Permitting Decisions - Bespoke

We have decided to grant the permit for Gulham Poultry Unit operated by Mercer Farming Limited.

The permit number is EPR/ZP3925LQ.

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 Installation is operated by Mercer Farming Limited and comprises of six poultry houses, numbered one to six, ventilated with high velocity roof fans, which provide a combined capacity of 240,000 broiler bird places.

Purpose of this document

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

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

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

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

Key issues of the decision

Intensive Rearing of Poultry or Pigs BAT Conclusions document

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

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

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

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

BAT Conclusions review

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

The Applicant has confirmed their compliance with all BAT conditions for the new Installation in their document reference 'Supporting Information Gulham Poultry Unit BAT' and dated 08/07/2026, 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 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 27 Monitoring of emissions and process parameters - Dust emissions

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

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

BAT 32 Ammonia emissions from poultry houses - Broilers

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

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

Detailed assessment of specific BAT measures

Ammonia emission controls – BAT Conclusion 32 broilers

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 broilers.

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.

Industrial Emissions Directive (IED)

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

Groundwater and soil monitoring

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

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

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

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

The site condition report (SCR) for Gulham Poultry Unit dated 16/07/2026, 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 '[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 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.

There are no relevant receptors within 400 metres of the Installation boundary, therefore we do not require an Odour Management Plan, however the applicant has provided an Odour Risk Assessment. Condition 3.3.2 has been added to the permit to ensure an OMP is provided if odour problems arise from this Installation in the future.

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 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 no relevant receptors within 400 metres of the Installation boundary, therefore we do not require an Noise Management Plan, however the applicant has provided an Noise Risk Assessment. Condition 3.4.2 has been added to the permit to ensure an NMP is provided if noise problems arise from this Installation in the future.

Dust and bioaerosols management.

Intensive farming by its nature involves activities that have the potential to cause dust emissions. This is recognised in our 'Intensive pig and poultry farming: How to comply with your permit' guidance.

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 links below:

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

There are no relevant receptors within 100 metres of the Installation boundary.

Standby generator

There is one standby generator with a net thermal rated input of 0.97 MWth and it will not be tested more than 50 hours per year or operated (including testing) for more than 500 hours per year (averaged over 3 years) for emergency use only as a temporary power source if there is a mains power failure.

Biomass boiler

The Installation has one biomass boiler with a net rated thermal input of 0.95 megawatts (MWth).

The Environment Agency has assessed the pollution risks and has concluded that air emissions from small biomass boilers are not likely to pose a significant risk to the environment or human health providing certain conditions are met. Therefore, a quantitative assessment of air emissions will not be required for poultry sites where:

- the fuel will be derived from virgin timber, miscanthus or straw, and;

- the biomass boiler appliance and Installation meets the technical criteria equivalent to the eligibility for the former Renewable Heat Incentive, and;

For poultry:

- the aggregate boiler net rated thermal input is less than or equal to 4 MWth, and no individual boiler has a net thermal input greater than 1 MWth, and;
- the stack height must be a minimum of 5 metres above the ground (where there are buildings within 25 metres the stack height must be greater than 1 metre above the roof level of buildings within 25 metres (including building housing boilers if relevant) and:
- there are no sensitive receptors within 50 metres of the emission points.

This is in line with the Environment Agency's document "Air Quality and Modelling Unit C1127a Biomass firing boilers for intensive poultry rearing". An assessment has been undertaken to consider the proposed addition of the biomass boilers.

Our risk assessment has shown that the biomass boiler will meet the requirements of the criteria above and is, therefore, considered not likely to pose a significant risk to the environment or human health and no further assessment is required.

Biomass boiler – Habitats Assessment

In accordance with the Environment Agency's Air Quality Technical Advisory Guidance 14 version 2, dated November 21, for combustion plants under 1MW, habitats assessment is only required for European sites and Sites of Special Scientific Interest if within 1.5km and for other nature conservation sites if within 200m. This proposal has no European sites or Sites of Special Scientific Interest within 1.5km and no for other nature conservation sites within 200m so is considered acceptable and no further assessment is required.

Heat exchangers

Heat exchangers are being fitted on all six poultry houses with this application.

All condensate from the heat exchangers will be directed to dirty water tanks. The operation and maintenance of the heat exchangers will be in accordance with manufacturer's instructions.

Ammonia

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

There are no Special Areas of Conservation (SAC), no Special Protection Areas (SPA) and no Ramsar sites located within 5 kilometres (km) of the Installation boundary. There is one Site of Special Scientific Interest (SSSI) located within 5 km of the Installation boundary. There is also one Local Wildlife Site (LWS), and no Ancient Woodlands (AW) or Local Nature Reserves (LNR) 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 (AST v4.6) (dated 24/06/2026) has indicated that emissions from Gulham Poultry Unit will only have a potential impact on SSSIs with a precautionary CLe of 1 μg/m^3 if they are within 938 metres of the emission source.

Beyond 938 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, there is one SSSI beyond this distance which can be screened out based on this distance criteria.

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.

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 the Ammonia Screening Tool (AST v4.6) (dated 24/06/2026) has indicated that emissions from Gulham Poultry Unit will only have a potential impact on the LWS sites with a precautionary CLe of 1 µg/m^3 if they are within 322 m of the emission source.

Beyond 322 m the PC is less than 1 µg/m^3 (i.e. less than 100% of the precautionary 1 µg/m3 CLe) and therefore beyond this distance the PC is insignificant. In this case there is one LWS beyond this distance which can be screened out based on this distance criteria.

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.

We consulted the following organisations:

- Health and Safety Executive
- Local Authority – Environmental Protection Department - West Lindsey District Council

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

Operator

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

The regulated facility

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

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

The site

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

The 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 and baseline reporting under the Industrial Emissions Directive.

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.

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 '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.

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.

We made these decisions in accordance with Intensive Farming BAT Conclusions document dated 21/02/2017.

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

Management system

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

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

Previous performance

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

No relevant convictions were found.

Financial competence

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

Growth duty

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

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 23/07/2026 and ended on 02/09/2026.

Responses from organisations listed in the consultation section

Response received from West Lindsey District Council on 04/08/2026.

Brief summary of issues raised: West Lindsey District Council confirmed that the Environmental Protection team have received no noise complaints and no enforcement action is being taken.

Summary of actions taken: No actions taken.

Representations from community and other organisations

Response received from: Communities Against Factory Farming (CAFF) on 14/08/2026.

Brief summary of issues raised and actions taken:

1. Manure storage and spreading.

No manure is stored within the Installation boundary; all manure is exported from the Installation immediately to a biomass facility for use as a renewable energy source.

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

The Installation boundary for permitted farms typically includes the livestock housing, any yard and ranging areas and associated infrastructure but does not routinely include wider adjacent land. Whilst on farm slurry and manure management, yard run off and drainage are regulated by the permit, the spreading of manures and slurry to land (and the associated potential for water

quality impacts) is primarily regulated through separate regulatory regimes namely the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations (Farming Rules for Water), and, in designated areas, the Nitrate Pollution Prevention Regulations.

2. Application Form Part B3.5, questions 8g to 8m – operating techniques related to slurry and manure management

Questions 8g to 8j on Application Form B3.5 relate to the storage of slurry and manure within dedicated slurry stores, lagoons or manure stores within the Installation boundary. Questions 8k to 8m relate to whether manure and/or slurry is spread on land owned or controlled by the Operator, or whether it is exported from the Installation boundary for use elsewhere.

The Applicant has confirmed that no manure or slurry will be stored within the Installation boundary in a slurry lagoon, slurry store or manure heap by answering no to questions 8g and 8i. The Applicant has also confirmed that poultry litter will be removed from site following depletion of the poultry houses and exported for use in a power station in response to question 8m.

The Applicant has further confirmed that poultry wash water will be channelled via a diverter valve to two underground collection tanks and subsequently exported off site for spreading on land owned or managed by third parties in the application supporting documents. Although poultry wash water meets the definition of slurry under intensive pig and poultry farming: how to comply with your permit, it is only collected temporarily within these underground tanks prior to off-site removal.

The application should therefore be understood as confirming that manure and slurry is generated by the operations at Gulham Poultry Unit. However, it is not stored within a dedicated slurry store / lagoon or manure store, nor spread within the Installation boundary. The responses to Questions 8g to 8m should therefore not be interpreted as indicating that no slurry is produced, but rather that any slurry generated is collected and exported off site.

3. Ammonia screening should take into account slurry storage

As stated in response number 2, slurry is not stored at the Installation and therefore is not included in the ammonia screening assessment.

4. Impact on drinking water

An assessment of the site drainage, including the risk to groundwater from potential pollutants from the Installation, has been undertaken and the Applicant's Site Condition Report, covering protection of groundwater, has been reviewed. In addition, the applicant has also assessed the risk of wash water discharge to groundwater as part of their Fugitive Risk Assessment. We are satisfied that the risk to groundwater is low.

5. Point source emissions to sewer, effluent treatment or other transfers off site table incomplete

The export of spent litter and slurry is not considered an emission. Emissions are substances released from the Installation whilst something exported in a controlled manner for subsequent use elsewhere is not considered an emission.

6. Reference to incineration of carcasses on Odour risk assessment

This was included in error and an updated Odour risk assessment omitting an incinerated was supplied to us on 01/10/2026.

7. Biosecurity

Appropriate biosecurity measures are required as part of the operation of the Installation to minimise the risk of disease outbreaks. We consulted relevant health bodies during our determination process and no major concerns were raised that would prevent the permit from being granted. We are satisfied that the activities at the Installation will not give rise to significant pollution of the environment or harm to human health.

8. Site plans not showing location, scale, fence or hedgerows

The plan submitted by the operator has a scale clearly marked and there are distinguishing features clearly marked on the plan. We are satisfied that the plan reflects the location of the Installation and is drawn to scale.

9. Waste management

Manure and slurry from intensive farming Installations does not fall within the scope of the Waste Framework Directive (2008/98/EC) where they are not discarded but are instead used beneficially, for example through land application as fertiliser. In such cases, these materials are typically treated as by-products rather than waste, as there is a clear and lawful subsequent use and they form part of the agricultural production cycle.

The Waste Framework Directive applies only where a substance is discarded or intended to be discarded.

The Applicant has addressed the requirements of question 10b of application form Part B3.5 with submission of their documents, referenced ‘Waste management plan’ and ‘Minimising waste’, both received with the application.

10. Water Resources

The Applicant has provided details regarding water use within their Minimising water use document, received with the application. Applicants are not required to provide details regarding the volume or source of water utilised at the Installation as part of the EPR application.

11. Pandemic risk

Effective biosecurity measures on site will ensure that the likelihood of disease will be low. We are satisfied that the risk of pollution of the environment or harm to human health from the activities at the site are not likely to be significant. We consulted relevant health bodies as part of our external consultation process and no major concerns were raised (see UKHSA response above).

12. 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.

13. Greenhouse gas emissions and climate change

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

14. Reductions in livestock numbers needed to meet climate targets

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

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

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

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

16. Other concerns

Loss of biodiversity as a national security issue; food as a lever to optimize human health and environmental sustainability; nature-friendly farming essential to nature recovery and broader environmental goals; animal farming unsustainable without imports; and use of antibiotics are not issues under the Environment Agency's regulatory responsibility within the EPR regulations. They do not therefore fall within the scope of the Permit determination.

The Health and Safety Executive was also consulted but no responses were received. There were no responses from individual members of the public.