

Environment Agency permitting decisions

Bespoke Variation

We have decided to issue the variation for Worlaby Farm Pig Units operated by Elsham Linc Limited.

The variation number is EPR/EP3733UM/V005.

This variation authorises the following changes;

- An increase in the numbers of pigs at Elsham Manor 1, Elsham Manor 2 and Southwold Farm and amends the distribution of piglets (below 30 kg) across these three farms. The number of pigs at Wilfreds Top remains unchanged. The revised numbers are detailed below;

Elsham Manor 1 Pig Unit is a pig breeding and finishing unit with sows and has the capacity to stock 3,230 finishing pigs (above 30kg), 538 sows and 2,000 piglets (below 30 kg).

Elsham Manor 2 Pig Unit has the capacity to stock 2,474 finishing pigs (above 30kg), 1,076 sows and 3,984 piglets (below 30 kg).

Southwold Farm Pig Unit is a pig breeding and finishing unit with sows and has the capacity to stock 3,826 finishing pigs (above 30kg), 540 sows and 2,460 piglets (below 30 kg).

Wilfreds Top Pig Unit is a pig finishing unit with the capacity to stock 4,200 finishing pigs.

The maximum number of production pigs (above 30kg) plus pigs less than 30kg that can be held over the four farms at any one time is 17,647.

- Amends the description of the ventilation for Elsham Manor 1 and Southwold Farm.
- Incorporates changes to the slurry store at Southwold Farm. Currently the three slurry stores are uncovered and the Operator now proposes to cover them with rigid covers.

Summary of changes to pig numbers and extent of listed activities

Clarification with respect to the maximum number of pigs in each class at the individual farms was confirmed (email 28/07/14) by a revised Non Technical Summary (Document 2a – Non Technical Summary 28th July 2014).

Although the maximum numbers requested were more than those initially modelled in the ammonia air impacts assessment we have confidence given the conservative nature of the modelling and the predicted impacts that varying the permit to accommodate these revisions will not allow any breach of an Environmental Assessment Level (EAL).

This consolidated variation incorporates the changes required by the Industrial Emissions Directive. This includes the amendment of the wording of several permit conditions. This also includes the addition of a condition relating to a requirement for routine monitoring, and an associated reporting condition.

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

- Annex 1 the decision checklist
- Key issues
- Annex 2 the consultation and web publicising responses

Key issues of the decision

Ammonia Impacts

The Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site is within 10km of the site. There are two Sites of Special Scientific Interest (SSSI) within 5km of the site and 16 Local Wildlife Sites (LWS) within 2km of the site.

Assessment of Humber Estuary SAC, SPA, Ramsar

The assessment for this variation has been based on processes developed by the Environment Agency for the permitting of existing farms.

The assessment will take into account the new United Nations Economic Commission for Europe (UNECE) critical levels (CLe) for ammonia, which have been applied as follows:

- Sites with sensitive Lichen or Bryophyte interest and habitats for which sensitive lichens and bryophytes are an integral part: $1\mu\text{g}/\text{m}^3$
- Other vegetation: $3\mu\text{g}/\text{m}^3$

A critical level of $3\mu\text{g}/\text{m}^3$ has been assigned to the Humber Estuary SPA/SAC/Ramsar as confirmed in the database of site Critical Levels (approved by Natural England July 2011).

The assessment will also consider the deposition of ammonia resulting in nutrient enrichment and acidification against relevant Critical Loads (CLo).

The Critical Levels and Loads used in this assessment are given in Table 1 below. APIS (<http://www.apis.ac.uk/>) states that the estuary habitats are not sensitive to acidity, therefore no Critical Load for acid deposition has been assigned.

Table 1 Critical Levels and Loads

Name of European Sites	Ammonia CLe ($\mu\text{g}/\text{m}^3$)	Nut-N CLo (kgN/ha/yr)
Humber Estuary SPA	3	20
Humber Estuary SAC	3	20
Humber Estuary Ramsar	3	20

The following trigger thresholds have been applied for assessment of European sites including Ramsar sites.

If the Process Contribution is below 4% of the relevant CLe or 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 overlapping in combination assessment will be completed with other existing farms which are identified as being within 10km of the Humber Estuary SPA/SAC/Ramsar.

For farms acting in-combination with existing permitted farms, the overlapping effect will be assessed by studying the isopleth diagrams for predicted annual averaged air concentrations for ammonia for the existing farms, calculating the joint impact at the maximum concentration point (at the European site) for the proposed farm.

If $\sum PC < 20\%$ of CLe or CLo no further assessment is required and it is possible to conclude no likely significant effect alone and in combination.

Initial modelling using the Ammonia Screening Tool v4.4 has determined that the Process Contributions (PC) of ammonia and N deposition from the application site are above the 4% threshold at 7.4 and 5.8% respectively and cannot be regarded as insignificant as detailed in Table 2 below.

Table 2 – Alone assessment

Site: Humber Estuary SPA/SAC/Ramsar	
Predicted PC Ammonia ($\mu\text{g}/\text{m}^3$)	0.222
PC as % of CLe Ammonia	7.4
Predicted PC N deposition (kg N/ha/yr)	1.154
PC as % of CLo N Deposition	5.8

The 4% threshold is exceeded for ammonia and nitrogen deposition therefore an in-combination assessment is required.

A search of all active intensive farming permits has identified nine farms within 10km of the Humber Estuary SPA/SAC/Ramsar. However only one (Farm 8) is relevant for an in-combination assessment as the other eight all have PCs less than 4% and therefore screen out in accordance with our guidance.

An assessment of ammonia impact and nitrogen deposition at the maximum concentration point for this application has been carried out in line with the method detailed above. The results are given in the Tables 3 and 4 below.

Ammonia

Table 3 – Humber Estuary SPA/SAC/Ramsar In combination ammonia assessment

Application	Receptor location	Estimated PC ($\mu\text{g}/\text{m}^3$)	PC as % CLe
Farm 8	495140 421450	0.159	5.3
Worlaby Farms		0.238	7.4

Total (ΣPCs)	12.7
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It is possible to conclude no likely significant effect in combination, the total PCs is less than 20% CLe for ammonia.

Nitrogen

Table 4 - Humber Estuary SPA/SAC/Ramsar In combination of nitrogen nutrient enrichment assessment

Application	Receptor location	Estimated PC (kg N/ha/yr)	PC as % CLo
Farm 8	495140 421450	0.823	4.1
Worlabby Farms		1.237	5.8
Total (ΣPCs)			9.9

It is possible to conclude no likely significant effect in combination, the total PCs are less than 20% CLo for nitrogen nutrient enrichment.

Although initial ammonia screening has shown that the PCs for ammonia and N deposition are above the 4% initial screening threshold, it has been demonstrated, by carrying out a further ammonia screening against the in-combination screening threshold that the proposed ammonia emissions from Worlabby Farm are unlikely to result in any significant effect on the interest features of the Humber Estuary SPA/SAC/Ramsar.

The process contribution considered in-combination with other relevant nearby farms is below 20% of the critical level and critical load and is therefore considered unlikely to give rise to any significant effect at the Humber Estuary SAC/SPA/Ramsar.

Ammonia Assessment – SSSI's

This assessment for a new installation has been based on processes developed by the Environment Agency for the permitting of existing farms.

The assessment will take into account the new UNECE critical levels (CLe) for ammonia, which have been applied as follows:

- Sites with sensitive Lichen or Bryophyte interest and habitats for which sensitive lichens and bryophytes are an integral part: $1\mu\text{g}/\text{m}^3$
- Other vegetation: $3\mu\text{g}/\text{m}^3$

The assessment will also consider the deposition of ammonia resulting in nutrient enrichment (and acidification) against relevant Critical Loads (CLo).

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

If the Process Contribution is below 20% of the relevant CLe or CLo then the farm can be permitted with no further assessment.

Where this threshold is exceeded an in-combination assessment and/or detailed modelling may be required.

There are two SSSIs within 5 km of the Pig Unit. Wrawby Moor and South Ferriby Chalk Pit. South Ferriby Chalk Pit is designated for its geological status so is not considered relevant for assessment. Consultation with Natural England confirmed that Wrawby Moor SSSI is not notified for any sensitive lichen or bryophyte habitat and they are not features of the woodland/acid grassland site which has been confirmed after checking related documents in relation to the site. Therefore a critical level for ammonia of $3 \mu\text{g}/\text{m}^3$ was recommended. For nitrogen deposition a critical load of 10 kg N/ha/yr has been assigned and for acid deposition the critical load assigned is 1.205 keq/ha/yr.

Screening using the Ammonia Screening Tool (v4.4) has determined that the PCs for ammonia, nitrogen and acid deposition on Wrawby Moor SSSI are above the 20% significance threshold and cannot be screened out as having the potential to cause damage to the SSSI. See results in Table 5 below.

Table 5

Site: Wrawby Moor	
Predicted PC Ammonia ($\mu\text{g}/\text{m}^3$)	0.79
PC as % of CLe Ammonia	26.4
Predicted PC N deposition (kg N/ha/yr)	4.1
PC as % of CLo N Deposition	41.2
Predicted PC Acid deposition (keq/ha/yr)	0.29
PC as % of CLo Acid Deposition	24.4

The 20% threshold is exceeded for ammonia, acid and nitrogen deposition therefore an in-combination assessment is required.

A search of all active intensive farming permits has identified four farms within 5 km of the SSSI however none are relevant for an in-combination assessment as they all have PCs less than 20% and therefore screen out in accordance with our guidance.

An assessment of ammonia impact and nitrogen and acid deposition at the maximum concentration point for this application has been carried out in line with the method detailed above. In line with Environment Agency guidelines, where the ΣPC is <50% of the Critical Level/load, in-combination impacts can be considered to conclude no damage. Therefore no further assessment is required. The results are given in the Tables 6, 7 and 8 below.

Ammonia

Table 6 – In combination ammonia assessment

Application	Receptor location	Estimated PC ($\mu\text{g}/\text{m}^3$)	PC as % CLe
Worlaby Farms		0.8	26.4
Total (ΣPCs)			26.4

Table 6 shows that the Σ process contribution at Wrawby Moor SSSI from all relevant farms in combination is 26.4%. In line with Environment Agency guidelines, where the Σ PC is <50% of the Critical Level/load, in-combination impacts can be considered to conclude no damage. Therefore no further assessment is required.

Nitrogen

Table 7 - In combination of nitrogen nutrient enrichment assessment

Application	Receptor location	Estimated PC (kg N/ha/yr)	PC as % CLo
Worlaby Farms		4.1	41.2
Total (ΣPCs)			41.2

Table 7 shows that the Σ process contribution at Wrawby Moor SSSI from all relevant farms in combination is 41.2%. In line with Environment Agency guidelines, where the Σ PC is <50% of the Critical Level/load, in-combination impacts can be considered to conclude no damage. Therefore no further assessment is required.

Acid deposition

Table 8 - In combination of acid deposition assessment

Application	Receptor location	Estimated PC (keq/ha/yr)	PC as % CLo
Worlaby Farms		0.3	24.4
Total (ΣPCs)			24.4

Table 8 shows that the Σ process contribution at Wrawby Moor SSSI from all relevant farms in combination is 24.4%. In line with Environment Agency guidelines, where the Σ PC is <50% of the Critical Level/load, in-combination impacts can be considered to conclude no damage. Therefore no further assessment is required.

Ammonia Assessment – Local Wildlife Sites

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

If the Process Contribution is below 100% of the relevant CLe or CLo then the farm can be permitted with no further assessment. Where this threshold is exceeded detailed modelling may be required.

Where a precautionary level of $1\mu\text{g}/\text{m}^3$ is used, and the process contribution is assessed to be less than 100% the site automatically screens out as insignificant, and no further assessment of ammonia contributions to nitrogen deposition and acidification is necessary.

Ammonia

Initial modelling using the Ammonia Screening Tool v4.4 has determined that the Process Contributions of ammonia from the application site are above the 100% threshold at Elsham Road Verges, Elsham Chalk Pit and Elsham Chalk Pit North and cannot be regarded as insignificant as detailed in Table 9 below. Detailed air dispersion modelling for these three LWS was required.

The remainder of the sites are below the 100% threshold therefore it is possible to conclude no significant pollution to these sites from the installation, and no further assessment is required

Table 9 – Ammonia emissions – LWS

Site	Critical Level Ammonia $\mu\text{g}/\text{m}^3$	Predicted Process Contribution $\mu\text{g}/\text{m}^3$	% of Critical Level
Elsham Road Verges	3*	3.217	107.2
Worlabby Meadow	3*	1.547	51.6
Elsham Chalk Pit	3*	3.811	127.0
Elsham Spring	3*	2.410	80.3
Newland Hill Road Verge	3*	1.203	40.1
Elsham Hall Country Park	3*	1.034	34.5
Worlabby Hollows	3*	2.667	88.9
Elsham Sandstone Exposures	3*	1.011	33.7
Elsham Pasture	3*	1.530	51.0
Worlabby Chalk Pits	3*	2.841	94.7
Elsham Marsh	3*	2.378	79.3
Elsham Chalk Pit North	3*	5.170	172.3
Saxby Verges South**	1	0.828	82.8
Hill Side Plantation	3*	1.007	33.6
Bonby Springs	3*	1.905	63.5
Bonby Upper Meadow	3*	2.616	87.2

*Critical level value of 3 µg/m³ used as there are no protected lichen/bryophyte species shown on the easimap layer.

**Saxby Verges South screens out for further assessment for nitrogen and acid deposition as the PC was less than 100% of the precautionary level of 1µg/m³.

Nitrogen

Initial modelling using the Ammonia Screening Tool v4.4 has determined that the Process Contributions for nitrogen deposition from the application site are above the 100% threshold at Elsham Chalk Pit, Worlaby Hollows, Elsham Marsh and Elsham Chalk Pit North and cannot be regarded as insignificant as detailed in Table 10 below. Detailed air dispersion modelling for these four LWS was required.

The remainder of the sites are below the 100% threshold. Therefore it is possible to conclude no significant pollution to these sites from the installation, and no further assessment is required.

Table 10 – Nitrogen deposition – LWS

Site	Critical Load kg N/ha/yr*	PC Kg N/ha/yr	PC % Critical Load
Elsham Road Verges	20	16.707	83.5
Worlaby Meadow	20	8.036	40.2
Elsham Chalk Pit	15	19.795	132.0
Elsham Spring	20	12.520	62.6
Newland Hill Road Verge	20	6.247	31.2
Elsham Hall Country Park	20	5.372	26.9
Worlaby Hollows	10	13.851	138.5
Elsham Sandstone Exposures	15	5.253	35.0
Elsham Pasture	20	7.948	39.7
Worlaby Chalk Pits	15	14.757	98.4
Elsham Marsh	10	12.352	123.5
Elsham Chalk Pit North	15	26.852	179.0
Hill Side Plantation	20	5.231	26.2
Bonby Springs	20	9.894	49.5
Bonby Upper Meadow	20	13.589	67.9

*Critical load values taken from APIS website (www.apis.ac.uk) – 11/03/2014

Acid deposition

Initial modelling using the Ammonia Screening Tool v4.4 has determined that the Process Contributions for acid deposition from the application site are below the 100% threshold. Therefore it is possible to conclude no significant pollution to these sites from the installation, and no further assessment is required as detailed in Table 11 below.

Table 11 – Acid deposition

Site	Critical Load keq/ha/yr*	PC Kg N/ha/yr	PC % Critical Load
Elsham Road Verges	4.7	1.193	25.4
Worlaby Meadow	4.7	0.574	12.2
Elsham Chalk Pit	4.7	1.414	30.1
Elsham Spring	4.7	0.894	19.0
Newland Hill Road Verge	4.7	0.446	9.5
Elsham Hall Country Park	4.7	0.384	8.2
Worlaby Hollows	10.95	0.989	9.0
Elsham Sandstone Exposures	4.7	0.375	8.0
Elsham Pasture	4.7	0.568	12.1
Worlaby Chalk Pits	4.7	1.054	22.4
Elsham Marsh**	N/A	N/A	N/A
Elsham Chalk Pit North	4.7	1.918	40.8
Hill Side Plantation	4.7	0.374	7.9
Bonby Springs	4.7	0.707	15.0
Bonby Upper Meadow	4.7	0.971	20.7

*Critical load values taken from APIS website (www.apis.ac.uk) – 11/03/2014

** Habitat not sensitive to acidity, therefore no Critical Load for acid deposition has been assigned.

Air Dispersion Modelling

The applicant submitted a Dispersion Modelling Report within the application (document ref. "An Assessment of the Ammonia Impact of the Regulated Facilities: Elsham Manor 1, Elsham Manor 2, Southwold Farm and Wilfreds Top (known as Worlaby Farm Pig Units), near Worlaby, North Lincolnshire).

This assessment used the AMS/EPA Regulatory Model (AERMOD) and meteorological data from Humberside Airport for the years 2008-2012 with gaps in the data in-filled with data provided from RAF Waddington for 2008. The assessment used an appropriate surface roughness value of 0.2m but did not include terrain in their modelling. The applicant stated "The slope between the farm and the four Local Wildlife Sites: Elsham Chalk Pit, Elsham Chalk Pit North and Worlaby Hollows never reaches 1:10. Therefore the effect of

topography on wind flow and dispersion of ammonia will be insignificant, and terrain data have not been used within AERMOD.” We have reviewed the terrain on maps of the local area and agree with this statement.

The assessment derived emission rates using appropriate emission factors for each specific type of pig in each house. This is consistent with the emission factors stated in our guidance (Environment Agency – Intensive Farming Guidance Note – January 2012 - V4).

The modelling has been reviewed by our Air Quality Modelling Assessment Unit (AQMAU) who confirmed that the predictions of the applicant’s model establishing the impacts are valid for assessment. Our check monitoring predicted impacts well below those predicted by the applicant, establishing that the model represents a worst case scenario.

The modelling concluded that the Process Contributions for ammonia and nitrogen deposition from the application site are below the 100% threshold. Therefore it is possible to conclude no significant pollution to these sites from the installation, and no further assessment is required as detailed in Tables 12 and 13 below.

Table 12 – Ammonia emissions (detailed modelling) – LWS

Site	Critical Level Ammonia $\mu\text{g}/\text{m}^3$	Maximum Predicted Process Contribution $\mu\text{g}/\text{m}^3$	% of Critical Level
Elsham Road Verges*	3	<1.5	<50.0
Elsham Chalk Pit	3	1.49	49.6
Elsham Chalk Pit North	3	1.99	63.3

* Based on modelled contour plot.

Table 13 – Nitrogen deposition (detailed modelling) - LWS

Site	Critical Load kg N/ha/yr	Maximum PC Kg N/ha/yr	PC % Critical Load
Elsham Chalk Pit	15	7.74	51.6
Worlaby Hollows	10	5.87	58.7
Elsham Marsh	10	5.07	50.6
Elsham Chalk Pit North	15	10.33	68.9

Conclusion

Based on the predicted impacts and given the conservative nature of the modelling we are satisfied that although the modelling is based on numbers below the maximum levels applied for; there is sufficient headroom to ensure that there will not be any breach of an EAL or cause a significant adverse effect on the environment.

In addition we have set a limit capping the number of production pigs (above 30kg) and pigs less than 30kg that can be held over the four farms at any one time – this number is less than the total figure used in the modelling and therefore will ensure that the modelled impacts will not be exceeded while allowing the applicant to have the degree of flexibility needed to operate the units.

Industrial Emissions Directive

The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 were made on the 20 February and came into force on 27 February. These Regulations transpose the requirements of the Industrial Emissions Directive (IED).

This permit has been consolidated and amended so that it now implements the requirements of the EU Directive on Industrial Emissions.

Groundwater / Soil Monitoring

As a result of the requirements of the Industrial Emissions Directive, all permits are now required to contain condition 3.1.3 relating to 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 the 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 your 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 in the application for Worlaby Farm Pig Units has been assessed during permit determination. This demonstrates the installation activities have little likelihood of causing pollution (as detailed in original permit decision document). We are satisfied that there are no

hazards to land or groundwater and no historic contamination on site that may present a hazard.

Therefore, although this condition is included in the permit, no groundwater or soil monitoring will be required at this installation as a result.

Annex 1: decision checklist

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

Aspect considered	Justification / Detail	Criteria met Yes
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with Regulatory Guidance Note (RGN) 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation and web publicising	The web publicising and consultation responses (Annex 2) were taken into account in the decision. The decision was taken in accordance with our guidance.	✓
Operator		
Control of the facility	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 EPR RGN 1 Understanding the meaning of operator.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application. This consolidated variation incorporates the changes required by the Industrial Emissions Directive (IED).	✓
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.	✓
Biodiversity, Heritage, Landscape	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.	✓

Aspect considered	Justification / Detail	Criteria met Yes
and Nature Conservation	<p>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 for the reasons outlined in the Key Issues section.</p> <p>An Appendix 11 Assessment for the Humber Estuary SPA/SAC/Ramsar and an Appendix 4 Assessment for SSSI's have been saved to EDRM.</p> <p>Formal consultation has been carried out with Natural England. The consultation responses received via email on 05/08/14 (Annex 2) were taken into account in the permitting decision.</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>The operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment, all emissions may be categorised as environmentally insignificant.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in Sector Guidance Note (SGN) EPR6.09 and 'How to comply with your environmental permit for intensive farming (version 2)' Technical Guidance Note and we consider them to represent appropriate techniques for the facility.</p> <p>We consider that the operating techniques specified in the permit reflect the Best Available Techniques (BAT) for the installation.</p>	✓
The permit conditions		

Aspect considered	Justification / Detail	Criteria met
		Yes
Updating permit conditions during consolidation.	<p>We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit(s).</p> <p>The operator has agreed that the new conditions are acceptable.</p>	✓
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	✓
Operator Competence		
Environment management system	<p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.</p>	✓
Relevant convictions	<p>The National Enforcement Database has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found.</p> <p>The operator satisfies the criteria in RGN 5 on Operator Competence.</p>	✓
Financial provision	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.</p>	✓

Annex 2: Consultation and web publicising

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process.

Response received from
Natural England
Brief summary of issues raised
<i>"Natural England agrees with your conclusions of no significant effect alone or in combination in relation to Humber Estuary SPA/SAC/Ramsar."</i>
Summary of actions taken or show how this has been covered
No action necessary

Response received from
North Lincolnshire Borough Council – Planning Department
Brief summary of issues raised
No response received
Summary of actions taken or show how this has been covered
-

Response received from
North Lincolnshire Borough Council – Environmental Health Department
Brief summary of issues raised
No response received
Summary of actions taken or show how this has been covered
-

Response received from
Health & Safety Executive
Brief summary of issues raised
Response dated 18/06/14 - no comments raised.
Summary of actions taken or show how this has been covered
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This proposal was also publicised on the Environment Agency's website between 09/07/2014 and 06/08/2014, but no representations were received during this period.