

# Permitting decisions

## Bespoke permit

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We have decided to grant the permit for Ermine Street Farm Poultry Unit operated by JCC Farms Limited.

The permit number is EPR/LP3302SD.

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. The decision checklist summarises the decision making process to show how all relevant factors have been taken in to account. 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 Best Available Techniques (BAT) Reference Document for the Intensive Rearing of Poultry or Pigs was published on the 21 February 2017. There is a separate BAT Conclusions document which sets out the standards that permitted farms have to meet. All new installation farming permits issued after 21 February 2017 must be compliant in full with the BAT Conclusions from the first day of operation. 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>

The BAT Conclusions include BAT Associated Emission Levels (BAT-AELs) for ammonia which apply to the majority of permits as well as BAT-AELs for nitrogen and phosphorous excretion. All new bespoke applications issued after the 21 February 2017 need to meet BAT-AELs. For some types of rearing practices stricter standards apply to farms and housing permitted after the new BAT Conclusions are published. There are 34 BAT Conclusion measures in total within the BAT Conclusions document.

A BAT-AEL provides us with a performance benchmark to determine whether an activity is BAT. The new BAT Conclusions include a set of BAT-AELs for ammonia emissions to air from animal housing for broilers and therefore an ammonia emission limit value has been included within the permit. The Applicant has confirmed that their installation at Ermine Street Farm will be able to comply in full and meet all the new relevant BAT Conclusion measures along with the new BAT AEL's.

**BAT 3 and 4:** - a nutritional strategy will be employed to reduce levels of nitrogen (N) and phosphorus (P) excretion. Feed dockets and a statement can be provided to demonstrate a decreasing protein (N) and phosphorus (P or total P) diet over the cycle.

**BAT 24:** - will be verified by manure analysis to estimate total N and P content and will be reported annually.

**BAT 25:** - monitor ammonia emissions and demonstrate emission levels through use of emission factors and will be reported annually.

**BAT 27:** - monitor and demonstrate dust emissions from each animal house by use of emission factors and will be reported annually.

**BAT 32:** - ventilation techniques employed to reduce ammonia emissions to air from each house.

<b>BAT measure</b>	<b>Applicant compliance measure - Broilers</b>
BAT 3 Nutritional management - Nitrogen excretion	BAT-AEL is 0.2 to 0.6kg N/animal place/yr
BAT 4 Nutritional management - Phosphorous excretion	BAT-AEL is 0.05 to 0.25kg P/animal place/yr
BAT 24 Monitoring of emissions and process parameters - Total nitrogen and phosphorous excretion	Table S3.3: Process monitoring. This table requires the applicant to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 25 Monitoring of emissions and process parameters - Ammonia emissions	
BAT 27 Monitoring of emissions and process parameters - Dust emissions	
BAT 32 Techniques to reduce ammonia emissions to air from each broiler house	BAT-AEL is 0.01 to 0.08kg NH <sub>3</sub> /animal place/yr

## Groundwater and Soil Monitoring

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

As a result of the IED requirements, 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 Ermine Street Farm Poultry Unit (dated November 2020) demonstrates that there are no hazards or likely pathways 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](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297084/geho0110brsb-e-e.pdf)

Condition 3.3 of the environmental permit reads as follows:

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

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

The risk assessment for the Installation provided with the application lists key potential risks of odour pollution beyond the Installation boundary. These activities are house clean out, carcass disposal, movement of feed/feed delivery, and dirty water and manure management. Olfactory checks will be undertaken coinciding with stock inspections and any abnormalities recorded, investigated, identified and appropriate action taken to reduce odour levels. Neighbours will be informed (where necessary) prior to activities which may cause odour. Weather monitoring helps to assess risks as wind direction will significantly influence how receptors are affected and if additional actions need to be taken to mitigate.

Odour mitigation measures at the site include feeding different diets through-out the cropping process, feeding dry feeds, washwater and dirty water runoff captured in dirty water tanks, good housekeeping, welfare and odour checks, clean dry bedding and carcasses kept in vermin proof covered storage.

### OMP Review

The OMP identifies site specific risks and mitigation measures for rearing broilers. Any odour complaints will be recorded by the operator, using guidance from EPR 6.09 3.1 and 3.2 odour and emissions management on intensive livestock installations, who will log and investigate causes of all odour complaints identifying the source and monitoring odour levels at the site boundary. The OMP will be reviewed at least annually or sooner in light of any building and management changes and/or on the outcome of any complaint investigations. Only farm operator and farm worker houses are within 100m of the installation boundary. A table and map showing the location of sensitive receptors within 400m of the installation boundary has been provided.

### Conclusion

We have assessed the OMP and a detailed H1 Environmental Risk Assessment for odour and conclude that the Applicant has followed the guidance set out in EPR 6.09 and Environment Agency guidance on preparing OMPs for Intensive Farm installations. We are satisfied that all sources and receptors have been identified, control measures and monitoring are in place, contingency and emergency plans are site specific, a complaints procedure has been set-up and that the proposed mitigation measures will minimise the risk of odour pollution/nuisance.

## Noise

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

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

There are sensitive receptors within 400m of the Installation boundary. The applicant has provided a NMP as part of the application supporting documentation conforming with SGN EPR6.09 ‘How to comply with your environmental permit for intensive farming’ setting out procedures to mitigate or minimise the risk of noise as well as formalise an effective method of dealing with any noise complaints quickly and efficiently. The H1 Environmental Risk Assessment for the Installation provided with the application lists key potential risks of noise pollution beyond the Installation boundary. These activities include feed delivery, vehicle movements, alarms, workers, catching, mucking out, cleaning, re-bedding, maintenance and repairs, fuel delivery, alarms and standby generator testing. Any abnormalities recorded and investigated, and continually assessing management techniques to improve control of noise pollution.

#### NMP Review

The OMP identifies site specific risks and mitigation measures for rearing broilers. Any noise complaints will be recorded by the operator, using guidance from EPR 6.09 on intensive livestock installations, who will log and investigate causes of all noise complaints identifying the source and monitoring noise levels at the site boundary. The NMP will be reviewed at least annually or sooner in light of any building and management changes and/or on the outcome of any complaint investigations. Only farm operator and farm worker houses are within 100m of the installation boundary. A table and map showing the location of sensitive receptors within 400m of the installation boundary has been provided.

#### Conclusion

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

## **Dust and Bio-aerosols**

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

The Applicant has provided a dust and bio aerosol risk assessment and a separate management plan - details can be found via the link [www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols](http://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols). There is one sensitive receptor 95m south-west of the installation boundary which is the Applicant’s residence. Activities which could cause the generation of particulates are feed deliveries, feeding systems, bedding, roof fan outlets and cleaning out operations.

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 the risk of spillages) all reduce the potential for emissions impacting the nearest receptors.

The Applicant has confirmed that they have the following measures in their operating techniques to reduce dust:

- contained feeding system
- no milling or mechanical feed mixing on site
- feed deliveries via contained systems in to sealed silos

- straw bedding applied internally (good quality straw used, reducing risk of dust and spores)
- housing, yards and equipment cleaned regularly to prevent dust build-up.

The plan will be reviewed in light of any building and management changes, and on outcomes of investigations or any complaints. As the farmhouse is a permit holders' residence, bio-aerosols are assessed daily.

### Conclusion

We have assessed the dust and bio aerosol management plan and the H1 risk assessment and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 11 'Assessing dust control measures on 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 dust nuisance.

## **Biomass Boiler**

The Applicant is including a biomass boiler in their permit with a net rated input of 0.995MWth. The Environment Agency has assessed the pollution risks and has concluded that air emissions from small biomass boilers are not likely to pose a significant risk to the environment or human health providing certain conditions are met.

A quantitative assessment of air emissions will not be required for poultry sites where:

- the fuel will be derived from virgin timber, miscanthus or straw
- the biomass boiler appliance meets the technical criteria to be eligible for the Renewable Heat Incentive
- no individual boiler has a net thermal input greater than 1MWth
- the stack height is a minimum of 5m above the ground
- there are buildings within 25m, the stack height is greater than 1m above the roof level of those buildings
- there are sensitive receptors, none are to be within 50m of the emission point (stack).

This is in line with the Environment Agency's document "Air Quality and Modelling Unit C1127a - Biomass firing boilers for intensive poultry rearing". An assessment has been undertaken to consider the biomass boiler and has shown that it should meet the requirements of the criteria above and is, therefore, considered not likely to pose a significant risk to the environment or human health and no further assessment is required.

## **Ammonia**

The assessment identified that there are six Sites of Special Scientific Interest (SSSI) within 5km of the installation and three Local Wildlife Sites (LWS) within 2km of the installation. The ammonia screening assessment for these sites was based on operating a facility comprising:

- four poultry houses with a combined capacity for upto 220,000 broilers
- poultry emission factor of 0.034kgNH<sub>3</sub>/animal place/year
- roof only ventilation (vents higher than 5.5m, efflux velocity of 11m/sec)
- no litter being stored at the installation.

### **Ammonia Assessment – SSSI**

Ammonia screening thresholds for SSSIs are given as Y% = 20 and Z% = 50. Trigger thresholds that have been applied for assessment of SSSIs are:

- If the process contribution (PC) is below 20% 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.
- 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 5km of the SSSI.

Initial screening using the ammonia screening tool (AST) spreadsheet v4.5 has indicated that Ancaster Valley, Copper Hill, Wilsford and Rauceby Warrens, Moor Closes, High Dyke and, Wilsford and Rauceby Warrens SSSIs all screened out based on the distance criteria given in the AST. Therefore, it is possible to conclude no damage and that further assessment is not necessary for these SSSIs.

## Assessment of LWS

Ammonia screening thresholds for LWSs are given as Y% and Z% = 100. Trigger thresholds that have been applied for the assessment of non-statutory sites are if the PC is <100% of relevant CL<sub>e</sub> or CL<sub>o</sub> then the farm can be permitted. Initial screening using the AST spreadsheet v4.5 has indicated that High Dike - Byard's Leap to Ancaster Verges, High Wood Road Verges and Lodge Paddock - RAF Cranwell LWSs all screened out based on the distance criteria given in the AST. Therefore, it is possible to conclude no damage and that further assessment is not necessary for these LWSs.

## Decision checklist

Aspect considered	Decision
<b>Receipt of application</b>	
Confidential information	A claim for commercial or industrial confidentiality has not been made. The decision was taken in accordance with our guidance on confidentiality.
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.
<b>Consultation</b>	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations (England and Wales) Regulations (2016) and our public participation statement. The application was publicised on the GOV.UK website. We consulted the following organisations: <ul style="list-style-type: none"> <li>▪ Local Authority Planning and Environmental Health</li> <li>▪ Health and Safety Executive</li> <li>▪ RAF Cranwell.</li> </ul> The comments and our responses are summarised in the <a href="#">consultation section</a> .
<b>Operator</b>	
Control of the facility	We are satisfied that the Applicant (now the Operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.
<b>The facility</b>	
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.
<b>The site</b>	
Extent of the site of the facility	The Operator has provided plans which we consider are satisfactory, showing the extent of the site of the facility. The plans are included in the permit to show the location of the facility.
Site condition report	The Operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive. <p>The site condition report (SCR) for Ermine Street Farm Poultry Unit (dated November 2020) demonstrates that there are no significant hazards or likely pathways to land or groundwater and no historic contamination sources on site that may present a significant risk.</p> <p>Therefore, on the basis of the assessment presented in the SCR the Environment Agency accepts that no baseline reference data needs to be provided for the site soil and groundwater conditions as part of application EPR/LP3302SD/A001.</p>
Biodiversity, heritage, landscape and nature conservation	The application is within the relevant distance criteria of sites of landscape and nature conservation, and protected habitat. We have assessed the application and its potential to affect all known sites of landscape and nature conservation, and protected

Aspect considered	Decision
	<p>habitat identified in the nature conservation screening report as part of the permitting process. We consider that the application will not affect any sites of landscape and nature conservation, and protected habitat identified.</p> <p>Refer to the Ammonia Assessment in the main section of this document for further details.</p>
<b>Environmental risk assessment</b>	
Environmental Statement	In determining the application we have considered the Environmental Statement.
Environmental risk	We have reviewed the Operator's assessment of the environmental risk from the facility. The Operator's risk assessment is satisfactory.
Climate Change Adaption	We have assessed the climate change adaptation risk assessment. We consider the climate change adaptation risk assessment is satisfactory. We have decided to include a condition in the permit requiring the operator to review and update their climate change risk assessment over the life of the permit.
<b>Operating techniques</b>	
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 operating techniques that the Applicant must use are specified in table S1.2 in the environmental permit.</p> <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR 6.09 and the BAT Conclusions Report. We consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs. The operation of the farm will be in accordance with SGN EPR 6.09 'How to comply with your environmental permit for intensive farming'.</p> <p>The soakaway design is based on the critical 100 year storm event with the required additional allowance of 40% to account for climate change, therefore:</p> <ul style="list-style-type: none"> <li>▪ poultry house roof runoff will run into linear drains alongside the houses</li> <li>▪ ancillary building runoff will be collected by downpipes and drainage channels prior to discharge to soakaway</li> <li>▪ concrete apron runoff will discharge to soakaway and include a diverter valve to an underground sealed dirty water tank for washdown periods</li> <li>▪ poultry shed floors will slope east and discharge washdown water to underground dirty water tanks via an internal piped drainage system</li> <li>▪ silt traps will be provided on any gully or drainage outlets</li> <li>▪ channels, all road gullies or drainage channel systems serving areas of hardstanding will be suitably maintained</li> <li>▪ hardstanding will be regularly inspected</li> <li>▪ all inspection chambers will be regularly inspected to ensure that the system is free-flowing</li> <li>▪ any interceptors will be regularly inspected and maintained to ensure that they remain operational.</li> </ul> <p>Water is from a metered borehole abstraction upto a maximum of 20,000 litres per day with mains water supplementing requirements on the site. Daily borehole abstraction records are kept.</p>
Odour management	We have reviewed the odour management plan (OMP) in accordance with our guidance on odour management. We consider that the OMP is satisfactory and we approve this plan.



Aspect considered	Decision
	<p>We have approved the OMP as we consider it to be appropriate measures based on information available to us at the current time. The Applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.</p> <p>The Applicant should keep the OMP under constant review and revise it annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.</p>
Noise management	<p>We have reviewed the noise management plan (NMP) in accordance with our guidance on noise assessment and control. We consider that the NMP is satisfactory and we approve this plan.</p> <p>We have approved the NMP as we consider it to be appropriate measures based on information available to us at the current time. The Applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.</p> <p>The Applicant should keep the NMP under constant review and revise it annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.</p>
Dust and bio-aerosol management	<p>We have reviewed the revised dust and bio-aerosol management plan (DMP) in accordance with our guidance on emissions management plans for dust. We consider that the DMP is satisfactory and we approve this plan.</p> <p>We have approved the DMP as we consider it to be appropriate measures based on information available to us at the current time. The Applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.</p> <p>The Applicant should keep the DMP under constant review and revise it annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.</p>
<b>Permit conditions</b>	
Emission Limits	Emission limits have been added as a result of the published BAT Conclusions. BAT-AELs have been set in the permit for ammonia, total nitrogen and total phosphorus.
Raw Materials	We have specified limits and controls on the use of raw materials as specified in Table S2.1 in the permit. This table restricts the use to straw only as fuel used for the on-site directly associated biomass boiler activity as defined by the permit application supporting documents and the RHI certification test parameters.
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. These monitoring requirements have been imposed in order to comply with the BAT Conclusions. We made these decisions in accordance with BAT Conclusions.</p> <p>Based on the information in the application we are satisfied that the Operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>
Reporting	We have specified reporting should be carried out for the parameters listed in the permit as specified. These reporting requirements have been imposed in order to comply with the BAT Conclusions. We made these decisions in accordance with the BAT Conclusions.



Aspect considered	Decision
<b>Operator competence</b>	
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. The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.
Relevant convictions	The Case Management System has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The Operator satisfies the criteria in our guidance on operator competence.
Financial competence	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.
<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 vary this permit. 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

<b>Response received from:</b> North Kesteven District Council Environmental Health, dated 14 December 2020
<b>Brief summary of issues raised:</b>
The main environmental health issues associated with this proposal are dust, odour, noise and flies. Although these would be covered by the EPR, we request that a suitable fly management plan is put in place to reduce the likelihood of a nuisance.
<b>Summary of actions taken or show how this has been covered:</b>
Within the Environmental Permit, Condition 3.6.1 states clearly that the activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. For Intensive Farming Installations, provision of a fly management plan is not a statutory requirement as part of the permit application process.
Should substantiated nuisance be caused by the presence of flies (as well as other 'pests'), Condition 3.6.2 requires a site specific pests management plan. It must identify and minimise annoyance from pests and fully implement the pests management plan from the date of approval. The plan must be to the Sector standard and submitted to the Environment Agency within a specified period.

<b>Response received from:</b> Lincolnshire County Council Development, dated 23 December 2020
<b>Brief summary of issues raised:</b>
None.
<b>Summary of actions taken or show how this has been covered:</b>
N/A.

<b>Response received from:</b> Health and Safety Executive, dated 14 December 2020
<b>Brief summary of issues raised:</b>
No comments.
<b>Summary of actions taken or show how this has been covered:</b>
N/A.

No consultation responses were received from the Public or RAF Cranwell.