

Permitting Decisions - Variation

We have decided to grant the variation for Great Ness Poultry Farm operated by Great Ness Poultry Limited.

The variation number is EPR/KP3130HL/V005.

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 variation authorises the following changes:

- Increase the permitted broiler numbers from 350,000 to 410,000. There will be no increase to the installation boundary and no new additional poultry houses.

Purpose of this document

This decision document provides a record of the decision-making process. It

- highlights key issues in the determination
- summarises the decision-making process in the decision considerations section to show how the main relevant factors have been taken into account
- shows how we have considered the consultation responses

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the variation notice.

Key issues of the decision

Intensive Rearing of Poultry or Pigs BAT Conclusions document

The Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) was published on 21st February 2017. There is now a separate BAT Conclusions document which sets out the standards that permitted farms will have to meet.

All new and redeveloped housing applied for in a permit variation must be compliant with the BAT Conclusions from the first day of operation. The BAT compliance of any existing housing has been subject to a sector review, however, for some reviewed permits, only generic limits have been included and individual housing should now be considered. Any existing housing that undergoes redevelopment with changes to housing location or expansion beyond the existing footprint is classed as new plant.

There are some additional requirements for permit holders. The BAT Conclusions include BAT-Associated Emission Levels (BAT AELs) for ammonia emissions, which will apply to the majority of permits, as well as BAT AELs for nitrogen and phosphorus excretion.

For some types of rearing practices, stricter standards apply to farms and housing permitted after the BAT Conclusions were published.

BAT Conclusions review

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

The Applicant has confirmed their compliance with all BAT conditions for the new housing in Application Variation V005 Supporting Information - 80904 BAT Assessment dated 10/12/2025.

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 0.25kg P₂O₅/animal place/year and will use BAT 4a technique reducing the crude protein content.

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

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

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

BAT 25 Monitoring of emissions and process parameters – Ammonia emissions

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

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

BAT 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:

- Minimum weekly perimeter fence odour sniff checks by a person not directly involved in the poultry.
- 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 NH₃/animal place/year. The Applicant will meet this as the emission factor for broilers is 0.024 kg NH₃/animal place/year.

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

Detailed assessment of specific BAT measures

Ammonia emission controls – BAT Conclusion 32

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.

'New plant' is defined as plant first permitted at the site of the farm following the publication of the BAT Conclusions.

For variations all new housing on existing farms will need to meet the BAT AEL. Existing housing BAT compliance has been subject to a sector review.

Industrial Emissions Directive (IED)

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

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:

- Manufacture and selection of feed
- Feed delivery and storage
- Ventilation system
- Litter management
- Carcass storage and disposal
- Poultry house clean out
- Dirty water management

Odour Management Plan Review

There are four 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. Residential property/Farm – approximately 115m southwest of the Installation boundary.
2. Residential property – approximately 331m north of the Installation boundary.
3. Residential property – approximately 292m north of the Installation boundary.
4. Residential property – approximately 324m northwest of the Installation boundary.

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

The Operator has provided an OMP (submitted 19/05/2026) 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, 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.

The Environment Agency has reviewed the OMP and considers it complies with the requirements of our H4 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:

- Large and small vehicles travelling to and from the farm.
- Large vehicle movement on site – including delivery of feed, transporting birds, equipment used to clean houses, litter and dirty water removal.
- Small vehicles (staff cars, visitor cars, courier vans).
- Feed transfer from lorry to bins.
- Ventilation fans.
- Alarm system and standby generator.
- Broilers – including catching and removal from site.
- Personnel.
- Building work and repairs.
- Feed systems.
- House clean out.
- Biomass boiler.

Noise Management Plan Review

The final NMP provided by applicant and assessed below was received as part of the application supporting documentation on 19/05/2026.

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, 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 28/04/2026.

There is one sensitive receptor within 100m of the installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 66 metres to the northwest of the installation boundary, and approximately 95 metres from the nearest poultry house.

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:

- Feed type and delivery.
- Bedding materials.
- Litter management.
- Ventilation.
- House cleaning operations.
- Bird type and numbers.
- Biomass boilers.

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 one standby generator with a net thermal rated input of 0.526MWth and it will not be tested more than 50 hours per year or operated (including testing) for more than 500 hours per year (averaged over 3 years) for emergency use only as a temporary power source if there is a mains power failure. This falls outside of Medium Combustion Plant.

Ammonia

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

Ammonia assessment – SSSI

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

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

Initial screening using the ammonia screening tool version 4.6 (dated 05/12/2025) has indicated that emissions from Great Ness Poultry Farm will only have a potential impact on SSSIs with a precautionary CL_e of 1 µg/m³ if they are within 1,340 metres of the emission source.

Beyond 1,340m the PC is less than 0.2 µg/m³ (i.e. less than 20% of the precautionary 1 µg/m³ CL_e) and therefore beyond this distance the PC is insignificant. In this case all SSSIs are beyond this distance (see table below) and therefore screen out of any further assessment.

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

Table 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
Shrawardine Pool (SSSI)	2,188
River Severn at Montford (SSSI)	3,432
Lin Can Moss (SSSI)	3,661

No further assessment is required.

Ammonia assessment – LWS, AW and LNR

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 (CL_e) or critical load (CL_o) then the farm can be permitted with no further assessment.

Initial screening using ammonia screening tool version 4.6 (dated 05/12/2025) has indicated that emissions from Great Ness Poultry Farm will only have a potential impact on the LWS, AW and LNR sites with a precautionary CLe of 1 µg/m³ if they are within 459m of the emission source.

Beyond 459m the PC is less than 1 µg/m³ and therefore beyond this distance the PC is insignificant. In this case all LWSs, AWs and LNRs are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 2 – LWS, AW and LNR Assessment

Site	Distance from site (m)
Nesscliffe Country Park (LNR)	1,535
Cottage Plantation Pools (LWS)	1,031
Nescliffe, Great Ness (LWS)	1,527
The Cliffe (LWS)	1,974
Nesscliffe Hill Wood (AW)	1,537
Vales Wood (AW)	1,958

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:

- Local Authority – Environmental Health/ Environmental Protection department.
- Local Authority – Director of Public Health.
- Health and Safety Executive.
- UK Health Security Agency.

The comments and our responses are summarised in the [consultation responses](#) section.

The site

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

The plans are included in the permit.

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.

Updating permit conditions during consolidation

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

Emission limits

No emission limits have been added, amended or deleted as a result of this variation.

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

Monitoring

Monitoring has not changed as a result of this variation.

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

Reporting

Reporting has not changed as a result of this variation.

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

Management system

We are not aware of any reason to consider that the Operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on Operator competence and how to develop a management system for environmental permits.

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit variation.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the Operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

The consultation commenced on 24/02/2026 and ended on 31/03/2026.

Responses from organisations listed in the consultation section

Response received from UK Health Security Agency dated 27/03/2026:

Brief summary of issues raised:

1. The Environment Agency should satisfy itself that the applicant's assumption – that increasing the number of broilers, albeit with reduced bird size, will not lead to increased fugitive emissions of ammonia, dust or bioaerosols – has been appropriately assessed.
2. The Environment Agency should satisfy itself that suitable inspections will take place on site to monitor odour emissions and appropriate action is taken should any odours be identified.

Summary of actions taken:

1. Smaller poultry breeds tend to have lower emissions so the impacts will be reduced. We have also 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. A revised Dust Management Plan was requested and received on 28/04/2026 which contains a dust mitigation and risk assessment. An Environmental Risk Assessment was also submitted for dust and fugitive emissions.
2. A revised Odour Management Plan was requested and received on 19/05/2026 which includes odour monitoring and mitigation. An Environmental Risk Assessment was also submitted for odour and fugitive emissions. Compliance checks will be undertaken by the Environment Officers within the Area teams.

Representations from community and other organisations

Response received from Communities Against Factory Farming (CAFF) dated 02/04/2026:

Brief summary of issues raised:

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 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. Stocking density and animal welfare:

Stocking density is an animal welfare issue and beyond our regulatory scope. We respond to applications where stocking densities changes leading to poultry housing changes in terms of our regulatory responsibility under EPR but overall animal welfare itself is beyond our regulatory scope.

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.

4. Greenhouse gas assessment calculation required for EIA:

As discussed 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. Used litter and dirty water offsite:

No used litter is stored on site and is exported offsite in covered trailers for spreading on operator-controlled land.

The land where used litter may be stored or spread does not form part of the installation and so used litter 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 ranging areas 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 used litter will confirm it is spread to land in accordance with the manure management plan for the receiving land.

6. 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 is intercepted by adjacent French drains acting as soakaways which flow to a swale soakaway via underground pipes with an overflow into a ditch which ultimately leads to the River Severn. Water draining from the yard (excluding periods of washout when water from the yard drains to the underground tanks) is directed to the swale soakaway via underground pipes. Therefore, there is no discharge direct to ground or surface waters from the installation.

Water from the wash out of poultry houses (slurry) is channelled to underground collection tanks close to the 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.

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.

7. Cumulative impacts of multiple intensive agricultural developments in one river catchment:

Scale, location and land use are matters for consideration during the planning process and do not form part of the Permit decision. The density of farms within a given area is not normally a relevant consideration under the EPR unless our risk assessment process requires an in-combination ammonia assessment; in this circumstance this was not required as the ammonia impact screened out based on impacts from this installation alone, in accordance with our guidance. Where planning permission is required the local planning authority is responsible for determining land use.

8. Impact on nearby habitat receptors:

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.

9. 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.

10. Risk of zoonotic disease:

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

11. Concerns for the impact of the installation on surrounding sensitive receptors:

Odour

Guidance on our website concludes that applicants need to produce and submit an odour management plan with their application if there are relevant receptors within 400 metres of their farm.

The applicant has submitted an odour management plan and 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 poultry litter. We are satisfied that these measures will mitigate emissions to prevent a significant impact from the site. Furthermore, standard condition 3.3.1 concerning odour emissions has been included in the permit.

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 have a significant impact on the health of local residents.

Dust

Guidance on our website concludes that applicants need to produce and submit a dust management plan with their application if there are relevant receptors within 100 metres of their farm, including the farmhouse or farm worker's houses.

The applicant has submitted a bioaerosol management plan and 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, type and containment of feedstuff and management of poultry litter.

We are satisfied that these measures will mitigate emissions to prevent a significant impact from the site. Furthermore, standard condition 3.2.1 concerning fugitive emissions has been included in the permit.

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 have a significant impact on the health of local residents.

Noise

Guidance on our website concludes that applicants need to produce and submit a noise management plan with their application if there are relevant receptors within 400 metres of their farm.

The applicant has submitted a noise management plan and 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 feeding equipment, ventilation systems, alarm systems and standby generator, management of vehicle movements to and from the site, scheduling activities within the working week (i.e. clean out operations, building work and repairs, etc.)

We are satisfied that these measures will mitigate emissions to prevent a significant impact from the site. Furthermore, standard condition 3.4.1 concerning noise emissions has been included in the permit.

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 have a significant impact on the health of local residents.

Representations from individual members of the public

Forty-three 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. Requirement for a Climate Assessment:

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

2. Application document not present:

Application document has been uploaded to Citizen Space and was available for viewing at the time of consultation.

3. Use of antibiotics:

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

4. Traffic Concerns:

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

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

5. 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.

6. Concerns regarding water abstraction:

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

The Health and Safety Executive, Director of Public Health and Environmental Health/Environmental Protection department were also consulted but no responses were received.