operating Techniques, of the permit.

Response received from: Uttlesford District Council Environmental Health (12/01/2026).

Brief summary of issues raised:

The supporting permitting documentation shows appropriate mitigation. They received two nearby fly complaints in October 2015 and 2017 but these were not substantiated as coming from this farm.

Summary of actions taken:

Bringing this farm under the Environmental Permitting Regulations 2016 (EPR) will lead to better regulation of this poultry farm which represents an improvement to the existing situation. The Environment Agency Environment Officer will be responsible for ensuring compliance with permit conditions, the application of Best Available Techniques and addressing any amenity-related complaints.

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

Representations from community and other organisations

Response received from: Coalition Against Factory Farming (CAFF) on 02/03/2026.

Brief summary of issues raised and actions taken:

1. 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 EPR permit application and have carried out an assessment of the environmental impact of the installation as part of the Permit determination.

2. Twin-tracking of EPR Permit and Planning Permission.
The decision whether to twin-track the applications is a matter for the Applicant. We have a legal duty to determine applications made to us under the EPR and we are satisfied that we have sufficient information to do so and to complete the determination.

3. Application is a major intensification
This farm is an existing under threshold turkey farm with two poultry houses, which house 29,852 turkeys. The change to 105,600 broilers within three poultry houses

will reduce the ammonia emitted by 80% as the emission factors used for broilers is much lower than for turkeys. Further to this all the process contributions (PC) are below 100% of the relevant critical level (CLe) or critical load (CLo) for the Local Wildlife Sites and Ancient Woodlands that screened in within 2km of the installation boundary and screened out as having no likely significant effect. Bringing this farm under the Environmental Permitting Regulations 2016 (EPR) will lead to better regulation of this poultry farm which represents an improvement to the existing situation. The Environment Agency does not operate under the Town and Country Planning Act 1990.

4. Greenhouse gas assessment calculation required for EIA
As discussed in point 1 above, an EIA is required as part of any planning application. A Greenhouse gas assessment is not required as part of the EPR permit application.

5. Intensive poultry production represents an inefficient use of grain protein
This is not an issue under the Environment Agency's regulatory responsibility. It does not therefore fall within the scope of the Permit determination. The Environment Agency is responsible for ensuring that the activities at the Installation do not have an unacceptable impact on the environment or human health.

6. Manure storage and spreading
No manure is stored within the Installation boundary; all manure is exported from the Installation for spreading on land owned by third parties or as fuel to a local power station.

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.

The Applicant has confirmed that the receiver of the manure will confirm it is spread to land in accordance with the Code of Good Agricultural Practice, or in accordance with the manure management plan for the receiving land.

7. Increase in the number of batches and the impact on local residents
There will be an increase in the number of poultry cycles with this application, the previous unregulated, under threshold turkeys would have had approximately 2 cycles a year. There will be approximately 7.6 cycles of broilers per year, which will be done on an all-in, all-out basis. The greatest risk will be from odour, and we have asked for a more robust odour management plan (OMP) with this application due to the proximity of sensitive receptors. This OMP includes timings for contingency measures to be implemented, stricter details on litter removal including ensuring litter is covered when being transported from site and includes detailed on-site odour monitoring. The following statement has also been added to the OMP "*If substantiated odour complaints are received over a one-month period without resolution to odour problem a formal action plan with measures and timescales for relevant odour issues shall be presented to the Environment Agency for approval*", this will help to give us greater enforcement power to get any odour problems resolved quickly if they do arise.

Once the permit has been issued, we will conduct compliance visits to ensure this site is operated correctly. We will ensure if any nuisance complaints are received, they are investigated fully and appropriate migration will be put in place. 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. We consulted relevant health bodies as part of our external consultation process and no major concerns were raised.

8. Assessment of impacts on groundwater and nearby watercourses
An assessment of the site drainage, including the risk to groundwater and surface water from potential pollutants from the Installation, has been undertaken and the Applicant's Site Condition Report, covering protection of land and ground water, has been reviewed. We are satisfied that the risk to ground and surface waters is low.

Roof water from the poultry houses and water draining from the yard (excluding periods of washout when water from the yard drains to the underground tanks) is directed to stone filled French drains with perforated pipes under the eaves of the poultry houses, acting as soakaways. Any surplus water overflows to the lined attenuation pond (which gives further settlement) before being discharged to the offside ditch to the east of the installation boundary. So, the discharge will receive appropriate attenuation before it is discharged from the installation boundary.

Water from the wash out of poultry houses (slurry) is channelled to underground collection tanks close to the poultry houses to await export off site for spreading on land owned by third parties. The collection tanks are built to conform to specifications in EPR 6.09 'How to comply with your environmental permit for

intensive farming', and specifically to meet the requirements of The Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010 (as amended 2013). Diverter bungs will be used during wash down periods to prevent the contamination of surface water systems and to divert the wash water to the dirty water tank. Clean drainage systems will not be contaminated.

Wash water applied to land must be spread in accordance with the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018 (Farming Rules for Water), and, in designated areas, the Nitrate Pollution Prevention Regulations 2015 which were further amended in 2016, a manure management plan (in accordance with the Nitrate Vulnerable Zone (NVZ) rules) and Condition 2.3.5 of the Permit, which requires that all appropriate measures are used to prevent or where that is not practicable minimise pollution.

The Applicant has proposed appropriate measures to manage fugitive emissions (emissions not controlled by an emission limit). We are satisfied that these measures will mitigate emissions to prevent a significant impact from the site. These measures are listed in Table S1.2 of the Permit and the Operator is required to comply with them as stipulated in Condition 2.3.1 of the Permit. Standard conditions 3.2.1 and 3.2.2 concerning fugitive emissions are also included in the permit.

Drinking water is supplied by mains water, so there is no borehole at this site.

We conclude that the measures in place will ensure that any contaminated water will be contained, and potentially lightly contaminated water has sufficient mitigation in place. Therefore, no pollution of groundwater or surface water should occur as a result of operations at the Installation.

9. Nutrient pollution

Assessment of nutrients is outside the scope of the determination of the Application. Where organic manures (including poultry manure and wash water) are applied to land owned and managed by the Operator, it must be spread in accordance with a manure management plan.

As outlined in point 8 above, the Applicant has confirmed that all manure and wash water is exported from the Installation for fuel to a local power station or for spreading on land owned by third parties and that the receiver will confirm it is spread to land in accordance with the manure management plan for the receiving land.

We have carried out an assessment of the impact from this proposal on nearby habitat sites from ammonia emissions. This has considered any Special Areas of Conservation, Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest within 5km of the Installation boundary and any other nature conservation sites, including National Nature Reserves, Local Nature Reserves, Ancient Woodlands and Local Wildlife Sites, within 2km of the Installation

boundary. Screening using the ammonia screening tool version 4.6, has concluded that all ammonia emissions from the site are insignificant. The key issues section of this document summarises our ammonia assessment.

We are satisfied, following a review of the information provided by the Applicant and the conditions present within the Permit, that emissions from the Installation will not cause significant pollution of the environment.

10. Global environmental footprint and previous turkey numbers within planning applications

Given the nature of the proposed activity, there is the potential for atmospheric ammonia to be released into the environment and impact nearby sensitive habitats and species. For this reason, we have carried out an assessment of the risk and concluded that all ammonia emissions from the site are insignificant. The key issues section of this document summarises our ammonia assessment. In relation to the broader impact of the greenhouse emissions from imported food, the effects of increased meat production on UK food security, and the supply chain on national security via global biodiversity loss, this does not fall within the regulatory responsibility of the Environment Agency.

In relation to the previous discrepancy in turkey numbers within planning applications, this is not relevant to this EPR permit application, as this application has been assessed on the number of broilers for the proposed permit, see ammonia section in key issues section above. We have not compared the proposal to the under-threshold turkey baseline for our ammonia assessment.

11. Animal welfare

Animal welfare is not within the regulatory responsibility of the Environment Agency. It does not form part of the Permit decision making process. The Environment Agency is responsible for ensuring that 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.

12. Increased pollution concerns

There are nine sensitive receptors, including a public right of way within 400m of the Installation boundary and so the Applicant was required to submit an odour management plan (OMP) and noise management plan (NMP) as part of the application. We are satisfied that all sources of odour and receptors have been identified, and that the proposed mitigation measures will minimise the risk of odour and noise pollution/nuisance beyond the Installation boundary. The use of BAT and good practice will ensure emissions of odour and noise are minimised. Furthermore, standard conditions 3.3.1 and 3.4.1 concerning odour and noise have been included in the permit.

Our approach to the control of dust and bioaerosols 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 source and fugitive emissions and 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. There are seven properties within 100m of the installation boundary and the Applicant has supplied a satisfactory dust and bioaerosol management plan for this site, with the nearest property being the Operators residence.

The Applicant submitted an environmental risk assessment 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 manure. 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. Issues from manure and dirty water have been discussed above under point 6 and issues on groundwater and nearby watercourses have been discussed under point 8.

We have carried out an assessment of the impact from this proposal on nearby habitat sites from ammonia emissions. There are no Special Area of Conservations, Special Protection Areas, Ramsars or Site of Special Scientific Interest within 5 km of the installation boundary. There are three ancient woodlands and nine local wildlife sites within 2 km of the installation boundary. Screening using the ammonia screening tool version 4.6 and detailed modelling “A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing Turkey Rearing Houses and Proposed Chicken Rearing Houses at Badcocks Farm Poultry Unit, Saling Road, near Stebbing in Essex dated June 2025”, has concluded that all ammonia emissions from the site are insignificant. The ammonia key issues section of this document summarises our ammonia assessment.

A Greenhouse gas assessment is not required as part of the EPR permit application.

Consideration of traffic beyond the installation boundary, is not within the regulatory responsibility of the Environment Agency. It is a matter for the Local Planning Authority to consider in relation to any planning application.

As discussed in point 1 above, an EIA is required as part of any planning application but is not required for this EPR permit application.

Based upon the information in the Application we are satisfied that the appropriate measures will be in place to prevent pollution from beyond the Installation boundary and that activities will not give rise to significant pollution or harm to human health.

Response received from: FAITH Animal Rescue on 02/03/2026. These raised many of the same issues as previously addressed. Only those issues additional to those already considered are listed below:

Brief summary of issues raised, and actions taken:

1. Climate change
Assessment of a climate change is outside the scope of the determination of the Application however the Operator will be required to complete a climate change risk assessment as part of ongoing compliance, which our compliance team will assess.

2. Meat consumption
This is not an issue under the Environment Agency's regulatory responsibility. It does not therefore fall within the scope of the Permit determination.

3. Cumulative impacts of multiple intensive farms in one river catchment
The permission to grant planning to construct an intensive farming facility in a specific location is the responsibility of the local council and outside of the regulatory responsibility of the Environment Agency. In terms of our responsibility we have confirmed compliance with our EPR 6.09 Intensive farming: comply with your environmental permit by ensuring impact on local watercourses is minimised. This includes dedicated site drainage with separate clean/lightly contaminated and dirty water drainage. For all emissions of lightly contaminated drainage, appropriate attenuation is in place in the form of stone filled French drains with perforated pipes acting as soakaways and a lined attenuation pond given settlement before being discharged to the offside ditch to the east of the installation boundary. In conclusion we are confident measures are in place for this installation to minimise environmental impacts on local watercourses.

Representations from individual members of the public

Thirty-one responses were received from individual members of the public. These raised many of the same issues as previously addressed. Only those issues additional to those already considered are listed below:

1. Imported soy for animal feed and the environmental consequences
This is not an issue under the Environment Agency's regulatory responsibility. It does not therefore fall within the scope of the Permit determination.

2. Traffic
Consideration of traffic beyond the installation boundary is not within the regulatory responsibility of the Environment Agency. It is a matter for the Local Planning Authority to consider in relation to any planning application.

3. Use of antibiotics
The use of antibiotics does not fall within the regulatory responsibility of the Environment Agency.

4. A clear biosecurity and health management plan
Effective biosecurity measures on site will 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. We consulted relevant health bodies as part of our external consultation process and no major concerns were raised.

5. Biodiversity and habitat loss
Given the nature of the proposed activity, there is the potential for atmospheric ammonia to be released into the environment and impact nearby sensitive habitats and species. For this reason, we have carried out an assessment of the risk and concluded that all ammonia emissions from the site are insignificant. The key issues section of this document summarises our ammonia assessment. The installation boundary is marked clearly and is included in the permit and does not encroach on local habitat sites.

6. Deforestation and soil degradation
This is not an issue under the Environment Agency's regulatory responsibility within the EPR regulations. It does not therefore fall within the scope of the Permit determination.

7. Pesticide and fertiliser use
This is not an issue under the Environment Agency's regulatory responsibility within the EPR regulations. It does not therefore fall within the scope of the Permit determination.