Permitting Decisions – Part Surrender and Variation

We have decided to grant the variation and accept the part surrender of the permit for Firs Field Farm Poultry Unit operated by IHP Limited.

The variation number is EPR/UP3231MJ/V005.

The part surrender application number is EPR/UP3231MJ/S006.

We are satisfied that the necessary measures have been taken to avoid any pollution risk and to return the area of the site to a satisfactory state. 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 part surrender and variation authorise the following changes:

- Installation boundary is amended on the site plan in schedule 7 to remove an area of land not associated with the permitted activity, where a residential property is located.
- Change the rearing regime from 55,100 ducks to 250,000 broilers.
- Poultry house ventilation has been upgraded to medium velocity roof fans, with additional gable end fans.
- Replacement of dirty water tanks with three new tanks.
- Site name updated to Firs Field Farm Poultry Unit and site address corrected.

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 and part surrender notice.

Key issues of the decision

Intensive Rearing of Poultry or Pigs BAT Conclusions document

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

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

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

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

BAT Conclusions review

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

The Applicant has confirmed their compliance with all BAT conditions for the new housing in their BAT document for Firs Field Farm Poultry Unit submitted on 11/12/2025, 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 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 emissions

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

- Daily stock checks (e.g. to check drinkers).
- Weekly olfactory checks conducted at site boundary, with any abnormalities recorded and investigated.
- In the event of substantiated 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

Ammonia emission controls – BAT Conclusion 32

A BAT-Associated Emission Level (BAT-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.

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 revised site condition report (SCR) for Firs Field Farm Poultry Unit, submitted on 02/06/2026, 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.

Odour Management Plan Review

There are twelve sensitive receptors within 400m of the Installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 200 metres to the south of the Installation boundary, and approximately 225 metres from the nearest poultry house.

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 a final OMP (submitted 02/06/2026) 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.

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.

Noise Management Plan Review

The final NMP provided by the Applicant and assessed below was received as part of the application supporting documentation on 17/05/2026.

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 also be reviewed if a complaint is received or following any changes to operations, whichever is sooner. The NMP includes noise control measures and procedural measures.

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 17/05/2026.

There is one sensitive receptor within 100m of the Installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is bordering the Installation boundary and is approximately 18 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).

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 0.485 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.

Ammonia

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsar sites located within 5 kilometres (km) of the Installation boundary. There are three Sites of Special Scientific Interest (SSSI) located within 5 km of the Installation boundary. There are also three Local Wildlife Sites (LWS) and four Ancient Woodlands (AW) 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 16/12/2025) has indicated that emissions from Firs Field Farm Poultry Unit will only have a potential impact on SSSI with a precautionary CLe of 1 μg/m^3 if they are within 1,414 metres of the emission source.

Beyond 1,414m 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 two of the SSSI 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)
Fritton Common	3,231
Sexton Wood	4,655

No further assessment is required for these sites.

Shotesham-Woodton Hornbeam Woods SSSI

Screening using the ammonia screening tool version 4.6 (dated 16/12/2025) has indicated that the PC for Shotesham-Woodton Hornbeam Woods SSSI is predicted to be less than 20% of the CLe for nitrogen deposition and 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 – Nitrogen deposition

Name of SSSI	Critical load kg N/ha/yr *	PC kg N/ha/yr	PC % critical load
Shotesham-Woodton Hornbeam Woods	15	2.439	16.3

* Critical load values taken from APIS website (www.apis.ac.uk) – 16/12/2025.

Table 3 – Acid deposition

Name of SSSI	Critical load keq/ha/yr *	PC keq/ha/yr	PC % critical load
Shotesham-Woodton Hornbeam Woods	10.916	0.174	1.6

* Critical load values taken from APIS website (www.apis.ac.uk) – 16/12/2025

No further assessment is required.

Screening using the ammonia screening tool version 4.6 (dated 16/12/2025) has determined that the process contributions of ammonia emissions from the application site are over the 20% threshold and therefore may cause damage to features of the SSSI. An in-combination assessment has therefore been carried out. There are five other farms acting in-combination with this application. A detailed assessment has been carried out as shown below.

A search of all existing active intensive agriculture installations permitted by the Environment Agency has identified the following farms within 5 km of the maximum concentration point for Shotesham-Woodton Hornbeam Woods SSSI.

Table 4 – In combination Assessment for Ammonia emissions

Name of Farm	PC µg/m^3	Critical Level µg/m^3	PC as % of Critical level
Firs Field Farm Poultry Unit	0.47	1	**47**
Grange Farm Poultry Unit	0.045	1	4.5
Littlebeck Poultry Farm	0.024	1	2.4
Hardwick Farm Poultry Unit	0.027	1	2.7
Friars Farm	0.052	1	5.2
Hempnall Poultry Farm	0.143	1	14.3
Total PC			**47**

Table 4 shows that the total PC at Shotesham-Woodton Hornbeam Woods SSSI from all farms is 47% for ammonia emissions. In-line with Environment Agency guidelines, where the total PC is less than 50% of the critical level/load, in-combination impacts can be considered as not being likely to damage the features of the SSSI for which it has been designated. The total PC for Shotesham-Woodton Hornbeam Woods SSSI from all farms is 47% for ammonia emissions, and therefore we have concluded no likely damage from in-combination impacts at the SSSI.

No further assessment is required.

Ammonia assessment – LWS and 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 16/12/2025) has indicated that emissions from Firs Field 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 511m of the emission source.

Beyond 511m the PC is less than 1 µg/m^3 and therefore beyond this distance the PC is insignificant. In this case all LWS and AW sites are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 5 – LWS and AW Assessment

Name of site	Distance from site (m)
Saxlingham Grove LWS	1,775
Spring Wood, Hempnall LWS	1,939
The Krons Meadows LWS	1,957
Little Wood AW	826
Winters Grove AW	1,011
Saxlingham Grove AW	1,679
Spring Wood AW	1,944

No further assessment is required.

Part Surrender

During determination it came to light that an area of land within the permitted boundary was occupied by a residential property, which had been built since the permit was first issued in 2007. The Operator provided an application for a part surrender to remove this area of land from the permitted boundary.

The Operator and Environment Agency both confirmed that the area identified to be removed from the Installation boundary has never been used for permitted intensive farming activities. A revised site condition report for Firs Field Farm Poultry Unit was submitted (received on 02/06/2026) to reflect the removal of this area of land from the existing permitted boundary.

Following our review of the part surrender application and supporting information we, the Environment Agency, are satisfied that the Operator, has provided sufficient evidence to demonstrate that this area of land has been returned toa satisfactory state.

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.

The regulated facility

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

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

The site

The extent of the facility has changed as a result of the partial surrender and variation applications.

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

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.

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 permit.

Improvement programme

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

Emission limits

We have decided that emission limits are required in the permit. BAT-AELs have been added in line with the Intensive Farming sector BAT Conclusions document dated 21/02/2017. These limits are included in table S3.3 of the permit.

Monitoring

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

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

Reporting

We have specified reporting in the permit, using the methods detailed and to the frequencies specified.

We made these decisions in order to ensure compliance with the Intensive Farming sector BAT Conclusions document dated 21/02/2017.

Management system

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

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

Extent of the surrender application

The Operator has provided a plan showing the extent of the site of the facility that is to be surrendered.

We consider this plan to be satisfactory.

Pollution risk

We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility.

Satisfactory state

We are satisfied that the necessary measures have been taken to return the area of the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation.

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 29/01/2026 and ended on 26/02/2026.

Responses from organisations listed in the consultation section

Response received from: UK Health Security Agency (UKHSA) on 17/02/2026.

Brief summary of issues raised: The main emissions of potential public health significance are emissions to air of bioaerosols, dust including particulate matter and ammonia.

Screening assessment for ammonia emissions suggested the development would offer reductions in ammonia levels in the surrounding area and present a low risk to human receptors. A Dust and Bioaerosol Management Plan and Odour Management Plan are provided, detailing mitigation measures for minimising public health impacts, including ventilation, feeding mechanisms and waste management. Providing the site is well managed and maintained, the proposed installation is not considered to present any obvious cause for concern.

It is assumed by UKHSA that the installation will comply in all respects with the requirements of the permit, including the application of Best Available Techniques (BAT). This should ensure that emissions present a low risk to human health.

Summary of actions taken: To prevent significant emissions from the site the Operator has proposed appropriate measures to manage emissions, including ammonia, bioaerosols and dust, 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 ensure a low risk to human health from the site.

In addition, standard conditions 3.2.1 and 3.2.2 concerning fugitive emissions have been included in the Permit.

Please refer to the key issues section for further details.

Representations from community and other organisations

Response received from: Three responses from Communities/Coalition Against Factory Farming (CAFF) on 24/02/2026.

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

2. **Application Form Part C3.5, question 2c**
On the revised Part C3.5 application form, submitted on 10/01/2026 during duly making, which was included with the application documents for external consultation and publicising, the Applicant has ticked the box to confirm that the application type is a substantial variation in response to question 2c.

3. **This is a major intensification, not a minor amendment**
This site already has a permit, and as this is an increase in poultry numbers more than 40,000, we have treated this application as a substantial variation. This means it is consulted on and publicised externally in the same way as a new permit application would be. This in in accordance with our guidance.

4. **Change of use under section 55 of the Town and Country Planning Act 1990.**
Consideration of the Town and Country Planning Act 1990 is a matter for consideration during the planning process and does not form part of the Permit decision.

5. **Discrepancy within the application documents, specifically referencing the Site Condition Report**
It was noted within the Site Condition Report (SCR) submitted with the application on 10/01/2026 that it referred to three poultry houses, instead of seven poultry houses. A revised SCR was received on 02/06/2026 which correctly refers to seven poultry houses within the Installation.

We have accepted the application and supporting documentation, seeking further information for our assessment where necessary. We are satisfied that we have received sufficient information to enable us to determine the application.

6. 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

7. 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.

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. Storage and spreading of manure and dirty water.
An Environmental Statement forms part of the EIA required as part of any planning application. As detailed above, the Applicant did not submit an EIA as part of the 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.

No manure (poultry manure) or slurry (also known as poultry wash water or dirty water) is stored within the Installation boundary; it is exported from the Installation for spreading on land owned by third parties.

The surrounding land where manure or slurry may be stored and spread does not form part of the Installation and so manure/slurry 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 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 manure 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 2018 (commonly known as Farming Rules for Water), and, in designated areas, the Nitrate Pollution Prevention Regulations 2015, which were further amended in 2016 (NVZ Regs. for short). Both regulations seek to prevent pollution through restricting when, where and how much manure or slurry can be applied. Farming Rules for Water require good farming practice, so that farmers manage their land both to avoid water pollution (from run-off) and to benefit their business. Nitrate Vulnerable Zones (NVZs) are areas designated as being at risk from agricultural nitrate pollution.

In NVZs, operators must comply with the rules that restrict the quantity of organic manures (including poultry manure and wash water) that can be applied, the times of the year when certain types may not be applied and set minimum storage requirements for some livestock manures.

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. **Mortalities**

Fallen stock during the production cycle are collected daily and stored in a secure container on site for removal by a licensed disposal contractor. In the event of a disease outbreak, the Operator will follow the guidance of the allocated veterinarian and mortalities will be disposed of under their advice.

11. Odour, noise and dust impacts

There are twelve sensitive receptors (not associated with the farm) 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 noise, and all sensitive 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 sensitive 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 is one receptor within 100m of the Installation boundary and the Applicant provided a satisfactory dust and bioaerosol management plan for this site.

12. Public health and amenity

We are satisfied following a review of the information provided by the Applicant, and the conditions present within the Permit, that on-site operations will not have a significant impact on the health or amenity of local residents.

13. 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.

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

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, in accordance with our guidance, we carried out an in-combination assessment for ammonia emissions for one SSSI and we have concluded no likely damage from in-combination impacts at the SSSI. See the key issues section for further details. Where planning permission is required the local planning authority is responsible for determining land use.

15. Source, volume and sustainability of water supply

Applicants are not required to provide details regarding the volume or source of water utilised at the installation as part of the EPR application. The consideration of water availability/water resources within a catchment area does not form part of the Permit decision.

As part of our determination, we consider the measures in place for efficient use of raw materials, including water. The Application contained details of the techniques in place for minimising water use; including to monitor and keep records of water use, daily checks and adjustment of drinking water equipment (when required), and cleaning procedures for levels of water usage. Furthermore, standard condition 1.3.1 concerning the efficient use of raw materials and water has been included in the permit.

16. Assessment of impacts on groundwater, nearby watercourses and drinking water

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 groundwater 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) drains via French drains (acting as soakaways) to an offsite ditch, therefore there is no discharge direct to groundwater 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 valves areused 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 waters should occur as a result of operations at the Installation.

17. Risk of zoonotic disease

The birds will be kept indoors at all times so 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.

18. 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.

19. Animal welfare and stocking density
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.

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

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.

20. The Environment Agency should refuse this application
We are satisfied that we have covered all relevant assessment criteria and that the Installation environmental impacts are acceptable to allow the issuing of this variation.

Response received from: FAITH Animal Rescue on 25/02/2026.

Brief summary of issues raised and actions taken: The response covered the same points as detailed in the CAFF response above.

Representations from individual members of the public

39 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:

Brief summary of issues raised and actions taken:

1. Principle of Intensive Farming

The principle of intensive farming of pigs for human consumption is not dealt with under the EPR and is therefore not an issue under the Environment Agency's remit. 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.

2. Use of antibiotics

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

3. Traffic

Consideration of traffic 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.

4. Climate change

Consideration of 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.

5. Loss of nature and wildlife

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. Application Form Part C3.5, question 8e

Question 8e on Application Form Part C3.5 asks if this variation will result in changes to the slurry or manure management, and the Applicant has ticked the box to confirm no changes. Questions 8f – 8j relate to whether slurry or manure are stored on the Installation and whether manure and/or slurry is spread on Operator owned/controlled land or if it is exported from the Installation.

The variation does not result in changes to slurry and manure management; it will continue to be exported from the Installation to be spread to third party land.

7. Dirty water tanks

As part of this variation application, the existing dirty water tanks will be replaced with three new underground ones. The locations of the new dirty water tanks are shown on the Site Layout and Drainage Plan, which has been included within Schedule 7 of the permit.

The Applicant has confirmed in the Technical Standards document that the dirty water tanks will be built to conform to specifications in SGN EPR6.09 ‘How to comply with your environmental permit for intensive farming’. Slurry storage (including wash water) is covered in Section 3.2 with ‘Infrastructure design and construction’ covering the requirements, including conforming with the technical measures detailed in the Control of Pollution (Silage, Slurry and Agricultural Fuel Oil) Regulations 1991 (amended 1997).

Within the revised Odour Management Plan, submitted on 02/06/2026, it is confirmed that key staff will monitor washing operations to ensure effective drainage to the dirty water tanks and to maintain freeboard. The tanks will be emptied as required to prevent overfill by a third party, with the wash water exported from the Installation.

These supporting documents have been referenced in Table S1.2 - Operating Techniques, of 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 cause significant pollution of the environment.

8. Management of waste and manure, including amount produced, handling, storage, transportation and utilisation

The Applicant has addressed the requirements of question 10c of Application form Part C3.5 with submission of their document referenced ‘Waste minimisation’ received with the Application.

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.

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