

Permitting decisions

Variation

We have decided to grant the variation for Mundford Poultry Farm operated by Mundford Poultry Limited. The variation number is EPR/PP3637MZ/V003.

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:

- 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 and the variation notice. The introductory note summarises what the variation covers.

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.

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 Mundford Poultry Farm (as part of permit application EPR/PP3637MZ/A001, dated 23/01/2007) 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.**

Site history

The original permit (EPR/PP3637MZ) was issued (26th March 2008) for the housing of 464,711 broilers with 20 houses with two improvement conditions (IC1 and IC2) requiring the permit holder to submit an emission reduction plan to reduce the level of ammonia impact from the installation at a nearby conservation site: Breckland SAC (UK0019865). The Environment Agency led variation was issued on 8th August 2008 to amend the need for the completion of improvement condition IC1 in table S1.3 Improvement programme requirements.

The determination of the original application involved an assessment of the potential impact of ammonia releases from the installation on ecological receptors using the environment Agency AFP1 Screening Tool and AFP2 Modelling Tool. This assessment showed that the installation was likely to emit ammonia at levels that might exceed the contribution to the critical level which had been assigned for Breckland SAC (UK0019865).

Natural England has subsequently undertaken additional site survey work to assess the evidence for impacts of ammonia on the site. As a result of this survey work Natural England wrote to the Environment Agency on the 27th January 2010 concluding that the predicted risk to the site (as predicted by the Environment Agency's original modelling assessment) does not appear to be evident in the vegetation of the site despite the installation being in existence for a significant period of time. On the basis of this new information the Environment Agency had carried out an Environment Agency led variation (EPR/PP3637MZ/V002) to remove improvement condition IC2 from table S1.3 Improvement programme requirements listed in variation notice dated 8th February 2010.

Ammonia Emissions

Original Proposal

Ammonia emissions were assessed for the original permit (EPR/PP3637MZ) with 464,711 poultry places.

This variation (EPR/PP3637MZ/V003) originally proposed to increase the stock numbers by 110,953 places, from 464,711 broilers to 575,664 broilers. The original submission would also propose improvements on site and add two heat exchangers to poultry houses 3 and 8, decommission five old poultry sheds, and erect two new poultry houses with high velocity roof fans.

The operator had submitted an Ammonia Modelling Report – Mundford Poultry Farm version 1.0 dated 12/01/2017 which assessed the impact of ammonia emissions, nitrogen and acid deposition at all the designated conservation sites. The results of the detailed modelling showed that the maximum Process Contribution (PC) of ammonia concentration at the sensitive habitats are expected to reduce by the minimum of 4.35% and the maximum of 7.49% only at four habitat sites, namely Breckland SAP, Breckland Farmland SSSI, Breckland Forest SSSI and Cranwich Camp SSSI, and there was no improvement in emissions demonstrated at Breckland SAC, Norfolk Valley Fens SAC and Didlington Park Lakes SSSI. Given that there was a degree of uncertainty from modelling, we were not confident that the small level of proposed improvement was betterment. This may in reality have no change in emissions, or could result in an increase in the ammonia impact at some of the habitats.

Additionally, the report had not considered the impact of ammonia at the non-statutory River Wissey Local Wildlife Site. The operator had also not specified the proposed Best Available Techniques (BAT) that would be used to minimize impacts on habitat sites in accordance with BAT 32 – Ammonia emissions from houses for poultry.

There is already a significant level of exceedance of critical levels and critical loads at Breckland SPA, Breckland SAC, Norfolk Valley Fens SAC, Breckland Forest SSSI, Cranwich Camp SSSI and River Wissey LWS. Therefore the operator is required to demonstrate a greater level of improvement that could be said to demonstrate betterment.

In order to demonstrate clear betterment at all the designated conservation sites, we needed the operator to show that they used a combination of techniques for the site as a whole given in BAT 32 rather than utilise one technique for a few houses, and resubmit their detailed ammonia modelling report in accordance with the BAT measures proposed, in response to the schedule 5 information request dated 27/07/2017.

Amended Proposal

The operator reviewed and resubmitted their proposal demonstrating a clear improvement in ammonia emissions. The revised Ammonia Modelling Report - Mundford Poultry Farm version 1.3 dated 26/09/17 has proposed to only increase the stock numbers from 464,711 broilers to 534,707 by 69,996 in comparison to the original 110,953 places, and proposed greater improvements on site by decommissioning eleven poultry houses and erecting three new houses with high velocity roof fans (11.23 m/s). Two heat exchangers will continue to be added to the existing poultry houses 2 and 3. These are proposed to reduce the ammonia emissions from the shed by an estimated 35%.

Tables 1-3 below show the results from the report to demonstrate the improvement in process contribution (PC) of ammonia emissions, nitrogen deposition and acid deposition from the farm at all receptors which are impacted by emissions from the farm, as a result of the variation.

Table 1: Ammonia emissions

Site of conservation	Permitted PC $\mu\text{g}/\text{m}^3$	Proposed PC $\mu\text{g}/\text{m}^3$	Reduction or improvement in PC (%)
Breckland Forest SSSI/Breckland SPA	6.1	4.39	28.03
Didlington Park Lakes SSSI	0.19	0.16	15.79
Breckland Farm SSSI/Breckland SPA	0.46	0.38	17.39

Breckland SAC/Cranwich Camp SSSI	0.45	0.34	24.44
Breckland SAC (location 1)	0.14	0.12	14.29
Breckland SAC (location 2)	0.09	0.08	11.11
Norfolk Valley Fens SAC	0.05	0.05	0.0
River Wissey LWS	31.62	23.65	25.21
Reedlands Plantation LWS	3.23	2.58	20.12
Adjacent River Wissey LWS	1.36	1.08	20.59

Table 2: Nitrogen deposition

Site of conservation	Permitted PC kg N/ha/yr	Proposed PC kg N/ha/yr	Reduction or improvement in PC (%)
Breckland Forest SSSI/Breckland SPA	46.62	34.06	26.94
Didlington Park Lakes SSSI	0.98	0.83	15.31
Breckland Farm SSSI/Breckland SPA	2.38	1.97	17.23
Breckland SAC/Cranwich Camp SSSI	2.33	1.76	24.46
Breckland SAC (location 1)	0.72	0.62	13.89
Breckland SAC (location 2)	0.7	0.62	11.43
Norfolk Valley Fens SAC	0.39	0.39	0.0
River Wissey LWS	245.3	183.47	25.21
Reedlands Plantation LWS	25.06	20.02	20.11
Adjacent River Wissey LWS	10.55	8.38	20.57

Table 3: Acid deposition

Site of conservation	Permitted PC keq/ha/yr	Proposed PC keq/ha/yr	Reduction or improvement in PC (%)
Breckland Forest SSSI/Breckland SPA	3.33	2.43	27.03
Didlington Park Lakes SSSI	0.07	0.06	14.29
Breckland Farm SSSI/Breckland SPA	0.17	0.14	17.65
Breckland SAC/Cranwich Camp SSSI	0.17	0.13	23.53
Breckland SAC (location 1)	0.05	0.04	20
Breckland SAC (location 2)	0.05	0.04	20
Norfolk Valley Fens SAC	0.03	0.03	0.0
River Wissey LWS	17.52	13.11	25.17
Reedlands Plantation LWS	1.79	1.43	20.11
Adjacent River Wissey LWS	0.75	0.6	20

The results of the detailed modelling show that:

- the maximum PC of ammonia concentration at the designated habitats are generally expected to reduce by the minimum of 11.11% and the maximum of 28.03% as a result of the variation.

- the maximum PC of nitrogen deposition at the designated habitats are expected to reduce by the minimum of 11.43% and the maximum of 26.94% as a result of the variation.
- the maximum PC of acid deposition at the designated habitats are expected to reduce by the minimum of 14.29% and the maximum of 27.03% as a result of the variation.

The only receptor where there is no improvement is Norfolk Valley Fens SAC, which showed no change from the previous ammonia emissions and nitrogen and acid deposition. This is due to the habitat being located further from the farm than the other designated habitats (over 6km from the farm), and therefore the improvements have a more limited impact. The results are also rounded to two decimal places which do not demonstrate marginal improvements on low PCs.

Conclusion

The detailed modelling has demonstrated that there will be a clear reduction of ammonia emissions, nitrogen deposition and acid deposition as a result of the variation to the site, at the majority of designated habitats. The exception to this is Norfolk Valley Fens SAC which showed no change. As there is a clear improvement for the majority of designated sites, we are satisfied that the Operator has demonstrated betterment for ammonia emissions.

We believe that the operator's proposal meets the BAT requirements for ammonia emissions, including having forced ventilation with high velocity roof fans in the three new poultry houses, two new heat exchangers, solid floors, and the use of nipple drinkers with drip cups to maintain dry litter conditions.

No further assessment is required.

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:

- Feed Delivery and Storage;
- Ventilation Techniques;
- Litter Conditions and Management;
- Carcass Disposal;
- Management of dirty water;
- Destocking of Live Stock; and
- House cleanout operations.

Odour Management Plan Review

There is a sensitive receptor within 100 metres and other receptors are within 400 metres of the installation boundary. The applicant has therefore submitted an Odour Management Plan as part of the application supporting documentation.

Operations with the most potential to cause an odour emissions have been assessed as those listed above. The Odour Management Plan covers control measures, in particular, procedural controls addressing ventilation and heating, litter condition and management, bird destocking/restocking, clean out operations, management of used litter and dirty water, and abnormal operations. The operator has also considered that they will undertake a BAT review following any substantiated odour complaints and provided a list of contingency measures that they will consider to reduce the odour emissions from site and meet BAT requirements. Following the BAT review the Operator has confirmed that they will select a suitable contingency measure from those listed in the odour management plan which will be agreed to by the agency.

There is the potential for odour emissions from the installation beyond the installation boundary, however the operator's compliance with the Odour Management Plan, submitted with this application, should minimise the risk of odour pollution beyond the installation boundary. We, the Environment Agency, have reviewed and approved the Odour Management Plan. 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.

Conclusion

We have assessed the OMP and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 4 'Odour management at intensive livestock installations'. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of odour pollution / nuisance.

Noise

Intensive farming by its nature involves activities that have the potential to cause noise pollution. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance. Under section 3.4 of this guidance a Noise Management Plan (NMP) must be approved as part of the permitting determination, if there are sensitive receptors within 400m of the Installation boundary.

Condition 3.4 of the Permit reads as follows:

Emissions from the activities shall be free from noise and vibration 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 noise and vibration management plan, to prevent or where that is not practicable to minimise the noise and vibration.

There are sensitive receptors within 400 metres of the Installation boundary as stated in section 4.4.2 above. The Operator has provided a noise management plan (NMP) as part of the Application supporting documentation, and further details are provided in section 4.5.2 below.

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

- Large vehicle movement to and from farm;
- Large vehicle movement on site;
- Transfer of feed from lorry to bins;
- Operation of ventilation fans and alarm system;
- Standby generator;
- Birds and personal on site; and
- Repair and maintenance work.

We have assessed the NMP and the H1 risk assessment for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 'Noise management at intensive livestock installations'. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution / nuisance.

Noise Management Plan Review

There is a sensitive receptor within 100 metres and other receptors are within 400 metres of the installation boundary. The applicant has therefore submitted a Noise Management Plan as part of the application supporting documentation.

Operations with the most potential to cause a noise emissions have been assessed as those listed above. Noise Management Plan covers those involving delivery vehicles travelling to and from the farm, vehicles on site, feeding system, operation of ventilation fans, noise from birds, bird restocking, bird removal and loading on to vehicles and clean out operations. The Noise Management Plan covers control measures, in particular, procedural controls addressing ventilation fans, feed deliveries, feeding systems, bird restocking, and clean out operations.

There is the potential for noise from the installation beyond the installation boundary, however the operator's compliance with the Noise Management Plan, submitted with this application, should minimise the risk of noise pollution beyond the installation boundary. The risk of noise pollution at sensitive receptors beyond the installation boundary is therefore not considered significant. 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.

Conclusion

We have assessed the NMP and the H1 risk assessment for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 'Noise management at intensive livestock installations'. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution / nuisance.

Dust and Bio aerosols

The use of Best Available Techniques and good practice will ensure minimisation of emissions. There are measures included within the Permit (the 'Fugitive Emissions' conditions) to provide a level of protection. Condition 3.2.1 'Emissions of substances not controlled by an emission limit' is included in the Permit. This is used in conjunction with condition 3.2.2 which states that in the event of fugitive emissions causing pollution following commissioning of the Installation, the Operator is required to undertake a review of site activities, provide an emissions management plan and to undertake any mitigation recommended as part of that report, once agreed in writing with the Environment Agency.

There are two sensitive receptors within 100m of the Installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 28 metres to the west of the installation boundary.

Guidance on our website concludes that applicants need to produce and submit a dust and bio aerosol risk assessment with their applications only if there are relevant receptors within 100 metres of their farm, e.g. the farmhouse or farm worker's houses. Details can be found via the link below:

www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols.

As there are receptors within 100m of the Installation, the Applicant was required to submit a dust and bio aerosol risk assessment in this format. The dust and bio aerosol risk assessment which has been prepared as required in chapter 3, section 3.2 of EPR 6.09 Sector Guidance Note, How to comply with your environmental permit for intensive farming, Version 2, published January 2010 (EPR 6.09 SGN).

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

- Feed delivery and storage;
- Litter management on site;
- Ventilation system;
- Carcass disposal;
- House clean out operations and stocking; and
- Manure management.

In the guidance mentioned above it states that particulate concentrations fall off rapidly with distance from the emitting source. This fact, together with the proposed good management of the Installation such as keeping areas clean from build-up of dust, and other measures in place to reduce dust and risk of spillages (e.g. litter and feed management/delivery procedures) all reduce the potential for emissions impacting the nearest receptors.

The Applicant has confirmed the following measures in their operating techniques to reduce dust: sealed feed delivery system; regular daily checks of condition of feed bins and feed pipes; use of enclosed feed silos; feed delivered via cross auger and drops fully into internal hoppers; no storage of used litter outside; no use of extraction (ventilation) during unloading of bedding; use of catching curtains during unloading of bedding to poultry houses; the use of high velocity roof exhaust fans and maintenance of exhaust vents.

Conclusion

We are satisfied that the measures outlined in the Application will minimise the potential for dust and bio aerosol emissions from the Installation.

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/Engagement	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> • Director of Public Health; • Public Health England; • Local Authority Environmental Health; and • Health and Safety Executive <p>The comments and our responses are summarised in the consultation section.</p>
The site	
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. The plan is included in the permit.</p> <p>The extent of the site has not changed as a result of this variation application. The new site plan submitted with the applications shows the changes proposed to poultry houses and drainage on site.</p> <p>This variation authorises the following changes</p> <ul style="list-style-type: none"> • The addition of 2 heat exchangers to house number 3 and 8; and • The replacement of 11 old houses with 3 new houses. <p>Additionally, we have corrected the original site plan which excludes house 21 from the permit boundary while permitted point source emissions to air from this house in accordance with table S4.1 of the original permit.</p> <p>The new site plan regularises the permit boundary and includes house 1 (previously house 21) to reflect existing operations in schedule 7 of this notice as a result of this variation.</p>

Aspect considered	Decision
<p>Biodiversity, heritage, landscape and nature conservation</p>	<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>The comments and our responses are summarised in the key issues.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p>
<p>Environmental risk assessment</p>	
<p>Environmental risk</p>	<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>Operating techniques</p>	
<p>General operating techniques</p>	<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 following operating techniques will be implemented for the new houses introduced as part of this variation application:</p> <ul style="list-style-type: none"> • forced ventilation with high velocity roof fans and additional gable end fans in the poultry houses numbered 4, 5 and 8; • solid floors; • nipple drinkers with drip cups to maintain dry litter conditions; • drainage provided by soakaways; and • in addition to these, two new heat exchangers will be installed on old houses numbered 2 and 3. <p>The comments and our responses are summarised in the key issues.</p>
<p>Odour management</p>	<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> <p>The comments and our responses are summarised in the key issues.</p>

Aspect considered	Decision
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> <p>The comments and our responses are summarised in the key issues.</p>
Permit conditions	
Pre-operational conditions	<p>Based on the information in the application, we consider that we need to impose pre-operational conditions.</p> <p>We have imposed pre-operational measures for future development (PO1) in table S1.4 as referenced in permit condition 2.5.1 to enable the operator to continue operating the installation in accordance with the existing stock numbers of 464,711 prior to increase in numbers to 534,707 on completion of three new poultry houses and implementation of Best Available Techniques as proposed and assessed as a result of this variation application.</p>
Emission limits	<p>No emission limits have been added, amended or deleted as a result of this variation.</p> <p>Emission points specified in table S3.1 have been amended in accordance with new site layout plan.</p>
Monitoring	Monitoring has not changed as a result of this variation.
Operator competence	
Management system	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.
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 grant 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>

Aspect considered	Decision
	<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 not received from
Director of Public Health

Response not received from
Public Health England

Response not received from
Health and Safety Executive

Response received from
Local Authority Environmental Protection on 15/06/2017
Brief summary of issues raised
The consultee has had no objections or comments on the grounds of Environmental Protection, providing the development proceeds in line with the application details. Their comments are based on the fact that the business is operated within the provisions of the Environment Agency permit system.
Summary of actions taken or show how this has been covered
Not action is taken.