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**Natural Resources Wales permitting decisions**

# Wern Heulog Poultry Unit

## Decision Document

## Variation permit

**The variation number is: PAN-011683**

**The permit number is: EPR-AB3496HZ-V002**

**The Applicant / Operator is: Mr Keri Davies**

**The Installation is located at: Wern Heulog Poultry Unit, Wern Heulog, Llanfaredd, Builth Wells, Powys, LD2 3TE**

We have decided to issue the variation for Wern Heulog Poultry Unit operated by Mr Keri Davies.

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.

## Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

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

## Structure of this document

- Table of contents
- Key issues
- Annex 1 the consultation and web publicising responses

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# Key issues of the decision

## 1 Our decision

We have decided to issue the permit variation to the Applicant. This will allow it to operate the Installation subject to the conditions in the permit.

We consider that, in reaching that decision, we have taken into account all relevant considerations and legal requirements and that the permit will ensure that a high level of protection is provided for the environment and human health.

This Application is to operate an installation which is subject principally to the Environmental Permitting Regulation 2016 ('EPR') and is subject to the requirements of the Industrial Emissions Directive (IED).

The Permit contains many conditions taken from our Environmental Permit template including, the relevant Annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the EPR and other relevant legislation. This document does not therefore include an explanation for these template conditions. Where they are included in the Permit, we have considered the Application and accepted the details are sufficient and satisfactory to make the template conditions appropriate.

## 2 How we reached our decision

### 2.1 Receipt of Application

The Application was accepted as duly made on 10/05/21. This means we considered it was in the correct form and contained sufficient information for us to begin our

determination, but not that it necessarily contained all the information we would need to complete that determination.

The Applicant made no claim for commercial confidentiality. We have not received any information in relation to the Application that appears to be confidential in relation to any party.

## 2.2 Consultation on the Application

We carried out consultation on the Application in accordance with the Environment Permitting Regulations 2016 ('EPR'), the Industrial Emissions Directive ('IED'), our statutory Public Participation Statement ('PPS') and our Regulatory Guidance.

We advertised the application by a notice placed on our website, which contained all the information required by the EPR/IED, including advising people where and when they could see a copy of the Application. The consultation started 14/05/21 and ended 12/06/21.

A copy of the Application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

We sent copies of the Application to the following bodies, which includes those with whom we have "Working Together Agreements":

- **Powys County Council Planning Authority**
- **Powys County Council Environmental Protection Department**
- **Food Standards Agency**
- **Health Protection Agency**
- **Public Health Wales (PHW)**

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly.

Further details along with a summary of consultation comments and our response to the representations we received can be found in Annex 1. We have taken all relevant representations into consideration in reaching our determination.

### **2.2.1 Draft Permit Consultation**

We are currently carrying out a consultation on our draft decision. This consultation will begin on 17/12/21 and end on 14/01/22.

## **2.3 Requests for Further Information**

Further information was requested by way of a Not Duly Made Letter requiring the applicant to submit an Environmental Management System (EMS) and Technical Standards document to account for the proposed air scrubbing units and ammonia modelling. The Not Duly Made Letter was sent on the 19/03/21 and the applicant responded with the relevant information on 21/03/21. A copy of the information notice and e-mails requesting further information were placed on our public register as were the responses when received.

Additional information was requested by way of a Schedule 5 Notice requiring the applicant to submit a Manure Management Plan, Ammonia Modelling report, Odour Assessment and Noise Report. The Schedule 5 Notice was sent on 29/07/21 with a response date of 12/08/21. The Applicants response to the Schedule 5 Notice was provided on 30/07/21.

A secondary Schedule 5 Notice was sent requiring the applicant to submit additional information relating to the design specification of the Ammonia Scrubber Units. The Schedule 5 Notice was sent on 14/09/21 with a response date of 28/09/21. The Applicants response to the Schedule 5 Notice was provided on 27/09/21.

A copy of the information notice and e-mails requesting further information were placed on our public register as were the responses when received.

### 3 The Legal Framework

The Permit will be granted, under Regulation 13 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that this decision is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales, and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in granting the Permit a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions.



## 4 The Installation

### 4.1 Description of the Installation and related issues

#### 4.1.1 The permitted activities

The Installation is subject to the EPR because it carries out an activity listed in Schedule 1 Part 2 of the EPR:

- Section 6.9 Part A(1)(a)(i) Rearing poultry in an installation with more than 40,000 places.

An installation may also comprise “directly associated activities”, which at this Installation includes.

- Feed silos
- Dirty water tanks
- Carcass incineration
- Heat exchangers

Together, these listed and directly associated activities comprise the Installation.

#### 4.1.2 The Site

Wern Heulog Poultry Unit is situated approximately 4 km north-east of Builth Wells. Predominant land use is grassland and grazing. There are nearby residences within 175 metres from the broiler houses. The National Grid Reference is SO 07796 53289.

The operator has provided a plan which we consider is satisfactory, showing the extent of the site. In addition, the operator has provided a site layout/drainage plan which

includes discharge points. A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.

#### 4.1.3 What the Installation does

The facility will comprise of four broiler houses, the total capacity at the site will be 180,000 broilers. Birds will be housed at day old and depopulated at the end of the rearing cycle, tis will be done on an all-out, all in basis. The houses will be fitted with high velocity roof mounted fans and air scrubbing systems which will be fitted to all houses to mitigate emissions from the increase bird numbers.

### 4.2 The site and its protection

#### 4.2.1 Proposed site design: potentially polluting substances and prevention measures

There will be four poultry houses, each with the capacity for 45,000 broilers. Vehicle and machine fuelling will take place on a concrete hardstanding area and spillages will be directed into overflow tanks. Feed is delivered in covered lorries and stored in sealed bins which are inspected regularly. Immediately following depopulation, litter is removed from the houses and taken off site for the use on operator controlled ground and sold to anaerobic digester. Any litter that is exported from the installation has records kept of the quantities, destination and the date of transfer to separate farming businesses. A full house clean out and disinfecting will take place at the end of each crop cycle prior to the cycle beginning again. Fatalities will be removed from the houses and stored in sealed containers immediately awaiting collection from a licensed agent.

The fuel oil storage tank is bunded on site, the tank will be regularly inspected. The bund meets the requirements of the Water Resources (Control of Pollution) SSAFO (Silage, Slurry and Agricultural Fuel Oil) Regulations 2010. Chemicals are stored are checked regularly for any faults found. The dirty water tank will be built to conform to

specifications in sector guidance note (SGN) EPR 6.09 'How to comply with your environmental permit for intensive farming'.

#### 4.2.2 Closure and decommissioning

Permit condition 1.1.1 requires the Operator to have a written management system in place which identifies and minimises risks of pollution including those arising from closure.

At the definitive cessation of activities, the Operator has to satisfy us that the necessary measures have been taken so that the site ceases to pose a risk to soil or groundwater, taking into account both the baseline conditions and the site's current or approved future use. To do this, the Operator has to apply to us for surrender, which we will not grant unless and until we are satisfied that these requirements have been met.

The Operator has completed a Site Condition Report when applying for the permit. The land had previously been used predominantly for grazing the grassland. We consider that the description provided is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5).

### 4.3 Operation of the Installation – general issues

#### 4.3.1 Administrative issues

The Operator is the sole Operator of the Installation. We are satisfied that the Applicants will have control over the operation of the Installation; and that the Applicants will be able to operate the Installation so as to comply with the conditions included in the Permit.

#### 4.3.2 Relevant convictions

NRW's COLINS Database has been checked to ensure that all relevant convictions have been declared.

No relevant convictions were found.

#### 4.3.3 Management

The Applicant has stated in the Application that they will implement an Environmental Management System (EMS) that will meet the requirements for an EMS in our "*How to comply with your environmental permit guidance*". The Applicant submitted a summary of the EMS with their application.

All written management systems will be subject to regular review by the Operator.

We are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

#### 4.3.4 Accident management

In order to ensure that the management system proposed by the applicant sufficiently manages the residual risk of accidents, permit condition 1.1.1(a) requires the implementation of a written management system which addresses the pollution risks associated with, amongst other things, accidents.

The Operator has an Emergency Plan which will be subject to regular review. The plan includes contingencies for events such as fire, power failure, flood, disease and containment failure. We are satisfied with the Applicant's Emergency Plan.

#### 4.3.5 Site security

The site does not have a secure boundary fence, all fuel stores, broiler houses and all storerooms are kept locked and secure, preventing any unauthorised access. Having considered the information submitted in the application, we are satisfied that appropriate infrastructure and procedures will be in place prior to start up to ensure that the site remains secure.

#### 4.3.6 Off-site conditions

Based on the information submitted in the application, we do not consider that it is necessary to impose offsite conditions.

#### 4.3.7 Operating techniques

Before bird arrival the house floors will be covered to a sufficient depth of bulk shavings. Temperature and humidity will be closely monitored on a daily basis to achieve bird comfort and a relative humidity of 55-60%, this should achieve litter with a dry matter content of between 60-70%. High performance nipple drinkers with 'drip cups' are used to minimise water wasted and to improve litter quality.

Birds are fed a minimum of three diets during their cycle, with gradually reducing levels of protein and phosphorous as bird age increases. Feed is delivered from a UKASTA accredited feed mill and blown into bulk feed bins located adjacent to the houses, from the feed bins the feed is moved into the houses and distributed to the birds via a pan feeding system.

At the end of the cycle the site will be pressure washed, disinfected and dried out prior to the cycle beginning again. All wash waters will be contained in sealed wastewater tank with an estimated capacity of 20,000 litres.

Fallen stock will be recorded daily and securely stored in vermin proof containers prior to incineration on site. The incinerator has a capacity below 50kg/hr and is licensed

and approved by animal health. Based on the size of the incinerator it is not considered that it will cause pollution. The applicant has incorporated it into operating procedures including the odour management plan.

We have reviewed the techniques proposed by the operator and compared these with the relevant guidance notes. We are satisfied that the techniques represent appropriate measures for the installation in line with BAT standards in EPR 6.09.

#### 4.3.8 Energy efficiency

We are satisfied that the applicant will ensure that energy is used in the most efficient way possible. The broiler houses are insulated and have an adequate ventilation system to help regulate temperature and maintain a healthy environment inside the house.

#### 4.3.9 Avoidance, recovery or disposal of wastes produced by the activities

This requirement addresses wastes produced at the facility.

Raw materials are selected to meet the requirements of the end market, with competitive drivers determining in some cases the specific materials consumed. All the raw materials used in the process are approved for use under the DEFRA approved list of cleaning chemicals. Other raw materials consumed are frequently reviewed, with the aims of these reviews being to improve process performance and to minimise potential environmental impact.

The installation is part of a large volume low margin industry where waste minimisation is fundamental for productivity and profitability, consequently the management of the process is designed to minimise process losses and waste generation.

Inorganic waste generated by the farm will mainly consist of paper, plastic and glass. Plastic waste will normally be in two forms, wrapping from bales of wood shavings and bottles from used disinfectants and detergents. The amount of plastic waste will be

minimised through good managerial techniques. By good management of the litter quality, fewer bales of wood shaving will be needed, thus lowering the amount of plastic wrapping discarded. Large empty plastic bottles from detergents will be 'recycled' and used for foot dip containers or smaller rubbish bins for the storerooms.

Poultry carcasses are, under normal circumstances, collected and stored in sealed containers awaiting regular collection under the fallen stock scheme by a licensed collection agent. As a contingency plan or if an outbreak of high mortality should arise, carcasses will be placed in sealed containers and removed, as detailed in the emergency plan.

In the event of high mortality caused by disease, the operator will follow the guidance of the allocated veterinarian dealing with the outbreak. The mortality would be disposed of at an approved landfill site under the advice of that veterinarian, after consideration of weather conditions and geographical haulage parameters.

We are satisfied that waste from the Installation that cannot be recovered will be disposed of offsite using a method that minimises any impact on the environment. Permit condition 1.4.1 will ensure that this position is maintained.

## **5 Minimising the Installation's environmental impact**

Regulated activities such as Intensive Farming can present different types of risk to the environment, these include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, discharges to ground or groundwater and generation of waste. All these factors are discussed in this and other sections of this document.

For an installation of this kind, the principal emissions are :

- Ammonia
- Dust
- Odour
- Noise
- Effluent discharges

The following sections of this document explain how we have considered the critical issue of assessing the likely impact of emissions from the Installation on human health and the environment and what measures we are requiring ensuring a high level of protection.

### 5.1 Assessment of Impact on Air Quality

The applicant has carried out a risk assessment identifying potential risks to human health including dust and ammonia. Operating procedures have been put in place to minimise the risks, in line with BAT procedures. It is considered that if the site is operated in line with these procedures, there is no significant risk to human health as a result of activities at the site.

We are in agreement with this approach. The assumptions underpinning the air, odour and noise model have been checked and are reasonably precautionary. The way in which the Applicant used dispersion models, its selection of input data, use of background data and the assumptions it made have been reviewed by Natural Resources Wales modelling specialists to establish the robustness of the Applicant's air impact assessment, odour assessment and noise assessment. The output from the model has then been used to inform further assessment of health impacts.

### 5.2 Assessment of odour impact

Published by:  
Natural Resources Wales  
Cambria House  
29 Newport Road  
Cardiff  
CF24 0TP

Issued xx/xx/xxxx

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0300 065 3000 (Mon-Fri, 8am - 6pm)

[enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

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The applicant has submitted an Odour Management Plan (OMP) for the installation as required by EPR 6.09 “*How to Comply with your Permit for Intensive Farming*” because there are sensitive receptors within 400 metres of the installation. Our check modelling predicted exceedances of the 3 OUE/m<sup>3</sup> benchmark at three receptors within 300m of the nearest scrubber outlet. The OMP describes the measures and controls in place to minimise odour and includes daily olfactory checks.

The applicant has described the following measures which will be in place to minimise odour emissions during house depopulation/de-littering:

- Litter will be placed carefully into trailers positioned under the covered apron close to doors;
- Trailers containing spent litter will be sheeted before leaving the fill position;
- De littering will be avoided at weekends during the summer months;
- Clean out will be carried out as soon as possible following destocking;
- No storage on site at any time;
- No movement or turning of the manure will occur until the manure is being spread onto land.

We have compared the measures proposed for the site to the BAT standards in EPR 6.09 and are satisfied that the techniques represent appropriate measures for the installation. The OMP has been incorporated into the operating techniques section of the permit.

Management of the onsite manure store will comply with the BAT standards in 6.09 to reduce odour emissions. Effluent channels and collection tanks will be maintained to avoid blockages and contaminated run-off. As a contingency measure, manure be

covered tightly with secured polythene sheeting to minimise emissions at times when the intensity may cause a statutory nuisance.

Permit condition 3.3.1 requires that emissions from the activities are free from odour at levels likely to cause pollution outside the site. We are satisfied that this condition will be sufficiently protective in conjunction with the measures described by the applicant for minimising odour production at the installation.

### **5.3 Assessment of impact to surface and ground water**

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of ground and surface water. Clean, uncontaminated rainwater from roofs and yard areas will be routed to the a nearby attenuation pond. Any lightly contaminated yard wash will be directed to a sealed underground dirty water tanks.

For any on-site/off-site manure spreading activities it is important that the applicant ensures that any local watercourses are not adversely impacted due to any increased nutrient loading.

### **5.4 Emissions to sewer**

There are no emissions to sewer. When birds are removed from the poultry houses, the site will be pressure washed, disinfected and dried out prior to the next cycle. All wash waters will be contained in sealed underground tanks.

### **5.5 Fugitive emissions**

The applicant has assessed the risk of fugitive emissions from the site. Potential sources of fugitive emissions include dust emissions to air and pests. To avoid any infestation of pests the manure store will be regularly checked for maggots and flies. If flies become an issue, manure will be treated with pesticide and covered with a polythene sheet.

Permit condition 3.6.1 requires that activities shall not give rise to the presence of pests which are likely to cause hazard or annoyance outside the boundary of the site. We are satisfied that this condition will be sufficiently protective in conjunction with the measures described by the applicant for minimising odour production at the installation.

To minimise dust emissions feed is stored in purpose built covered feed silos located next to the layer sheds. No milling or mixing of feed takes place at the farm, all feed is delivered to the farm by lorry from a UKASTA accredited feed mill. Feed is piped from the silos to the sheds minimising dust emissions. Dust is controlled through the management of litter and air quality.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

## 5.6 Noise Assessment

A risk assessment of the potential impact of noise from the site on nearby sensitive receptors has been carried out by the applicant. Potential sources of noise include vehicles travelling to and from site, ventilation fans, Inno+ scrubber systems, feed transferring from lorries to bins, bird catching and clean out operations.

There are sensitive receptors within 400 metres of the installation, with the closest receptor situated 115m to the South-East of the site. The applicant has submitted a Noise Management Plan (NMP) supported by a noise assessment of predicted impacts at receptors for the installation as required by EPR 6.09 “*How to Comply with your Permit for Intensive Farming*”. The NMP describes the measures and controls in place to minimise noise, mitigation is to carry out operations/maintenance etc. during normal working hours (0700-2300).

The noise management plan states that roof mounted ventilation fans will be subject to regular, end of cycle maintenance by qualified electricians and that noisy roof mounted ventilation fans will be isolated and an electrician notified. Good maintenance and cleaning procedures will ensure additional noise from out of balance or worn roof mounted ventilation fans is unlikely to occur. Effective inspection and maintenance forms a key part of compliance with permit condition 1.1.1 on environmental management systems and condition 1.1.2 on associated record keeping.

Our assessment assumes that the final performance of all plant, mitigation measures and enclosures meet or exceed those detailed in the submitted noise modelling report and should be maintained accordingly. We are satisfied that vibration is unlikely to be an issue at the installation. The nature of the intensive farming operation means that there are no significant sources of vibration on site. Therefore, vibration does not need to be included in the noise management plan.

We have compared the measures proposed for the site to the BAT standards in EPR 6.09 and are satisfied that the techniques represent appropriate measures for the installation. The NMP has been incorporated into the operating techniques section of the permit.

Permit condition 3.4.1 requires that emissions from the activities are free from noise at levels likely to cause pollution outside the site, as perceived by an officer of NRW. We are satisfied that this condition will be sufficiently protective in conjunction with the measures described by the applicant for minimising odour production at the installation.

### 5.7 Impact on Habitats sites, SSSIs, non-statutory conservation sites etc

The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.

A full assessment of the application and its potential to affect the sites has been carried out as part of the permitting process. We consider that the application will not affect the features of the sites.

The following sites have been considered:

SAC, SPA and Ramsar sites (within 5km):

- SAC River Wye / Afon Gwy (Wales) UK0012642 (0.95 km away from the installation)

SSSI (within 5km):

- Afon Irfon (5km away from the installation)
- Banc Hirllwyn (2.9km away from the installation)
- Coed Mawr Quarry (3.6km away from the installation)
- Colwyn Brook Marshes (N&S) (0.8km away from the installation)
- Duhonw (2.5km away from the installation)
- Gwern-Yfed-Fach Quarry (4.8km away from the installation)
- Llanelwedd Rocks (2.1km away from the installation)

- Neuadd and Tylelo Mires (4.4km away from the installation)
- Newmead (2.2km away from the installation)
- Pen-Cerrig Stream Section (3.5km away from the installation)
- River Wye (Tributaries) / Afon Gwy (Isafonydd)
- River Wye (Upper Wye) / Afon Gwy (Gwy Uchaf)
- Trecoed/Castle Crab (3.1km away from the installation)
- New castle meadows (3.9km away from the installation)

#### HRA consultation:

An OGN 200 Form 1 has been completed and forwarded onto our internal Natural Resource Management (NRM) team for consultation and notification. On the basis that a betterment is presented compared to the existing proposal using the best available techniques. The proposed development will result in an overall reduction in NH<sub>3</sub> contributions at all included habitat sites and therefore represents a betterment over the existing facility.

Full details of the assessment carried out of the potential effect of ammonia emissions from the proposed site on any Natura 2000/Ramsar site (designated under s28(1) of the Wildlife and Countryside Act 1981) mentioned above are detailed in the forms. It was also noted that the project is providing a betterment when compared to the existing development.

An Appendix 4 has been completed and forwarded onto our internal Natural Resource Management (NRM) team for consultation and notification. Full details of the assessment carried out of the potential effect of ammonia emissions and nitrogen deposition from the proposed site on any SSSI site (designated under s28(1) of the Wildlife and Countryside Act 1981) mentioned above are detailed in the forms. It is noted that the Impacts of NH<sub>3</sub> at all receptor locations from the proposed development

with Inno+ wet scrubbers will be below the current impacts from the existing two poultry sheds ventilated via unabated ridge mounted fans presenting a betterment. There is no objection to the issuing of this permit provided it includes an enforceable condition of fitting Inno+ ammonia scrubbers to both the new and existing sheds and that follow up monitoring is carried to ensure compliance with this measure

## 6 Setting ELVs and other Permit conditions

### 6.1 Translating BAT into Permit conditions

Article 14(3) of the Industrial Emissions Directive (IED) states that BAT conclusions shall be the reference for setting the permit conditions to installations covered by the Directive. As a result of the Commission Implementing Decision (EU) 2017/302 of 15 February 2017 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for the intensive rearing of poultry or pigs, the format of our Permit for the intensive farming sector has been updated. Appendix 1 of the Permit sets out generic conditions which apply to all sites. Appendix 2 sets out site specific conditions based on the activities being carried out.

### 6.2 Monitoring

Monitoring should be carried out for the parameters listed in Appendix 1, Schedule 3 of the permit using the methods and to the frequencies specified in Table S3.1 for laying hens. These monitoring requirements have been introduced in order to demonstrate compliance with the best available techniques (BAT) conclusions for the intensive rearing of poultry or pigs, as set out in the Commission Implementing Decision (EU) 2017/302 of 15 February 2017.

No monitoring is required from the point source emissions on site.

### 6.3 Reporting

We have specified reporting requirements in Appendix 2, Schedule 4 of the Permit to ensure compliance with permit conditions and to monitor the efficiency of farming activities at the site in line with BAT. We made this decision in accordance with EPR 6.09 “*How to Comply with your Permit for Intensive Farming*”.



## ANNEX 1: Consultation Responses

### A) Advertising and Consultation on the Application

The Application has been advertised and consulted upon in accordance with Natural Resources Wales Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex. Copies of all consultation responses have been placed on Natural Resources Wales public register.

#### 1) Consultation Responses from Statutory and Non-Statutory Bodies

Response Received from Public Health Wales	
Brief summary of issues raised:	Summary of action taken / how this has been covered
1. A site ammonia and odour management scheme should be implemented and maintained.	1. The applicant has created odour management plans to minimise ammonia and odour at nearby sensitive receptors.
2. Best Available Techniques (BAT) and management controls should be applied.	2. Operating techniques and permit conditions cover concerns.
3. Impacts of noise at sensitive receptors.	3. See section 5.6
4. All on-site storage of liquids is accompanied by bunding in compliance with industry practice and guidance.	4. See section 4.2.1
5. The applicant should seek external accreditation for the Environmental Management System (EMS) e.g. ISO14001 standard.	The Environmental Management System is addressed within this decision document, in particular at section 4.3.3.

## 2) Consultation Responses from Members of the Public and Community Organisations

A number of the issues raised during the consultation process are outside Natural Resources Wales remit in reaching its permitting decisions. Specifically, questions were raised which fall within the jurisdiction of the planning system, both on the development of planning policy and the grant of planning permission. Specific planning issues raised related to the location of the site, the location of the stack, traffic movements and emissions from off-site traffic movements.

Guidance on the interaction between planning and pollution control is given in PPS23 / Planning Policy Wales. It says that the planning and pollution control systems are separate but complementary. We are only able to take into account those issues which fall within regulatory scope of the Environmental Permitting Regulations 2016.

### a) Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A

### b) Representations from Community and Other Organisations

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A

### c) Representations from Individual Members of the Public

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A