

Permitting decisions

Bespoke permit

We have decided to grant the permit for Bullocks Hill Farm North operated by Rattlerow Farms Limited.

The permit number is EPR/JP3635JP.

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; and
- 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 sets 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 (BAT-AELs) for ammonia emissions, which will apply to the majority of permits, as well as BAT-AELs 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 were published.

New BAT Conclusions review

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

We have sent out a Schedule 5 Notice requiring the Applicant to confirm that the new installation complies in full with all the BAT conclusion measures.

The Applicant has confirmed their compliance in full with all BAT Conclusion measures for the new installation, in their documents reference “Technical Standards” dated 13/12/18 and “Drainage Review” dated 11/01/19.

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 they will demonstrate that the installation achieves levels of Nitrogen excretion below the required BAT-AEL of 13 kg N/animal place/year by an estimation using manure analysis for total Nitrogen content. Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 4 Nutritional management - Phosphorous excretion	The Applicant has confirmed they will demonstrate that the installation achieves levels of Phosphorous excretion below the required BAT-AEL of 5.4 kg P ₂ O ₅ animal place/year by an estimation using manure analysis for total Phosphorous content. Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with this BAT Conclusion.
BAT 24 Monitoring of emissions and process parameters	Table S3.3 concerning process monitoring requires the Operator to undertake relevant monitoring that complies with this BAT Conclusion.

BAT measure	Applicant compliance measure
<ul style="list-style-type: none"> - Total nitrogen and phosphorous excretion 	
BAT 25 Monitoring of emissions and process parameters <ul style="list-style-type: none"> - Ammonia emissions 	Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with this BAT Conclusion.
BAT 26 Monitoring of emissions and process parameters <ul style="list-style-type: none"> - Odour emissions 	The approved Odour Management Plan (OMP) Version 1 includes the following details for on farm monitoring and continual improvement: <ul style="list-style-type: none"> - All pens and stock checked for cleanliness as part of daily welfare routines. - Daily checks to detect water leaks to avoid wet bedding and pooling of urine or dung, leading to increased odour emissions. - The Farm Manager will be responsible for ensuring staff perform checks for possible odour within and beyond the site boundary. - The wind direction is observed before potentially odourous activities are carried out. Manure will not be collected when the wind direction is from the north-east, as this will significantly increase the risk of odour exposure to the nearest sensitive receptors.
BAT 27 Monitoring of emissions and process parameters <ul style="list-style-type: none"> - Dust emissions 	Table S3.3 concerning process monitoring requires the Operator to undertake relevant monitoring that complies with this BAT Conclusion. The Applicant has confirmed they will report the dust emissions to the Environment Agency annually by multiplying the dust emissions factor for pigs by the number of pigs on site.
BAT 30 Ammonia emissions from pig houses	The Applicant has confirmed they will demonstrate that the installation achieves levels of ammonia below the required BAT-AEL for the following pig types: Pigs > 30kg: 2.6 kg NH ₃ /animal place/year. The installation does not include an air abatement treatment facility, hence the standard emission factor complies with the BAT AEL.

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.

BAT conclusion 30

The new BAT Conclusions include a set of BAT-AELs for ammonia emissions to air from animal housing for pigs.

'New plant' is defined as plant first permitted at the site of the farm following the publication of the BAT Conclusions.

All new bespoke applications issued after the 21st February 2017, 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 Bullocks Hill Farm North (dated March 2019) 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.**

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 found at (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."

Nearby dwellings not considered as sensitive receptors in terms of odour

The three closest dwellings: Herons Mill, Cuckoo Barn and Bullocks Hill Farm, situated on Rattlerow Hill road, are immediately to the West of the site boundary are housing for Operators and farm workers for the installation. As the Operators and farm workers are involved with the installation, there is deemed to be little risk of odour being an amenity issue and they are therefore not considered to be sensitive receptors in terms of odour.

There are two dwellings: 1 and 2 Hunstead, which are approximately 335 metres to the South East of the permit boundary. However, as above, these are also dwellings for farm workers, so are not considered sensitive receptors in terms of odour.

Sensitive receptors for odour

After the aforementioned properties have been discounted as sensitive receptors for odour there are four sensitive receptors to odour within 400 metres of the installation boundary. These are a cluster of houses to the South West of the installation boundary: Hill, Willow and Barbers Cottages. The closest parts of these property boundaries are approximately 270 metres from the installation boundary, and Mayhews Corner Farm House, whose boundary is approximately 330 metres from the installation.

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.

It is noted that the installation has not received any complaints regarding odour to date.

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

- Manufacture and selection of feed
- Feed delivery and storage
- Ventilation systems
- Poor quality or wet straw bedding
- Spillage from drinking systems
- Manure storage
- Dirty water storage
- Storage of dead stock
- Pig house clean-out

In the Operator's Odour management plan they have proposed to install a physical floating cover for the dirty water lagoon as a contingency measure if odour is found to be a problem, or to install an underground dirty water tank to reduce odour. This can only be done after the construction of the sixth pig house, which has not yet commenced at time of permit issue.

We have assessed the OMP and the H1 risk assessment for odour 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 four sensitive receptors within 400 metres of the installation boundary as stated in the odour section above. The Operator has provided an NMP as part of the application supporting documentation, and further details are provided below.

The risk assessment for the installation provided with the application lists key potential risks of noise pollution beyond the installation boundary. These activities and potential sources of noise are as follows:

- Large vehicles travelling to and from the site
- Small vehicles travelling to and from the site
- Feeding equipment: blowing of feed from lorry to silos and augering of feed from silos to pig houses

- Employees, contractors and visitors
- Animal noise
- Repair and maintenance works

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 Bioaerosols

The use of Best Available Techniques (BAT) 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 3 sensitive receptors within 100m of the installation boundary. The nearest sensitive receptors (the nearest point of their assumed property boundary) immediately borders the installation boundary on the West side: Herons Mill and Cuckoo Farm are homes for employees working on the farm.

The Applicant has provided a dust and bioaerosol risk assessment.

In addition, guidance on our website concludes that Applicants need to produce and submit a dust and bioaerosol management plan beyond the requirement of the initial 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 bioaerosol management in this format.

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, as detailed below, all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed the following measures in their operating techniques to reduce dust:

- Delivery of feed in sealed systems
- Storage of feed in enclosed silos
- Collection of any feed spill is undertaken as soon as possible
- Monitored deliveries to reduce dust and spills
- Clearing up dust deposits near vents frequently
- Pig houses washed out with disinfectant after being depopulated

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

Dirty Water Lagoon

The farm operates a straw based solid floor system. The lagoon is situated within the permit boundary on the Northern edge of the site and will hold dirty water effluent only, derived from Pig House wash-out activities. Because the dirty water will consist of over 1% of solid manure this is officially classed as a slurry according to our guidance. The Operator has provided impermeability testing for the soil adjacent to the lagoon, confirming that it meets the standard set out in the regulations for Storing silage, slurry and agricultural fuel oil (available at the following link: <https://www.gov.uk/guidance/storing-silage-slurry-and-agricultural-fuel-oil>). Laboratory analysis

and testing was carried out by A F Howland Associates to British Standard BS EN 1997-2:2007. The results were provided within their report entitled: "A report on a ground investigation at Bullocks Hill Farm, Stradbroke, IP21 5NA", dated 28th February 2019. The report confirms that the clay soil is over one metre thick and is of suitable impermeability. We are satisfied that the soil is of a suitable impermeability to eliminate the risk of pollution to groundwater. Manure from cleaning out the Pig Houses is stored at the North side of the permit boundary, on an impermeable surface, with any run-off draining to the dirty water lagoon. Here it awaits export off-site, for use as fuel in a biogas plant or for land-spreading.

Ammonia

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsars within 5km of the installation. There is one Site of Special Scientific Interest (SSSI) located within 5km of the installation, and six other nature conservation sites within 2km comprising of five Local Wildlife Sites (LWS) and two Ancient Woodlands (AW).

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 (CLe) or critical load (CLo) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required. An 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 Bullocks Hill Farm North will only have a potential impact on an SSSI with a precautionary CLe of 1µg/m³ if it is within 3,341 metres of the emission source.

Beyond 3,341m the PC is less than 0.2µg/m³ (i.e. less than 20% of the precautionary 1µg/m³ CLe) and therefore beyond this distance the PC is insignificant. In this case the SSSI is beyond this distance (see Table 1 below) and therefore screen out of any further assessment.

Where the precautionary level of 1µg/m³ is used and the PC is assessed to be less than 20%, the site automatically screens out as insignificant and no further assessment of CLo is necessary. In this case the 1µg/m³ 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 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
Chippenhall Green SSSI	4,862

Ammonia assessment - LWS/AW

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 Bullocks Hill Farm North will only have a potential impact on the LWS and AW sites with a precautionary CLe of 1µg/m³ if they are within 1,395 metres of the emission source.

Beyond 1,395m the PC is less than 1µg/m³ and therefore beyond this distance the PC is insignificant. In this case the following LWS and AW sites are beyond this distance (see Table 2 below) and therefore screen out of any further assessment.

Table 2 – LWS / AW Assessment

Name of LWS / AW	Distance from site (m)
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Grove Wood LWS	2,017
The Slades LWS	1,828
The Slades AW	1,829

Screening using the ammonia screening tool version 4.5 has determined that the PC on the LWS and AW for ammonia emissions from the application site are under the 100% significance threshold and can be screened out as having no likely significant effect. See Tables 3, 4 and 5 below.

Table 3 - Ammonia emissions

Site	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$	PC % of critical level
Stradbroke Cemetery LWS	3*	1.302	43.4
Stradbroke Meadow LWS	3*	1.206	40.2
Wingfield Priory Meadow LWS	3*	1.038	34.6

*CLE 3 applied as no protected lichen or bryophytes species were found when checking Magic map.

Table 4 – Nitrogen deposition

Site	Critical load kg N/ha/yr	Predicted PC kg N/ha/yr	PC % of critical load
Stradbroke Cemetery LWS	10*	6.762	67.6
Stradbroke Meadow LWS	10*	6.266	62.7
Wingfield Priory Meadow LWS	10*	5.392	53.9

*Critical load values taken from APIS website (www.apis.ac.uk) – 03/12/2018

Table 5 – Acid deposition

Site	Critical load keq/ha/yr	Predicted PC keq/ha/yr	PC % of critical load
Stradbroke Cemetery LWS	2.068*	0.483	23.4
Stradbroke Meadow LWS	2.068*	0.448	21.7
Wingfield Priory Meadow LWS	2.068*	0.385	18.6

*Critical load values taken from APIS website (www.apis.ac.uk) – 03/12/2018

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.
Consultation	
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 Planning Authority, Babergh Mid Suffolk • Local Authority Environmental Health • Health and Safety Executive <p>The comments and our responses are summarised in the consultation section.</p>
Operator	
Control of the facility	We are satisfied that the Applicant (now the Operator) is the person who will have control over the operation 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	<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>
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.
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>

Aspect considered	Decision
	<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>Please see ammonia assessment of key issues for further information.</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. The Operator has confirmed that:</p> <ul style="list-style-type: none"> • They will be able to meet all requirements of the new Best Available Techniques (BAT) Reference Document (BREF) for the Intensive Rearing of poultry or pigs (IRPP) which was published on the 21st February 2017 • All housing will be constructed to BAT • Package drinkers will be installed to prevent spillage
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> <p>Please see odour section of key issues for further information.</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> <p>Please see noise section of key issues for further information.</p>
Permit conditions	
Use of conditions other than those from the template	<p>Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.</p>
Emission limits	<p>Emission Limit Values (ELVs) or equivalent parameters have been set for the following substances in accordance with relevant BAT:</p> <ul style="list-style-type: none"> • Nitrogen • Phosphorus • Ammonia
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>

Aspect considered	Decision
Reporting	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. We made these decisions in accordance with the relevant BAT measures.
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>
Relevant convictions	<p>The Case Management System has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The Operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	There is no known reason to consider that the operator will not be financially able 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 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
Public Health England, dated 23/10/2018
Brief summary of issues raised
<p>The main emissions of potential public health significance are emissions to air of bioaerosols, dust including particulate matter and ammonia. The applicant proposes controls such that residual impacts should not be significant to public health.</p> <p>An accident management plan has not been provided with the application and the regulator should be satisfied that the applicant has a robust accident management plan in place before any permit is granted.</p>
Summary of actions taken or show how this has been covered
<p>Please see dust, bioaerosols and ammonia sections of key issues for further information.</p> <p>We have reviewed the Operator's Accident Risk Assessment within their Environmental Risk Assessment, document reference B3.5-6a, provided with their application.</p> <p>We have received confirmation from the Operator that the site has an Accident Management Plan.</p>

Response received from
Suffolk County Council Public Health, dated 25/10/2018
Brief summary of issues raised
As per Public Health response above.
Summary of actions taken or show how this has been covered
As above.

Response received from
Local Planning Authority, Babergh Mid Suffolk, dated 10/10/2018
Brief summary of issues raised
No issues raised.
Summary of actions taken or show how this has been covered
N/A

Response received from
Local Authority, Babergh Mid Suffolk, Environmental Protection, dated 08/10/2018
Brief summary of issues raised
No issues raised.
Summary of actions taken or show how this has been covered
N/A