

Permitting Decisions - Bespoke Permit

We have decided to grant the permit for Ellerdine Grange Farm Poultry Unit operated by E AGRI LTD.

The permit number is EPR/XP3125MX.

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 application is for a new greenfield site for 48,000 laying hens in two poultry houses with a summer grazing paddock. Both poultry houses have side fan outlets on the gable ends that are connected to air scrubbing units. The air scrubbing units have been added for planning proposal purposes only.

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

Now the BAT Conclusions are published, all new installation farming permits issued after 21st February 2017 must be compliant in full from the first day of operation.

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

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

BAT Conclusions review

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

The Applicant has confirmed their compliance with all BAT conditions for the new installation in their BAT assessment document received 01/06/2026, 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 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 and will use BAT 4b 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:

- 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 28 Monitoring of emissions and process parameters linked to Ammonia, Odour and Dust emissions

Table S3.3 concerning processing monitoring requires the Operator either to pursue Ammonia, Odour and Dust emission monitoring in line with BAT 25, 26 and 27 criteria as detailed above.

BAT 31 Ammonia emissions from poultry houses - Laying hens

The BAT AEL to be complied with is 0.13 kg NH₃/animal place/year. The Applicant will meet this as the emission factor for layers with non-caged system, multi-tier with once weekly belt removal housing is 0.073 kg NH₃/animal place/year.

Narrative BAT 31 is complied with via usage of BAT 31 technique c), use of an air cleaning system. In particular we are confident that the scrubbers chosen comply with BAT 31c) criteria based on the ammonia removal percentage greater than 70% as confirmed in scrubber specific DLG certification provided.

Detailed assessment of specific BAT measures

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.

All new bespoke applications issued after the 21st February 2017, 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 Ellerdine Grange Farm Poultry Unit received 01/06/2026 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. These activities are as follows:

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

Odour Management Plan Review

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

1. Residential property – approximately 196m southeast of the Installation boundary.
2. Residential property – approximately 224m southeast of the Installation boundary.
3. Residential property – approximately 251m southeast of the Installation boundary.
4. Residential property – approximately 194m southeast of the Installation boundary.
5. Residential property – approximately 210m southeast of the Installation boundary.
6. Residential property – approximately 321m southeast of the Installation boundary.
7. Residential property – approximately 251m south of the Installation boundary.
8. Residential property – approximately 250m south of the Installation boundary.
9. Commercial property – approximately 235m east of the Installation boundary.

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

The Operator has provided an OMP (submitted 23/06/2026) 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. These activities are as follows:

- Large vehicles travelling to and from the farm
- Vehicle movement on site – including delivery of feed, transporting birds, litter removal and dirty water removal
- Small vehicles (staff, visitors couriers)
- Feed transfer from lorry to bins
- Operation of fans
- Alarm system
- Barn reared laying hens
- Personnel
- Repairs
- Scrubbers

Noise Management Plan Review

The final NMP provided by applicant and assessed below was received as part of the application supporting documentation on 23/06/2026.

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

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 04/03/2026.

There is one sensitive receptor within 100m of the installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 65 metres to the south of the installation boundary, and approximately 170 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:

- Manufacturer and selection of feed
- Feed delivery and storage
- Ventilation system
- Litter management
- House clean out
- Used litter

Conclusion

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

Air scrubbers

In accordance with the application, acid air scrubbers will be fitted to poultry houses 1 to 2 for planning permission purposes only. The scrubbers will treat air flows up to 122,400 m³/h for both poultry houses, with additional ventilation provided by the gable end fans. Ammonia emissions from the poultry houses fitted with air scrubber units will be reduced by a total of 80.2% averaged over the winter and summer.

Acid for use in the scrubber system will be stored in the IBC storage area, and is included within the installation boundary. The storage area is bunded (CIRIA C736 compliant) for acid storage, with a bund capacity of 110% capacity of the largest container. The acid will be delivered in double skinned IBC's and placed in the IBC storage area; there is no filling of tanks required. There is a maintenance program in place, with daily inspections of pipework and the bund. Acid pumps will be fitted with leak detection with automatic shut off. All pipework will be specified as non-corrosive. Spent liquor will be sent offsite to a licensed

disposal contractor. The manufacturer's operating manual "Inno+ user manual Euro Air Scrubber" was obtained 23/06/2026 as part of this application.

Improvement conditions

IC1 has been included in Table S1.3 to obtain evidence that the Inno+ BV acid scrubbers proposed for poultry houses 1 and 2 have been installed and commissioned in-line with the acid scrubber operating manual provided in the response dated 23/06/2026 and as referenced in Table S1.2 Operating Techniques within the permit.

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) or no Ramsar sites located within 5 kilometres (km) of the installation boundary. There is one Site of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There are also two Local Wildlife Sites (LWS) and one Ancient Woodland (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 (CL_e) or critical load (CL_o) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required. An in-combination assessment will be completed to establish the combined PC for all existing farms identified within 5 km of the SSSI.

Initial screening using the ammonia screening tool version 4.6 (dated 17/02/2026) has indicated that emissions from Ellerdine Grange Farm Poultry Unit will only have a potential impact on SSSIs with a precautionary CL_e of 1 µg/m³ if they are within 1,566 metres of the emission source.

Beyond 1,566 m the PC is less than 0.2 µg/m³ (i.e. less than 20% of the precautionary 1 µg/m³ CL_e) and therefore beyond this distance the PC is insignificant. In this case the SSSI is beyond this distance (see table below) and therefore screens out of any further assessment.

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

Table 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
Hodnet Heath SSSI	4,861

No further assessment is required.

Ammonia assessment – LWS / AW

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

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

Initial screening using ammonia screening tool version 4.6 (dated 17/02/2026) has indicated that emissions from Ellerdine Grange Farm Poultry Unit will only have a potential impact on the LWS / AW sites with a precautionary CLe of 1 µg/m³ if they are within 654 m of the emission source.

Beyond 654 m the PC is less than 1 µg/m³ and therefore beyond this distance the PC is insignificant. In this case all LWS / AW sites are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 2 – LWS / AW Assessment

Site	Distance from site (m)
Wytheford Wood & Broom Coppice	1,937
Platt Brook	2,124
Brooms Coppice	1,936

No further assessment is required.

Decision considerations

Confidential information

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

Identifying confidential information

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

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

Consultation

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

The application was publicised on the GOV.UK website. No responses were received.

We consulted the following organisations:

- UK Health Security Agency
- Director of Public Health
- Health and Safety Executive
- Telford & Wrekin Environmental Health

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.

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.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

We have included an improvement programme to ensure that the proposed acid scrubbers are installed and commissioned in-line with the operating manual.

Emission limits

We have decided that emission limits are required in the permit.

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

Monitoring

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

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

Reporting

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

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

Management system

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

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

Previous performance

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

No relevant convictions were found.

Financial competence

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

Growth duty

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

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all

specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

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

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

Consultation Responses

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

The consultation commenced on 13/03/2026 and ended on 14/04/2026.

Responses from organisations listed in the consultation section

Response received from UK Health Security Agency (received 31/03/2026)

Brief summary of issues raised:

1. The main source emissions of potential public health significance are emissions to air of bioaerosols, dust and particulate matter and ammonia. The Environment Agency should satisfy themselves that the bioaerosol management plan is appropriate and receptors should be included up to 250m.
2. The Environment Agency should satisfy themselves that the control measures outlined by the applicant (including removal efficiencies of the scrubbers) are sufficient to reduce concentrations of ammonia, bioaerosols and particulate matter to levels which are not a hazard to those residing in the vicinity of the site.
3. The applicant refers to a manure burner being controlled by the operator as a disposal route for the litter and manure generated on site. We recommend this activity is considered in the risk assessment although this activity falls outside of the scope of the permit.
4. There are two boreholes in close proximity to the site and it is not clear in the application what the water source is used for. The Environment Agency may wish to clarify with the applicant what chemicals are used in the foot dips in site, and whether containment measures utilised on site are sufficient to minimise and risks to public health by impacting the water abstracted from the boreholes.

Summary of actions taken:

1. 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. In relation to ammonia, all habitat sites screened out on distance, see ammonia [key issues](#) above, and no mitigation was required for this permit application. The applicant is including acid scrubbers for the planning permission approval, but these acid scrubbers will lead to reductions in ammonia, dust and odour emissions so are welcomed. We are satisfied with the control measures outlined by the applicant.
3. The manure burner (which was proposed outside of the installation boundary) has been removed from the application completely. All manure exported from the installation boundary goes to a third party anaerobic digester site.
4. Water is supplied to the birds from main water using high performance nipple drinkers with 'drip cups'. There are two boreholes within 50m of the site (not associated with this installation), water is directed away from the boreholes due to natural topography of the site, reducing any risk from this site to these boreholes. All dirty water is contained within dirty water tanks. Roof water from both houses and water draining from the yard (excluding periods of washout when water from the yard drains to the underground tanks) discharges to open and stone filled infiltration trenches acting as soakaways, running adjacent to the poultry houses. These trenches then overflow into an unlined swale, also acting as a soakaway, which in turn overflows to an unnamed brook, which ultimately drains to the Lakemoor Brook. There is no fuel storage tanks or generator within the installation boundary. Acid for use in the scrubber system will be stored in the IBC storage area at the main farm, and is included within the installation boundary. This has an impermeable base and emergency spill arrangements are in place. The storage area is bunded (CIRIA C736 compliant) for acid storage, with a bund capacity of 110% capacity of the largest container. The acid will be delivered in double skinned IBC's and placed in the IBC storage area; there is no filling of tanks required. Any other chemicals are also stored safely within the IBC bunded storage area. We are satisfied that there is no risk to pollution to the nearby boreholes.

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