

Dear James Whilding,

Thank you for your application received on 13 December 2013.

You need to provide further information to allow me to proceed with your application.

### **1. Site Specific Bioaerosol Risk Assessment (SSBRA)**

We are not satisfied that the risk assessment submitted with your application provides enough evidence to demonstrate that bioaerosol dispersion and dilution at the proposed site is sufficient to prevent/mitigate risk to sensitive receptors.

The Monitoring data included as part of your SSBRA is from Galley Hill intensive Farm. This site is not comparable to the Sutton Veny site as it is double the capacity of the proposed development and there is no information given to suggest the ventilation and infrastructure is comparable

On the basis of the bioaerosol concentrations monitoring data you have provided, sensitive receptors at 40, 45 or 85 metres would be exposed to levels of bioaerosol significantly (at least 5x) in excess of current guideline values accepted by Public Health England (PHE) for bioaerosols from composting sites. This projected impact is unacceptable and we would not issue the site with a permit on this basis

If we were to assume that emissions varied pro rata with the number of bird places, and halved the ambient values measured on this basis, they would still exceed guidance levels for bioaerosols from compost. Please note there are currently no bioaerosol guideline values for Intensive Farms but we and Public Health England consider the composting bioaerosol values to be the most appropriate.

After taking the above information into account, **we require that you update your site specific bioaerosol risk assessment with the following;**

- Monitoring data from a legitimately comparable site to Sutton Veny if available, which demonstrates that the risk from bioaerosols from the operation of your proposed installation is likely to be acceptable,
- In the event you do not have comparable monitoring data, you can alternatively provide evidence to demonstrate that the ventilation system at your proposed site provides adequate dilution and dispersion sufficient to reduce bio-aerosol concentrations at the sensitive receptors to acceptable

concentration levels (i.e. 300; 1,000 and 500 cfu/m<sup>3</sup> for gram-negative bacteria, total bacteria and *Aspergillus fumigatus* respectively).

- Evidence to demonstrate why employees/customers of the neighbouring horse riding school should not be considered as sensitive receptors of bioaerosol impact. Otherwise, we require that you consider the impact of bioaerosol on these sensitive receptors.
- An assessment of the risk and impact of bioaerosol release from gable-end fans, including a layout plan showing the locations of gable end fans with respect to sensitive receptors. Bearing in mind the sheds are not yet built, it may be worth considering the effect that the orientation of the sheds (and the positioning of their release points) may lessen impacts on nearby receptors.
- Include in your report an appropriate site plan showing the installation boundary, as the site plan referenced in the Bioaerosol Risk Assessment Report shows the ownership boundary. It would be useful to indicate the proposed locations of the sheds, their release points and the locations of all receptors for consideration.
- Antibiotics can affect levels of bioaerosols. Please ensure you include details of any proposed use of antibiotics and assess the risk of anti-biotic resistant bioaerosol (pathogens) development as a result.

2. **Odour Risk Assessment:** We are not satisfied that the basic H1 risk assessment and odour management plan submitted with your application provides enough evidence to demonstrate that the impact of odour on sensitive receptors will be insignificant. We therefore require detailed odour modelling to give a good indication of the potential for odour pollution at nearby receptors and a revision of your odour risk assessment to take into consideration the following details;

- Full compliance with our H1 guidance (Annex F) on modelling air emissions, H4 guidance on odour management and IPPC SRG 6.02 (Farming) – Odour Management at Intensive Livestock Installations.
- Application of an odour annoyance threshold of 3ou (indicative exposure level criterion) in accordance with IPPC SRG 6.02 (Farming) – Odour Management at Intensive Livestock Installations. If you choose to use another value, this deviation from our guidance must be fully justified for our consideration.
- If results indicate that there may be an exceedence of the odour annoyance threshold, you must include measures to mitigate any and all adverse impact.
- All sensitive receptors must be taken into consideration including but not limited to the residential property to the north, commercial places of work to the north, equine activities (including staff/customers of the neighbouring horse training

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- business) to the east and allotments to the west of your proposed installation.
- Distance to sensitive receptors must be from the nearest emission point of the nearest poultry house to said receptor (not the centre of the farm).
  - Assessment should consider the effect of using high velocity fans (11m/s) and gable-end fans.
  - Your assessment should consider odour impact from the installation when both high velocity roof fans and gable end fans are in operation during the summer.
3. Part B2 Section 6a: Site Plan – You have indicated in your application (see non-technical summary) a national grid reference that is dissimilar with the site plans provided, please clarify and amend suitably.
  4. Please confirm that the site plan showing ownership boundary is irrelevant to this application and no activity will be carried out on land outside the site boundary.
  5. Please indicate on your site plan where the frozen carcass storage and feed silos will be located at the installation.
  6. Part B2 Section 6c: Non technical summary- We require confirmation in your non-tech summary that 11m/s is the minimum exhaust velocity for high velocity fans that will be installed. Your modelling has been performed based upon this value.
  7. Part B2 Section 7: We require that you submit for auditing the modelling files used to generate the Ammonia Concentration Study Report.
  8. Part B3 Section 5; Environmental Impact Assessment – Records show that your proposals have been the subject of an EIA. We require that you submit a copy of the environmental statement.
  9. Part F1 Section 7 (Application checklist): We require that you complete this section and associated checklist.

Please reply within 10 working days from the date of this letter. If we don't hear from you we reserve the right to return your application and fee.

When we receive the missing items we'll continue to check the details in your application. If the information received is not what is required, we reserve the right to return your application and fee. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

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Please quote our reference if you contact us. If you have any questions please phone me on 01158462669 or email [anthony.udueni@environment-agency.gov.uk](mailto:anthony.udueni@environment-agency.gov.uk)

Yours sincerely,

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