Permitting Decisions – Variation and part surrender

We have decided to grant the variation and partial surrender for **Pershore Poultry Unit** operated by **Mr Eric Drummond, Mrs Susanna Drummond and Mr Eric Benjamin Drummond (trading as E.C. Drummond & Son).**

The variation number is **EPR/DP3937MG/V008.**

The partial surrender number is **EPR/DP3937MG/S009.**

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

- Partial surrender: removal of land linked to existing Combined Heat and Power (CHP) Plant which was never technically connected to installation intensive farming scheduled activities.
- Variation; addition of two new poultry houses and associated increase in installation boundary with total bird numbers unchanged. Removal of two existing smaller biomass boilers and addition of one new larger biomass CHP unit, with 1.047 MW thermal input capacity. This unit is subject to the Medium Combustion Plant Directive and also as the fuel is Grade A waste wood and thermal input capacity is greater than 50 kgs/hour this is a new 5.1 Part B (v) 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 and the combined variation and partial surrender notice.

Key issues of the decision

Partial surrender

We have agreed to the partial surrender of the land linked to historic Combined Heat and Power (CHP) plant that is not technically connected to this installation, as it is not the main user of heat and power from this unit.

Our compliance team have confirmed that no intensive farming activities took place on this land area. The CHP will continue to be permitted via a standalone Medium Combustion Plant (MCP) permit for a biogas CHP. The MCP permit is EPR/EP3026LH, operated by Vale Green Energy and the permit issued on 05/12/25.

We have agreed therefore this is a partial surrender where no intensive farming activities took place on the land and we are confident this MCP is covered by the EPR/EP3026LH permit.

Hence, we are satisfied that this land can be surrendered as inherently low risk.

Variation

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 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.

BAT Conclusions review

There are 34 BAT Conclusion measures in total within the BAT Conclusion document dated 21st February 2017.

The Applicant has confirmed their compliance with all BAT conditions for the new housing in their BAT document dated 17/03/26, 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 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 and will use BAT 4a technique reducing the crude protein content.

BAT 24 Monitoring of emissions and process parameters - Total nitrogen and phosphorus excretion

Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

This will be verified by means of manure analysis and reported annually.

BAT 25 Monitoring of emissions and process parameters – Ammonia emissions

Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

The Applicant has confirmed they will report the ammonia emissions to the Environment Agency annually by utilising estimation by using emission factors.

BAT 26 Monitoring of emissions and process parameters - Odour

The approved odour management plan (OMP) includes the following details for on farm monitoring and continual improvement:

- The staff will perform a weekly 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 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.

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 farm dated 20/02/25, 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.

The site condition report is updated for both land removed via partial surrender and new land introduced to the installation with the variation application.

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 for each listed risk.

There are two sensitive receptors located within 400m of the installation boundary. The closest receptor is 109 metres from the installation boundary and to east of the installation.

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.

It should also be noted that for this installation , having consulted with the Local Authority and our local area compliance team there are no known historical odour complaints at this site. The Local Authority did not provide a consultation response.

The Operator has provided an OMP submitted 05/12/25 this has been assessed against the requirements of 'How to Comply with your Environmental Permit for

Intensive Farming' EPR 6.09 (version 2), Appendix 4 guidance 'Odour Management at Intensive Livestock Installations' and our Top Tips Guidance and Poultry Industry Good Practice Checklist (August 2013) or Pig Industry Good Practice Checklist (August 2013), as well as the site-specific circumstances at the Installation. We consider that the OMP is acceptable because it complies with the above guidance, with details of odour control measures, contingency measures and complaint procedures described below.

The Operator is required to manage activities at the Installation in accordance with condition 3.3.1 of the Permit and its OMP. The OMP includes odour control measures and procedural measures. The Operator has identified the potential sources of odour as well as the potential risks and problems, and detailed actions taken to minimise odour including contingencies for abnormal operations.

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 installation impacts.

Noise Management Plan Review

The final NMP provided by applicant and assessed below was received as part of the application supporting documentation on 05/12/2025.

The NMP provides a suitable procedure in the event of complaints in relation to noise. The NMP is required to be reviewed at least every year (as committed to in the NMP), however the Operator has confirmed that it will be reviewed if a complaint is received, whichever is sooner. The NMP includes noise control measures and procedural measures.

It should also be noted that for this installation, having consulted with the Local Authority and our local area compliance team there are no known historical noise complaints at this site. The Local Authority did not provide a consultation response.

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

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

Conclusion

We have assessed the NMP for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 'Noise management at intensive livestock Installations'. We are satisfied that all sources and receptors have been

identified, and that the proposed mitigation measures will minimise the risk of noise pollution/nuisance.

Dust and bioaerosols management

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

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

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

As there are receptors within 100m of the installation, the Applicant was required to submit a dust and bioaerosol management plan in this format. The final dust and bioaerosol management plan provided by the applicant and assessed below was received on 17/03/26.

There are two sensitive receptors within 100m of the installation boundary, the nearest point of their assumed property boundary is approximately 5 metres to the northwest of the installation boundary.

In light of there being two sensitive receptors within 10 metres of the installation boundary, we required Operator to submit a revised plan with additional measures included to minimise human dust exposure from installation at these specific receptors.

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:

We are satisfied that the measures outlined in the application will minimise the potential for dust and bioaerosol emissions from the installation.

Medium Combustion Plant (MCP)

The Operator has provided information as follows:

- Emission limit data to show compliance with MCP Emissions Limit Values as follows:
  - Dust :50 mg/Nm3
  - Oxides of Nitrogen : 500 mg/Nm3.
- Monitoring : compliance with MCP monitoring standard as follows:

  https://www.gov.uk/government/publications/monitoring-stack-emissions-low-risk-mcps-and-specified-generators/monitoring-stack-emissions-low-risk-mcps-and-specified-generators
- Operational detail; operating details form completed including operating hours; document submitted 17/03/26.

Conclusion

MCP requirements have been complied with.

Standby generator

There are two standby generators with net thermal rated input as follows

- The generators have a thermal input of 850kw & 606kw.

They 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 fall outside of the requirements of the Medium Combustion Plant Directive.

Biomass boiler

The Applicant is varying their permit to include one new biomass boiler with a net rated thermal input of 1.047 Megawatts (MW). The existing two smaller biomass boilers are being removed from the installation.

The Environment Agency has assessed the pollution risks and has concluded that air emissions from small biomass boilers are not likely to pose a significant risk to the

environment or human health providing certain conditions are met. Therefore, a quantitative assessment of air emissions will not be required for where:

- the fuel will be derived from virgin timber, miscanthus or straw, and;
- the biomass boiler appliance and installation meets the technical criteria equivalent to the eligibility for the former Renewable Heat Incentive, and;

For poultry:

- the aggregate boiler net rated thermal input is less than or equal to 4 MWth, and no individual boiler has a net thermal input greater than 1 MWth, and;
- the stack height must be a minimum of 5 metres above the ground (where there are buildings within 25 metres the stack height must be greater than 1 metre above the roof level of buildings within 25 metres (including building housing boiler(s) if relevant) and:
- there are no sensitive receptors within 50 metres of the emission points.

This is in line with the Environment Agency's document "Air Quality and Modelling Unit C1127a Biomass firing boilers for intensive poultry rearing". An assessment has been undertaken to consider the proposed addition of the biomass boiler.

Our risk assessment has shown that the biomass boilers will meet the requirements of the criteria above and are, therefore, considered not likely to pose a significant risk to the environment or human health and no further assessment is required].

the aggregate boiler net rated thermal input is:

A. less than 0.5MWth, or;
B. less than 1MWth where the stack height is greater than 1 metre above the roof level of adjacent buildings including building housing boiler(s) if relevant (where there are no adjacent buildings, the stack height must be a minimum of 3 metres above ground), and there are:
    - no Special Areas of Conservation, Special Protection Areas, Ramsar sites or Sites of Special Scientific Interest within 500 metres of the emission point(s);
    - no National Nature Reserves, Local Nature Reserves, ancient woodlands or local wildlife sites within 100 metres of the emission point(s), or;
C. less than 2MWth where, in addition to the above criteria for less than 1MWth boilers, there are:
    - no sensitive receptors within 150 metres of the emission point(s).

This is in line with the Environment Agency's May 2013 document "Biomass boilers on EPR Intensive Farms". An assessment has been undertaken to consider the proposed addition of the biomass boiler.

Conclusion

The Environment Agency's risk assessment has shown that the biomass boiler does not initially meet the requirements of any of criteria above.

The installation is close to meeting criteria C, and a more detailed assessment is required.

The installation aggregate capacity is lower than 2MW, but individual boiler is just above 1MW criteria at 1.047 MW and there is a receptor just within 150 metres at 140 metres.

After further review we have concluded that will impacts are not likely to pose a significant risk to the environment or human health based on following :

- Dust: Screening above based on 70 mg/Nm3 and MCP criteria complied with is less than 50 mg/Nm3
- Oxides of Nitrogen ; Screening above based on 250 mg/Nm3 and Applicant biomass performance data of 204 mg/Nm^3
  (based on emission correction to 6 % O2).
- More detailed quantitative assessment will lead to lower process contributions below no significant impact thresholds

Therefore, we conclude no further assessment is required.

Conclusion

In accordance with the Environment Agency's Air Quality Technical Advisory Guidance 14 version 2, dated November 21, for combustion plants under 2 MW, habitats assessment is only required for European sites and Sites of Special Scientific Interest if within 1 km and for other nature conservation sites if within 300 m. This proposal has no European sites or Sites of Special Scientific Interest within 1 km and no other nature conservation sites within 300m so is considered acceptable and no further assessment is required.

Grade A Wood Burning

The Operator has applied to use grade A recycled waste wood as fuel for a single biomass boiler with a net rated thermal input of 1.047 (MW). Where virgin and waste wood are mixed the fuel is all considered a waste.
The biomass boiler is to be fed by grade A wood only or a mixture of Grade A wood and virgin wood.

Grade A wood definition:
"Grade A waste wood" means visibly 'clean' recycled waste wood mainly originating from packaging waste, pallets, packing cases and process off-cuts from the manufacture of untreated wood products (as defined in BSI PAS 111: 2012).
The total capacity of the installation's biomass boilers using Grade A wood is **380** kgs/hour.
As the activity does not meet the criteria of a U4 waste exemption, it will fall under a directly associated activity or section 5.1 B) (a) (v) of the Environmental Permitting Regulations - 'The incineration in a small waste incineration plant with an aggregated capacity of 50kgs or more per hour of the following waste – wood waste with the exception of waste which may contain halogenated organic compounds or heavy metals as a result of treatment with wood preservatives or coatings'.

A site-specific description of waste source and procedure have been reviewed and accepted as satisfactory to ensure that only grade A waste wood will be accepted.

The Operator will only be permitted to accept this waste type. Table S2.2 of the permit includes relevant waste wood and descriptions. We are satisfied that the waste wood is from a manufacturing source and that it will not be contaminated.

Ammonia

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

There are no Special Areas of Conservation (SAC) and no Special Protection Areas (SPA) and no Ramsar sites located within 5 kilometres (km) of the installation boundary. There are six Sites of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There is also one Local Wildlife Site (LWS) and no other conversation sites within 2 km of the installation boundary.

Ammonia assessment – SSSI

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

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

Initial screening using the ammonia screening tool version 4.6 (dated 05/05/26) 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 **2761** metres of the emission source.

Beyond **2761 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 listed below 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 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
Naunton Court Meadows	2,764
Highclere	4,247

Name of SSSI	Distance from site (m)
Portway Farm Meadows	4,458
Grafton Wood	4,880

No further assessment is required.

Screening using the ammonia screening tool version 4.6 05/05/26, has indicated that the PC for SSSIs listed below are predicted to be less than 20% of the CLe for ammonia emissions / nitrogen deposition / acid deposition therefore it is possible to conclude no damage. The results of the ammonia screening tool version 4.6 are given in the tables below.

Table 2 – Ammonia emissions

Site	Critical level ammonia µg/m^3	Predicted PC µg/m^3	PC % of Critical level
Yellow House Meadow SSSI	3*	0.260	8.7
Baynhall Meadow SSSI	3*	0.207	6.9

*Critical level values taken from Air Pollution Information System (APIS) website (www.apis.ac.uk) - [05/05/26]

Table 3 – Nitrogen deposition

Site	Critical load kg N/ha/yr*	Predicted PC kg N/ha/yr	PC % of critical load
Yellow House Meadow SSSI	10	1.349	13.5
Baynhall Meadow SSSI	10	1.078	10.8

* Critical load values taken from Air Pollution Information System (APIS) website (www.apis.ac.uk) -[05/05/26]

Table 4– Acid deposition

Site	Critical load keq/ha/yr *	Predicted PC keq/ha/yr	PC % of critical load
Yellow House Meadow SSSI	4.928	0.096	1.9
Baynhall Meadow SSSI	4.928	0.077	1.6

* Critical load values taken from APIS website (www.apis.ac.uk) - [05/05/26]

No further assessment is necessary.

Ammonia assessment – LWS

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

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

Initial screening using ammonia screening tool version 4.6 dated 05/05/26, Has indicated that emissions from this installation, will only have a potential impact on the LWS with a precautionary CLe of 1 µg/m^3 if they are within **1,116m** of the emission source.

Beyond **1,116m** the PC is less than 1 µg/m^3 and therefore beyond this distance the PC is insignificant. In this case the LWS is beyond this distance (see table below) and therefore screen out of any further assessment.

Table 5 – LWS Assessment

Site	Distance from site (m)
Piddle and Whitsun Brooks LWS	1,266

No further assessment is required.

Decision considerations

Confidential information

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

The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

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

The decision was taken in accordance with our guidance on confidentiality.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Health and Safety Executive
- UKHSA
- Department of Public Health ; Worcestershire
- Worcestershire 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 facility at the site in accordance with RGN2 ‘Understanding the meaning of regulated facility’. The permit table S1,1 has been updated to include the new waste wood burner scheduled activity (5.1 B (a) (v)).

The site

The Operator has provided a plan which we consider to be satisfactory, showing the extent of the site facilities.

The plans show 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 no European Sites/Ramsar sites within relevant 5km distance and hence no requirement for a 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.

Medium Combustion Plants

The assessment shows that applying the conservative criteria in our guidance on environmental risk assessment or similar methodology supplied by the Operator and reviewed by ourselves, all emissions may be categorised as environmentally not significant.

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’.

We consider that the activities carried out at the site have the potential to cause noise that might cause pollution outside the site and consider it appropriate to include specific measures.

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

Dust and bioaerosol management

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

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

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

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

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

Updating permit conditions during consolidation

We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit.

Raw materials

We have specified limits and controls on the use of raw materials and fuels.

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

We are satisfied that the Operator can accept these wastes for the following reasons:

- they are suitable for the proposed activities
- the proposed infrastructure is appropriate; and
- the environmental risk assessment is acceptable.

Waste codes are included as listed in permit table S2.2.

Emission limits

Emission Limit Values (ELVs) based on Medium Combustion Plant Directive requirements have been added for the following substances:

- Dust
- Oxides of Nitrogen

We have decided that emission limits are required in the permit. These limits are included in table S3.3 of the permit.

Monitoring

We have decided that monitoring should be added linked to MCP unit for the following parameters, using the methods detailed and to the frequencies specified:

- All those parameters listed above with ELVs
- Carbon Monoxide

We made these decisions in accordance with MCP technical guidance:

Medium Combustion Plant guidance: https://www.gov.uk//guidance/medium-combustion-plant-and-specified-generator-permits-how-to-comply.

Reporting

We have added reporting requirements for MCP monitoring as listed above.

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.

Decarbonisation Readiness

This application for CHP unit addition was received before 28/2/26 and hence Decarbonisation Readiness criteria do not apply.

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 **12/03/26** and ended on **13/04/26.**

Responses from organisations listed in the consultation section

Response received from : UKHSA . Response dated 16/04/26

Brief summary of issues raised:

Overall listing key issues including dust, ammonia, combustion gas and odour. No specific issues listed based on adequate controls and BAT compliance

Summary of actions taken:

No specific actions. Key issues summarises actions to ensure BAT compliance. In addition, dust, odour and noise management plans are in place to ensure adequate controls to minimise emissions. The key issues summarises compliance with Medium Combustion Plant emission limits to ensure combustion unit emissions are minimised.

Conclusion

The Health and Safety Executive/ Director of Public Health , the local Worcestershire County Council Environmental Health Department were also consulted but no responses were received.

There were no responses from the general public nor any responses from other organisations or community groups.