

# **Permitting decisions**

# Variation

We have decided to grant the variation for Methwold Airfield Poultry Unit operated by Annyalla Chicks (UK) Broiler Breeders Limited.

The variation number is EPR/UP3209PN/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 <u>decision checklist</u> to show how all relevant factors have been taken into account
- summarises the engagement carried out because this is a site of high public interest
- 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

## 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 phosphorus excretion.

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

This installation was first permitted in 2018 and therefore all existing housing was considered as new when first permitted and this determination includes a review only of BAT compliance for new plant introduced with this variation. In addition a change in livestock from broilers to broiler breeders has resulted in a change in some of the BAT requirements, which have been addressed below.

#### New BAT conclusions review

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

The following is a more specific review of the change in measures affected by this variation, and the key BAT measures which remain unchanged.

BAT measure	Applicant compliance measure
BAT 3 - Nutritional management Nitrogen excretion	There is no applicable nitrogen excretion BAT-AEL for broiler breeders.
BAT 4 Nutritional management Phosphorus excretion	There is no applicable phosphorus excretion BAT-AEL for broiler breeders.
BAT 24 Monitoring of emissions and process parameters - Total nitrogen and phosphorus excretion	This BAT requirement no longer applies as there are no applicable BAT AEL's for nitrogen and phosphorus for broiler breeders.
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. This remains unchanged by this variation.
BAT 27 Monitoring of emissions and process parameters -Dust emissions	<ul><li>Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions.</li><li>The Applicant will report the dust emissions to the Environment Agency annually by multiplying the dust emissions factor for broiler breeders by the number of birds on site.</li><li>This remains unchanged by this variation.</li></ul>

BAT measure	Applicant compliance measure
BAT 31 Ammonia emissions	There is no ammonia BAT-AEL to be complied with for broiler breeder laying hens.
from poultry houses	The Installation includes an air abatement treatment facility, hence the housing complies
-Laying hens	with the narrative BAT under BAT 31 b 0.

#### 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. The BAT Conclusions document does not have a BAT AEL for broiler breeder laying hens and therefore an ammonia emission limit value has not been included within the permit.

## Industrial Emissions Directive (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.

Two documents were submitted with the application, the original site condition report (SCR) with changes, and an SCR part 1 – 3 for the additional land for Methwold Airfield Poultry Unit (referenced MA 002 and MA 002.1 respectively, received as part of the application duly made on 16/10/19) 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 (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 there are sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) 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. However there are no sensitive receptors within 400m, but a dwelling for the poultry farm manager is in the process of being constructed, at a distance of approximately 70m from the eastern perimeter boundary of the installation therefore the applicant has submitted an OMP. As the dwelling is to be occupied by the farm manager, it is unlikely to be the source of any odour complaints, and as such we wouldn't ordinarily require an OMP, however we have assessed the submission as detailed in the OMP review section below.

The odour risk assessment for the Installation provided with the Application refers to the OMP submitted with the application which details the potential risks of odour pollution beyond the Installation boundary and control measures in place, as detailed below. In addition it states that continuous ventilation incorporating wet acid scrubbing on all 6 houses will have a very significant impact in reducing the potential for odour in the air vented from the stocked housing.

#### Odour Management Plan review

The Installation is not located within 400m of sensitive receptors, however the applicant has submitted one because a manager's house is being constructed as detailed above. In line with our guidance properties associated with the farm are excluded from our assessment, however we have assessed the OMP as it is referenced in the odour section of the applicant's risk assessment.

The OMP has been assessed against the requirements of 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 (version 2), Appendix 4 guidance 'Odour Management at Intensive Livestock Installations' and our Top Tips Guidance and Poultry Industry Good Practice Checklist (August 2013) as well as the site specific circumstances at the Installation. We consider that the OMP is acceptable.

The Operator is required to manage activities at the Installation in accordance with condition 3.3.1 of the Permit and its OMP. The OMP includes odour control measures, in particular, procedural controls for the manufacture and selection of feed, feed delivery and storage, ventilation techniques, egg handling, litter selection, conditions and management, carcass storage and disposal, fluctuations in stocking densities, management of drinking water systems, destocking of houses, house clean out operations, dirty water management, and the diesel generator. It includes contingency measures to minimise odour pollution during abnormal operations including poor quality feed, failure of pipes during feed delivery, failure of ventilation, failure of egg handling system, failure of drinker system, bird sickness, overstocking due to failure of collection process, failure of carcass disposal storage and removal, failure of clean out operations and malfunction of the diesel generator.

The OMP provides a complaints form template to be used in the event that complaints are made to the Operator. The OMP also states that it will be reviewed every 4 years or following any substantiated complaint, and any actions that are implemented in relation to the resolution of complaints will be included in an updated OMP.

The Environment Agency has reviewed the OMP and consider it complies with the requirements of our H4 Odour management guidance note. We agree with the scope and suitability of key measures but this should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and sufficient. That remains the responsibility of the Operator.

Although there is the potential for odour pollution from the Installation, the Operator's compliance with its OMP and permit conditions will minimise the risk of odour pollution beyond the Installation boundary. The risk of odour pollution at sensitive receptors beyond the Installation boundary is therefore not considered significant.

#### **Conclusion**

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 (NMP), to prevent or where that is not practicable to minimise the noise and vibration.

The Installation is not located within 400m of sensitive receptors, however the applicant has submitted one because a manager's house is being constructed as detailed above. In line with our guidance properties associated with the farm are excluded from our assessment, however we have assessed the NMP as it is referenced in the noise section of the applicant's risk assessment.

The noise risk assessment for the Installation provided with the Application refers to the NMP submitted with the application which details the potential risks of noise pollution beyond the Installation boundary, and control measures in place, as detailed below.

#### Noise Management Plan Review

A noise management plan (NMP) has been provided by the operator as part of the application supporting documentation.

Operations with the most potential to cause noise nuisance have been assessed and control measures put in place for vehicles travelling to and from the site, vehicle activities on site, stocking and destocking of poultry houses, egg handling, feed transfers, ventilation operations, personnel, bird noise, clean out operations, cleaning of equipment and standby generator testing and operation.

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

The NMP states it will be reviewed following any complaint that has been substantiated by the Environment Agency or every four years, whichever is sooner.

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

#### **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 Bioaerosols**

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 Guidance on our website concludes that applicants need to produce and submit a dust and bioaerosol management plan 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-dustand-bioaerosols.

As there is a receptor within 100m of the Installation, the manger's house being constructed approximately 70m to the east of the installation boundary, the Applicant was required to submit a dust and bioaerosol risk assessment 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 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 measures in their operating techniques to reduce dust (which will inherently reduce bioaerosols) from the following sources:

- Feed manufacture and selection
- Feed deliverer and storage
- Feeding systems
- Bird types, numbers and growing cycles
- Ventilation techniques
- Litter conditions, material and management
- Bird destocking
- Litter removal
- House cleaning operations

Continuous ventilation incorporating wet acid scrubbing on all 6 houses will have a significant impact in reducing the potential for dust particles in the air vented from the poultry houses.

#### **Conclusion**

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

# Ammonia

There is one Special Area of Conservation (SAC), one Special Conservation Area (SPA) and four Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There is also one Local Wildlife Site(s) (LWS) within 2 km of the installation.

The applicant has claimed that the acid scrubber units will reduce the emissions of ammonia (NH<sub>3</sub>) to 2ppm, which equates to a reduction of 88.5% of ammonia emissions. However, test data is not available for the proposed units for broiler breeder housing therefore they provided evidence in the form of document referenced MA 014.7 Air Scrubbing Techniques for Ammonia and Odour Reduction at Livestock Operations (Melse and

Ogink) submitted 28/04/20 as part of the response to a 2nd Schedule 5 Notice. In this report it states in table 4, footnote [i] that the average NH<sub>3</sub> removal measured for broiler breeders ranged from 78% to 88%.

Assuming the lower reduction of 78% for all houses for the broiler breeder layer hens, then the annual emissions of NH<sub>3</sub> from the installation is calculated to reduce the total annual NH<sub>3</sub> emissions from 10,200 kg NH<sub>3</sub>/year, calculated from the originally permitted 300,000 broiler chickens with the unabated broiler housing, to 3,695 kg NH<sub>3</sub>/year for 80,000 broiler breeder layer hens with full scrubber abatement. This is a 63% reduction. Given the same emission conditions (stack heights and diameters, exhaust velocities and temperatures) the Process Contribution (PC) will reduce by the same proportion. If two of the houses are unmitigated the reduction will be 21%. If 3 or more of the scrubbers were not in use, the emissions would be greater than that for the 300,000 broilers therefore further mitigation would be required. See below for more detailed calculations:

#### **Original permit**

Livestock type	Livestock number	Emission factor NH3/animal place/year	Total annual kg NH3
Broilers	300,000	0.034	10,200
			Total 10,200

#### Fully abated housing (6 wet acid scrubbers in use)

Livestock type	Livestock number	Emission factor NH3/animal place/year	Total annual kg NH3
Broiler breeders	80,000	0.0462	3,696
			Total 3,696

#### Partially abated housing (2 out of the 6 wet acid scrubbers not in use)

Livestock type	Livestock number	Emission factor NH3/animal place/year	Total annual kg NH3
Broiler breeders	53,333	0.0462	2,464
Broiler breeders	26,667	0.21	5,600
			Total 8,064

When 3 or more acid scrubbers are not in use, this will result in the total annual  $NH_3$  emissions exceeding 10,200 kg  $NH_3$ /year.

#### **Conclusion**

The installation will be operated based on 6 scrubbers being in use resulting in a 63% ammonia reduction compared to that originally permitted, under normal circumstances. At the start of each new poultry cycle the Operator has confirmed that 6 scrubbers will be operational as a minimum. If one or two scrubbers are not in use, emissions will remain below the levels originally permitted. Contingency measures are in place should one or more scrubber fail during the cycle, to ensure that average annual emissions will remain below the originally permitted levels.

No further assessment is required.

# **Decision checklist**

Aspect considered	Decision		
Receipt of application			
Confidential information	A claim for commercial or industrial confidentiality has not been made.		
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.		
	The decision was taken in accordance with our guidance on confidentiality.		
Consultation/Engagement			
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.		
	The application was publicised on the GOV.UK website.		
	We consulted the following organisations:		
	King's Lynn & West Norfolk Borough Council Environmental Health		
	King's Lynn & West Norfolk Borough Council Planning Authority		
	Health and Safety Executive		
	Public Health England		
	Norfolk County Council Director of Public Health		
	The comments and our responses are summarised in the consultation section.		
The facility			
The regulated facility	We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility'.		
	The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.		
The site			
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. The plan is included in the permit.		
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	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.		
conservation	We have not completed a detailed assessment of 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		

Aspect considered	Decision
	as part of the permitting process, as the ammonia emissions have reduced as a result of the changes brought about by the variation.
	See Ammonia section in the Key Issues above for more details.
	We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.
Environmental risk assess	nent
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility.
	The operator's risk assessment is satisfactory.
Operating techniques	
General operating techniques	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 operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.
	The key revised operating techniques are as follows:
	<ul> <li>change from broiler operation to broiler breeder layer operation, with associated nesting and egg collection facilities</li> </ul>
	• wet acid scrubber units used as ammonia abatement on each of the 6 houses
	<ul> <li>high velocity roof fans and gable end fans to be used only as a contingency if one or more acid scrubber is not in use, or for temperature control during times of extreme hot weather</li> </ul>
	<ul> <li>sulphuric acid tanks within each wet acid scrubber unit will be compliant with CIRIA C736 guidance and the tanks will be bunded with at least 110% capacity of the tank volume.</li> </ul>
	The proposed techniques for priorities for control are in line with the Intensive Farming Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility.
Odour management	We have reviewed the odour management plan in accordance with our guidance on odour management.
	We consider that the odour management plan is satisfactory.
Noise management	We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.
	We consider that the noise management plan is satisfactory.
Permit conditions	
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 permit.
Pre-operational conditions	Based on the information in the application, we consider that we need to impose

Aspect considered	Decision
	pre-operational conditions.
	We have included pre-operational condition PO1 in table S1.4 of the permit, requiring the operator to submit their monitoring programme for approval prior to the installation of monitoring equipment, and prior to broiler breeder operations commencing.
Improvement programme	Based on the information on the application, we consider that we need to impose an improvement programme.
	We have included improvement condition IC1 in table S1.3 of the permit to undertake and report a review of monitoring results and implement alternative mitigation proposals if the acid scrubber abatement does not achieve the required reduction in ammonia emissions.
Emission limits	We have decided that emission limits are required in the permit. BAT AELs have been added in line with the Intensive Farming sector BAT conclusions document dated 21/02/17. These limits are included in permit table S3.3.
Monitoring	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.
	These monitoring requirements have been imposed in order to ensure compliance with Intensive Farming BAT conclusions document dated 21/02/17.
Reporting	We have specified reporting in the permit.
	We made these decisions in order to ensure compliance with Intensive Farming BAT conclusions document dated 21/02/17.
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	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.
	Paragraph 1.3 of the guidance says:
	"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."
	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.

Aspect considered	Decision
	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.

# 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**

West Norfolk Council - King's Lynn and West Norfolk's Community Safety & Neighbourhood Nuisance Team (received 25/11/19)

#### Brief summary of issues raised

The response summarises the application and concludes that supporting documents should be complied with. It concludes that they have no objection to the granting of a permit/variation as the operator can demonstrate that they should be able to carry out the activity without significant risk to the environment or human health.

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

The supporting documents (as stipulated above) are included in the operating techniques table in the permit. No action required.

#### **Response received from**

Public Health Enghland (received 25/11/19)

#### Brief summary of issues raised

The response summarises the application and states that the main emissions of potential public health significance are emissions to air of bioaerosols, dust including particulate matter and ammonia, however the applicant's assessment has shown that there is insignificant risk to the local population from the proposed process. There are no residential receptors within 400 metres of the installation, with the exception of the property planned for construction which will be occupied by the farm manager. This will be approximately 70 metres from the installation boundary, necessitating development and implementation of a dust and bioaerosols management plan. It goes on to detail the current information regarding consideration of bioaerosols.

It concludes that it is assumed by PHE that the installation will comply in all respects with the requirements of the permit, including the application of Best Available Techniques (BAT). This should ensure that emissions present a low risk to human health.

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

We are satisfied that the measures outlined in the application will minimise the potential for ammonia and dust emissions (which will inherently minimise bioaerosols and particulate matter emissions) to impact public health outside the boundary of the site, and we are satisfied with the risk assessments and management plans in place.

No action required.

#### Response received from

Borough Council of King's Lynn and West Norfolk, Environment and Planning Team (received 26/11/19)

#### Brief summary of issues raised

The response summarises the application and includes the following:

'We note that there are no private residential properties within 400m of the poultry farm although a farm bungalow, to provide accommodation for the farm manager, is being constructed approximately 70m from the installation boundary. We conducted a screening assessment calculation in line with LAQM TG16, to establish the relevant percentile contribution to the daily mean PM10 concentration at the bungalow from the poultry farm. The calculated total 90.4<sup>th</sup> percentile daily mean PM10 concentration of 22.05µg/m3 is well below the 24-hour mean PM10 objective limit value of 50µg/m3 for England. Therefore we can conclude that there is no significant risk of exceeding the 24-hour mean PM10 objective at the bungalow as a consequence of PM10 emissions from the poultry farm'.

It concludes that they have no objection to the granting of a permit/variation as the operator can demonstrate that they should be able to carry out the activity without significant risk to the environment or human health.

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

No action required.

The Health and Safety Executive and the Director of Public Health were also consulted, with a deadline for responses of 27/11/19, but no responses were received.

In addition, the application was publicised on the www.gov.uk website, with a deadline for comments of 27/11/19, but no comments were received.