

Permitting Decisions – Bespoke Permit

We have decided to grant the permit for Manor Farm Eggs operated by Mr Peter Barley, Mrs Carole Barley, Mr Samuel Barley and Mrs Jennifer Hirst.

The permit number is EPR/EP3727LS.

The application number is EPR/EP3727LS/A001.

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 permit is for fourteen poultry houses providing a combined capacity for 80,000 laying hen bird places and 20,000 pullet bird places, mostly operating as an enriched cage system. Only poultry house R-3 operates as a floor-reared barn pullet system. Most of the poultry houses are ventilated by high velocity roof fans with an emission point higher than 5.5 metres above ground level and an efflux speed greater than 10 metres per second, and L-Grand and L-BS poultry houses have gable end fan ventilation. The site was previously permitted under EPR/JP3533UU but was surrendered when the site was previously depopulated.

Purpose of this document

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

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

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

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

Key issues of the decision

Intensive Rearing of Poultry or Pigs BAT Conclusions document

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

All new installation farming permits issued after 21st February 2017 must be compliant in full from the first day of operation.

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

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

BAT Conclusions review

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

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

The Applicant has confirmed their compliance with all BAT conditions for the new installation in their document reference 'BAT Assessment' received 01/02/2026, 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 0.8 kg N/animal place/year for the laying hens and will use BAT 3b 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 0.45 kg P₂O₅/animal place/year for the laying hens and will use BAT 4a technique reducing the crude protein content.

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

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

This will be verified by means of using a mass balance calculation of nitrogen and phosphorus based on the feed intake, dietary content of crude protein and animal performance and reported annually.

BAT 25 Monitoring of emissions and process parameters – Ammonia emissions

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

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

BAT 26 Monitoring of emissions and process parameters - Odour emissions

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

- The staff will perform a daily boundary walk to check the surrounding area for high levels of odour. Checks will also be performed on the surrounding area by persons who do not regularly work on the farm.
- Visual (and nasal) inspections of potentially odorous activities will be carried out.
- In the event of odour complaints being received the Operator will notify the Environment Agency and make a record of the complaint. The Operator will undertake the necessary odour contingency as required.

BAT 27 Monitoring of emissions and process parameters - Dust emissions

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

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

BAT 31 Ammonia emissions from poultry houses - Laying hens

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 layers with the enriched cage system with belt removal twice weekly without air drying is 0.048 kg NH₃/animal place/year.

Detailed assessment of specific BAT measures

Ammonia emission controls

A BAT Associated Emission Level (AEL) provides us with a performance benchmark to determine whether an activity is BAT. The BAT Conclusions document does not have a BAT-AEL for pullets and therefore an ammonia emission limit value has not been included within the permit.

Ammonia emission controls – BAT Conclusion 31 (laying hens)

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 laying hens.

The Applicant has confirmed they will comply with BAT 31 (a) for all the enriched cage systems with twice weekly belt removal.

For the one barn reared system for house R-3 (pullets) the Applicant has confirmed they will comply with BAT 31 (b) (1) deep litter with a manure belt.

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

All new bespoke applications issued after 21st February 2017, including those where there is a mixture of old and new housing, will now need to meet the BAT-AEL.

Industrial Emissions Directive (IED)

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

Groundwater and soil monitoring

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

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

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

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

The site condition report (SCR) for Manor Farm Eggs dated 18/05/2026 (and received 27/05/2026), 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 baseline reference data for the soil and groundwater at the site at this stage and although condition 3.1.3 is included in the permit no groundwater monitoring will be required.

Odour management

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

Condition 3.3 of the environmental permit reads as follows:

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

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

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

- Poultry housing
- Ventilation systems
- Manure handling and removal
- Mortality storage and disposal
- Feed storage, milling and mixing (on-site)
- Cleaning and disinfection activities
- Washing operations including vehicles
- Fugitive emissions
- Dirty water management
- Abnormal operations
- Waste production and storage
- Egg collection and handling

Odour Management Plan Review

There are 59 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 – approximately 24m southeast of the Installation boundary.
2. Residential property – approximately 60m east of the Installation boundary.
3. Residential property – approximately 79m east of the Installation boundary.
4. Residential property – approximately 49m east of the Installation boundary.

5. Residential property – approximately 40m northeast of the Installation boundary.
6. Residential property – approximately 70m northeast of the Installation boundary.
7. Residential property – approximately 53m northeast of the Installation boundary.
8. Residential property – approximately 72m north of the Installation boundary.
9. 5 x residential properties – approximately 87m northeast of the Installation boundary.
10. Residential property – approximately 77m northeast of the Installation boundary.
11. Residential property – approximately 88m northeast of the Installation boundary.
12. Residential property – approximately 97m northeast of the Installation boundary.
13. Residential property – approximately 107m northeast of the Installation boundary.
14. Residential property – approximately 122 northeast of the Installation boundary.
15. Residential property – approximately 139m northeast of the Installation boundary.
16. Residential property – approximately 140m northeast of the Installation boundary.
17. Residential property – approximately 148m northeast of the Installation boundary.
18. Residential property – approximately 202m northeast of the Installation boundary.
19. x 2 residential properties – approximately 220m northeast of the Installation boundary.
20. x 4 residential properties– approximately 118m northeast of the Installation boundary.
21. x 2 residential properties – approximately 133m northeast of the Installation boundary.

22. x 4 residential properties – approximately 207m northeast of the Installation boundary.

23. x 2 residential properties – approximately 165m northeast of the Installation boundary.

24. x 14 residential properties – approximately 206m northeast of the Installation boundary.

25. x 2 residential properties – approximately 363m northeast of the Installation boundary.

26. x 3 residential properties – approximately 338m northeast of the Installation boundary.

27. x 4 residential properties – approximately 270m northeast of the Installation boundary.

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

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

The Operator has provided an OMP (submitted 08/06/2026) 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) or Pig Industry Good Practice Checklist (August 2013), as well as the site-specific circumstances at the Installation. We consider that the OMP is acceptable because it complies with the above guidance, with details of odour control measures, contingency measures and complaint procedures described below.

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

The OMP also provides a suitable procedure in the event that complaints are made to the Operator. The OMP is required to be reviewed at least every year (as committed to in the OMP) and/or after a complaint is received, and/or after

any changes to operations at the installation, whichever is the sooner. The OMP includes contingency measures to minimise odour pollution during abnormal operations. A list of remedial measures is included in the contingency plan, including triggers for commencing and ceasing use of these measures.

The Environment Agency has reviewed the OMP and considers it complies with the requirements of our Odour management guidance note. We agree with the scope and suitability of key measures, but this should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and sufficient. That remains the responsibility of the Operator.

Although there is the potential for odour pollution from the Installation, the Operator's compliance with its OMP and permit conditions will minimise the risk of odour pollution beyond the Installation boundary. The risk of odour pollution at sensitive receptors beyond the Installation boundary is therefore not considered significant.

Conclusion

We have assessed the OMP and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 4 'Odour management at intensive livestock installations'. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of odour pollution/nuisance.

Noise management

Intensive farming by its nature involves activities that have the potential to cause noise pollution. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance.

Condition 3.4 of the permit reads as follows:

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

Under section 3.4 of the guidance, a Noise Management Plan (NMP) is required to be approved as part of the permitting process if, as is the case here, sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the installation boundary. It is appropriate to require a NMP when such sensitive receptors have been identified within 400m

of the installation to prevent or, where that is not practicable, to minimise the risk of pollution from noise emissions.

There are sensitive receptors within 400 metres of the installation boundary as stated under the 'Odour' section. The Operator has provided a NMP as part of the application supporting documentation, and further details are provided below.

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

- Ventilation fans
- Feed deliveries
- Feeding systems
- Egg collection and handling
- Fuel deliveries
- Alarm systems
- Bird catching and depopulation
- Manure removal and clean-out
- Maintenance and repair activities
- Set up and placement activities
- Standby generator testing and use

Noise Management Plan Review

The final NMP provided by the applicant and assessed below was received as part of the application supporting documentation on 08/06/2026.

The NMP provides a suitable procedure in the event of complaints in relation to noise. The NMP is required to be reviewed annually (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.

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 18/06/2026.

There are 18 sensitive receptors within 100m of the installation boundary, the nearest point of their assumed property boundary is approximately 0 metres to the east of the installation boundary, and approximately 17 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 deliveries
- Feed milling and mixing
- Feed distribution systems
- Feed spillages
- Bins and pipework
- Bird activity
- Ventilation
- Manure handling
- Cleaning and washing
- Site housekeeping

Conclusion

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

Standby Generator

There is one standby generator with a net thermal rated input of 0.29 MWth; it will not be tested more than 52 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

The Applicant has demonstrated that the housing will meet the relevant NH₃ BAT-AEL.

There are no Special Areas of Conservation (SAC), no Special Protection Areas (SPA), no Ramsar sites or no Sites of Special Scientific Interest (SSSI) located within 5 kilometres (km) of the installation boundary. There are also no Local Wildlife Sites (LWS), no Ancient Woodlands (AW), no Local Nature Reserves (LNR) or no other nature conservation sites within 2 km of the installation boundary. Therefore a full ammonia assessment on habitat sites was not required.

Decision considerations

Confidential information

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

Identifying confidential information

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

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

Consultation

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

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- UK Health Security Agency
- Director of Public Health
- North Yorkshire Council Environmental Health
- Health and Safety Executive

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

Operator

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

The regulated facility

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

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

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.

Site condition report

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

We have advised the Operator what measures they need to take to improve the site condition report.

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

We have checked the location of the application to assess if it is within the screening distances, we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is not within our screening distances for these designations.

Environmental risk

We have reviewed the Operator's assessment of the environmental risk from the facility.

The Operator's risk assessment is satisfactory.

General operating techniques

We have reviewed the techniques used by the Operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with The Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) published on 21st February 2017.

Odour management

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

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

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

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

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

Noise management

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

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

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

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

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

Dust and bioaerosol management

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

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

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

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

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

Emission limits

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

Monitoring

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

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

Reporting

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

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

Management system

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

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

We only review a summary of the management system during determination. The applicant submitted their full management system. We have therefore only reviewed the summary points.

A full review of the management system is undertaken during compliance checks.

Previous performance

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

No relevant convictions were found.

Financial competence

There is no known reason to consider that the Operator will not be financially able to comply with the permit conditions.

Growth duty

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

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 26/02/2026 and ended on 26/03/2026.

Responses from organisations listed in the consultation section

Response received from UK Health Security Agency (received 18/03/2026)

Brief summary of issues raised:

1. Evaluate the control measures in relation to bioaerosols, ammonia, and particulate matter emissions due to the proximity of sensitive receptors including two inside the installation boundary and some within 100m, and whether further assessment is required in the form of monitoring.
2. UKHSA expects the use of BAT will minimise the amount of dust released but recommends the applicants reports dust complaints.
3. Clarification on the volume of fuel and fuel oil stored on the site, and the capacity of the bunding. If there are any private water abstractions there may be risk to groundwater.
4. Clarification on chemicals and disinfectants used and volumes on site. If there are any private water abstractions there may be risk to public health from emissions to water.
5. May wish to request an accident management plan to ensure is its suitable, including risks of fire.

Summary of actions taken:

1. The two sensitive receptors within the installation boundary have now been removed from the installation boundary, these are residential properties owned by the farm which were incorrectly included within the original installation boundary. We have received a more robust odour management plan as there are sensitive receptors within 100m, where we have asked for more robust timings, monitoring and odour controls. This has been referenced in Table S1.2 - Operating Techniques, of the permit. With regards to particulate matter, our approach to dust and bioaerosol control (to require a dust and bioaerosol management plan for intensive farming installations with receptors within 100 metres of the installation boundary) will reduce total overall dust levels which will subsequently reduce PM10 and PM2.5 particle size dust, with most of the measures focusing on reducing creation of dust at source. We are satisfied with the dust and bioaerosol management plan submitted as part of this

application. Ammonia impacts on human health from intensive farming installations has not been considered a significant risk and the focus has been on such installation ammonia impacts on local habitat sites where we have formal robust procedures for relevant assessments, see ammonia key issues above. On the limited occasions where intensive farming installation ammonia human health impact assessments have been carried out, they have concluded no significant impact.

2. There is no reason to believe that the Operator will not comply with the permit. The Applicant has confirmed their compliance with all BAT conditions for the new installation in their BAT document reference 'Best Available Technique Assessment - Manor Farm Eggs' received 01/02/2026, which has been referenced in Table S1.2 - Operating Techniques, of the permit. We are satisfied with the dust and bioaerosol management plan submitted as part of this application, which is also referenced in table S1.2 Operating Techniques table within the permit. The dust and bioaerosol management plan includes a section for 'complaints procedure' with a complaint form template attached for use if required.
3. Section 8 of the application form B3.5 lists the raw materials, this includes any fuels and oils and the volumes are provided. The Technical Standards document confirms the oil tanks are bunded to comply with The Control of Pollution (Silage, Slurry and Agricultural Fuel Oil) Regulations 1991 (amended 2010) to contain any leaks or spillages, therefore they will hold at least 110% of the tanks capacity.
There is a private borehole used for bird drinking water and washing/cleaning activities located adjacent, but outside of the installation boundary. Domestic and human drinking water for the residential property is supplied separately via the mains water supply. The borehole is located within a concrete-surrounded area near the site weighbridge and is positioned away from poultry house wash-down areas, manure handling activities and other potential sources of contamination. Operational controls and site drainage arrangements are in place to minimise the risk of contaminated yard water or wash water entering the borehole area. We are satisfied that there will be no risk to public health or groundwater pollution from the oil tanks.
4. Section 8 of the application form B3.5 lists the raw materials; this includes any chemicals and disinfectants used and the volumes are provided. These are stored securely within a designated storage area away from surface water drains and are handled in accordance with manufacturer recommendations. As stated in section 3 above, we are satisfied that there will be no risk of pollution to water abstraction points, no risk to groundwater pollution and no risk to public health from these chemicals and disinfectants.
5. We do not need to see the full accident management plan during the permit application process. The Environmental Management System document confirms that there is an accident management plan in place and this will be checked during future compliance visits. The

Environmental Risk Assessment submitted with this application includes a section on accidents and fire/fire-waters are included.

Response received from North Yorkshire Council Environmental Health (received 10/03/2026).

Brief summary of issues raised: No contaminated land or air quality issues have been identified. Given the agricultural context of the site, the lack of complaints or enforcement history, no concerns were raised.

Summary of actions taken: N/A

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

Representations from community and other organisations

Response received from: Coalition Against Factory Farming (CAFF) on 25/03/2026, FAITH animal rescue on 24/03/2026 and Climate Action St. Austell 25/03/2026.

Brief summary of issues raised and actions taken:

1. Requirement for an Environmental Impact Assessment (EIA)

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

2. Residential amenity and health due to nearby sensitive receptors

The two sensitive receptors within the installation boundary have now been removed from the installation boundary, these are residential properties owned by the farm which were incorrectly included within the original installation boundary. However, there are still a number of sensitive receptors within 100m of the installation boundary.

We have received a robust odour management plan as there are sensitive receptors within 100m, where we have asked for more robust timings, monitoring and odour controls. We have received a detailed noise management plan with monitoring and noise controls. We have also received a detailed dust and bioaerosol management plan focusing on reducing the creation of dust at source. We are satisfied with these management plans, and they all include a complaints

procedure if any problems occur. It should be noted that when this site was previously operational there were no known complaints in relation to odour, noise and dust. These management plans have been referenced in Table S1.2 - Operating Techniques, of the permit. Further details on these management plans can be found in the odour, noise and dust key issues section above.

Ammonia impacts on human health from intensive farming installations has not been considered a significant risk and the focus has been on such installation ammonia impacts on local habitat sites where we have formal robust procedures for relevant assessments. On the limited occasions where intensive farming installation ammonia human health impact assessments have been carried out, they have concluded no significant impact.

3. Night time conditions and noise mitigation

The use of high velocity roof fans and gable end fans have been designed and positioned to provide effective bird welfare ventilation while minimising noise impact at nearby sensitive receptors. High-capacity, energy-efficient fans are used to minimise the total number of fans required across the installation. Fans are operated and adjusted according to flock age, bird welfare requirements and weather conditions. Routine inspection, servicing and maintenance of ventilation equipment is undertaken in accordance with the Routine Inspection and Maintenance Schedule to prevent excessive or abnormal noise caused by wear, imbalance or equipment failure. Staff are trained to report any excessive noise or faults immediately to the site manager. Faulty fans are shut down where safe and practicable until repair is completed.

In relation to catching birds, this may occasionally take place during unsociable hours to meet slaughterhouse scheduling and bird welfare requirements; however, the duration of activities is minimised, and operations are completed as efficiently as practicable. Bird catching and depopulation are carried out by the operator's own trained in-house staff under the supervision of site management. Staff are trained to handle birds calmly and quietly to minimise bird stress and associated noise. The installation operates an enriched colony cage system, which results in lower noise levels during depopulation compared with loose-housed systems. Catching and removal activities occur infrequently, typically once approximately every 20 weeks.

The standby emergency generator testing is restricted to normal working hours, and testing duration is kept to the minimum necessary. The standby generator is positioned to benefit from screening provided by existing buildings and site infrastructure in order to reduce noise propagation towards nearby sensitive receptors. The generator is routinely inspected, serviced and maintained in accordance with manufacturer recommendations to prevent excessive engine noise or vibration. Use of the generator is limited to emergency situations, power failures and essential operational testing only.

We are satisfied that noise has been addressed satisfactorily within the noise management plan. If any problems do arise there is a satisfactory complaints procedure in place.

4. Impact on designated sites and ammonia emissions

There are no Special Areas of Conservation (SAC), no Special Protection Areas (SPA), no Ramsar sites or no Sites of Special Scientific Interest (SSSI) located within 5 kilometres (km) of the installation boundary. There are also no Local Wildlife Sites (LWS), no Ancient Woodlands (AW), no Local Nature Reserves (LNR) or no other nature conservation sites within 2 km of the installation boundary. As a result, and in accordance with our guidance, an ammonia assessment on habitat sites was not required for this application. Odour issues have been covered by other points in this consultation section.

5. Impact on species

Our internal screening did not bring up any protected species or protected habitats within the relevant screening distances that needed to be considered.

6. Water quality and river catchment vulnerability

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 most of the poultry houses is directed to soakaways located beneath the houses. All other roof water from four of the poultry houses and water draining from the yard (excluding periods of washout when water from the yard drains to the underground tanks) drain to adjacent permeable ground acting as a soakaway or to the yard hardstanding, this drainage then goes to a surface water drain immediately east of the installation boundary which ultimately drains to Holme and Ainderby Beck.

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). During activities with increased pollution risk, including bird catching, manure removal, clean-out and washing operations, operational controls are implemented to prevent contaminated run-off entering the surface water drainage system. These measures include prompt removal of manure and spillages, temporary management of contaminated yard areas during operations, dry cleaning of heavily contaminated areas prior to washing, and ensuring wash water is directed to designated wash water collection and

storage systems rather than surface water drains. 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.

The cumulative impacts of intensification within catchments are matters for consideration during the planning process and do not form part of the permit decision.

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. Water sustainability

The 'Energy Efficiency and Resource Management Statement' document includes a section on water use. Bird drinking water is supplied from a borehole located adjacent to the installation boundary and water use is managed carefully to minimise unnecessary consumption. Bird drinking water is supplied via non-leaking nipple drinker systems designed to minimise water wastage. Water systems are inspected routinely as part of normal husbandry checks to identify leaks, faulty drinkers or abnormal water consumption. Any leaks or faults are repaired promptly to minimise unnecessary water use. Water consumption is monitored routinely to assist with flock management and early identification of potential system issues. Poultry houses are cleaned efficiently between flocks to minimise water usage while maintaining appropriate biosecurity and hygiene standards. High-pressure cleaning equipment is used where practicable to improve cleaning efficiency and reduce water usage. We are satisfied that water use will be managed appropriately at this site.

8. 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.

9. Climate targets and inefficient use of resources and grain

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.

Use of resources 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 therefore it is extremely unlikely that they will contract zoonotic diseases. 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.

11. Animal welfare

Animal welfare is not within the regulatory responsibility of the Environment Agency. It does not form part of the Permit decision making process under EPR. 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.

Representations from individual members of the public

Sixty-seven 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. Use of antibiotics

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

2. Traffic

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

3. Loss of 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.

4. Best Available Techniques (BAT)

The applicant has confirmed they will comply with (BAT) in their BAT Assessment document. This document has been referenced in Table S1.2 - Operating Techniques, of the permit. Table S3.3 of the permit list the standard process monitoring requirements under BAT AEL's (Associated Emission Levels) which are required for this site. BAT odour control measures are discussed under the BAT key issues section above. No ammonia reduction technologies were required for this site. We are satisfied from the information we received that this site will comply with BAT.

5. Manure storage concerns

No manure or used litter is stored within the installation boundary. Manure is removed from all poultry houses by belts two or three times each week, and is transferred to a covered manure trailer. All manure is exported from the installation immediately to a biomass facility for use as a renewable energy source.

The land where manure may be stored or spread does not form part of the installation and so manure exported from the installation for storage and spreading outside the installation is outside the scope of our determination. The EPR scope of regulation is limited to preventing significant pollution from emissions from the installation. Emissions are substances released from the installation whilst something exported in a controlled manner for subsequent use elsewhere is not considered an emission. The latter includes manure and litter removed as part of poultry house cleanouts.

The installation boundary for permitted farms typically includes the livestock housing, any yard and 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.

6. Emergency Plan

We have received a satisfactory emergency plan for this application, this covers spills, leaks, equipment failure, power failure, fire, flooding and other risks.