# Permitting Decisions - Variation

We have decided to grant the variation for Felthorpe Poultry Unit operated by 2 Agriculture Growing Limited.

The variation number is EPR/NP3132YL/V003.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

This variation changes the livestock type and number stocked at the Installation from 151,967 turkey places to 617,500 broiler places. Ventilation is also changed from side fans to high velocity roof fans, with additional gable end fans for summer cooling, and two standby generators, each with a net thermal rated input of 0.78 MWth, are added to the Permit.

## Purpose of this document

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

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

Unless the decision document specifies otherwise, we have accepted the applicant's proposals. Read the permitting decisions in conjunction with the environmental permit and the variation notice.

# Key issues of the decision

## Intensive Rearing of Poultry or Pigs BAT Conclusions document

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

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

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

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

Poultry housing has not been changed as part of this variation and no new houses have been added to the Permit. We have however reviewed existing housing, permitted before 21/02/2017, against the best available techniques (BAT) conclusions as defined in the intensive rearing of poultry or pigs (IRPP) BAT conclusions document, dated 21/02/2017, to ensure compliance.

### 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 Installation in their document reference ‘BAT Review – Felthorpe’ submitted with the application, which has been referenced in Table S1.2 - Operating Techniques, of the permit.

The following is a more specific review of the measures the Applicant has applied to ensure compliance with the above key BAT measures:

**BAT 3 Nutritional management - Nitrogen excretion**

The Applicant has confirmed it will demonstrate that the Installation can achieve levels of nitrogen excretion below the required BAT-AEL of 0.6 kg N/animal place/year and will use BAT 3a technique reducing the crude protein content.

**BAT 4 Nutritional management - Phosphorus excretion**

The Applicant has confirmed it will demonstrate that the Installation can achieve levels of phosphorus excretion below the required BAT-AEL of 0.25 kg $P_2O_5$/animal place/year and will use BAT 4a technique reducing the crude protein content.

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

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

This will be verified by means of 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.

**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:

- Internal relevant humidity, temperature and litter quality is to be monitored by farm personnel and recorded daily. Any abnormal odours detected will be reported to the area team.
- The area manager will assess odour during his normal site visits which are usually carried out weekly.
- Odour monitoring will be carried out 30 days into each crop at the Installation boundary.
- If an odour complaint is received for the site, then a more robust monitoring regime will be implemented. This shall include boundary sniff monitoring by

the area manager and potentially sniff monitoring at the complainant receptor if this can be agreed.

**BAT 27 Monitoring of emissions and process parameters - Dust emissions**

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

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

**BAT 32 Ammonia emissions from poultry houses - Broilers**

The BAT-AEL to be complied with is 0.08 kg $NH_3$/animal place/year. The Applicant will meet this as the emission factor for broilers is 0.024 kg $NH_3$/animal place/year.

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

### Detailed assessment of specific BAT measures

**Ammonia emission controls – BAT Conclusion 32**

A BAT-Associated Emission Level (BAT-AEL) provides us with a performance benchmark to determine whether an activity is BAT. The BAT Conclusions include a set of BAT-AELs for ammonia emissions to air from animal housing for broilers.

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

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

## Industrial Emissions Directive (IED)

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

## 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 revised risk assessment for the Installation, received on 07/10/2026, lists key potential risks of odour pollution beyond the Installation boundary.

Odour Management Plan Review

There are sensitive receptors located within 400m of the Installation boundary. The nearest receptor is located approximately 73 m to the northeast of the Installation boundary (please note, the distance stated is only an approximation from the Installation boundary to the assumed boundary of the property).

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

The Operator has provided a revised OMP, received on 07/10/2026, 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, as well as the site-specific circumstances at the Installation. We consider that the OMP is acceptable because it complies with the above guidance, with details of odour control measures, contingency measures and complaint procedures described below.

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

It should also be noted that for existing farms, having checked Environment Agency records and consulted with the Local Authority, there are no known historical odour complaints at this site.

The OMP also provides a suitable procedure in the event that complaints are made to the Operator. The OMP is required to be reviewed at least every year (as committed to in the OMP) and/or after a complaint is received, and/or after any changes to operations at the Installation, whichever is the sooner. The OMP includes contingency measures to minimise odour pollution during abnormal operations. A list of remedial measures is included in the contingency plan, including triggers for commencing and ceasing use of these measures.

The Environment Agency has reviewed the OMP and considers it complies with the requirements of our 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 revised risk assessment for the Installation, received on 07/10/2026, lists key potential risks of noise pollution beyond the Installation boundary.

Noise Management Plan Review

The final NMP provided by applicant and assessed below was received as part of the application supporting documentation on 07/10/2026.

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

It should also be noted that for existing farms, having checked Environment Agency records and consulted with the Local Authority, there are no known historical noise complaints at this site.

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

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

Conclusion

We have assessed the NMP for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 'Noise management at intensive livestock Installations'. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution/nuisance.

## Dust and bioaerosols management

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

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

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

As there are receptors within 100m of the Installation, the Applicant was required to submit a dust and bioaerosol management plan in this format. The final dust and bioaerosol management plan provided by the applicant and assessed below was received on 07/10/2026.

There are two sensitive receptors within 100m of the Installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 10 metres to the west of the Installation boundary, and approximately 105 metres from the nearest poultry house.

In the guidance mentioned above it states that particulate concentrations fall off rapidly with distance from the emitting source. This fact, together with the proposed good management of the installation (such as keeping areas clean from build-up of dust and other measures in place to reduce dust and the risk of spillages e.g. litter and feed management/delivery procedures) all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed measures in their dust and bioaerosol management plan to reduce dust (which will inherently reduce bioaerosols).

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

## Standby generator

There are two standby generators each with a net thermal rated input of 0.78 MWth. They will not be tested more than 50 hours per year or operated (including testing) for more than 500 hours per year (averaged over 3 years) for emergency use only as a temporary power source if there is a mains power failure. The generators fall outside of the requirements of the Medium Combustion Plant Directive.

## Improvement programme

Improvement condition IC 6 has been marked as completed as part of this variation.

The IC required the operator to submit a written Emission Reduction Plan to the Environment Agency for approval with proposals to reduce ammonia emissions from the Installation so that the PC at Norfolk Valley Fens SAC is no more than 0.07µg/m3 as an annual average.

It can be seen from the detailed modelling, reference 'A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing Turkey Rearing Houses and the Proposed Broiler Chicken Rearing Houses at Beck Farm, Felthorpe Poultry Unit, Haveringland Road, near Felthorpe in Norfolk', submitted with the application, that the maximum PC at the SAC under the proposal is 0.043 µg/m3 as an annual mean. The requirements of the IC have therefore been met, and the IC has been marked as completed in Table S1.3 of the Permit.

## Ammonia

There are two Special Areas of Conservation (SAC) within 5km of the Installation boundary. In addition, there are five Sites of Special Scientific Interest (SSSI) within 5km of the Installation boundary, and thirteen other nature conservation sites within 2km comprising eleven Local Wildlife Sites (LWS) and two ancient woodlands.

## Ammonia assessment – SAC

The following trigger thresholds have been designated for the assessment of European sites:

- If, using the Ammonia Screening Tool (AST v4.6) the process contribution (PC) is below 4% of the relevant critical level (CLe) or critical load (CLo) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded, detailed ammonia modelling is required, and, if the PC from such modelling is below 1% of the relevant critical level

(CLe) or critical loads (CLo) then the farm can be permitted with no further assessment.

- Where the PC (after modelling) exceeds 1%, further detailed assessment is required, taking into consideration the ammonia and nitrogen background concentrations and may also require an in-combination assessment.
- Where an in-combination assessment is required, the combined PC for all relevant existing permitted installations identified within 5 km of the SAC will be considered, together with impacts from other local plans, projects, and non-permitted farms which could act in-combination. The in-combination assessment is limited to those impacts not already included in the relevant background emission baseline.

Following the receipt of an application, the determination may require an additional, more detailed assessment of the Installation's impact on SACs, SPAs and Ramsar sites including, if appropriate, consideration of impacts of other local plans, projects, and non-permitted farms which could act in-combination. It may also include consideration of the condition of the SAC, SPA or Ramsar site and the background concentrations at the sites for ammonia, nitrogen deposition and acid deposition. This potential additional assessment is required to take into consideration recent case law.

The trigger level for completing the additional assessment during determination will be if the process contribution exceeds 1% of the critical level/loads. Following further detailed assessment, we may require the applicant to ensure ammonia emissions do not result in a process contribution at any SAC, SPA or Ramsar that exceeds 1%. We will contact the Applicant when duly making if we require any additional information to assess whether to issue or refuse the variation.

River Wensum SAC assessment

Detailed modelling, reference 'A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing Turkey Rearing Houses and the Proposed Broiler Chicken Rearing Houses at Beck Farm, Felthorpe Poultry Unit, Haveringland Road, near Felthorpe in Norfolk', submitted with the application, has determined that the PCs of nitrogen deposition and acid deposition from the application site are less than the 1% insignificance threshold at River Wensum SAC. In addition, comparison of the modelling for the baseline scenario, 151,967 turkeys in houses with side fan ventilation, with the modelling for the proposed scenario, 617,500 broilers in houses with high velocity ventilation, shows a reduction in emissions under the proposal at the SAC (see tables below). It is therefore possible to conclude no likely significant effect.

Detailed modelling provided by the Applicant has been audited in detail by the Environment Agency and we have confidence that we can agree with the report conclusions.

**Table 1** – **Nitrogen deposition**

| Site | Critical load kg N/ha/yr [1] | Predicted PC kg N/ha/yr [2] | PC % of critical load |
|---|---|---|---|
| River Wensum SAC | 15 | 0.07 | 0.45 |

Notes:
[1] Critical load values taken from APIS website (www.apis.ac.uk) – 19/03/2026.
[2] Based on the worst-case (maximum) PC, taken from Table 7b of the modelling report (receptor 32).

**Table 2** – **Acid deposition**

| Site | Critical load keq/ha/yr [1] | Predicted PC keq/ha/yr [2] | PC % of critical load |
|---|---|---|---|
| River Wensum SAC | 0.535 | 0.005 | 0.93 |

Notes:
[1] Critical load values taken from APIS website (www.apis.ac.uk) – 19/03/2026.
[2] Acid deposition based on 1/14th of the maximum nitrogen deposition PC taken from Table 7b of the modelling report.

**Table 3 – River Wensum SAC**

| | Process contribution Nitrogen deposition (kg N/ha/yr) [1] | Process contribution acid deposition (keq/ha/yr) [2] |
|---|---|---|
| Baseline | 0.07 | 0.005 |
| Proposal | 0.06 | 0.004 |
| Percentage reduction | 14.29% | 20% |

Notes:
[1] Based on the worst-case (maximum) PC for the proposed scenario. PCs taken from Tables 7a and 7b of the modelling report (receptor 33).
[2] Acid deposition based on 1/14th of the maximum nitrogen deposition PC taken from Tables 7a and 7b of the modelling report.

It should be noted that the nitrogen deposition PC for receptor 32 is slightly higher than the PC for receptor 33 under the proposal and that the PCs at this receptor show no change between the baseline and proposal, unlike all the other receptors at the River Wensum SAC. It is thought that this result is an anomaly, possibly the result of a rounding error. However, the PC for the proposal is still below the 1% insignificance threshold at this receptor.

No further assessment is required.

Detailed modelling, reference 'A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing Turkey Rearing Houses and the Proposed Broiler Chicken Rearing Houses at Beck Farm, Felthorpe Poultry Unit, Haveringland Road, near Felthorpe in Norfolk', submitted with the application, has determined that the PCs of ammonia emissions from the application site are over the 1% threshold at River Wensum SAC, when using the correct CLe 1 $\mu g/m^3$, and are therefore potentially significant. However, comparison of the

modelling for the baseline scenario, 151,967 turkeys in houses with side fan ventilation, with the modelling for the proposed scenario, 617,500 broilers in houses with high velocity ventilation, shows a reduction in emissions under the proposal at the SAC (see table below). On this basis, we agree that the variation can be issued based on a reduction in impacts at the SAC under the proposal.

Detailed modelling provided by the Applicant has been audited in detail and we have confidence that we can agree with the report conclusions.

**Table 5 – River Wensum SAC**

| | **Process contribution Ammonia (µg/m$^3$)** [1] |
|---|---|
| Baseline | 0.014 |
| Proposal | 0.011 |
| Percentage reduction | 21.43% |

Notes:
[1] Based on the worst-case (maximum) PC for the proposed scenario. PCs taken from Tables 7a and 7b of the modelling report (receptor 33).

It should be noted that the ammonia PC for receptor 32 is slightly higher than the PC for receptor 33 under the proposal and that PCs for this receptor show no change between the baseline and proposal, unlike all the other receptors at the River Wensum SAC. It is thought that this result is an anomaly, possibly the result of a rounding error.

Conclusion

Overall, we have confidence that the proposal impacts are no higher than the current baseline impacts at the River Wensum SAC.

Therefore, we can permit this variation and no further assessment is required.

Norfolk Valley Fens SAC assessment

Detailed modelling, reference ‘A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing Turkey Rearing Houses and the Proposed Broiler Chicken Rearing Houses at Beck Farm, Felthorpe Poultry Unit, Haveringland Road, near Felthorpe in Norfolk’, submitted with the application, has determined that the PCs of ammonia emissions, nitrogen deposition and acid deposition from the application site are over the 1% threshold at Norfolk Valley Fens SAC and are therefore potentially significant. However, comparison of the modelling for the baseline scenario, 151,967 turkeys in houses with side fan ventilation, with the modelling for the proposed scenario, 617,500 broilers in houses with high velocity ventilation, shows a reduction in emissions under the proposal at the SAC (see table below). On this basis, we agree that the variation can be issued based on a reduction in impacts at the SAC under the proposal.

Detailed modelling provided by the Applicant has been audited in detail and we have confidence that we can agree with the report conclusions.

**Table 4 – Norfolk Valley Fens SAC**

| | **Process contribution Ammonia (µg/m$^3$)** [1] | **Process contribution Nitrogen deposition (kg N/ha/yr)** [1] | **Process contribution acid deposition (keq/ha/yr)** [2] |
|---|---|---|---|
| Baseline | 0.060 | 0.31 | 0.022 |
| Proposal | 0.043 | 0.23 | 0.016 |
| Percentage reduction | 28.34% | 25.81% | 27.28% |

Notes:
[1] Based on the worst-case (maximum) PC for the proposed scenario. PCs taken from Tables 7a and 7b of the modelling report (receptor 24).
[2] Acid deposition based on 1/14th of the maximum nitrogen deposition PC taken from Tables 7a and 7b of the modelling report.

Conclusion

Overall, we have confidence that the proposal impacts are no higher than the current baseline impacts at the Norfolk Valley Fens SAC.

Therefore, we can permit this variation and no further assessment is required.

# Ammonia assessment – SSSI

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

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

Initial screening using the ammonia screening tool version 4.6 (dated 19/03/2026) has indicated that emissions from the Installation will only have a potential impact on SSSI with a precautionary CLe of 1 µg/m$^3$ if they are within 1,759 metres of the emission source.

Beyond 1,759 m the PC is less than 0.2 µg/m$^3$ (i.e. less than 20% of the precautionary 1 µg/m$^3$ CLe) and therefore beyond this distance the PC is insignificant. In this case all SSSI are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of 1 µg/m$^3$ is used and the PC is assessed to be less than 20%, the site automatically screens out as insignificant and no further assessment of CLo is necessary. In this case the 1 µg/m$^3$ level used has not

been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely damage to these sites.

**Table 6 – SSSI Assessment**

| Name of SSSI | Distance from site (m) |
|---|---|
| Swannington Upgate Common | 2,166 |
| Buxton Heath | 2,385 |
| Alderford Common | 4,105 |
| Cawston and Marsham Heaths | 4,201 |
| River Wensum | 4,699 |

No further assessment is required.

# Ammonia assessment – LWS and AW

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

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

Initial screening using ammonia screening tool version 4.6 (dated 19/03/2026) has indicated that emissions from the Installation will only have a potential impact on the LWS / AW with a precautionary CLe of 1 µg/m$^3$ if they are within 603 m of the emission source.

Beyond 603 m the PC is less than 1 µg/m$^3$ and therefore beyond this distance the PC is insignificant. In this case the LWS and AW are beyond this distance (see table below) and therefore screen out of any further assessment.

**Table 7 – LWS and AW Assessment**

| Site | Distance from site (m) |
|---|---|
| Meadows by Cushion's Common Plantation LWS | 722 |
| Whinney Hills & Common LWS | 1,145 |
| Botany Bay Farm LWS | 1,349 |
| Quakers Farm Meadows LWS | 1,542 |
| Horsford Woods LWS | 1,546 |
| Fishpool Covert LWS | 1,712 |
| Hevingham Park LWS | 1,870 |
| Dark Plantation LWS | 2,018 [1] |
| Horsford Rifle Range LWS | 2,103 [1] |
| Drayton Drewray LWS | 2,266 [1] |
| Hevingham Park AW | 1,866 |

| | |
|---|---|
| Great Wood AW | 1,963 |

Notes:
[1] This site is included at >2km because the screening is based on an approximate centre point of the emissions and includes a buffer distance calculated from this centre point to the furthest point of the boundary to ensure all nature conservation sites within the threshold distance from the installation boundary have been included in the assessment.

No further assessment is required.

Screening using the ammonia screening tool version 4.6 (dated 19/03/2026) has determined that the PC on the LWS for nitrogen deposition and acid deposition from the application site are under the 100% significance threshold and can be screened out as having no likely significant effect (see tables below).

**Table 8 – Nitrogen deposition**

| Site | Critical load kg N/ha/yr [1] | Predicted PC kg N/ha/yr | PC % of critical load |
|---|---|---|---|
| Green Lane LWS | 10 | 8.518 | 85.2 |

Notes
[1] Critical load values taken from APIS website (www.apis.ac.uk) – 19/03/2026.

**Table 9 – Acid deposition**

| Site | Critical load keq/ha/yr [1] | Predicted PC keq/ha/yr | PC % of critical load |
|---|---|---|---|
| Green Lane LWS | 1.263 | 0.608 | 48.1 |

Notes
[1] Critical load values taken from APIS website (www.apis.ac.uk) – 19/03/2026.

No further assessment is required.

Detailed modelling, reference ‘A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing Turkey Rearing Houses and the Proposed Broiler Chicken Rearing Houses at Beck Farm, Felthorpe Poultry Unit, Haveringland Road, near Felthorpe in Norfolk’, submitted with the application, has determined that the PCs of ammonia emissions from the application site are under the 100% significance threshold at Green Lane LWS and can be screened out as having no likely significant effect. In addition, comparison of the modelling for the baseline scenario, 151,967 turkeys in houses with side fan ventilation, with the modelling for the proposed scenario, 617,500 broilers in houses with high velocity ventilation, shows a reduction in emissions under the proposal at the LWS (see tables below). It is therefore possible to conclude no likely significant effect.

**Table 10 - Ammonia emissions**

| Site | Critical level ammonia µg/m$^3$ | Predicted PC µg/m$^3$ | PC % of critical level |
|---|---|---|---|
| Green Lane LWS | 1 [1] | 0.475 [2] | 47.5 |

Notes:
[1] CLe 1 µg/m$^3$ applied as protected lichen or bryophytes species were found when checking Easimap layer.
[2] Based on the worst-case (maximum) PC for the proposed scenario. PCs taken from Tables 7a and 7b of the modelling report (receptor 1).

**Table 11 – Green Lane LWS**

| | **Process contribution Ammonia (µg/m$^3$)** [1] |
|---|---|
| Baseline | 1.517 |
| Proposal | 0.475 |
| Percentage reduction | 68.69% |

Notes:
[1] Based on the worst-case (maximum) PC for the proposed scenario. PCs taken from Tables 7a and 7b of the modelling report (receptor 1).

# 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:

- Local Authority – Environmental Protection – Broadland Council
- UK Health Security Agency (UKHSA)
- Director of Public Health
- Health and Safety Executive

The comments and our responses are summarised in the consultation responses section.

## The site

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

The plan is included in the permit.

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

We have checked the location of the application to assess if it is within the screening distances, we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

See Ammonia section in the Key Issues above for more details.

We have not consulted Natural England.

The decision was taken in accordance with our guidance.

## Environmental risk

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

The Operator’s risk assessment is satisfactory.

## General operating techniques

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

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

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

## Odour management

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

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

We have approved the odour management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the

measures in the plan are considered to cover every circumstance throughout the life of the permit.

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

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

## Noise management

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

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

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

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

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

## Dust and bioaerosol management

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

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

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

The applicant should keep the plans under constant review and revise them annually, or if necessary sooner, if there have been complaints arising from

operations on site or if circumstances change. This is in accordance with our guidance ‘Control and monitor emissions for your environmental permit.

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

## Updating permit conditions during consolidation

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

## Improvement programme

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

See Key Issues section above for more details.

## Emission limits

Emission Limit Values (ELVs) based on Best Available Techniques (BAT) have been added for broilers for ammonia, phosphorous and nitrogen.

Emission Limit Values (ELVs) based on Best Available Techniques (BAT) have been deleted for turkeys for phosphorous and nitrogen.

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

Monitoring has not changed as a result of this variation.

## Reporting

Reporting has not changed as a result of this variation.

## Management system

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

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

## Growth duty

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

Paragraph 1.3 of the guidance says:

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

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

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

# Consultation Responses

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

The consultation commenced on 14/07/2026 and ended on 11/08/2026.

## Responses from organisations listed in the consultation section

**Response received from:** UKHSA on 31/07/2026.

**Brief summary of issues raised:** The main emissions of potential public health significance are emissions to air of bioaerosols, dust including particulate matter and ammonia. The applicant has provided an Environmental Risk Assessment and outlined a range of mitigation and management measures in an Odour Management Plan and a Dust and Bioaerosol Management Plan. An accident management plan has been proposed but not included in the application documents.

UKHSA is reassured that abatement measures outlined within the permit documentation will help reduce emissions to air from site processes and comply with permit guidance and conditions.

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

**Summary of actions taken:** No further action.

## Representations from community and other organisations

**Response received from:** Communities Against Factory Farming Limited on 03/08/2026 and 09/08/2026.

**Brief summary of issues raised and summary of actions taken:**

**1. Offences committed by previous operator Hook 2 Sisters Limited.**
The enforcement actions listed date from 2009 and 2011. There is no evidence that these actions relate specifically to the site subject to this application. On the information available they are not considered relevant to the determination of this EPR application.

The Select Committee report concerns issues investigated in 2017 at a 2 Sisters Food Group poultry processing plant. As the matters identified relate to a different facility and are not specific to the site subject to this application, the report is not considered relevant to the determination of this EPR application.

**2. Defects in plans**

Revised plans were provided by the Operator in line with guidance during determination.

**3. Application Part C3.5, question 8e**

Question 8e of Application Part C3.5 asks if the variation will result in changes to slurry or manure management. As the Applicant ticked the box to confirm there will be no changes, they were not required to answer questions 8f to 8j.

The variation does not result in changes to slurry and manure management; dirty water (slurry) will continue to be exported from the Installation for spreading to third party owned land and litter sent for energy recovery or for spreading on third party owned land.

The two dirty water tanks within the Installation boundary are existing. No additional tanks have been added as part of this variation. Documents have been revised during determination to be consistent.

**4. Ammonia Impact Assessment**

The Environment Agency accepted use of a site-specific emission factor of 0.138 kg $NH_3$/place/year proposed by Bernard Matthews for their stag turkey rearing regime (EPR/RP3534LX/V002, 01/11/2010). This emission factor has been correctly used for the baseline modelling for this determination, in line with guidance, to avoid over inflating the baseline process contributions.

Detailed modelling, reference ‘A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing Turkey Rearing Houses and the Proposed Broiler Chicken Rearing Houses at Beck Farm, Felthorpe Poultry Unit, Haveringland Road, near Felthorpe in Norfolk’, submitted with the application, has determined that PCs of nitrogen deposition and acid deposition from the application site are less than the 1% insignificance threshold at River Wensum SAC under the proposal.

Comparison of the modelling for the baseline scenario with the modelling for the proposed scenario, shows reduced impacts at all assessed protected conservation designations under the proposal.

**5. Application Part C3.5, question 10**

Question 10 of Application Part C3.5 asks if the variation will result in changes to resource efficiency. As the proposed changes do not change how resource efficiency is managed the Applicant was not required to complete questions 10a to c.

## 6. Nitrate Vulnerable Zone (NVZ)

Details regarding environmental protection designations, for example NVZs, would normally be included within a Site Condition Report (SCR). As the Installation boundary is not increasing as part of this variation, the Applicant was not required to submit a SCR.

Spent litter will continue to be exported off site and sent for energy recovery or for spreading on land owned by third parties. The Applicant has confirmed that dirty water (slurry) and litter will be spread to third-party owned land in accordance with a manure management plan for the receiving land, good agricultural practice and relevant legislation, including Code of Good Agricultural Practice, Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018 (Farming Rules for Water) and Nitrate Pollution Prevention Regulations.

Question 7 of Application Part C3.5 covers point source emissions from the Installation. The export of spent litter and slurry is not considered an emission. Emissions are substances released from the Installation whilst something exported in a controlled manner for subsequent use elsewhere is not considered an emission.

The export of spent litter and slurry from the Installation is covered under question 8 of Application Part C3.5. As outlined above, there are no changes to manure or slurry management as part of this variation and so the Applicant was not required to answer questions 8f to 8j.

The permit does not authorise or require slurry or spent litter to be spread in a particular location. A map of available land and any restrictions to be placed upon the land is a requirement of the manure management plan which is agreed with the Environment Agency before any spreading takes place; there is no requirement for the Operator to submit this information during the permit determination process.

## 7. Carcass incineration

There is no carcass incinerator within the Installation boundary. The Applicant has confirmed that carcasses will be removed from the Installation at least weekly by a licensed contractor, in accordance with the Animal by product regulations.

## 8. Site security

The Applicant has confirmed in the Environmental Risk Assessment that there is a hedge/fence around the Installation with a locked front gate. Section C2.3d, ‘Summary of Environment Management System’, of the document ‘Supporting documents to vary an existing environmental permit’ has been updated to reflect this during determination.

## 9. Raw materials

Question 8c of Application Part C3.5 asks for an updated raw materials inventory where additional or new raw materials will be used. The Applicant submitted an updated raw materials inventory during the permit determination.

## 10. Missing checklist

All documents required to be submitted with the Application in line with guidance and the correct application fee under our charging scheme have been received.

## 11. Action required to further the general biodiversity objective

In accordance with section 40 of the Natural Environment and Rural Communities Act 2006, as amended by the Environment Act 2021, the Environment Agency has had regard to the purpose of conserving and enhancing biodiversity in exercising its functions.

## 12. Agriculture and rural land use are the main sources of nitrogen and phosphorous pollution.

BAT Conclusions 3 and 4 of the 2017 Intensive Farming BAT Conclusions require the Operator to adopt a nutritional strategy to reduce the levels of Nitrogen and Phosphorous within excreted manure and demonstrate they are meeting the BAT-Associated excretion levels given in table 1.1 and table 1.2 of the BAT conclusions document. The Applicant has confirmed they have checked the relevant levels and can comply with them. They will also be required to calculate or analyse manure and/or slurry to estimate N and P excretion and report this to the Environment Agency annually. We are satisfied that the Applicant will comply with the relevant BAT conclusions.

In addition, the Applicant has confirmed that slurry and spent litter spread to third party owned land will be done in accordance with a manure management plan for the receiving land, relevant good agricultural practice and legislation, including the Code of Good Agricultural Practice, the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018 (Farming Rules for Water) and the Nitrate Pollution Prevention Regulations.

We are satisfied that the Installation complies with best practice, that no pollution of ground waters or surface waters should occur as a result of operations at the Installation and that we have sufficient controls within the permit conditions to enable further measures to be implemented should these be required.

## 13. Impact of spreading digestate, manure and slurry

The land where manure may be stored or spread does not form part of the installation and so slurry and manure exported from the installation for storage or 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 slurry and manure removed as part of poultry house cleanouts.

The installation boundary for permitted farms typically includes the livestock housing, any yard and ranging areas and associated infrastructure but does not routinely include wider adjacent land. Whilst on farm slurry and manure management, yard run off and drainage are regulated by the permit, the spreading of manures and slurry to land (and the associated potential for water quality impacts) is primarily regulated through separate regulatory regimes namely the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations (Farming Rules for Water), and, in designated areas, the Nitrate Pollution Prevention Regulations.

The Applicant has confirmed that slurry and spent litter spread to third party owned land will be done in accordance with a manure management plan for the receiving land, relevant good agricultural practice and legislation, including the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018 (Farming Rules for Water) and the Nitrate Pollution Prevention Regulations.

No digestate will be exported from the Installation for spreading on land.

**14. Greenhouse gas emissions and climate change**

We have considered the information submitted in support of the application and are satisfied that we have sufficient information to determine the Application. A greenhouse gas assessment is not required as part of an EPR permit application.

**15. Reductions in livestock numbers needed to meet climate targets**

This is not an issue under the Environment Agency's regulatory responsibility within the EPR regulations. However, we have carried out all relevant assessments in line with guidance and are satisfied that the environmental impacts from this Installation are acceptable.

**16. Pollution of air, soil and water**

We have assessed the potential impacts from the Installation, including odour, noise, dust, bioaerosols, ammonia emissions, drainage and impacts on nearby sensitive receptors. During determination we have reviewed the environmental risk assessments, management plans and drainage plans submitted in support of the Application and sought further information where necessary to ensure that appropriate controls and mitigation measures are in place.

We are satisfied that appropriate operating techniques, management plans and permit conditions are in place to prevent, or where that is not practicable minimise, emissions from the Installation. These include controls relating to odour, noise, fugitive emissions, drainage and dirty water management, together with the requirement for the Operator to comply with the operating techniques referenced within the Permit.

We have also assessed the potential impacts of ammonia emissions on nearby nature conservation sites and are satisfied that the Installation will not result in significant pollution of the environment or harm to human health. Based on the information provided and our assessment of the Application, we are satisfied that

the environmental impacts associated with the permitted activities are acceptable.

**17. Pandemic risk**
Effective biosecurity measures on site will 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. We consulted relevant health bodies as part of our external consultation process and no major concerns were raised (see UKHSA response above).

**18. 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. 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.

**19. Rejection of the application**
We have carried out all relevant assessments in line with guidance and are satisfied that the environmental impacts from the Installation are acceptable. As a result, the Environment Agency does not have reason to refuse the Application.

**20. Other concerns**
Alternative dietary choices to meat and dairy; farmers requiring support to diversify their businesses; loss of biodiversity where animal feed is grown; loss of biodiversity as a national security issue; food as a lever to optimize human health and environmental sustainability; nature-friendly farming essential to nature recovery and broader environmental goals; animal farming unsustainable without imports; and use of antibiotics are not issues under the Environment Agency's regulatory responsibility within the EPR regulations. They do not therefore fall within the scope of the Permit determination.

## Representations from individual members of the public

Nine 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 summary of actions taken:**

1. **Approving further intensification at this site would run counter to national environmental goals and the Agency's stated priorities**

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.

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 in line with our responsibilities as the relevant regulator under the EPR.

**2. Incomplete and inconsistent application**

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

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