Permitting Decisions -Variation

We have decided to grant the variation for **True Hill Farm Poultry Unit** operated by **Mr Robert Anderson, Mrs Rosamund Anderson and Mr Marcus Anderson.**

The variation number is **EPR/PP3130UY/V005.**

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

Overview of changes:

This variation is to add:

- Two new poultry houses will be built and the older poultry houses 1,2 and 3 will be decommissioned and remain in the installation boundary.
- Installation broiler places increasing from 360,000 to 440,000.
- The two new houses will be fitted with wet acid air scrubbers, with high velocity roof fans (11m/s efflux 5.5m release height) emergency backup and gable fans for hot weather cooling.
- No additional ground to be included in the installation boundary for the additional houses and relocated attenuation pond.
- No changes to heating which is to continue to be via LPG heaters.
- Standby generator upgraded to 1.2MWth (MCPD Compliant).

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.

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.

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

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

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

BAT Conclusions review

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

The Applicant has confirmed their compliance with all BAT conditions for the new housing in their BAT document reference and dated 29/05/2026, 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 **0.6** kg N/animal place/year and will use BAT 3a technique reducing the crude protein content.

BAT 4 Nutritional management - Phosphorus excretion

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

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

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

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

BAT 25 Monitoring of emissions and process parameters – Ammonia emissions

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

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

BAT 26 Monitoring of emissions and process parameters - Odour emissions

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

• The staff will perform a twice 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.

• In the event of odour complaints being received the Operator will notify the Environment Agency and make a record of the complaint. The Operator will undertake the necessary odour contingency as required.

BAT 27 Monitoring of emissions and process parameters - Dust emissions

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

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

BAT 32 Ammonia emissions from poultry houses - Broilers

The BAT-AEL to be complied with is **0.025 kg** NH_3/animal place/year for broilers with air cleaning abatement systems. The Applicant will meet this as the standard emission factor for broilers is 0.024 kg NH_3/animal place/year.

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 'Intensive pig and poultry farming: How to comply with your permit' 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 listed in the OMP with relevant control measures linked to each activity to minimise risk of odour pollution beyond the installation boundary.

Odour Management Plan Review

The final OMP provided by applicant and assessed below was received as part of the application supporting documentation on 02/10/2026.

There are fifty two sensitive receptors located within 400 m of the installation boundary. The closest receptor is approximately 25 metres to the west of the installation boundary.

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

For more information see the AHDB model template for an odour management plan and the odour management guidance.

The Operator has provided an OMP and this has been assessed against the requirements of 'Intensive pig and poultry farming: how to comply with your permit' guidance 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 (see consultation response below), 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 'Intensive pig and poultry farming: How to comply with your permit' 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 listed in the NMP with relevant control measures linked to each activity to minimise risk 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 02/10/26.

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 (see consultation response below), 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 'Intensive pig and poultry farming: how to comply with your

permit'. 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 02/10/2026.

There are three sensitive receptors within 100 m of the installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 25 metres to the west of the installation boundary.

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 all the listed activities.

The final updated dust and bioaerosol management plan included additional controls to minimize installation dust emission impacts on the closest receptor, 25 metres from the installation boundary.

Conclusion

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

Standby generator (Medium Combustion Plant)

There is one **new** standby generator with a net thermal rated input of 1.2 MWth and it will not be tested more than 52 hours per year or operated (including testing) for more than 500 hours per year (averaged over 3 years) for emergency use only as a temporary power source if there is a mains power failure.

As the thermal input capacity is greater than 1 MW this is classed as a new Medium Combustion Plant Unit.

Based on the above hours criteria being met this generator is classed as a low risk standby generator not requiring further assessment.

On the basis of compliance with reduced hours criteria listed above no emission limits apply in relation to the Medium Combustion Plant Directive.

However, monitoring is required for the standby generator air emissions as follows:

- Carbon Monoxide
- Oxides of Nitrogen

The operator has confirmed compliance with low risk MCP monitoring guidance.

These monitoring requirements have been added to Table S3.1 of the permit.

Ammonia

The Applicant has demonstrated that the housing will meet the relevant NH_3 BAT AEL.

There are two Special Areas of Conservation (SAC), one Special Protection Area (SPA) and no Ramsar sites located within 5 km of the installation boundary. There are eight Sites of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There are also three Local Wildlife Sites (LWS) within 2 km of the installation boundary.

Ammonia assessment – SAC and SPA

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/SPA/Ramsar 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.

Screening:

Initial screening using ammonia screening tool version 4.6 dated 15/09/2026 has indicated that emissions from this installation will only have a potential impact on the SAC listed below with a precautionary CLe of 1 μg/m^3 if they are within **4095** metres of the emission source.

Beyond **4095** m the PC is less than 0.04 μg/m^3 (i.e. less than 4% of the precautionary 1 μg/m^3 CLe) and therefore beyond this distance the PC is insignificant. In this case the SAC is beyond this distance (see table below) and therefore screens out of any further assessment.

Where the precautionary level of 1μg/m^3 is used and the PC is assessed to be less than 4%, 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 significant effect.

Table 1 – SAC Assessment

Name of SAC	Distance from site (m)
Breckland SAC	4,529

Therefore, no further assessment is required.

Norfolk Valley Fens SAC and Breckland SPA require more detailed assessment.

Screening using the detailed modelling ‘A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Broiler Chicken Rearing Houses at True Hill Farm Poultry Unit, near Brookville in Norfolk’ dated 21st July 2026 is summarised below with our final conclusions.

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

The worst-case modelled process contributions are summarised in tables below:

Table 2 – Ammonia emissions

Site	Critical level ammonia µg/m^3	Predicted PC µg/m^3	PC % of Critical level
Breckland SPA proposal	1*	0.003	0.28
Norfolk Valley SAC proposal	1*	0.009	0.87

*A precautionary CLe of 1 µg/m^3 has been assigned to this site.

Table 3 – Nitrogen deposition

Site	Critical load kg N/ha/yr*	Predicted PC kg N/ha/yr	PC % of critical load
Breckland SPA proposal	5	0.015	0.30
Norfolk Valley SAC proposal	5	0.045	0.91

* Critical load values taken from Air Pollution Information System (APIS) website (www.apis.ac.uk) – [15/09/2026]

The applicant did not complete an assessment for acid deposition.
We have utilised the modelling report nitrogen deposition process contributions and divided results by fourteen to create acid deposition process contributions.
The maximum results are detailed below:

Table 4 – Acid deposition

Site	Critical load keq/ha/yr *	Predicted PC keq/ha/yr	PC % of critical load
Breckland SPA proposal	0.536	0.0010	0.20
Norfolk Valley SAC proposal	0.514	0.0032	0.63

* Critical load values taken from APIS website (www.apis.ac.uk) - [15/09/2026]

Conclusion
We conclude that for all modelled receptors the impacts on the above listed SAC and SPA for the proposal are below the relevant 1 % of critical levels and loads threshold

Therefore, 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 15/09/26 has indicated that emissions from this installation will only have a potential impact on SSSIs with a precautionary CLe of 1 μg/m^3 if they are within **1,404** metres of the emission source.

Beyond **1,404** 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 SSSIs 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 5 – SSSI Assessment

Name of SSSI	Distance from site (m)
The Brinks, Northwold	2,099
Breckland Forest	2,308
Foulden Common	3,310
Didlington Park Lakes	3,913
Breckland Farmland	4,200
Boughton Fen	4,439
Cranwich Camp	4,529
Wretton	4,961

No further assessment is required.

Ammonia assessment – LWS

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 15/09/2026 has indicated that emissions from this installation will only have a potential impact on the LWS sites with a precautionary CLe of 1 µg/m^3 if they are within **481** m of the emission source.

A rescreen was completed on 15/09/2026 and no revised Ancient Woodlands were found within the relevant 2 km screening distance.

Beyond **481** m the PC is less than 1 µg/m^3 and therefore beyond this distance the PC is insignificant. In this case all LWS s beyond this distance (see table below) and therefore screen out of any further assessment.

Table 6 – LWS Assessment

Site	Distance from site (m)
Cut-off Channel (Northwold) LWS	1,655
String Drain LWS	1,979
Cut-off Channel (Methwold Hythe) LWS	2,080

No further assessment is required.

Decision considerations

Confidential information

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

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

Identifying confidential information

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

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

Consultation

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

The application was publicised on the GOV.UK website.

<u>We consulted the following organisations:</u>

- UK HSA.

- East of England Department of Public Health.
- Health and Safety Executive.
- Kings Lynn and West Norfolk Council Environmental Protection Department.

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

The regulated facility

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

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

This variation does not lead to any increase in installation boundary area.

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 consulted Natural England on our Habitats Regulation for the assessments for the relevant European Sites (dated 16/10/26) as listed in the key issues section of this document and as there were no comments from Natural England by deadline of 13/11/26 issued the assessment based on our original version.

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.

The assessment shows that applying the conservative criteria in our guidance on environmental risk assessment all emissions including those linked to standby generator Medium Combustion Plant may be categorised as environmentally not significant.

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 include those of the new air cleaning system scrubbers which we have concluded after review are satisfactory.

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 ‘Intensive pig and poultry farming: how to comply with your permit’ guidance and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with The Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) published on 21st February 2017.

Odour management

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

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

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

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

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

Noise management.

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

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

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

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

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

Dust and bioaerosol management

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

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

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

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

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

Updating permit conditions during consolidation

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

Pre-operational conditions

Based on the information in the application, we consider that we need to include a single pre-operational condition.

This is to ensure a robust ammonia monitoring protocol is in place to our satisfaction to measure ammonia scrubber performance

There is a historic pre-operational condition carried over from the previous permit which is still outstanding.

Improvement programme

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

We have included a single additional improvement programme to ensure that monitoring evidence is provided to measure ammonia scrubber performance

There is a historic improvement programme carried over from the previous permit which is still outstanding.

Emission limits

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

The existing emission limit values have been applied to new poultry houses.

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.

We have decided that monitoring should be added for the following parameters, linked to standby generator stack emissions, using the methods detailed and to the frequencies specified:

- Carbon Monoxide
- Oxides of Nitrogen

These monitoring requirements have been included in order to ensure compliance with Medium Combustion Plant Directive.

Based on the information in the application we are satisfied that the Operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

Reporting

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

We have added reporting in the permit linked to new Medium Combustion Plant monitoring requirements.

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.

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 **15/07/2026** and ended on **12/08/2026.**

Responses from organisations listed in the consultation section

Response received from: UKHSA dated 31/07/2026.

Brief summary of issues raised: The response summarizes general intensive farming installation environmental concerns linked to ammonia and dust emissions.

Two specific checks mentioned

- Confirmation ammonia emissions not a human health issue.
- Specific review of dust emissions impacts on closest receptor at 25 metres from installation boundary.

Summary of actions taken:

- **Ammonia emissions human health assessment**
  The Applicant has confirmed the application of BAT measures to minimise ammonia emissions from the installation.
  With the usage of air cleaning scrubbers on all poultry houses, the installation ammonia emissions on local habitat sites is concluded as satisfactory being below the relevant thresholds.
  Given the much higher ammonia human health Air Quality Standard numeric values for ammonia relative to the respective habitat Critical levels and loads, we have confidence that impacts on local human receptors is reduced to a satisfactory level.
  No requirement for further actions.

- **Dust emissions at closest receptor**
  A revised dust and bio aerosol management plan was requested from Applicant with additional measures to minimise installation dust emissions at the closest receptor. The details of these measures are listed in key issues section of this document.
  In conclusion we are satisfied that these measures provided adequate control to minimise impacts to an acceptable level.
  No requirement for further actions.

Response received from: Kings Lynn and West Norfolk Council Environmental Protection Department: Dated 31/07/26.

Brief summary of issues raised: The response summarizes general intensive farming installation environmental concerns and extent of any concerns linked to this specific installation:

- Complaints History.
- Ground Water and Contaminated Land risk/history.
- Air Quality concerns:
  Defra's TG-22 refers to the fine particulate matter emissions (PM10) being a concern for local air quality management where stocking levels exceed 400,000 birds from mechanically ventilated buildings. With the addition of the extra poultry buildings will take the stocking levels above this screening criteria for air quality assessment.
- Amenity issues.

Summary of actions taken:

- **Complaints History**
  No specific complaints found including no odour or noise complaints.

- **Ground Water and Contaminated Land risk/history**
  No specific concerns raised.

- **Air Quality concerns**
  The referenced guidance is linked to planning applications. Our assessment of intensive farming installation dust emission impacts is based on a robust dust and bioaerosol management plan assessment. The latter provides additional level of protection by assessing control measures for not just point source emissions but also fugitive emissions.

  Our key issues section of this document outlines our assessment of the applicant Dust and Bioaerosol Management Plan. Our conclusion is that we are satisfied that sufficient controls are in place to minimise dust emissions from this installation to an acceptable level.

- **Amenity issues**
  Odour Management Plan:
  We have required the applicant to submit an updated more robust Odour Management Plan. The detail of the review is provided in the key issues section of this document.
  We are satisfied that the Odour Management Plan includes suitable measures to minimise risk of odour pollution from the installation at relevant local receptors.

Noise Management Plan:
We are satisfied that the Noise Management Plan includes suitable measures to minimise risk of noise pollution from the installation at relevant local receptors.

Representations from community and other organisations

Response received from: Communities against Factory Farming (CAFF) dated 05/08/2026

Brief summary of issues raised and actions taken:

1. **Slurry/dirty water onsite facilities**
   The response raised concerns linked to inconsistencies between differing applicant documents with respect to exact new slurry storage facilities linked to this variation.

   Actions taken
   We requested more information on dirty water storage from the Applicant. The response provided (02/10/2026) confirmed there are new concrete areas in front of the two new poultry houses including turning area. There is an additional dirty water tank for wash water from new poultry houses 9&10 and yard wash, all directed to the new diverter valve by concrete gradients. These facilities are clearly marked on updated site drainage plan dated 02/10/2026.

2. **Off-site transfer details**
   The response raised concerns linked to inconsistencies between differing applicant documents with respect to exact details of off-site transfers linked to the installation.

   Actions taken
   We requested clarity on off-site transfer details from the applicant.
   The response provided (02/10/2026) confirmed all spent litter is exported off-site to a local power station and no spent litter storage on site. Wash water is exported off site for third party land spreading, with manure management plans.

3. **NVZ compliance and Safe Water quality compliance.**
   The response raised concerns linked to lack of clarity of details linked to compliance.

   Actions taken
   Wash water is exported off site after completion of wash down, prior to placement of next cycle. No wash water stored on site and in line with our guidance not requiring storage capacity under NVZ regulations.
   Wash water is exported off site for third party land spreading, with manure management plans and compliant with NVZ, minimising risk of run off.
   All site drainage has been constructed as per a comprehensive SUDS report, minimising risk of run off and water quality impacts.

4. **Detailed biosecurity measures**
   The response requests clarity for what are specific biosecurity measures are in place within this installation.

   Actions taken
   The fugitive emissions plan has been updated to our satisfaction with biosecurity measure details.

5. **Installation boundary plan**
   The response raises concerns linked to neither of the maps shows a scale and the location detail is also unclear.

   Actions taken
   An updated boundary plan with scale has been provided by Applicant (dated 02/10/2026) to our satisfaction.

6. **Odour and dust management plans**
   The response highlights that both documents mention eight poultry houses with air scrubbers and yet the proposal is to add two extra poultry houses with scrubbers leading to a total of ten poultry houses within the installation.

   Actions taken
   The Applicant has updated both plans with correct number of poultry houses. The documents were received 02/10/2026.

7. **Odour and noise management plans key responsibilities document**
   The responses raised issue that this document was mentioned but not actually provided.

   Actions taken
   The relevant key responsibilities document has been provided by applicant to our satisfaction. The document was received on 02/10/2026.

8. **Water neutrality and quality**
   The application has not provided any information regarding the quantity of water required to operate the proposed development.

   Actions taken
   Water quality assessment of the feed water to the installation is outside the scope of the regulatory responsibility of the Environment Agency. No further actions required.

9. **Other relevant considerations**

The response raised the following concern:
A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.

Actions taken

We have satisfied that our review of the installation operating techniques has ensured compliance with the relevant BAT conclusions and minimised environmental impacts.

10. **Animal welfare concerns**

Actions taken

Animal welfare is outside the scope of the regulatory responsibility of the Environment Agency. No further actions required.

Representations from individual members of the public

There were also twelve public responses raising the same issues as the CAFF response above.

As no further issues were raised there is no requirement for further actions.

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