Permitting Decisions - Bespoke Permit

We have decided to grant the permit for Yarrow Hey operated by Mr Graeme Moon and Mr Richard Moon.

The permit number is EPR/HP3626LB.

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.

The application is for the operation of an intensive farming pig installation, comprising 14 pig houses with a capacity for rearing 1,600 pigs to 30kg, 2,512 pigs over 30kg (including 8 boars) and 374 sow places. The site operates a mixture of fully or partially slatted housing and houses with solid floor and straw bedding. The ventilation ranges from natural ventilation to high velocity ventilation.

Purpose of this document

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

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

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

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

Key issues of the decision

Intensive Rearing of Poultry or Pigs BAT Conclusions document

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

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

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

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

BAT Conclusions review

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

The Applicant has confirmed their compliance with all BAT conditions for the new installation in their document reference 'Technical Standards – BAT Review' and dated August 2025, which has been referenced in Table S1.2 - Operating Techniques, of the permit.

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

BAT 3 Nutritional management - Nitrogen excretion

The Operator has confirmed it will demonstrate that the installation can achieve levels of nitrogen excretion below the required BAT-AEL for the following pig types:

- Weaners (pigs 7 – 30kg): 4.0 kg N/animal place/year.
- Fattening pigs (pigs > 30kg): 13.0 kg N/animal place/year.
- Sows: 30.0 kg N/animal place/year.

They will use BAT 3a technique reducing the crude protein content and BAT 3b technique multiphase feeding strategy.

BAT 4 Nutritional management - Phosphorus excretion

The Operator has confirmed it will demonstrate that the installation can achieve levels of phosphorus excretion below the required BAT-AEL for the following pig types:

- Weaners (pigs 7 – 30kg): 2.2 kg P_2O_5/animal place/year.
- Fattening pigs (pigs > 30kg): 5.4 kg P_2O_5/animal place/year.
- Sows: 15 kg P_2O_5/animal place/year.

They will use BAT 4a technique multiphase feeding strategy.

BAT 14 Emissions from solid manure storage

Solid manure is stored at the Installation using BAT 14a, 14b, 14c and 14d techniques to ensure compliance with BAT requirements.

BAT 15 Emissions from solid manure storage

Solid manure is stored at the Installation using BAT 15a and 15d techniques to ensure compliance with BAT requirements.

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:

- Weekly sniff testing at the site to be conducted and records kept.

- In the event of an odour complaint being received, the Operator will undertake the necessary odour mitigation measures as required and records kept.

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 30 Ammonia emissions from pig houses

The Applicant has confirmed it will demonstrate that the installation achieves levels of ammonia below the required BAT-AEL for the following pig types:

- Weaners (pigs 7 – 30kg) (fully slatted (FSF) with frequent slurry removal): 0.53 kg NH_3/animal place/year.
- Fattening pigs (pigs > 30kg) (FSF with frequent slurry removal): 2.6 kg NH_3/animal place/year.
- Fattening pigs (pigs > 30kg) (solid floor): 5.65 kg NH_3/animal place/year.
- Farrowing sows (FSF/PSF): 5.6 kg NH_3/animal place/year.
- Mating and gestating sows (FSF/PSF with frequent slurry removal): 2.7 kg NH_3/animal place/year.
- Mating and gestating sows (solid floor): 5.2 kg NH_3/animal place/year.

Detailed assessment of specific BAT measures

Ammonia emission controls

Ammonia emission controls – BAT Conclusion 30

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

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

Detailed assessment of BAT-AELs

Pig housing

The new ammonia emission factor for production pigs > 30kg (including not served gilts) in housing with fully slatted floors is 2.813 kg NH3/animal

place/year, which is higher than the relevant BAT-AEL of 2.6 kg NH_3/animal place/year. In order to comply with the BAT-AEL, the Operator provided details of reduced crude protein in the pig feeds in their RFI responses received on 27/08/2026 and 02/09/2026.

For the production pigs >30kg, the crude protein content in the feed is 17.2%, a reduction of 0.8% from the average of 18% that the standard emission factor is based on. This means a reduction of 8% can be applied to the standard emission factor of 2.813 kg NH_3/animal place/year, giving an emission factor of 2.588 kg NH_3/animal place/year.

For the not served gilts (pigs >30kg), the crude protein content in the feed is 17.055%, a reduction of 0.9% from the average of 18% that the standard emission factor is based on. This means a reduction of 9% can be applied to the standard emission factor of 2.813 kg NH_3/animal place/year, giving an emission factor of 2.560 kg NH_3/animal place/year.

This is based on the fact that we can allow a 10% reduction in the emission factor for a 1% reduction of crude protein from the standard used, up to a maximum of 20% reduction in the emission factor.

Therefore, the Operator is compliant with the relevant BAT AEL of 2.6 kg NH3/animal place/year.

Industrial Emissions Directive (IED)

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

Groundwater and soil monitoring

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

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

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

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

The revised site condition report (SCR) for Yarrow Hey, submitted on 15/07/2026, demonstrates that there are no hazards or likely pathway to land or groundwater and no historic contamination on site that may present a hazard from the same contaminants. Therefore, on the basis of the risk assessment presented in the SCR, we accept that they have not provided base line reference data for the soil and groundwater at the site at this stage and although condition 3.1.3 is included in the permit no groundwater monitoring will be required.

Odour management

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

Condition 3.3 of the environmental permit reads as follows:

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

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

The risk assessment for the Installation provided with the application lists key potential risks of odour pollution beyond the Installation boundary.

Odour Management Plan Review

There are nine sensitive receptors (not associated with the farm) within 400m of the Installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 70 metres to the south of the Installation boundary, and approximately 75 metres from the nearest pig house.

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

The Operator has provided an OMP (submitted 15/07/2026) and this has been assessed against the requirements of 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 (version 2), Appendix 4 guidance 'Odour Management at Intensive Livestock Installations' and our Top Tips Guidance and Pig Industry Good Practice Checklist (August 2013), as well as the site-specific circumstances at the Installation. We consider that the OMP is acceptable because it complies with the above guidance, with details of odour control measures, contingency measures and complaint procedures described below.

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

It should also be noted that for existing farms, having checked Environment Agency records and consulted with the Local Authority, we are not aware of any 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 risk assessment for the installation provided within the NMP for the application lists key potential risks of noise pollution beyond the Installation boundary.

Noise Management Plan Review

The final NMP provided by the Applicant and assessed below was received as part of the application supporting documentation on 13/05/2026.

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

It should also be noted that for existing farms, having checked Environment Agency records and consulted with the Local Authority, we are not aware of any 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 13/05/2026.

There are four sensitive receptors within 100m of the Installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is adjacent to the north of the Installation boundary, and approximately 5 metres from the nearest pig 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).

Conclusion

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

Standby generator

There is one standby generator with a net thermal rated input of 0.26 MWth and it will not be tested more than 12 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. This generator falls outside of the requirements of the Medium Combustion Plant Directive.

Ammonia

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

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsar sites located within 5 kilometres (km) of the installation boundary. There are three Sites of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There are also five Local Wildlife Sites (LWS) and one Ancient Woodland (AW) within 2 km of the installation boundary.

Ammonia assessment – SSSI

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

- If the process contribution (PC) is below 20% of the relevant critical level (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 (revised 15/09/2026) has indicated that emissions from Yarrow Hey will only have a potential impact on SSSIs with a precautionary CLe of 1 μg/m^3 if they are within 1,453 metres of the emission source.

Beyond 1,453 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 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
East Polden Grasslands	4,323
Great Breach and Copley Woods	4,735
Kingweston Meadows	5,061*

* This site is included at >5km 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 SSSI sites within the threshold distance from the installation boundary have been included in the assessment.

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 (revised 11/09/2026) has indicated that emissions from Yarrow Hey will only have a potential impact on the LWS and AW sites with a precautionary CLe of 1 µg/m^3 if they are within 550 m of the emission source.

Beyond 550 m the PC is less than 1 µg/m^3 and therefore beyond this distance the PC is insignificant. In this case all LWS and AW sites are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 2 – LWS and AW Assessment

Site	Distance from site (m)
River Brue (Pomparies Bridge to Cat) LWS	890
Kennard and Butt Moor LWS	1,170
Moor Meads LWS	1,542
South Moor LWS	1,653
Park Wood (Butleigh) LWS	1,742
Park Wood AW	1,741

No further assessment is required.

Decision considerations

Confidential information

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

Identifying confidential information

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

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

Consultation

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

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority – Environmental Health
- UK Health Security Agency
- Director of Public Health
- Health and Safety Executive

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

Operator

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

The regulated facility

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

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

The site

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

The plan is included in the permit.

Site condition report

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

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

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

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

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

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

We have not consulted Natural England. The decision was taken in accordance with our guidance.

Environmental risk

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

The Operator’s risk assessment is satisfactory.

General operating techniques

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

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

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

Odour management

We have reviewed the Odour Management Plan in accordance with our guidance on odour management.

We consider that the Odour Management Plan is satisfactory, and we approve this plan.

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

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

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

Noise management

We have reviewed the Noise Management Plan in accordance with our guidance on noise assessment and control.

We consider that the Noise Management Plan is satisfactory, and we approve this plan.

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

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

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

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

Dust and bioaerosol management

We have reviewed the Dust and Bioaerosol Management Plan in accordance with our guidance on emissions management plans for dust.

We consider that the Dust and Bioaerosol Management Plan is satisfactory and we approve this plan.

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

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

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

Emission limits

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

Monitoring

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

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

Reporting

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

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

Management system

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

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

Previous performance

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

No relevant convictions were found.

This is an existing farm over the EPR threshold which is coming under Environment Agency regulation.

Financial competence

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

Growth duty

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

Paragraph 1.3 of the guidance says:

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

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

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

Consultation Responses

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

The consultation commenced on 13/11/2025 and ended on 11/12/2025.

Responses from organisations listed in the consultation section

Response received from: UK Health Security Agency (UKHSA) on 05/12/2025.

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

The Applicant has carried out risk assessments for the impact on neighbouring residential receptors from point source and fugitive emissions to air and water, and nuisance aspects such as odour and dust.

UKHSA have the following recommendations:

- This site is in a rural area but with sensitive receptors in close proximity, including several residential dwellings located within 100m of the site boundary. There is some inconsistency in the submitted documentation about nearest residential receptors. The Environment Agency should check that all potentially relevant receptors are included in the risk assessments submitted.
- Emissions of ammonia have been assessed by the Environment Agency and screened out based on ecologically sensitive areas. UKHSA has not seen information or data from this assessment and therefore cannot confirm that process contributions do not exceed limits at locations for vulnerable sensitive human receptors. The Environment Agency may therefore wish to ensure ammonia concentrations at nearby residential receptors will not exceed health-based Environmental Assessment Levels.
- Given the presence of sensitive receptors within 100 metres of the boundary, UKHSA notes that only a qualitative bioaerosol risk assessment was submitted. The Environment Agency should satisfy itself that a quantitative bioaerosol risk assessment is not required, considering there are properties within 100 metres of the site boundary.

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).

Summary of actions taken: The Applicant submitted revised odour, noise and dust management plan documents, as outlined in the key issues section above, in-line with guidance. The revisions included clarification on the sensitive receptors and updated distances.

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

The Applicant has provided a combined Dust and Bioaerosol Management Plan as part of the supporting information for this application, in accordance with guidance. We have checked this management plan against our guidance, www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols, and are satisfied that the measures proposed will minimise the potential for dust and bioaerosol emissions from the installation.

To prevent significant emissions from the site the Operator has proposed appropriate measures to manage emissions, including ammonia, bioaerosols and dust, in accordance with our technical guidance note for intensive farming and the BAT Conclusions document. These measures include the use of appropriate ventilation systems, appropriate housing design and management, containment of feedstuff and management of manure and slurry. We are satisfied that these measures will mitigate emissions to ensure a low risk to human health from the site.

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

Please refer to the key issues section for further details.

Representations from community and other organisations

Response received from: Two responses from Communities Against Factory Farming on 09/12/2025.

Brief summary of issues raised and actions taken:

1. Requirement for an Environmental Impact Assessment (EIA)
An EIA is required as part of any planning application. The Applicant did not submit an EIA as part of the Environmental Permitting Regulations (EPR)

application. We are satisfied we have sufficient information to determine the Application and have carried out an assessment of the environmental impact of the Installation as part of the permit determination.

2. Change of use under section 55 of the Town and Country Planning Act 1990.

Consideration of the Town and Country Planning Act 1990 is a matter for consideration during the planning process and does not form part of the permit decision.

3. Manure management environmental implications

The site operates a mixture of fully or partially slatted housing and houses with solid floor and straw bedding. Dunging areas on partially slatted housing and passageways in solid floor housing are scraped at least three times per week. The manure storage facility has capacity for a maximum of 100 tonnes of manure. Manure is exported from site to be spread on third party land or operator-controlled land in accordance with a manure management plan.

Slurry (including water from the wash out of pig houses and drainage from contaminated yards) is directed to reception pits and then exported offsite for suitable storage (in offsite lagoons) or spreading to third party land.

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

The Installation boundary for permitted farms typically includes the livestock housing, any yard 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 the receiver of the manure will confirm it is spread to land in accordance with the relevant Rules for Farmers and Land Managers and in accordance with the manure management plan for the receiving land.

4. Intensive pig production represents an inefficient use of grain protein.
This is not an issue under the Environment Agency's regulatory responsibility. It does not therefore fall within the scope of the Permit determination. The Environment Agency is responsible for ensuring that the activities at the Installation do not have an unacceptable impact on the environment or human health.

5. Imported soy for animal feed and the environmental consequences
This is not an issue under the Environment Agency's regulatory responsibility. It does not therefore fall within the scope of the permit determination.

6. Water requirements
Applicants are not required to provide details regarding the volume or source of water utilised at the installation as part of the EPR application. The consideration of water availability/water resources within a catchment area does not form part of the determination for the environmental permit for the Installation.

As part of our determination, we will consider the measures in place for efficient use of raw materials, including water. The Application contained details of the techniques in place for efficient use of water, in accordance with BAT 9; keep record of water use, detect and repair water leakages, use high-pressure cleaners, select and use suitable equipment, and regularly check and adjust drinking water equipment. Furthermore, standard condition 1.3.1 concerning the efficient use of raw materials and water has been included in the permit.

7. Risk of zoonotic disease and swine flu
The pigs will be kept indoors at all times so therefore it is extremely unlikely that they will contract swine flu. Effective biosecurity measures will also ensure that the likelihood of disease will be low. We are satisfied that the risk of pollution of the environment or harm to human health from the activities at the site are not likely to be significant. Our compliance team will ensure all relevant precautions are actioned in the event of any cases of swine flu.

8. Red meat and health concerns with cancer
This is not an issue under the Environment Agency's regulatory responsibility under EPR regulations. It does not therefore fall within the scope of the permit determination.

9. 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.

10. Cumulative impacts and increased pollution concerns

This is not a planning consultation; we have assessed this permit application under the Environmental Permitting (England and Wales) Regulations 2016.

Location and land use are matters for consideration during the planning process and do not form part of the Permit decision. The density of farms within a given area is not normally a relevant consideration under the EPR unless our risk assessment process requires an in-combination ammonia assessment; in this circumstance this was not required as the ammonia impact screened out based on impacts from this Installation alone, in accordance with our guidance. Where planning permission is required the local planning authority is responsible for determining land use.

There are nine sensitive receptors (not associated with the farm) within 400m of the Installation boundary and so the Applicant was required to submit an odour management plan (OMP) and noise management plan (NMP) as part of the application. We are satisfied that all sources of odour and receptors have been identified, and that the proposed mitigation measures will minimise the risk of odour and noise pollution/nuisance beyond the Installation boundary. The use of BAT and good practice will ensure emissions of odour and noise are minimised. Furthermore, standard conditions 3.3.1 and 3.4.1 concerning odour and noise have been included in the permit.

Our approach to the control of dust and bioaerosols is to require a Dust and Bioaerosol Management Plan for intensive farming installations with receptors within 100 metres of the Installation boundary. This is an agreed approach with UKHSA and the Environment Agency. This is a robust approach requiring the listing of both point source and fugitive emissions and controls to minimise impact on human health. The risk assessment criteria of 100 metres from the boundary is set out in our Intensive Farming risk assessment guidance at https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit. There are four receptors within 100m of the installation boundary and the Applicant has supplied a satisfactory Dust and Bioaerosol Management Plan for this site.

All clean water run-off has interception prior to discharge. Roof water from all the houses drains via French Drains (acting as soakaways) prior to discharge to a ditch, which eventually drain to the River Brue. Clean water draining from the yard drains via a sediment tank to the manmade wetland within the Installation boundary. Clean drainage systems will not be contaminated.

The Applicant submitted a fugitive emissions risk assessment detailing measures to prevent significant emissions from the site, in accordance with our technical guidance note for intensive farming and the BAT Conclusions document. These measures include the use of appropriate ventilation systems, appropriate housing design and management, containment of feedstuff and management of manure. We are satisfied that these measures will mitigate emissions to prevent a

significant impact from the site. Furthermore, standard condition 3.2.1 concerning fugitive emissions has been included in the permit.

Issues from manure management have been discussed above under point 3.

We have carried out an assessment of the impact from this proposal on nearby habitat sites from ammonia emissions. There are no Special Areas of Conservation, Special Protection Areas or Ramsar sites within 5km of the Installation boundary. There are three Sites of Special Scientific Interest within 5 km of the Installation boundary. There are also five Local Wildlife Sites and one Ancient Woodland within 2 km of the Installation boundary. Screening using the ammonia screening tool version 4.6 has concluded that all ammonia emissions from the site are insignificant. The ammonia key issues section of this document summarises our ammonia assessment.

A Greenhouse gas assessment is not required as part of the EPR permit application.

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

Based upon the information in the Application we are satisfied that the appropriate measures will be in place to prevent pollution from beyond the Installation boundary and that activities will not give rise to significant pollution or harm to human health.

11. Planning Permission

Planning permission is not required for an EPR permit to be granted, whether or not they need planning permission is a matter for the local planning authority. If planning permission is required, they will require both planning permissions and a relevant EPR permit in order to operate. We have a legal duty to determine applications made to us under the EPR and we are satisfied that we have sufficient information to do so and to complete the determination. The requirement for an EIA is addressed above in point 1.

12. The Environment Agency should refuse this application

We are confident that we have covered all relevant assessment criteria and are satisfied that the Installation environmental impacts are acceptable to allow the issuing of this permit.

Representations from individual members of the public

57 responses were received from individual members of the public. These raised many of the same issues as previously addressed. Only those issues additional to those already considered are listed below:

Brief summary of issues raised and actions taken:

1. Principle of Intensive Farming
The principle of intensive farming of pigs for human consumption is not dealt with by the Environmental Permitting Regulations and is therefore not an issue under the Environment Agency's remit. The Environment Agency is responsible for ensuring that the activities at the Installation do not have an unacceptable impact on the environment or human health.

2. The industrial nature and the scale of the development
Scale, location and type of development is a matter for consideration during the planning process and does not form part of the permit decision.

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.

We are satisfied that the risk of activities at the Installation will not have an unacceptable impact on the environment or health of local residents.

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

4. Meat consumption
This is not an issue under the Environment Agency's regulatory responsibility. It does not therefore fall within the scope of the Permit determination.

5. Loss of nature and wildlife
Given the nature of the proposed activity, there is the potential for atmospheric ammonia to be released into the environment and impact nearby sensitive habitats and species. For this reason, we have carried out an assessment of the risk and concluded that all ammonia emissions from the site are insignificant. The key issues section of this document summarises our ammonia assessment. The installation boundary is marked clearly and is included in the permit and does not encroach on local habitat sites.

6. Intensive production of pig feed
This is not an issue under the Environment Agency's regulatory responsibility. It does not therefore fall within the scope of the Permit determination. The Environment Agency is responsible for ensuring that the activities at the

Installation do not have an unacceptable impact on the environment or human health.

7. Water pollution

An assessment of the site drainage, including the risk to surface water from potential pollutants from the Installation, has been undertaken. We are satisfied that the risk to groundwater and surface water is low.

The Operator has proposed appropriate measures to manage fugitive emissions (emissions not controlled by an emission limit). We are satisfied that these measures will mitigate emissions to prevent a significant impact from the site. These measures are listed in Table S1.2 of the Permit and the Operator is required to comply with them as stipulated in Condition 2.3.1 of the Permit. Standard conditions 3.2.1 and 3.2.2 concerning fugitive emissions are also included in the permit.

We conclude that the measures in place will ensure that any contaminated water will be contained, and potentially lightly contaminated water has sufficient mitigation in place. Therefore, we are satisfied that the risk of pollution of groundwater or surface water from this Installation is minimised to an acceptable level.

8. Amount of animal waste (manure and slurry) production

We have considered what is within our legal remit under EPR and specifically the emissions from the Installation. Issues from manure and slurry management have been discussed in the section above under point 3.

9. Level of application detail, including impact assessments

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.

10. Climate problems and climate change risk assessment

Assessment of a climate change risk assessment is outside the scope of the determination of the Application, so although the Applicant provided one it has not been assessed during determination and therefore not included with the documents for consultation and publicising. Our compliance team will assess the Climate Change Risk Assessment as part of ongoing compliance. The document is available on the public register.

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