

# Permitting decisions

## Variation

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We have decided to grant the variation for Vine Farm Poultry Unit operated by A.E. & W.A. Farr Limited.

The variation number is EPR/GP3630VQ/V002.

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

### Odour

This variation is to add two new poultry sheds and to increase the permitted capacity of broiler places from 336,000 to 442,000. These changes have the potential to increase odour emissions from the site.

Vine Farm Poultry Unit was first issued an environmental permit on 19/08/15. Since being permitted the site activities have led to substantiated odour complaints, which are predominantly from the nearby village of Astwick, which is located approximately 450m from the permit boundary. The [consultation responses](#) section of this decision document shows comments from members of the public with regards to this variation application and the existing activities. All respondents to the consultation identified odour as a concern.

The operator has provided an Odour Management Plan (OMP) (reference: High Risk Odour Management Plan Vine Farm, dated: 31/08/18) with this variation application. Within the OMP, the operator has identified that a high moisture content of the litter within the sheds is the leading cause of odour. The OMP also identifies that the odour complaints have coincided with periods of depopulating the poultry houses and periods of cleaning out the litter at the end of each cycle. This cause of odour has been verified by the Environment Agency.

The operator has updated their OMP with the aim to address the existing odour issues. The main improvements to the OMP include:

- Twice daily olfactory monitoring checks are to be carried out at 12 locations, including near the village of Astwick. The operator has provided a monitoring procedure (reference: Odour Monitoring Procedure at Vine Farm, dated: 31/08/18) which details the approach. The operator will record the location, if odour is

detected, the severity (scored 0 - 5), the duration (intermittent or continuous), ambient temperature, wind strength and wind direction. The detection of odour will result in the use of contingency measures stated in the OMP.

- The operator will apply Cyclex, which is a disinfectant, to the poultry houses twice per year to control any potential oocysts which are responsible for coccidiosis. Coccidiosis can lead to excessive levels of moisture within the litter, so this additional measure by the operator should result in a reduction to the moisture content of the litter, and therefore those odours which have previously been associated with the site.
- The moisture level of the litter within the sheds will be monitored daily, and if the reading exceeds 40%, or if a low continuous odour is detected from the litter, then new bedding will be added immediately to maintain dry friable litter. This will occur at any stage of the cycle, and will result in a reduction of litter moisture content and associated odour issues. Hourly monitoring of odour will occur after new bedding is added to ensure the odour levels have dropped. These additional measures should again lead to a reduction of the moisture content of the litter and those odours which have previously been associated with the site.
- Previously the use of gable end fans during destocking had been identified as a cause for any potential odours being concentrated towards the village of Astwick. Now during periods of destocking and litter clear out, gable end fans will not be used unless required on welfare grounds, for example during high ambient temperatures. During destocking the high velocity roof fans will also be operated at a maximum allowable level. This would help to disperse air from the sheds to a greater area, and should help to prevent concentrated odours from occurring at nearby receptors, such as the village of Astwick. The operator has further agreed to carry out smoke testing within a poultry shed during a period of depopulation to identify any further measures for fan and ventilation control which could help with the dispersion of air during depopulation.
- The operator has confirmed that they now meet the relevant requirements stated within the Poultry Industry Good Practice Checklist (Version 2, dated: August 2013). This checklist confirms that operators are using the Industry-standard Best Available Techniques for the reduction of odours from poultry production. This checklist is now forms part of the operator's OMP, so they will be required to meet the checklist as part of their permit compliance.
- In accordance with Best Available Techniques, the operator has now included a list of contingency measures within their OMP. This will require the operator to carry out further measures to address any odour issues which are identified on site.

The above measures will minimise odour levels from the poultry sheds and reduce the pathway of potential odours to the sensitive receptors. However as some of these measures have not yet been implemented, it has not yet been demonstrated that the site can operate without causing odour pollution by following the updated OMP. Therefore, the permit has included a pre-operational measure for future development requiring the operator to demonstrate an improvement in odour management before they can increase the number of broiler places on the site. This is detailed further below.

#### Pre-operational measure for future development

This variation has included a pre-operational measure for future development, referenced as PO1 within Table S1.4 of the permit. This requires the operator to implement the operational improvements (see bullet points above) detailed in the updated OMP and demonstrate that the site can operate free from odour at levels likely to cause pollution outside the site at the existed permitted level, before the operator can stock the two new poultry houses and increase the sites capacity to 442,000 places. For this pre-operational measure, the operator will be required to demonstrate over 3 whole cycles of broilers that the site can operate without odour emissions from the activities being at levels likely to cause pollution outside the site. During the period of 3 cycles the Environment Agency will attend the site during each depopulating phase to ensure that any potential odours are identified, and ensure that all measures within the OMP are followed.

The operator will then need to provide a report which includes:

- a review of the effectiveness of the Odour Management Plan over 3 whole cycles of broiler growth including depopulation periods;
- a review of the monitoring results and the effectiveness of the monitoring procedure; and,

- a summary of any additional improvements for effective odour control that were identified during the 3 cycles of broiler growth and depopulation.

Following the submission of this report, the operator will require written confirmation from the Environment Agency that the OMP and the measures within it are acceptable. If the Environment Agency agree that the operator has successfully demonstrated that their activities did not cause odour pollution over a period of 3 cycles of broiler growth, the pre-operational measure to be considered complete. If the pre-operational measure is complete, then the operator will be allowed to stock poultry houses 9 and 10 and increase the site's capacity to 442,000 places.

Improvement Condition

If the operator is able to complete the pre-operational measure for future development, and can begin to stock broilers in poultry houses 9 and 10, then in accordance with improvement condition IC2 of Table S1.3 of the permit, the operator will then have to review their OMP and Odour Monitoring Procedure to further assess their operational experience in sheds 9 and 10 specifically, and then update the OMP with specific further measures for odour control if deemed necessary.

Conclusion

We are satisfied that the operator will have to demonstrate that the site will operate without causing odour pollution prior to increasing the number of broiler places on site. Without providing satisfactory further evidence that is to be further reviewed by the Environment Agency, the operator will not be permitted to increase the number of birds, as detailed in the pre-operational measure for future development PO1 of Table S1.4 of the permit.

**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 housing within variation applications** issued after the 21<sup>st</sup> 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.

**This variation determination includes a review only of BAT compliance for new housing introduced with this variation. A BAT review of existing housing compliance with BAT conclusions document is to be the subject of a sector permit review and is beyond the scope of this variation application permit determination.**

New BAT conclusions review

There are 34 BAT conclusion measures in total within the BAT conclusion document dated 21<sup>st</sup> February 2017.

The Applicant has confirmed their compliance with all BAT conditions for the new housing, in their document reference '*Summary of Operational Activities Carried Out at the Installation*' and dated 20/12/17.

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	The Applicant has confirmed it will demonstrate it achieves levels of Nitrogen excretion below the required BAT-AEL of 0.6 kg N/animal

BAT measure	Applicant compliance measure
	<p>place/year by an estimation using manure analysis for total Nitrogen content.</p> <p>Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.</p>
BAT 4 Nutritional management Phosphorous excretion	<p>The Applicant has confirmed it will demonstrate it achieves levels of Phosphorous excretion below the required BAT-AEL of 0.25 kg P<sub>2</sub>O<sub>5</sub> animal place/year by an estimation using manure analysis for total Phosphorous content.</p> <p>Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.</p>
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	Table S3.3 of the Permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 26 Monitoring of emissions and process parameters - Odour emissions	Twice daily olfactory monitoring checks are to be carried out at 12 locations, including near the village of Astwick. The operator has provided a monitoring procedure (reference: Odour Monitoring Procedure at Vine Farm, dated: 31/08/18) which details the approach. The operator will record the location, if odour is detected, the severity (scored 0 - 5), the duration (intermittent or continuous), ambient temperature, wind strength and wind direction.
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 32 Ammonia emissions from poultry houses - Broilers	<p>The BAT-AEL to be complied with is 0.08 kg NH<sub>3</sub>/animal place/year.</p> <p>The Applicant will meet this as the emission factor for broilers is 0.034 kg NH<sub>3</sub>/animal place/year.</p> <p>The Installation does not include an air abatement treatment facility, hence the standard emission factor complies with the BAT AEL.</p>

### **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 32**

The new BAT conclusions include a set of BAT-AEL's for ammonia emissions to air from animal housing for broilers. For variations all new housing on existing farms will need to meet the BAT-AEL.

## 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 Vine Farm Poultry Unit (dated 17/02/18) 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 and although condition 3.1.3 is included in the permit no groundwater monitoring will be required.**

## Ammonia

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

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA), or Ramsar sites located within 10 kilometres of the installation. There are also no Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are 3 Local Wildlife Sites (LWS) within 2 km of the installation, but no Ancient Woodlands or Local Nature Reserves.

### 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 (CL<sub>e</sub>) or critical load (CL<sub>o</sub>) then the farm can be permitted with no further assessment.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Vine Farm Poultry Unit will only have a potential impact on the LWS sites with a precautionary critical level of 1µg/m<sup>3</sup> if they are within 693 metres of the emission source.

Beyond 693m the PC is less than 1µg/m<sup>3</sup> and therefore beyond this distance the PC is insignificant. In this case two LWSs are beyond this distance (see table below) and therefore screen out of any further assessment.

**Table 1 – LWS Assessment**

Name of SAC/SPA/Ramsar	Distance from site (m)
Hill Farm Pit CWS	1,411
Henlow Park Woods CWS	1,832

Screening using detailed modelling [Reference: *A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Existing and Proposed Broiler Chicken Rearing Houses at Vine Farm, Edworth Road, Langford in Hertfordshire*, dated: 02/11/17] 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 in Table 2.

The results in Table 2 are seen as conservative as the modelling was carried out on the assumption that there would be 442,000 broilers, whereas the application is for the lower figure of 420,000 broiler places. Additionally an ammonia critical level of 1 µg/m<sup>3</sup> has been used for the modelling, whereas due to there being no lichens or bryophytes, the higher critical level of 3 µg/m<sup>3</sup> would have been accepted.

**Table 2 - Ammonia emissions**

Site	Critical level ammonia µg/m <sup>3</sup>	Predicted PC µg/m <sup>3</sup>	PC % of critical level
Rivers lvel and Hiz CWS	1*	0.794	79.4

\* CLe 1 applied as no protected lichen or bryophytes species were found when checking Easimap layer

No further assessment is required.

## Decision checklist

Aspect considered	Decision
<b>Receipt of application</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.
<b>Consultation/Engagement</b>	
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"> <li>• Director of Public Health / Public Health England</li> <li>• Local Authority – Environmental Health</li> <li>• Health and Safety Executive</li> </ul> <p>The comments and our responses are summarised in the <a href="#">consultation section</a>.</p>
<b>The facility</b>	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility'.</p> <p>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.</p>
<b>The site</b>	
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. The plan is included in the permit.
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.
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. The decision was taken in accordance with our guidance.</p> <p>See the ammonia section of <a href="#">key issues</a> for further information.</p>

Aspect considered	Decision
<b>Environmental risk assessment</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>The applicant has not submitted an odour or noise management plan as there are no sensitive receptors for these emissions within 400m of the permit boundary. We are satisfied that the risk assessment demonstrates a low risk of these emissions.</p> <p><b>Dust and Bioaerosols</b></p> <p>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.</p> <p>There is one receptor within 100m of the permit boundary which is sensitive to bioaerosols. 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:</p> <p><a href="http://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols">www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols</a>.</p> <p>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 applicant has provided a fugitive emissions risk assessment and management plan to address the potential impacts from dust and bioaerosols.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Use of suitable bedding materials.</li> <li>• Use of pelleted feed delivered in sealed systems.</li> <li>• Litter removed carefully during cleanout minimising dust.</li> <li>• Full trailers sheeted before leaving.</li> <li>• Biomass ash stored in sealed container prior to removal off site.</li> <li>• Feed formulated to match flock requirements.</li> <li>• Litter removed off site following crop depletion, no storage on site.</li> </ul> <p><u>Conclusion</u></p> <p>We are satisfied that the measures outlined in the Application will minimise the potential for dust and bio aerosol emissions from the Installation.</p>
<b>Operating techniques</b>	
General operating	We have reviewed the techniques used by the operator and compared these with



Aspect considered	Decision
techniques	<p>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 detail that the sheds have roof mounted ventilation and nipple drinkers.</p> <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs.</p> <p>Please see <a href="#">key issues</a> for further information on the New Intensive Rearing of Poultry or Pigs BAT Conclusions document.</p>
<b>Permit conditions</b>	
Updating permit conditions during consolidation	We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permits.
Emission limits	<p>ELVs and equivalent parameters or technical measures based on BAT have been set for the following substances.</p> <ul style="list-style-type: none"> <li>• Nitrogen: 0.6 kg N/animal place/year</li> <li>• Phosphorus: 0.25 kg P<sub>2</sub>O<sub>5</sub> animal place/year</li> <li>• Ammonia: 0.08 kg NH<sub>3</sub>/animal place/year</li> </ul>
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p> <p>These monitoring requirements have been imposed in order to comply with the relevant BAT measures.</p> <p>See the key issues of the decision section of this decision document for further information. We made these decisions in accordance with BAT conclusion document dated 21st February 2017.</p>
Reporting	We have specified reporting in the permit. These reporting requirements on monitoring data and performance parameters have been imposed in order to comply with the conditions of the permit.
<b>Growth Duty</b>	
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> <p>Any unique condition, that is a condition distinct from a site specific condition needed to deliver the legislative standards need to be justified</p> <p>Provide additional text if needed, for example where specific comment on the growth duty is made by the applicant in their application.</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.

**No responses were received from organisations listed in the consultation section.**

## Representations from individual members of the public.

<b>Brief summary of issues raised</b>
<p>Responses from seven members of the public were received during the consultation period. A summary of the issues raised is provided below.</p> <p><b>Odour</b> - All respondents identified that odour was a current issue for the farm, so increasing the number of poultry houses and broilers was a common concern. Specific mentions were made to the site continuing to cause odour issues despite improvements to working practices. The odours are reported as being regular and long lasting for days. Smells were generally described as foul with a specific mention to the smell of ammonia. It was suspected that all methods of controlling emissions were not being followed. The impacts of the odour were described as having a negative impact on quality of life.</p> <p><b>Ammonia</b> - The impacts of ammonia on human health were questioned.</p> <p><b>Dust</b> - A respondent was concerned over the dust emissions increasing from the site, and the potential human health impacts. Specific reference was made to trailers not being sheeted.</p> <p><b>Traffic</b> - A reference was made to the vehicle traffic having increased significantly.</p>
<b>Summary of actions taken or show how this has been covered</b>
<p><b>Odour</b> - Please see the <a href="#">key issues</a> for details on how the odour concerns have been taken into account.</p> <p><b>Ammonia</b> - Levels of ammonia in ambient air will decrease rapidly with distance from a source. The Health Protection Agency (now Public Health England) has stated (Position Statement, Intensive Farming, 2006) that it is unlikely that ammonia emissions from a well-run and regulated farm would be sufficient to cause ill health. We conclude that ammonia will not cause a problem to human receptors from the installation, given the conditions imposed by the permit.</p> <p>The ammonia emissions from the site have been assessed for the impact on habitats, and the results screened out as having no likely significant effect. Please see <a href="#">key issues</a> for further information.</p> <p><b>Dust</b> - 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.</p> <p>There is one receptor within 100m of the permit boundary which is sensitive to bioaerosols. This has been identified as being a house for the Vine Farm Site Manager. 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:</p> <p><a href="http://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols">www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols</a></p> <p>As there is a receptor within 100m of the Installation, the Applicant was required to submit a dust and bioaerosol risk assessment in this format. The applicant has provided a fugitive emissions risk assessment and management plan (reference: Fugitive Emissions Vine Farm, received: 20/12/17) to address the potential impacts from dust and bioaerosols.</p> <p>In the guidance mentioned above it states that particulate concentrations fall off rapidly with distance from the</p>

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:

- Use of suitable bedding materials.
- Use of pelleted feed delivered in sealed systems.
- Litter removed carefully during cleanout minimising dust.
- Full trailers sheeted before leaving.
- Biomass ash stored in sealed container prior to removal off site.
- Feed formulated to match flock requirements.
- Litter removed off site following crop depletion, no storage on site.

On the issue of vehicles being covered, in accordance with the operators OMP, the site is required to keep vehicles with litter/manure covered unless when being loaded. The OMP has been incorporated into Table S1.2 of the permit, and as such the operator is required to comply with this measure to cover these vehicles. An identified failure to do so would result in a permit compliance issue for the operator.

We are satisfied that the measures outlined in the application will minimise the potential for dust and bioaerosol emissions from the Installation.

**Traffic** - The vehicle movements outside of the site boundary is not a consideration for the environmental permitting of the site. The permit is for the control of potential emissions originating from inside the permitted area. This decision has been made in accordance with our Regulatory Guidance Note No. 2 Understanding the meaning of regulated facility, which can be found on our gov.uk guidance.

<https://www.gov.uk/government/publications/rgn-2-understanding-the-meaning-of-regulated-facility>