

Permitting decisions

Bespoke permit

We have decided to grant the permit for Manor Wood Poultry Farm operated by Manor Wood Limited.

The permit number is EPR/VP3535YB

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 provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken in to account.

This decision document provides a record of the decision making process. It:

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account
- shows how we have considered the [consultation responses](#).

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

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

Key issues of the decision

New Intensive Rearing of Poultry or Pigs BAT Conclusions document

The new Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) was published on the 21st February 2017. There is now a separate BAT Conclusions document which will set out the standards that permitted farms will have to meet.

The BAT Conclusions document is as per the following link

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D0302&from=EN>

Now the BAT Conclusions are published all new installation farming permits issued after the 21st February 2017 must be compliant in full from the first day of operation.

There are some new requirements for permit holders. The conclusions include BAT Associated Emission Levels for ammonia emissions which will apply to the majority of permits, as well as BAT associated levels for nitrogen and phosphorous excretion.

For some types of rearing practices stricter standards will apply to farms and housing permitted after the new BAT Conclusions are published.

New BAT conclusions review

There are 33 BAT conclusion measures in total within the BAT conclusion document dated 21st February 2017.

The Applicant has confirmed their compliance with all BAT conditions for the new installation, in their document reference "Appendix 5: Technical Standards" and "Environmental Management System Summary" received 06/02/17 (EDRM date shows as 07/02/17).

The following is a more specific review of the measures the Applicant has applied to ensure compliance with the above key BAT measures

BAT measure	Applicant compliance measure
BAT 3 - Nutritional management Nitrogen excretion	0.4-0.8 kg N excreted/animal place/year.
BAT 4 Nutritional management Phosphorous excretion	0.10-0.45 kg P ₂ O ₅ excreted/animal place/year.
BAT 24 Monitoring of emissions and process parameters - Total nitrogen and phosphorous excretion	Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions
BAT 25 Monitoring of emissions and process parameters - Ammonia emissions	
BAT 27 Monitoring of emissions and process parameters -Dust emissions	Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions.

BAT measure	Applicant compliance measure
BAT 28 Monitoring of emissions and process parameters linked to - Ammonia, Dust and Odour emissions	No air cleaning abatement device in place, so BAT 28 not applicable.
BAT 31 Ammonia emissions from poultry houses -Laying hens	BAT AEL for Free range layer hens is 0.13 kg NH ₃ /animal place/year. Ammonia screening uses an emission factor of 0.08 kg NH ₃ /animal place/year this emission factor is lower than the BAT AEL we are therefore satisfied that the BAT AELs will be met for the new poultry housing.'

More detailed assessment of specific BAT measures

Ammonia emission controls

A BAT Associated Emission Level (AEL) provides us with a performance benchmark to determine whether an activity is BAT.

Ammonia emission controls – BAT conclusion 31

The new BAT conclusions include a set of BAT-AEL's for ammonia emissions to air from animal housing for laying hens.

There is a footnote in some of the Ammonia BAT-AELs allowing a higher AEL for existing plant. 'New plant' is defined as plant first permitted at the site of the farm following the publication of the BAT conclusions. 'Existing plant' is defined in the BREF as any plant that is not a 'new plant'. The key phrase is 'first permitted'.

All new bespoke applications issued after the 21st February, including those where there is a mixture of old and new housing, will now need to meet the BAT-AEL.

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.

This permit implements the requirements of the European Union Directive on Industrial Emissions.

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 Manor Wood Poultry Farm (dated 25/01/17) 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

Intensive farming is by its nature a potentially odorous activity. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance (http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297084/geho0110brsb-e-e.pdf).

Condition 3.3 of the environmental permit reads as follows:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour."

Under section 3.3 of the guidance an Odour Management Plan (OMP) is required to be approved as part of the permitting process, if as is the case here, sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the Installation boundary. It is appropriate to require an OMP when such sensitive receptors have been identified within 400m of the installation to prevent, or where that is not practicable, to minimise the risk of pollution from odour emissions.

The risk assessment for the Installation provided with the Application lists key potential risks of odour pollution beyond the Installation boundary. These activities are as follows:

- Free range egg production
- Manufacture and selection of feed
- Feed delivery & storage
- Ventilation and dust
- Litter management.
- Carcass disposal
- House clean out
- Used litter
- Washing operations including vehicles
- Fugitive emissions
- Dirty water management
- Abnormal operations
- Waste production/ storage
- Materials/storage

Odour Management Plan Review

There are 7 sensitive receptors within 400m of the site boundary. The sensitive receptors that have been considered under odour and noise do not include the operator's property and other people associated with the farm operations as odour and noise are amenity issues.

The closest is an operator owned property which is within the boundary. The next closest receptor is Green Grass Caravan Park, which is approximately 9m to the east of the site boundary. This distance is from the installation boundary to site boundary. In reality, the risk of odour nuisance is unlikely, because the distance from the closest poultry house to the area where caravans are situated is approximately 179m (caravans to the east of the closest poultry house).

Other sensitive receptors within 400m of the site boundary include; Haverham Farm (~230m north), Southwell TW & Sons (~330m north), 2 residential properties (~206 and 356m north) and a camp site (~379m south east).

The operator is required to manage activities at the installation in accordance with condition 3.3.1 of the permit and it's OMP (version received 12/05/17, reference 'Odour management Plan Manor Wood Poultry Farm' saved to EDRM as 'Odour Management Plan REVISED 120517').

The operator has identified the potential sources of odour (listed above). The operator has also identified the potential risks and problems as well as detailed actions taken to minimise odour and odour risks at the installation. This is detailed in the OMP (reference 'Odour Management Plan Manor Wood Poultry Farm').

The OMP also provides a suitable procedure in the event of complaints in relation to odour. The OMP is required to be reviewed at least every 4 years, however the operator has confirmed that it will be reviewed annually and/or if a complaint is received, whichever is sooner.

The general wind direction is usually predominantly from the south west. This means that the nearest receptors are generally not downwind of the installation.

Whilst there is a potential for odour pollution from the installation, the overall risk is not significant with careful management and compliance with the OMP.

Noise

There are 7 sensitive receptors within 400m of the site boundary.

The closest is an operator owned property which is within the boundary. The next closest receptor is Green Grass Caravan Park, which is approximately 9m to the east of the site boundary. This distance is from installation boundary to site boundary. In reality, the risk of noise nuisance is unlikely, because the distance from the closest poultry house to the area where caravans are situated is approximately 179m (caravans to the east of the closest poultry house).

Other sensitive receptors within 400m of the site boundary include; Haverham Farm (~230m north), Southwell TW & Sons (~330m north), 2 residential properties (~206 and 356m north) and a camp site (~379m south east).

The operator has identified potential sources of noise, as well as techniques to minimise noise:

- Ventilation fans – noise assessed twice daily during normal working hours*. Large capacity fans, reducing number of fans required. Fans operated on intermittent programme. Regular maintenance.
- Feed deliveries – Lorries fitted with silencers, large capacity Lorries to reduce number of deliveries, deliveries time restricted. Road/track maintenance.
- Feeding systems- regular checks and regular maintenance. During normal working hours.
- Fuel deliveries – time restricted – during normal working hours.
- Alarm systems – use of pagers or mobiles
- Bird catching – catch teams trained, crates placed carefully. Lorries scheduled and parked to minimise duration, screen curtains fitted to Lorries.
- Clean out – litter removal and washing during normal working hours, trailers parked close to doors.
- Maintenance/Repair – during normal working hours (except emergencies/ breakdown), routine end of cycle servicing.
- Set up/ Placement- normal working hours.
- Standby Generator – tests run during normal working hours.

*Normal working hours are between 07:00 – 19:00.

There is the potential for noise from the installation beyond the installation boundary. However the risk of noise beyond the installation boundary is considered unlikely to cause a nuisance, as long as the operator ensures careful management and compliance with the NMP (reference 'Noise Management Plan').

We have included our standard noise and vibration condition 3.4.1 in the Permit, which requires that emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the Installation, as perceived by an authorised officer of the Environment Agency, unless the Operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan (which is captured through condition 2.3 and Table S1.2 of the Permit), to prevent or where that is not practicable to minimise the noise and vibration.

We are satisfied that the manner in which operations are carried out on the Installation will minimise the risk of noise pollution.

Dust and bioaerosols

There are 2 sensitive receptors within 100m of the site boundary. The sensitive receptors that have been considered under odour and noise do not include the operator's property, and other people associated with the farm operations as odour and noise are amenity issues. However, with dust and Bioaerosols, all sensitive receptors are considered as dust and Bioaerosols have the potential to affect human health.

The closest is Manorwood House, which the operator is owned property. This house is within the boundary. The house boundary is approximately 65m east of the closest poultry house. The next closest receptor is Green Grass Caravan Park, which is approximately 9m to the east of the site boundary. This distance is from installation boundary to site boundary. In reality, the risk of dust related issues are unlikely, because the distance from the closest poultry house to the area where caravans are situated is approximately 179m (caravans to the east of the closest poultry house).

The operator has identified potential sources of dust, as well as techniques to minimise it:

- Feed – feed is delivered in sealed systems. Dust socks fitted to silo exhaust pipes. Closed system delivery of feed from silo to poultry houses. Feed spills dealt with promptly.
- Bedding – use of suitable bedding materials. Not blown into houses.
- Litter system – belt removal of litter twice weekly into covered trailer. Aviary housing system.
- Ventilation – use of gable end fans on houses.
- House cleaning- litter removed carefully during cleanout minimising dust. Full trailers sheeted before leaving installation.
- Bird numbers/types – free range layers 48,000- reduced time within poultry house reducing dust levels.

The general wind direction is usually predominantly from the south west. This means that the nearest receptors are generally not downwind of the installation. The operator has completed a bioaerosol risk assessment (reference 'Bio Aerosol Emissions at Manor Wood poultry Farm'). The plan identified hazards, receptors, pathways, ways in which to manage/ minimise the risks, potential consequences if not managed correctly and a brief summary of the overall risks. This, together with good management of the installation, keeping areas clean from build-up of dust, other measures in place to reduce dust and risk of spillages, such as manure and feed management/delivery procedures all reduce the potential for emissions impacting the nearest receptors.

Although the caravan park distance from site boundary to park boundary is ~9m, the distance from the actual closest poultry house, which is where the majority of dust would come from, is ~179m, which is over the 100m distance used by the Environment Agency, so the likelihood of dust becoming an issue is unlikely.

With good management of the installation, keeping areas clean from build-up of dust, other measures in place to reduce dust and risk of spillages, such as manure and feed management/delivery procedures all reduce the potential for emissions impacting the nearest receptors.

Ammonia

Ammonia assessment

The applicant has demonstrated that the housing will meet the relevant NH₃ BAT-AEL.

Ammonia emissions

There is 1 Special Protection Area (SPA), site located within 10 kilometres of the installation. There are 3 Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also 5 Local Wildlife Sites (LWS) within 2 km of the installation.

Ammonia assessment – SAC/SPA/Ramsar

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_e) or critical load (CL_o) 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 SPA.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Manor Wood Poultry Farm will only have a potential impact on the SPA site with a precautionary critical level of 1µg/m³ if they are within 3890 metres of the emission source.

Beyond 3890m the PC is less than 0.04µg/m³ (i.e. less than 4% of the precautionary 1µg/m³ critical level) and therefore beyond this distance the PC is insignificant. In this case the SPA is beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of $1\mu\text{g}/\text{m}^3$ is used, and the process contribution is assessed to be less than 4% the site automatically screens out as insignificant and no further assessment of critical load is necessary. In this case the $1\mu\text{g}/\text{m}^3$ level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely significant effect

Table 1 – SPA Assessment

Name of SAC/SPA/Ramsar	Distance from site (m)
Hornsea Mere	8846

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_e) or critical load (CL_o) 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.

Initial screening using the ammonia screening tool version 4.5 has indicated that emissions from Manor Wood Poultry Farm will only have a potential impact on SSSI sites with a precautionary critical level of $1\mu\text{g}/\text{m}^3$ if they are within 1624 metres of the emission source.

Beyond 1624m the PC is less than $0.2\mu\text{g}/\text{m}^3$ (i.e. less than 20% of the precautionary $1\mu\text{g}/\text{m}^3$ critical level) and therefore beyond this distance the PC is insignificant. In this case the SSSIs are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of $1\mu\text{g}/\text{m}^3$ is used, and the process contribution is assessed to be less than 20% the site automatically screens out as insignificant and no further assessment of critical load is necessary. In this case the $1\mu\text{g}/\text{m}^3$ level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely damage to these sites.

Table 2 – SSSI Assessment

Name of SSSI	Distance from site (m)
River Hull Headwaters	1985
Leven Canal	4861

Screening using the ammonia screening tool version 4.5 has indicated that the PC for Tophill Low is predicted to be less than 20% of the critical level for ammonia emissions/nitrogen deposition/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 3 – Ammonia emissions

Site	Ammonia Cle ($\mu\text{g}/\text{m}^3$)	PC ($\mu\text{g}/\text{m}^3$)	PC % critical level
Tophill Low	3*	0.336	11.2

*CLE of 3 for ammonia found using APIS (May 2017)

Table 4 – Nitrogen deposition

Site	Critical load kg N/ha/yr [1]	PC kg N/ha/yr	PC % critical load
Tophill Low	20	1.745	8.7

Note [1] Critical load values taken from APIS website (www.apis.ac.uk) – May 2017

Table 5 – Acid deposition

Site	Critical load keq/ha/yr [1]	PC keq/ha/yr	PC % critical load
Tophill Low	---	---	---

Note [2] –Information taken from APIS website (www.apis.ac.uk). The interest features of the SSSI are not sensitive to acidity- May 2017

No further assessment is required.

Ammonia assessment - LWS

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 (CLE) or critical load (CLO) then the farm can be permitted with no further assessment.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Manor Wood Poultry Farm will only have a potential impact on the LWS with a precautionary critical level of $1\mu\text{g}/\text{m}^3$ if they are within 678 metres of the emission source.

Beyond 678m the PC is less than $1\mu\text{g}/\text{m}^3$ and therefore beyond this distance the PC is insignificant. In this case the LWSs are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 6 – LWS Assessment

Name of LWS	Distance from site (m)
Tophill Low	958
Strick Pastures	1059
Alderman's Gorse	1790
Bransedburton – Frodingham Road	2321

Screening using the ammonia screening tool version 4.5 has determined that the PC on the LWS for ammonia emissions/nitrogen deposition/acid deposition 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 7 - Ammonia emissions

Site	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$	PC % of critical level
Frodingham Pits/Coneygarth	3*	1.156	38.5

* CLe 3 applied as no protected lichen or bryophytes species were found when checking easimap layer

Table 8 – Nitrogen deposition

Site	Critical load kg N/ha/yr [1]	Predicted PC kg N/ha/yr	PC % of critical load
Frodingham Pits/Coneygarth	---	---	---

Note [3] No Critical load values available from APIS website (www.apis.ac.uk). East Riding Council have advised that; "It is presumed that the open water of the pits was the main feature for which is was proposed as the site does not support other habitats except some willow scrub around the edges of the pits." and "The site appears to be managed for amenity and fishing, not nature conservation". We have also been advised that the land is not likely to be assessed. Therefore, we will take a risk based approach that the site can be discounted for the purposes of this assessment – May 2017.

Table 9 – Acid deposition

Site	Critical load keq/ha/yr [1]	Predicted PC keq/ha/yr	PC % of critical load
Frodingham Pits/Coneygarth	---	---	---

Note [4] see note 3 above.

No further assessment is required.

Decision checklist

Aspect considered	Decision
Receipt of application	
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 confidentiality.
Consultation	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement. The application was publicised on the GOV.UK website. We consulted the following organisations: <ul style="list-style-type: none"> • Health and Safety Executive • Public Health England • Director of Public Health • Local Authority (Environmental Control Team, East Riding of Yorkshire Council) The comments and our responses are summarised in the consultation section .
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 our guidance on legal operator for environmental permits.
The facility	
The regulated facility	We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits. The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.
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. The plan is included in the permit.

Aspect considered	Decision
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.
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>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application, but we have completed and submitted (09/06/17) an Appendix 11 to Natural England for information only. The decision was taken in accordance with our guidance.</p>
Environmental risk assessment	
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>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p> <p>The operating techniques are as follows:</p> <ul style="list-style-type: none"> • Compliance with responses to Parts B3.5 of the application form and referenced supporting documents (received 06/02/17). • Compliance with revised OMP and NMP (received 01/05/17). • Birds to be brought onto the installation at approximately 17 weeks old. Birds to leave the installation at approximately 75 weeks old. Average cycle length to be approximately 14 months. All litter to be exported from site. Wash water to be spread on operator controlled land (received 19/05/2017).
Odour management	<p>We have reviewed the odour management plan in accordance with our guidance on odour management.</p> <p>We consider that the odour management plan is satisfactory.</p>
Noise management	<p>We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.</p> <p>We consider that the noise management plan is satisfactory.</p>

Aspect considered	Decision
Permit conditions	
Emission limits	We have decided that emission limits are not required in the permit.
Reporting	<p>We have specified reporting in the permit.</p> <p>We made these decisions in accordance with the new Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) published on the 21st February 2017.</p>
Operator competence	
Management system	<p>There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to vary this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Environmental Control Team, East Riding of Yorkshire Council
Brief summary of issues raised
No issues raised. Council advised that they have had no complaints of noise, odour or dust from the premises. Nonetheless, they understand that noise, odour and dust will be addressed in the environmental permit. Therefore, they have no objections to the application,
Summary of actions taken or show how this has been covered
N/A – noise, odour and dust has been assessed and addressed during permit determination.

Response received from
Public Health England (PHE)
Brief summary of issues raised
The response acknowledged no ammonia modelling submitted, but this was because the pre-application ammonia screening had not yet been completed screening now completed and no modelling required)
The response states that if there are sensitive receptors within 100m from site boundary, the applicant should carry out a bioaerosol risk assessment (submitted with application).
Summary of actions taken or show how this has been covered
No extra actions needed. Ammonia and bioaerosols covered with Decision document.

No other responses were received.

Representations from individual members of the public.

No responses were received.