

# **Environment Agency permitting decisions**

## **Variation**

We have decided to issue the variation for Steep Marsh Poultry Unit operated by Humphrey Farms Limited.

The variation number is EPR/GP3133UAV003

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**

- Description of the changes introduced by the variation
- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

## **Description of the changes introduced by the Variation**

This is a Substantial Variation.

This variation authorises the following changes:

- an increase in total bird places at the installation from 126,000 to 186,000 pullets;
- refurbishment of the poultry houses at Steep Marsh Farm to upgrade the ventilation system to high velocity side mounted fans with side wall inlets (bird places to remain at 102,000 pullets);
- replace the two existing poultry houses at Gardners Rearing Farm with one large poultry house (split into two houses internally), bringing the site up to current BAT standards and increasing bird places from 24,000 to 84,000 pullets;
- Table S3.1 amended to reflect the changes to ventilation for the poultry houses; and
- Table S3.2 amended to reflect the changes to the emission of roof and yard water.

The high velocity fans at Steep Marsh Farm are side mounted with ducting to release vertically 0.5 metres above the ridge height. The new poultry houses at Gardners Rearing Farm will be constructed to comply with the latest BAT recommendations. The houses will be fan ventilated with a fully littered floor, well insulated and equipped with a nipple drinking system. Ventilation will be provided by high velocity roof extraction fans with side wall inlets for normal ventilation and gable end fans for hot weather cooling.

Wash water from the poultry houses at Steep Marsh Farm and Gardners Rearing Farm will be contained in sealed tanks and spread on operator controlled land. All roof water from the poultry houses and yard water (excluding poultry house wash out periods) will discharge to soakaways. There is no increase to the site boundary as a result of this variation.

## **Key issues of the decision**

### **Industrial Emissions Directive (IED)**

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

Amendments have been made to the conditions of this variation so that it now implements the requirements of the European Union Directive on Industrial Emissions.

## Ammonia Emissions

There are six Special Areas of Conservation (SAC)/Special Protection Areas (SPA) sites located within 10 kilometres of the installation. There are five Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also fifty five Local Wildlife Sites (LWS)/Ancient Woodlands (AW)/ National Nature Reserves (NNR) within 2 km of the installation.

### Ammonia assessment – SAC/SPA

The following trigger thresholds have been designated for the assessment of European sites:

- If the process contribution (PC) is below 4% of the relevant critical level (CL<sub>e</sub>) or critical load (CL<sub>o</sub>) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required.
- An in combination assessment will be completed to establish the combined PC for all existing farms identified within 10 km of the SAC/SPA.

### Sites screen out as <4% of the PC

Screening using the ammonia screening tool version 4.5 has determined that the PC on the following SACs/SPAs for ammonia emissions from the application site are under the 4% significance threshold and can be screened out as having no likely significant effect. See results below.

**Table 1 – Ammonia emissions**

Site	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$	PC % of Critical level
Shortheath Common SAC	1*	0.011	1.1
Butser Hill SAC	1*	0.022	2.2
Rook Clift SAC	1*	0.005	0.5
Woolmer Forest SAC	1*	0.023	2.3
Wealdon Heaths Phase II SPA	3**	0.045	1.5

\*A precautionary critical level of 1  $\mu\text{g}/\text{m}^3$  has been assigned to this site. Where the precautionary level of 1  $\mu\text{g}/\text{m}^3$  is used, and the PC is assessed to be less than the 4% insignificance threshold in this circumstance it is not necessary to further consider nitrogen deposition or acid deposition critical load values.

\*\*APIS and our audited spreadsheet indicates that the features are not designated for lower plants and therefore a critical level of 3  $\mu\text{g}/\text{m}^3$  can be applied.

Initial modelling using the Ammonia Screening Tool version 4.5 has determined that the process contributions of N deposition/acid deposition from the application site are over the 4% threshold, and are therefore potentially significant. As a result detailed modelling has been carried out, the first step of which involved the applicant supplying a detailed air dispersion modelling assessment of the emissions from the installation (A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Pullet Rearing Houses at Steep Marsh Farm and Gardener's Green Farm, near Steep Marsh in Hampshire – dated 14 June 2016).

**The detailed modelling has determined that the process contributions of nitrogen deposition/acid deposition from the application site is below the 4% significance threshold and can be screened out as insignificant. See below for the detail.**

**Table 2 – Nitrogen deposition**

Site	Critical load kg N/ha/yr [1]	Predicted PC kg N/ha/yr	PC % of critical load
Wealdon Heaths Phase II SPA	5	0.14	2.9

Note [1] Critical load values taken from APIS website ([www.apis.ac.uk](http://www.apis.ac.uk)) – 07/9/16

**Table 3 – Acid deposition**

Site	Critical load keq/ha/yr [1]	Predicted PC keq/ha/yr [2]	PC % of critical load
East Hampshire Hangers SAC	2.159	0.03	1.39

Note [1] Critical load values taken from APIS website ([www.apis.ac.uk](http://www.apis.ac.uk)) – 07/9/16

Note [2] The predicted process contributions of acid deposition at the site were calculated using predicted nitrogen deposition values from the applicant's detailed air dispersion modelling assessment.

Wealdon Heaths Phase II SPA - APIS states that the species broad habitat is sensitive to acidification but concludes that there should be no expected negative impact on the species due to impacts on the species' broad habitat.

The process contribution of acid deposition from the farm under the existing permit is 0.01 keq/ha/yr. Under this new proposal, the process contribution will be the same. Therefore the proposal does not result in any changes from the existing permitted site. This is due to the refurbishment and upgrading of ventilation to high velocity side mounted extraction at Steep Marsh Farm and rebuilding of housing at Gardners Rearing Farm to meet Best Available Techniques including high velocity roof extraction.

### **Sites between Y% and Z% of the PC**

Initial modelling using the Ammonia Screening Tool version 4.5 has determined that the process contributions of ammonia emissions/N deposition

from the application site are over the 20% threshold, and are therefore potentially significant. As a result detailed modelling has been carried out, the first step of which involved the applicant supplying a detailed air dispersion modelling assessment of the emissions from the installation.

**The detailed modelling has determined that the process contributions of ammonia emissions/nitrogen deposition from the application site is over the 4% significance threshold. See below for the detail.**

The process contribution of ammonia from the farm under the existing permit is 7.8% as a percentage of the critical level. Under this new proposal, the process contribution will be reduced to 5.8%. This can therefore be considered an environmental improvement.

The consultant used a critical load of 10 kg N/ha/year in the detailed modelling. According to APIS a critical load of 5 kg N/ha/year should have been applied. However, the variation results in a reduction of emissions and an overall environmental improvement. The process contribution of nitrogen deposition from the farm under the existing permit is 6.0% as a percentage of the critical load. Under this new proposal, the process contribution will be reduced to 4.5%. This can therefore also be considered an environmental improvement.

This reduction in ammonia is due to the refurbishment and upgrading of ventilation to high velocity side mounted extraction at Steep Marsh Farm and rebuilding of housing at Gardners Rearing Farm to meet Best Available Techniques including high velocity roof extraction.

**Table 4 – Ammonia emissions**

Site	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$	PC % of Critical level
East Hampshire Hangers SAC	1*	0.058	5.8

**Table 5 – Nitrogen deposition**

Site	Critical load kg N/ha/yr	Predicted PC kg N/ha/yr	PC % of critical load
East Hampshire Hangers SAC	10	0.45	4.5

We have audited the operator's detailed modelling and we have confidence that we can agree with the report conclusions.

No further assessment is required.

## **Ammonia assessment – SSSI**

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

- If the process contribution (PC) is below 20% of the relevant critical level (CL<sub>e</sub>) or critical load (CL<sub>o</sub>) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required. An in combination assessment will be completed to establish the combined PC for all existing farms identified within 5 km of the SSSI.

### **Sites screen out as <20% of the PC**

Screening using the ammonia screening tool version 4.5 has indicated that the PC is predicted to be less than 20% of the critical level for ammonia emissions/acid deposition therefore it is possible to conclude no damage. The results of the ammonia screening tool version 4.5 are given in the tables below.

**Table 6 – Ammonia emissions**

<b>Site</b>	<b>Ammonia Cle (µg/m<sup>3</sup>)</b>	<b>PC (µg/m<sup>3</sup>)</b>	<b>PC % critical level</b>
Upper Greensand Hangers: Empshott to Hawley SSSI	1*	0.106	10.6
Rake Hanger SSSI	1*	0.056	5.6
Noar Hill SSSI	1*	0.032	3.2
Woolmer Forest SSSI	1*	0.045	4.5

\*A precautionary level of 1 µg/m<sup>3</sup> has been used during the screen. Where the precautionary level of 1 µg/m<sup>3</sup> is used, and the process contribution is assessed to be less than the 20% insignificance threshold in this circumstance it is not necessary to further consider nitrogen deposition or acid deposition critical load values. In these cases the 1 µg/m<sup>3</sup> level used has not been confirmed, but it is precautionary.

**Table 7 – Acid deposition**

<b>Site</b>	<b>Critical load keq/ha/yr [1]</b>	<b>PC keq/ha/yr</b>	<b>PC % critical load</b>
Wealdon Edge Hangers SSSI	2.275	0.157	6.9

Note [1] Critical load values taken from APIS website ([www.apis.ac.uk](http://www.apis.ac.uk)) – 07/9/16

Initial modelling using the Ammonia Screening Tool version 4.5 has determined that the process contributions of ammonia emissions/N deposition from the application site are over the 20% threshold, and therefore may cause damage to features of the SSSI. As a result detailed modelling has been carried out, the first step of which involved the applicant supplying a detailed air dispersion modelling assessment of the emissions from the installation.

The detailed modelling has determined that the process contributions of ammonia emissions/nitrogen deposition from the application site is below the 20% significance threshold and can be screened out as insignificant. See below for the detail.

**Table 8 – Ammonia emissions**

Site	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted process contribution $\mu\text{g}/\text{m}^3$	% of critical level
Wealdon Edge Hangers SSSI	1	0.058	5.8

**Table 9 – Nitrogen deposition**

Site	Critical load kg N/ha/yr [1]	Predicted PC kg N/ha/yr	PC % of critical load
Wealdon Edge Hangers SSSI	10	0.45	4.5

Note [1] The consultant used a critical load of 10 kg N/ha/year in the detailed modelling. According to APIS a critical load of 5 kg N/ha/year should have been applied. The variation results in a reduction of emissions and an overall environmental improvement (the process contribution of nitrogen deposition from the farm under the existing permit is 6.0% as a percentage of the critical load. Under this new proposal, the process contribution will be reduced to 4.5%).

We have audited the operator's detailed modelling and we have confidence that we can agree with the report conclusions.

No further assessment is required.

### **Ammonia assessment - LWS/AW/NNR**

The following trigger thresholds have been applied for the assessment of these sites:

- If the process contribution (PC) is below 100% of the relevant critical level (CL<sub>e</sub>) or critical load (CL<sub>o</sub>) then the farm can be permitted with no further assessment.

### **Sites screen out as <100% of the PC**

Screening using the ammonia screening tool version 4.5 has determined that the PC on the LWS/AW/NNR for ammonia emissions from the application site are under the 100% significance threshold and can be screened out as having no likely significant effect. See results below.

**Table 10 - Ammonia emissions**

Site	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$	PC % of critical level
Ashford Hangers NNR	1*	0.428	42.8
Above Ashford Hangers LWS	1*	0.122	12.2
Hog Moor Copse LWS	1*	0.23	23.0
Lutcombe Stream LWS	1*	0.114	11.4
Wheatham Hill LWS	1*	0.167	16.7
Glascombe Hanger/Coldhays Hanger LWS	1*	0.637	63.7
Lower Oakshott Meadow LWS	1*	0.083	8.3
Cheesecombe Farm Lane Woods LWS	1*	0.068	6.8
Chalk Pit below Old Stoner LWS	1*	0.085	8.5
Millponds - Sims Woodland LWS	1*	0.265	26.5
Long Copse, Steep LWS	1*	0.328	32.8
Jack's Meadow LWS	1*	0.276	27.6
Lane by Coldhayes Hanger LWS	1*	0.798	79.8
Cheesecombe Farm Lane LWS	1*	0.134	13.4
Coldhayes Wood LWS	1*	0.895	89.5
Adhurst Woods & Big Moor LWS	1*	0.105	10.5
U211 Tankerdale Lane LWS	1*	0.218	21.8
Alder Carr South of Stodham Bridge LWS	1*	0.27	27.0
River Rother LWS	1*	0.294	29.4
Naps Copse LWS	1*	0.194	19.4
Northfield Wood/Millhams Copse LWS	1*	0.382	38.2
Down Hangar Downland LWS	1*	0.099	9.9
Warren Copse & Sandpit LWS	1*	0.237	23.7
Wheatham Woods LWS	1*	0.284	28.4
Old Litten Lane Verge LWS	1*	0.097	9.7
Foot of Wheatham Hill LWS	1*	0.331	33.1
Hazel Holt Copse LWS	1*	0.163	16.3
Roundabout Copse, Oakshott LWS	1*	0.155	15.5
Alder Carr North of Stodham Bridge LWS	1*	0.27	27.0
Berry Grove Copse LWS	1*	0.058	5.8
C18 Stoner Hill LWS	1*	0.09	9.0
Ridge Hanger AW	1*	0.086	8.6



Unnamed Woodland - Steep Marsh AW	1*	0.738	73.8
Unnamed Woodland - Garden Farm AW	1*	0.267	26.7
Warren Copse AW	1*	0.232	23.2
Hazel Holt Copse AW	1*	0.163	16.3
Juniper Hanger AW	1*	0.101	10.1
Millham's Copse AW	1*	0.382	38.2
Naps Copse AW	1*	0.194	19.4
Long Copse AW	1*	0.361	36.1
Northfield Wood AW	1*	0.286	28.6
Oakshott Hanger AW	1*	0.086	8.6
Down Hanger AW	1*	0.180	18.0
Adhurst Wood, Budds Copse AW	1*	0.229	22.9
St Mary's Well Hanger AW	1*	0.209	20.9
Budds Copse AW	1*	0.221	22.1
Coldhay Wood AW	1*	0.766	76.6
Ashford Hill, AshfordHanger, Berryfield Hanger AW	1*	0.121	12.1
Roundabout Copse AW	1*	0.152	15.2
Berrygrove Copse AW	1*	0.058	5.8
Church Copse AW	1*	0.231	23.1
Stodham Copse AW	1*	0.257	25.7

\* Precautionary CLe of 1 µg/m<sup>3</sup> has been used. Where the precautionary level of 1 µg/m<sup>3</sup> 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 critical load is necessary. In these cases the 1 µg/m<sup>3</sup> level used has not been confirmed, but it is precautionary.

### **Sites within 250 metres of the application site**

Screening using the ammonia screening tool version 4.5 has identified three LWS/AW that are within 250 metres of the application site. These LWS/AW cannot be automatically screened out using the ammonia screening tool and as a result detailed modelling has been carried out, the first step of which involved the applicant supplying a detailed air dispersion modelling assessment of the emissions from the installation.

**The detailed modelling has determined that the process contributions of ammonia emissions from the application site is below the 100% significance threshold and can be screened out as insignificant. See below for the detail.**

**Table 11 – Ammonia emissions**

Site	Critical level ammonia µg/m <sup>3</sup>	Predicted PC µg/m <sup>3</sup>	PC % of critical level
Taylor's Farm Corpse LWS	1*	0.958	95.8
Bushy Copse AW	1*	0.292	29.2

The Moors AW	1*	0.958	95.8
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\* Precautionary CLe of 1 µg/m<sup>3</sup> has been used. Where the precautionary level of 1 µg/m<sup>3</sup> 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 critical load is necessary. In these cases the 1 µg/m<sup>3</sup> level used has not been confirmed, but it is precautionary.

No further assessment is required.

## Groundwater and soil monitoring

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

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

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

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

The site condition report (SCR) for Steep Marsh Poultry Unit (ASR dated 23/08/07) demonstrates that there are no hazards or likely pathway to land or groundwater and no historic contamination on site that may present a hazard from the same contaminants. **Therefore, on the basis of the risk assessment presented in the SCR, we accept that they have not provided base line reference data for the soil and groundwater at the site at this stage.**

## Odour Management Plan

We, the Environment Agency, have reviewed and approved the Odour Management Plan (OMP) and consider it complies with the requirements of

our H4 Odour management guidance note. We agree with the scope and suitability of key measures but this should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and sufficient. That remains the responsibility of the operator.

The OMP should be reviewed on a regular basis to ensure that it reflects the most up to date management practices and infrastructure.

### Annex 1: decision checklist

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

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>Receipt of submission</b>		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
<b>Consultation</b>		
Scope of consultation	<p>The consultation requirements were identified and implemented. The decision was taken in accordance with our Public Participation Statement and our Working Together Agreements.</p> <p>For this application we consulted the following bodies:</p> <ul style="list-style-type: none"> <li>• The Health &amp; Safety Executive</li> <li>• Environmental Health – East Hampshire District Council</li> <li>• The Local Planning Authority – East Hampshire District Council</li> <li>• The Director of Public Health</li> <li>• Public Health England</li> </ul>	✓
Responses to consultation and web publicising	<p>The web publicising and consultation responses (Annex 2) were taken into account in the decision.</p> <p>The decision was taken in accordance with our guidance.</p>	✓
<b>European Directives</b>		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
<b>The site</b>		
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.</p> <p>A plan is included in the permit and the operator is</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	required to carry on the permitted activities within the site boundary.	
Biodiversity, Heritage, Landscape and Nature Conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .</p> <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 site</p> <p>See Key Issues 'Ammonia Emissions Assessment' section above for further information.</p> <p>An Appendix 11 was completed and sent to Natural England on 21/10/16 'For Information Only'.</p>	✓
<b>Environmental Risk Assessment and operating techniques</b>		
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>See Key Issues section for further explanation.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The operating techniques are as follows:</p> <ul style="list-style-type: none"> <li>• Replacement poultry houses at Gardners Rearing Farm constructed to comply with the latest BAT recommendations. The houses will be fan ventilated with high velocity roof extraction fans with gable end fans for cooling purposes. Houses will have a fully littered floor, be well insulated and equipped with a nipple drinking system fitted with cups to reduce leakage and spills.</li> <li>• Upgrading of ventilation system for the poultry houses at Steep Marsh Farm, with installation of high velocity side mounted extraction fans.</li> </ul>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	The proposed techniques for priorities for control are in line with the benchmark levels contained in the SGN EPR6.09 'How to comply with your environmental permit for intensive farming' and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions.	
<b>The permit conditions</b>		
Updating permit conditions during consolidation.	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.  The operator has agreed that the new conditions are acceptable.	✓
Use of conditions other than those from the template	Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template, which was developed in consultation with industry having regard to the relevant legislation.	✓
Incorporating the application	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.  These descriptions are specified in the Operating Techniques table in the permit.	✓
Emission limits	No emission limits have been added as a result of this variation.	✓
<b>Operator Competence</b>		
Environment management system	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 our guidance on what a competent operator is.	✓

## Annex 2: External Consultation and web publicising responses

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 on 12/10/16 from
Local Planning Authority - East Hampshire District Council
Brief summary of issues raised
The LPA noted that some of the proposed works may require planning permission and the Environment Agency should inform the operator to speak to the Local Planning Authority.
Summary of actions taken or show how this has been covered
No action required

Response received on 28/10/16 from
Public Health England (PHE)
Brief summary of issues raised
<p>PHE have examined the potential health implications of the proposed application and noted that the installation has the potential to cause pollution from fugitive emissions (ammonia, bio-aerosols and particulates) and pollution to ground and surface water in the form of leachate and spillages. Furthermore, PHE noted that the potential exists to cause nuisance in respect of odour and noise from the operation itself and any application being granted needs to ensure these are managed.</p> <p>PHE are concerned about the close proximity of residential properties that are within 250m for bio-aerosols and 400m for odour of the site. The HPA position statement on intensive farming (which has been adopted by Public Health England) describes the main public health risks from this type of activity and notes that published studies indicate bio-aerosols are generally reduced to background levels within 250m of the facility and exceptions to 250m are allowed if effective mitigation techniques are employed. PHE noted that there were no details in the application or the bio-aerosol risk assessment that detailed mitigation techniques would be employed and that the only information provided related to mechanisms to control dust nuisance.</p> <p>PHE highlighted that the Environment Agency needs to be satisfied that there are adequate controls on all airborne particles that contain living organisms, fragments, toxins and waste products and that any monitoring needs to consider the impacts on the community and occupational exposure.</p> <p>PHE also highlighted that there was no information contained in the application or dust management plan concerning the conditions of roads and that the Environment Agency needs to ensure that the condition of roads at the sites will not result in a source of particulate matter being created and deposited off site.</p>

PHE highlighted that there was no information in the application pertaining to complaints being received for the existing activities and that the Environment Agency needs to be satisfied that any local amenity concerns are identified and can be mitigated due to their close proximity. PHE highlighted that the Environment Agency should ensure a system is in place to identify and mitigate the source of any odour following substantiated complaints.

**Summary of actions taken or show how this has been covered**

The operator has submitted an odour management plan, noise management plan and a dust (including bio-aerosols) risk assessment, all of which have been reviewed and approved by the Environment Agency.

Likely impacts have been assessed during the determination as unlikely to have a significant impact and therefore we have included standard conditions which require the operator to action any emissions management plan should a substantiated negative impact be notified. Conditions 3.1.1, 3.2.1, 3.3.1 and 3.4.1, concerning odour, noise and fugitive emissions are included in the permit.

The odour management plan submitted by the operator confirms that Steep Marsh/Gardners Rearing Farm have not been the subject of odour complaints. Condition 1.1.1 concerning the written management system, including complaints, is included in the permit.

The following organisations were consulted, however no responses were received:

- Environmental Health – East Hampshire District Council
- The Director of Public Health
- The Health and Safety Executive

This proposal was also publicised on the Environment Agency's website between 5/10/16 and 2/11/16, but no representations were received during this period.