

Natural Resources Wales ('NRW') permitting decisions

Bespoke permit

We have decided to grant the permit for Croft y Lloi Poultry Unit operated by Crofty Growers Limited.

The permit number is EPR/AB3098FG

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.

What this document is about

This document explains how we have considered the Applicant's Application, and why we have included the specific conditions in the permit we have issued to the Applicant. It is our record of our decision-making process, to show how we have taken into account all relevant factors in reaching our position. Unless the document explains otherwise, we have accepted the Applicant's proposals.

Preliminary information and use of terms

We gave the application the reference number EPR/VB3090HN/A001. We refer to the application as "the Application" in this document in order to be consistent.

The number we have given the permit is EPR/AB3098FG We refer to the permit as "the Permit" in this document.

The Application was duly made on 09/11/2015.

The Applicants are Crofty Growers Limited (Applicant) and the facility is located on land at Croft y Lloi Poultry Unit, Croft y Lloi farm, Dingestow, Monmouth, Monmouthshire.

Our decision

We have decided to grant the Permit to the Applicant. This will allow the permit holder 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.

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

How we reached our decision

The Application was duly made on 9 November 2015. 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.

We carried out consultation on the Application in accordance with the Environmental Permitting Regulations (EPR) and our statutory Public Participation Statement (PPS).

We advertised the Application by a notice placed on our website, which contained all the information required by the Industrial Emissions Directive (IED), including telling people where and when they could see a copy of the Application.

We sent copies of the Application to the following bodies:

- Montgomeryshire County Council Local Planning Department
- Montgomeryshire County Council Environment Protection Department
- Aneurin Bevan University Health Board
- Public Health Wales

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

What the Regulated Facility Does

The installation will comprise three poultry houses, accommodating a maximum of 160,000 chickens. The birds will be brought to the site at approximately one day old and removed at approximately thirty two to forty two days old. The birds will be delivered and removed on an “All In, All Out” basis.

The Birds will be housed in three buildings each of which will be constructed to the latest BAT standards. The buildings will be equipped with high velocity roof vents and will be heated by a biomass boiler.

After the birds are removed the litter will be removed. The buildings will then be cleaned, disinfected and dried prior to the next re-stocking of birds. All wash waters will be collected and disposed of appropriately.

Structure of this document

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses
- Annex 3 Consultation on draft determination

Key issues of the decision

This section describes the key aspects of our assessment of the application.

Biodiversity, Heritage, Landscape and Nature Conservation

Ammonia, Nitrogen and Acid Deposition

The Applicant has submitted a report on the modelling of the dispersion and deposition of ammonia from the proposed units at the site.

NRW have reviewed this report and are satisfied with the findings. We have considered the potential impacts of those findings and do not consider that the emissions represent a hazard to the nearby sensitive habitats. The only source of ammonia emission from the permitted site is via aerial emission. The impacts from dust emissions directly onto habitats such as streams and rivers is miniscule and is not considered further.

Specifically we considered potential impacts on the River Wye SAC and the Wye Valley Woodlands SAC, the seven SSSIs and a series of ancient woodlands.

The River Wye SAC has screened out due to the aquatic and non-vulnerable condition of the elements of the SAC that lie within 10km from the proposed installation.

The SSSI's all saw results that would not be expected to represent a risk.

The predicted ammonia emission impacts on nearby ancient woodlands was included in the modelling.

This modelling gave the results for the existing turkey rearing as well as for the proposed chickens (which would replace the Turkeys). The results for the existing rearing of turkeys showed substantial exceedances at the nearest two ancient woodlands (in some locations by ten times the satisfactory level). The modelling for the proposed chickens showed 106.7% of the satisfactory level at ground level. However as this modelling was carried out based on a bird population of 172,000 birds and the number of birds applied for has been reduced to 160,000, then the anticipated concentration would fall within the satisfactory level. This is a substantial reduction over the present levels.

We have reviewed EPR 6.09 and the European Commission Draft BAT conclusions for the sector to ensure that the installation will be operated in accordance with BAT for minimising ammonia emissions from animal housing, as well as feed and feeding cycles. We are satisfied that the following measures, which will be in place at the installation, represent BAT:

Animal Housing

- Solid concrete floor, forced ventilation, housing system equipped with a non-leaking drinking system;
- The housing is well insulated and the houses have a damp proof course;
- The houses are fully insulated with a U-Value of approximately 0.4 W/m²/°C to reduce condensation and heat lost;
- Litter is kept dry.

Feed and Feeding Cycles

- Protein is reduced over the growing cycle by providing different feeds;
- Phosphorous levels in feed are reduced over the production cycle;
- Feed storage bins are specifically designed to accommodate the required feeding regime.

The above measures are described in the Applicant's Technical Standards. These have been incorporated into Table S1.2 of the permit as operating techniques and are therefore enforceable.

Odour

The applicant has submitted a detailed odour modelling report. This modelling looked at the odours generated by the existing Turkey rearing houses and also at the odours that would be expected if the site were to convert to the Chickens as planned.

The modelling shows that substantial reductions in the odour concentrations that would be achieved if the proposals were to go ahead. Specifically the modelling showed maximum annual 98th percentile odour concentrations experienced at a nearby property not owned by the applicant would drop from 11.76 odour units at present, to 3.7 odour units. Since this modelling was carried out, the applicant has reduced the planned number of chickens from 172,000 birds to 160,000 birds. This would be a 7% reduction in bird numbers and would be expected to achieve a similar reduction in anticipated odour. Therefore the maximum annual 98th percentile odour concentrations experienced at a nearby property not owned by the applicant would be expected to be 3.44 odour units.

The 98th percentile threshold is taken from the Environment Agency's H4 Odour Management Guidance, which is widely accepted and used in the regulatory odour impact assessment. NRW have adopted this guidance.

The spreading of chicken manure outside the boundary of a permitted installation does not require a permit. On this basis, manure spreading is outside the regulatory scope of the Environmental Permitting (England and Wales) Regulations 2010 (as amended) and is not controlled by the environmental permit.

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

- Litter will be placed carefully into trailers positioned under covered apron close to house doors;
- Trailers containing spent litter will be sheeted before leaving the fill position;
- Clean out will be carried out as soon as possible following destocking;

These measures are described in the odour management plan which has been incorporated into Table S1.2 of the permit as an operating technique and is therefore enforceable.

The H4 Odour Management guidance explains that the odour benchmarks are based on the 98th percentile of hourly average concentrations of odour modelled over a year at the site/installation boundary. The benchmarks are:

- 1.5 odour units for most offensive odours
- 3 odour units for moderately offensive odours
- 6 odour units for less offensive odours

Given the substantial reduction in odour that would be expected and the fact that the predicted maximum odour concentrations are below 3.5 odour units, the proposals represent a substantial improvement and are considered acceptable.

Noise

Noise Management Plan and Noise and Vibration Assessment

The potential for noise pollution is controlled through the noise management plan. The noise management plan describes the controls in place to minimise noise. A number of these controls are also described in the subsection below on **Application of Best Available Techniques (BAT)**. The Noise Management Plan has been incorporated into Table S1.2 of the permit as an operating technique and is therefore enforceable.

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.

The noise management plan states that ventilation fans will be subject to regular, end of cycle maintenance by qualified electricians and that noisy

ventilation fans will be isolated and an electrician notified. 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. We will check this during our routine inspection visits and we will take appropriate action if required.

The noise management plan states that silencers will be fitted to feed delivery lorries.

Movement of vehicles outside the installation boundary is outside the regulatory scope of the Environmental Permitting (England and Wales) Regulations 2010 and is a matter for the local planning authority.

Permit condition 3.4.1 requires that emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site. This will be checked during NRW site inspections and if this is not the case, we will take appropriate action. The Environment Agency guidance EPR 6.09 Appendix 5 provides guidance on noise management for farms. NRW have adopted this guidance. An effective noise management plan and use of appropriate measures is required for EPR intensive farming applications with sensitive receptors located within 400m of the proposed installation, which is the case for Croft y Lloi Poultry Unit. EPR 6.09 also explains that “The appropriate measures for this sector prevent and where that is not possible minimise these noise emissions. We are satisfied that appropriate control measures are in place as part of the noise management plan for Croft y Lloi Poultry Unit. See ***Application of Best Available Techniques (BAT) for noise*** subsection below.

We are satisfied that the controls described in the noise management plan for bird catching and clean-out are sufficient for the purposes of preventing noise pollution. Finally the noise management plan states daily walk around inspections will be conducted twice per day at (07:00 – 10:00hrs, 16:00hrs – 18:00hrs). It also explains the mechanism by which any noise complaints will be recorded and investigated.

Application of Best Available Techniques (BAT) for noise

Noise is not generally a source of complaints for the intensive farming sector in Wales. This conclusion is supported by information on noise complaints from NRW’s own databases. On the basis that noise is not generally an identifiable issue at intensive farming installations in Wales, NRW can reasonably expect that the operator will be able to comply with permit condition 3.4.1 on noise by operating in accordance with the noise management plan for the installation which has been incorporated into the operating techniques table of the permit and is therefore enforceable. We also require the operator to operate the installation in compliance with Best Available Techniques (BAT).

We have reviewed the application against the European Commission draft BAT conclusions for the Intensive Farming sector which represent future best

practice. We are satisfied that the installation will be BAT compliant for reducing noise emissions (BAT 8) because the following techniques will be employed:

- Equipment operation by experienced staff: Permit condition 1.1.1(b) requires the operator to use sufficient competent persons and resources to manage and operate the activities;
- Avoidance of noisy activities at night and during weekends: The operator's noise management plan states that the following activities can only take place between 07:00hrs and 19:00hrs –fuel deliveries (if required), removal of litter, washing of the houses, maintenance / repair, set up / placement
- Feed delivery lorries to be fitted with silencers
- Feed bin stocks will also be checked twice per day between 07:00hrs and 10:00hrs and between 16:00hrs and 18:00hrs to prevent augers running empty;
- Use of low-noise equipment including high efficiency ventilation fans, when natural ventilation is not possible or sufficient: The noise management plan states that large capacity ventilation fans will be used which will reduce the overall number of fans required.; and any noisy fans will be isolated.

In summary, we are satisfied that pollution due to noise will be managed to acceptable levels. This is based on the fact that predicted noise is based on a worst case scenario that will occur at the lowest levels of noise pollution, infrequently and for short periods of time. It has therefore been assessed as not being a significant enough reason to refuse the application.

We consider the permit conditions and operating techniques to be sufficiently protective and are satisfied that the operational measures taken to minimise noise are compliant with future BAT standards.

Dust

PM₁₀ and PM_{2.5}

When an application is made, NRW assess all of the information and require the operator to comply with our guidance documents (EPR 6.09). These documents detail what the operator must do to ensure their emissions are controlled. There are no requirements for the operator to monitor emissions as these are controlled throughout the operation by adherence to the guidance.

There are a national network of air quality monitors throughout the UK and details of these including the results can be found on the Welsh Air Quality Website <http://www.welshairquality.co.uk>. NRW will react to any reports of air pollution from a regulated installation. Monitoring may be undertaken by the operator or NRW if problems are identified or suspected.

On the basis that there are no sensitive receptors within 100m of the nearest air emission point, we have not required the operator to undertake dust modelling and we are satisfied that the permit conditions, operating techniques and application of BAT will be sufficient to minimise dust emissions from the installation.

All operators of intensive farming installations are required to operate at Best Available Techniques (BAT). Controls on the production of dust and the use of high velocity roof mounted ventilation fans ensures dust formation is reduced and where emitted is done at high velocity to ensure adequate dispersion. NRW are of the opinion that the implementation of Best Available Techniques and the current control on dust emissions imposed on intensive farming is adequate to prevent adverse health effects.

On this basis, we consider that further investigation of PM₁₀ and PM_{2.5} levels is not required.

Dust release associated with Use of Roof Mounted Ventilation Fans

There are a number of ventilation systems available for use at intensive poultry installations, however, the most efficient at achieving high rates of dispersal are high velocity roof mounted ventilation fans. These are defined by sector guidance note EPR 6.09 as having an efflux velocity of above 5 metres per second (m/s).

Modern extraction systems help ensure that dispersion rates are achieved resulting in reduction to background levels normally no greater than 100m from a unit and therefore unlikely to pose a risk to nearby receptors as described in the Defra Research paper referenced below. The Defra paper demonstrates, dust emissions from similar sites has been shown to reduce to acceptable levels beyond 100m and often much shorter distances from the units.

The nearest receptor to Croft y Lloi Poultry Unit is approximately 170 metres away from the nearest air emission point. On this basis, dust modelling and a specific impact assessment of dust on receptors has not been required, as we are satisfied that the permit conditions, operating techniques and application of BAT will be sufficient to minimise dust emissions from the installation.

We expect that the frequency of cleaning around roof mounted ventilation fan exhausts to be incorporated into the operator's routine maintenance regime. Routine maintenance forms part of the environmental management system for the installation and it is the Operator's responsibility to ensure that routine maintenance activities are sufficient to deliver compliance with conditions 1.1.1

and 1.1.2 of the permit. NRW can audit this during site inspection visits and take appropriate action where necessary if any problems are identified.

Permit Conditions

Dust generation is also controlled through permit condition 3.2.1. This condition requires that emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. We will check compliance with this condition during our site inspections to ensure that dust production is kept to a minimum. If this is not the case, we will take the appropriate action.

Best Available Techniques

De-littering of the poultry houses cannot take place without using the roof mounted ventilation fans to provide ventilation. Similarly, this activity cannot be performed with the trucks inside the house and the doors closed, because sufficient ventilation must be maintained during this operation to safeguard the health and safety of the personnel undertaking the task.

As already described, we require the operator to operate the installation in compliance with Best Available Techniques (BAT). However we cannot require the operator to install measures that would mean going beyond BAT. We have reviewed the application against EPR 6.09 Appendix 11 and the European Commission Draft BAT conclusion document which represents the likely future BAT standards for the industry. We are satisfied that the installation will be BAT compliant for reducing dust emissions because the following techniques will be employed:

- Use of suitable bedding materials;
- Use of pelleted feed delivered in sealed systems;

The documents that describe these control measures have been incorporated into Table S1.2 of the permit as operating techniques and are therefore enforceable.

In summary, we are satisfied that the risk of pollution due to dust is not significant. This is based on the evidence from Defra contained in Defra Research project final report (2009) "Characterising Poultry Dust Properties, assessing the human health implications, quantifying emission levels and assessing the potential for abatement". We also consider that the permit conditions and operating techniques will be sufficiently protective and are satisfied that the measures taken to minimise dust are compliant with future BAT standards. As such we do not require additional monitoring or controls to manage dust.

Manure Management

Spreading of chicken manure outside of the boundary of a permitted site does not require a permit. It is therefore outside the regulatory scope of the Environmental Permitting (England and Wales) Regulations 2010 (as amended). NRW also does not have regulatory powers to control the storage and application of manure to land through the Environmental Permitting (England and Wales) Regulations 2010 (as amended) unless this takes place within the green installation boundary shown on the site plan in Schedule 7 of the permit. In the case of Croft y Lloi Poultry Unit, manure storage and spreading does not take place within the installation boundary. Although manure may be stored and spread on operator-controlled land at Croft y Lloi farm, this is land beyond the installation boundary shown in Schedule 7 of the permit. Because the storage and spreading of manure is outside the scope of the environmental permitting process, this has not been included in our decision making process.

The Code of Good Agricultural Practice applies to all farms in England and Wales and provides guidance on nutrient management (including landspreading of manure). This is a guidance document and not enforceable by law.

Water quality and fish populations are affected by a wide range of activities including land use over a wide area. NRW will continue, in association with other authorities, to work with land owners and farmers to help ensure the nutrients in manures are applied following best practice and where it is clear this is not the case and results in detriment to the environment, we will take the appropriate action.

NRW are responsible for ensuring that pests and other emissions from any permitted poultry facility are controlled to ensure that they do not cause pollution of the surrounding environment. For pests (defined in Schedule 6 of the permit as birds, vermin and insects), this responsibility also includes ensuring that pests which are likely to cause hazard or annoyance outside the boundary of the site are not present. Permit conditions 3.6.1 and 3.6.2 have been set to address the pest aspect of this responsibility.

Whilst a manure management plan is not required by the permit, we have set condition 2.3.4 which requires the operator to maintain and implement a system to record the quantities of solid manure or slurry exported from the installation. The record must include the date of export from the site, quantity exported and details of the receiving site. This condition will enable us to establish if there is any relationship between manure export and any reported pollution incident. It will also enable us to discuss best practice with the receiving farm owner to minimise the risk to local water courses.

Transmission of Pathogens

NRW have regulatory powers in connection with ensuring that potential water borne pollutants are controlled within the boundary of the permitted process to ensure that they do not cause pollution of the surrounding environment.

However, land-spreading of chicken manure outside of a permit boundary for agricultural purposes does not require a permit and so is outside NRW's regulatory role. Diseases and bio-hazard risks are assessed by Public Health Wales who were consulted on the permit application.

Water Pollution as a result of Dust

Atmospheric dust releases from modern intensive farming units are minimal. This is supported by Defra Research project final report (2009) "Characterising Poultry Dust Properties, assessing the human health implications, quantifying emission levels and assessing the potential for abatement", which states that PM₁₀ particulate levels were reduced to background levels by 100m downwind of even the highest emitting poultry houses, therefore are unlikely to pose a risk to those living in the vicinity of poultry operations. On this basis, we have not required the operator to undertake dust modelling and we are satisfied that the permit conditions, operating techniques and application of BAT will be sufficient to minimise dust emissions from the installation. (See **Dust** section above).

Dust may accumulate around the roof mounted ventilation fan mechanisms which are internal and will need to be cleaned occasionally for maintenance purposes. However as the air extraction is performed by high velocity roof mounted ventilation fans, dust will be sufficiently dispersed into the atmosphere and not deposited on the roof. There may be some very small organic dust particles reaching fields and vegetation within a close proximity of the units however the levels and effect of this is not significant and no adverse impact is expected. In addition the impact of the dust on flood water given the dilution will also be negligible. Furthermore any emitted dust will naturally decompose on the surface of the land it settles on.

Areas of roof and yard draining to surface waters will receive very minimal quantities of dust from atmospheric deposition.

The sector guidance also explains that grass cover around the installation may be sufficient to collect dust and impede run-off to surface water systems. On this basis, we do not consider dispersed dust landing on fields outside the proposed installation boundary and being transported into watercourses as a significant environmental risk, as the measures described in this paragraph will ensure that dust is adequately dispersed, to background levels within 100m of the installation.

We also do not consider dispersed dust landing on fields outside the proposed installation boundary and being transported into watercourses by flood water as a significant environmental risk.

The clean roof water and yard water will not need to be treated. Lightly contaminated wash water from the yard is segregated by using a diverter valve and contained in a dedicated tank, prior to its removal from site.

Water Pollution as a result of Phosphate

Phosphorus is excreted by poultry and is therefore incorporated into the manure that is removed from the installation. NRW are responsible for ensuring that potential water borne pollutants are controlled within the confines of the permitted process to ensure that they do not cause pollution of the surrounding environment. However the land-spreading of chicken manure outside the boundary of a permitted facility does not require a permit and so is outside the scope of EPR and the permitting process. (See section on **Manure Management** above for further information).

Phosphate excretion can be minimized at source through the use of BAT for feeding and nutrition. We have reviewed EPR 6.09 and the European Draft BAT conclusions for the sector and we are satisfied that the installation will employ the following technique which are BAT:

- Reduction of phosphorus levels in poultry rations over the production cycle

Permit conditions and application of BAT

Permit condition 3.1.1 states that “there shall be no point source emissions to water, air or land except from the sources and emission points listed in Schedule 3, Tables S3.1 and S3.2. Also, Permit condition 3.2.1 requires that “emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution”. We are satisfied that these conditions are sufficiently protective to ensure that releases from the installation are properly controlled. We are also satisfied that the controls described in the operator’s management plans (addressed under the individual topic headings elsewhere in this document) represent the appropriate measures for preventing water pollution and therefore water pollution will not be caused by the regulated installation.

Traffic

NRW is not able to consider the issue of traffic on local roads as it is a matter for the local authority.

Loss of Amenity

Issues associated with the siting of the development are a matter for the local planning authority.

Annex 1: decision checklist

This document should be read in conjunction with the application and supporting information and permit / notice.

Aspect considered	Justification / Detail
Consultation	
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with NRW guidance, our Public Participation Statement and our Working Together Agreements.
Responses to consultation, web publicising and newspaper advertising	The web publicising, consultation and newspaper advertising responses were taken into account in the decision. The decision was taken in accordance with our guidance.
European Directives	
Applicable directives	All applicable European directives have been considered in the determination of the application.
The site	
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.
Site condition report	The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with NRW guidance on site condition reports – guidance and templates (H5).
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within the relevant distance criteria of a number of nature conservation sites. More specifically: There are several ancient woodlands within 2km of the site. There are 7 SSSIs within 5km of the site. These being:

Aspect considered	Justification / Detail
	<p>Maes-yr-uchaf Wood, SSSI Code:: 1.5 Km East Gaer Wood, SSSI Code: 0014e58: 2.94 Km Caer llan wood, SSSI Code:00166bc: 3.22 Km East Croes Robert Wood, SSSI Code 001b20a: 3.26 Km South East Llangovan Church, SSSI Code: 0016653: 3.58 Km South Penarth Brook Woodlands, SSSI Code: 0014a25: 4.81Km South Wye Valley lesser horseshoe bat site, SSSI Code: 001e30d: 4.97 Km South</p> <p>There are two SAC's within 10 km of the site. These being the River Wye SAC, the nearest part of which is approximately 5.83km from the site and the Wye valley woodlands SAC, the nearest part of which is 5.68km from the site.</p> <p>A full assessment of the application and its potential to affect these sites has been carried out as part of the permitting process. We consider that the application will not affect the features of the SAC, SSSIs, and Ancient Woodlands described above.</p>
Environmental Risk Assessment and operating techniques	
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>We have reviewed the Applicant's risk assessment and are satisfied that the management techniques and infrastructure described within this document are in accordance with the Best Available Techniques (BAT). We are satisfied that with the use of BAT any risks will be adequately controlled.</p> <p>The pressure of vehicles on land is not a significant issue associated with the operation of intensive farms and is therefore not addressed by the sector guidance. The release of combustion gases is also not covered because the boilers at intensive farm installations are small and typically fall below the threshold at which a Permit would be required for their operation.</p>
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant NRW guidance notes, including EPR 6.09 "How to Comply with your Environmental Permit for Intensive Farming", 2014</p>

Aspect considered	Justification / Detail
	<p>The proposed techniques are in line with the Technical Guidance Notes and we consider them to represent appropriate techniques for the facility.</p>
The permit conditions	
<p>Use of conditions other than those from the template</p>	<p>Based on the information in the application, we consider that we need to impose conditions other than those in our permit template, which was developed in consultation with industry having regard to the relevant legislation.</p> <p>Condition 2.3.3 has been included in order to ensure that adequate records are kept of manure or slurry exported from the installation, in terms of how much is being exported and to where. The Operator is required to record the date that manure and slurry is exported from the site, the quantity exported and details of the receiving site. This condition will enable us to establish if there is any relationship between manure export and any reported pollution incident. It will also enable us to discuss best practice with the receiving farm owner to minimise the risk to local water courses.</p>
<p>Emission Limits and Monitoring</p>	<p>We have reviewed the risk assessment for this site against the relevant technical guidance, including the European Commission BAT Reference (BRef) document “Best Available Techniques for Intensive rearing of Poultry and Pigs” (July 2003). The BRef does not propose the setting of emission limits for this sector. The requirements of the BRef are incorporated into NRW technical guidance note EPR 6.09 “How to Comply with your Environmental Permit for Intensive Farming” (October 2014) which accordingly sets no BAT emission benchmarks for the sector.</p> <p>We are satisfied that compliance with the BAT standards at this site means that emission limits and associated monitoring are not required.</p>
Operator Competence	
<p>Environment management system</p>	<p>NRW is satisfied that the operator will have a management system that enables it to comply with the permit conditions. The decision was taken in accordance with NRW guidance EPR RGN 5 on Operator Competence.</p> <p>The Applicant has provided a summary of their proposed environmental management system, which includes maintenance, reference to the Emergency Plan, provision for staff training and logging of complaints and routine checks. Written odour and noise</p>

Aspect considered	Justification / Detail
	<p>management plans have also been supplied and these have been incorporated into Table S1.2 of the permit as operating techniques.</p> <p>Permit condition 1.1.1 requires the operator to have a written management system in place.</p>

Annex 2: Consultation on the application, web publicising and newspaper advertising responses

Summary of responses to consultation, web publication and newspaper advertising and the way in which we have taken these into account in the determination process. (Newspaper advertising is only carried out for certain application types, in line with our guidance.)

Response received from
Monmouthshire County Council
Brief summary of issues raised
none
Summary of actions taken or show how this has been covered
N/A

Response received from
Public Health Wales
Brief summary of issues raised
None
Summary of actions taken or show how this has been covered
N/A

No response received from
Health and Safety Executive
Brief summary of issues raised
None
Summary of actions taken or show how this has been covered
N/A

No response received from
Aneurin Bevan University Health Board
Brief summary of issues raised
Comments regarding Ammonia and odour emissions, Manures, dusts and bioaerosols, water, noise, biomass boiler
Summary of actions taken or show how this has been covered
These issues were considered and further details are contained in the details above.

Annex 3: Consultation on the draft determination

No responses received