Decision document new bespoke Permit

We have decided to grant the permit for Denham Feed Mill operated by Crown Chickens Ltd.

The permit number is EPR/QP3407PH.

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:

- summarises the decision making process in the decision considerations section to show how the main relevant factors have been taken into account
- highlights key issues in the determination
- 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.

Description of the activities

The application is for a feed mill. The facility has been operational since the 1970's producing meal for pigs. It was repurposed and refurbished in 2019 to manufacture compound feedstuffs for poultry. Production capacity also increased and the site now requires and environmental permit under reference Part A1 of the Environmental Permitting Regulations. The reference is:

6.8 A1 (d) (ii) Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging): only vegetable raw materials with a finished product production capacity greater than 300 tonnes per day.

The site processes raw materials on a batch basis. Cereal raw materials are ground and sieved before being fed via load cells into a batch mixer producing

homogenous batches to be conveyed to the pressing plant. Other ingredients such as vitamins, minerals and preservatives are added in the mixer. Steam is added to the mix to improve the physical characteristics for extrusion and destroy bacteria. A screw feed forces the hot mix into a press to be extruded through a rotating ring die to form a pellet. Hot product is passed through a counter flow air cooler to reduce the temperature and allow the pellets to harden. Cooled pellets are sprayed with vegetable oil and enzymes.

Key issues of the decision

Risks to Surface Water, Soil and Groundwater

A number of materials are stored at the site that have the potential to cause pollution if allowed to escape into the aquatic environment, including solid and liquid raw materials and fuels. The site comprises of zoned yard areas and process buildings. The yard and process buildings are situated on impermeable surfaces. The site does not produce any effluent and there is no foul sewer connection. Surface waters from yard and roofs are channelled to surface water discharged locations which are discussed further in this document.

Materials storage and drainage

Many of the materials used on site have the potential to pollute watercourses. The chemicals used for cleaning and dosing have the potential to pollute watercourses if allowed to escape.

Solid raw materials such as grains and pulses are delivered to site in covered vehicles and tipped into two intake pits prior to conveyance to silos or bulk bins for storage. Other bulk powders such as minerals are delivered by road tankers and blown directly into storage silos.

Liquid raw materials such as lecithin, methionine and lysine are delivered by road tankers and pumped into dedicated storage tanks. These tanks are bunded by a structurally independent reinforced half blockwork wall. The applicant has confirmed the secondary containment on site does not meet guidance CIRIA 736 ‘Containment systems for the prevention of pollution: Secondary, tertiary and other measures for industrial and commercial premises’.

Delivery points for the three tanks are also located outside the bund. This is not in line with our guidance on bunding.

We expect bunds to comply with the following:

- be waterproof
- be resistant to any materials stored in them
- have no outlets (e.g. drains or taps)
- drain to a blind (completely enclosed) collection point

- have self-contained pipework that is separate from the container pipework

We have therefore included Improvement Condition 1 which requires the operator to review the containment and implement improvements to a time scale agreed by us.

In addition there is also a polyethylene diesel and gas oil tanks located outside in the yard area to the south east. These are used for fuelling and maintenance of HGVs. The operator has confirmed these are both double skinned and include overfill prevention valves and automatic shut off nozzles and holsters. The operator confirms the tanks are in accordance with the Oil Storage Regulations (OSR).

Kerosene is stored within a double skinned steel fuel storage tank. The tank is fixed to the boiler and kept locked and inspected and maintained in accordance with the requirements of the OSR.

Packed raw materials such as minerals and vitamin supplements are stored internally. As are boiler treatment chemicals.

The operator submitted a drainage plan with the application. The concrete hard standing areas on the southern and eastern sides of the site (where external fuels storage occurs) slopes towards a drainage channel where water is channelled via a catch pit and underground pipework to an offsite clay lined, earth banked holding lagoon (S2). Water from this lagoon is periodically emptied and spread to land.

The northern and western areas of the site (where liquid feed additives are stored) flows to a catch pit which drains to underground pipe to an open surface water ditch 190m north east of the site (S1). There is no means to shut of the discharge and any spills occurring in these areas could potentially escape the site if not contained by spill kits.

We have therefore included Improvement Condition 2 requiring the operator to identify and implement suitable measures to improve containment and manage controls for liquid discharges.

The site does not produce any process effluent and there is no sewer connection on site. As a result boiler blowdown waters are discharged to the on-site lagoon which is periodically emptied and spread to land. This contains a multifunctional treatment chemical (oxygen scavenger, alkalinity builder, sludge conditioner).

The site overlies a principal aquifer. We consider these chemicals and sludges could have a negative impact if allowed to accumulate with continual repeat discharge. We have therefore included Improvement Condition 3 In the permit to require the operator to undertake a quantitative risk assessment of the discharge. It also requires them to agree a timetable for implementation if improvement works are identified.

Accidents

Raw materials are transported around the site using conveyors and elevators. Any spillages that occur would be cleaned up using spill kits and dry cleaning methods. All offloading of materials will be supervised to minimise the risk of accidents.

The bulk liquid storage tanks are fitted with high level alarms to prevent overfilling. Silos use automatic controls backed up by manual supervision. They are equipped with instrumentation included microprocessor control, trips, flow metering and high level alarms. Explosion relieve valves are also provided on the silos.

Overfill protection systems are installed on the amino acid tanks.

Emissions to air

There are 3 point source emissions to air at the installation:

- A1: 2.835 MWth steam boiler
- A2: grinder stack
- A3: Cooler cyclone stack

A key environmental risk from the installation is the potential to create particulate emissions. Particulate emissions are controlled using cyclones and bag filters at different stages throughout the process.

Grain seeds are delivered in bulk covered HGV's and tipped into pit intake no 1 to be conveyed into the storage silos via a grain cleaner. Dust arrestment bag filters on intake no.1 blow dust of the grain before storage. Air is released via fabric bags and the dust drops to the bottom into plastic bags for disposal. The process is monitored by mill workers.

Pulses are tipped into pit intact No. 2 for storing in bulk bins. There is a newly installed package cartridge system installed above the intake. Arrested particles drop into the pit preventing waste.

Other bulk powders are delivered by road tankers and blown directly into storage silos inside the mill building. Packaged raw materials (vitamins and mineral supplements) are delivered in smaller quantities and stored in their original packaging in the mill store. Preservatives are delivered and stored in IBC's in the store.

The grinder reduces the particle size of the raw materials and operates within a sealed enclosure vented to atmosphere through a package dust abatement unit. The filter is fully automatic, the continuously operating bag filter is cleaned with compressed air. Instrumentation within the grinder and automatic monitoring

within the control room provide audible/visual alarm which activates if a malfunction is detected interlocking to shut down the process.

The cooling systems involves passing ambient air over the hot pellets to cool them. This air is then ducted into a cyclone which removes particulates before being vented to atmosphere at emissions point A2. Dust recovered from the cyclone is added back into the process. Instrumentation in the cooler and automated monitoring in the control room provide audible/visual alarm which activates on cooler malfunction, interlocked to shut down the process.

Transfer equipment such as elevators and screw conveyors have package reverse jet polyethylene fabric filters for decentralisation filtration of dust inside the mill. Separated dust is returned directly to the material flow. Workers visually inspect the reverse jet filters monthly.

We consider that the use of a bag filters and cyclone to abate emissions from the grinder and cooler represent BAT.

The operator minimises the release of fugitive particulate emissions by keeping doors closed where possible during normal operations. Spills are also cleaned up immediately using dry cleaning methods such as sweeping.

Workers visually inspect the pit intakes and grain hatches daily. Gain hatches in the HGV trail boards are used to control flow and minimise dust plumes during tipping. Most hatches are also fitted with grain socks to lessen fall height and dust plume. Workers sweep up daily around the edges of the pits to remove residues and also clean settled dust on the inside of the pit intake enclosures as required.

Similarly socks are installed to the bottom of the out loading hoppers to control flow and lessen fall height. The trailers are sheeted before being drawn forwards keeping the roller shutter door closed at other times.

AQ Assessment

The operator submitted an Air Quality Impact Assessment which we have assessed.

A methodology for risk assessment of point source emissions to air is set out in our guidance https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit.

The applicant provided an assessment of the impact of emissions to air with the application which is detailed in document: "*An Assessment using Dispersion Modelling of the Impact of Airborne Emissions from the Boiler, Grinder and Cyclone Scrubber at Denham Feed Mill"* dates 27th April 2020.

We have reviewed the assessment and are satisfied that it has taken into account all relevant ecological and human health receptors, that the model and

its inputs are appropriate and that the assessment has been carried out in accordance with our guidance.

We agree with the applicant's conclusions that the impact of the emissions at human and ecological receptors are not significant. Our findings are summarised below:

Technical assessment

The site lies on the edge of Denham 350m from residential areas. Farm buildings and a house lie adjacent to the mill and share the same access road. These are occupied by the mill owners.

The applicant identified 32 locations of relevant exposure which were used in the modelling study. Many of these locations were on-site receptors and areas where members of the public would only transitorily visit such as footpaths. We have therefore used the modelling results at the nearest residential receptors on Denham Road for our assessment.

Process Contributions (PCs) from the emissions sources have been assessed using dispersion modelling. This is then presented as a percentage of the relevant Environmental Standard.

The highest PC's at the most impacted offsite residential receptor are detailed below. Impacts have also been calculated for the landlords residence (Denham Farm House)

Pollutant	**Environmental standard**	**Background**	**Process Contribution (PC)**		**Process Environmental Concentration (PEC)**	
Unit	**µg/m^3**	**µg/m^3**	**µg/m^3**	**% of Environmental standard**	**µg/m^3**	**% of Environmental standard**
NO_2 Hourly mean R17	200	14.5	4.35	2.2	-	-
NO_2 Hourly mean R10 Denham Farm House.	200	14.5	10.17	5.1	-	-
NO_2 Annual mean	40	7.24	0.13	0.3	-	-

R15						
NO_2 Annual mean R10 Denham Farm House.	40	7.24	0.72	1.8	7.96	3.18

Long term pollutant concentration – continuous sources

The long term pollutant concentrations of nitrogen dioxide cannot be screened out as insignificant at Denham Farm House as it is greater than 1% of the ES. This PC is 1.8% of the ES. The long term PC has not screened out but the PEC (3.18 µg/$m^{3)}$ as a percentage of the associated ES is less than 100% and can therefore be considered not significant.

The PC at the most impacted offsite residential receptor is 0.3 µg/m^3 which is less than 1% of the ES and can be considered insignificant.

Short term pollutant concentration – continuous sources

The short term pollutant concentration of nitrogen dioxide at the most impacted residential receptor and Denham Farm House screen out as insignificant as they are below 10% of the environmental standard.

Ecological receptors

The operator has assessed the impact of plant operations on a number of non-statutory Local Wildlife Sites and an ancient woodland within the screening distance.

The operator carried out an assessment at the habitats sites for comparison with critical levels for the protection of woodland and ecosystems. Results are presented below.

Habitat site	**Pollutant**	**Critical Level (ug.m^{-3})**	**PC (ug.m^{-3})**	**PC/Critical Level (%)**
E1	NOx Annual	30	0.038	0.13
	NOx 24 hour	75	0.966	1.29
E2	NOx Annual	30	0.055	0.18
	NOx 24 hour	75	0.686	0.91
E3	NOx Annual	30	0.053	0.18
	NOx 24 hour	75	0.580	0.77
E4	NOx Annual	30	0.023	0.08
	NOx 24 hour	75	0.310	0.41

E5	NOx Annual	30	0.017	0.06
	NOx 24 hour	75	0.216	0.29
E6	NOx Annual	30	0.024	0.08
	NOx 24 hour	75	0.325	0.43
E7	NOx Annual	30	0.023	0.08
	NOx 24 hour	75	0.595	0.79

The predicted contributions to annual mean NO_2 concentration are below 1% of the relevant critical level at all receptors and are therefore considered insignificant.

The predicted process contribution to short term NO_2 concentration is below 10% of the critical level at all receptors and is therefore considered insignificant.

The applicant also considered Acidification – contribution from N deposition (Keq/ha/yr) which was negligible, resulting in 0.001 at receptors E1-E3.

PM_{10} Particulates

The operator carried of an assessment of particulate emissions at the same 32 receptor locations. The majority of residential receptors (including Denham Farm House) recorded negligible emissions.

Pollutant	**Environmental standard**	**Background**	**Process Contribution (PC)**	
Unit	**µg/m³**	**µg/m³**	**µg/m³**	**% of Environmental standard**
NO_2 Hourly mean R17	50	31.68	0.23	0.5
NO_2 Annual mean	40	15.84	0.01	0.00

There are no predicted exceedances of the long or short term PC for PM_{10} and emissions can be considered insignificant.

Noise

The operators risk assessment identifies the noisiest activities will be undertaken inside the process building with the roller shutter doors closed. The building will provide a measure of attenuation from noise. The application confirms packaged silencers are installed under the roof in the exhaust from the grinder and above the roof for the cooler using professional design and installation contractors.

There is external plant which has the potential to be noisy, this includes the pit intakes, electric motors, fans and elevators to the bulk storage silos and bins. These are sited 350m from the nearest residential receptors which lie to the west in Denham Road. The operator has discounted Town Farm immediately adjacent to the western site boundary and the agricultural buildings to the east as receptors as these are occupied by the mill owners and landlord and will not be sensitive to noise emissions from the activities.

Another potential source of noise is vehicle movements. The site operates 24 hours a day however the operator details vehicle movements will be limited to normal daytime working only to minimise disturbance. A speed limit is also in place along the access track.

The operator has not provided a noise management plan and we did not requested one as we considered the noise risk to be low from the site, taking into account the measures proposed on site to reduce noise and the 350m distance from the external yard area and residential receptors.

During determination however we received a significant number of comments from local residents that noise nuisance had been arising from operations within the site.

Considering this we have included an Improvement Condition 4 within the permit requiring the operator to undertake a noise survey when the site is under full operation. If the survey shows significant impacts beyond the site boundary the operator must provide a plan to mitigate noise emissions for approval and implement and improvements identified.

Odour

The application confirms under normal conditions the dry and liquid ingredients are not odorous. However odour may be released as part of the cooling process. The application confirms the cooler operates under positive pressure releasing from a high level point above the roof of the mill.

The risk of odour is further minimised by all storage and transference occurring in sealed vessels and conveyors. Spillages will be quickly cleaned up using dry cleaning methods.

We have also receive a number of comments regarding odour nuisance from the site. We have therefore include Improvement Condition 5 requiring the operator to identify potential sources of odour and the options available to reduce or eliminate odour from the site.

Best Available Techniques (BAT) Assessment

The relevant BAT guidance document is the Food, Drink and Milk Industries BAT Conclusions (BATC) which were published in November 2019. The applicant

provided a BAT assessment in line with this document. We consider the techniques as described represent BAT for the facility.

Decision considerations

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.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

Local Authority Environmental Protection Department.

Local Authority Planning Department.

Public Health England.

The comments and our responses are summarised in the consultation responses section.

Operator

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.

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, Appendix 2 of RGN2 Defining the scope of the installation.

The extent of the facility is defined in the site plan in the permit. The activities are defined in table S1.1 of the permit.

The site

The operator has provided a plan which we consider to be satisfactory.

These show 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.

A Site Condition Report (SCR) was submitted with the application. The SCR describes the site setting as being located in an agricultural area with adjacent farm buildings and stores next door (within the ownership of the mill owners). The farm and mill share the same access road. The closest residential receptor is Town Farm adjacent to the western boundary of the site. This is discounted for the purposes of amenity assessments as it is occupied by the mill owners. The next closest receptors are 350m to the west in Denham Road. An above ground earth banked surface water lagoon which receives water from the roof and south western yard areas lies to the north west of the permitted area.

The site overlies a principal aquifer. There are two active groundwater abstraction licenses within 2km of the site. The closest being 580m west at East Anglian Fruit Farm. A surface water drain is located approximately 190m to the north. The site is located in a source protection zone 3.

The applicant confirms there is no foul drainage on the site and no process water is generated. Boiler blowdown water is discharged to the on-site lagoon as discussed above.

The application confirms there has been no known pollution incidents that may have effected land on site.

The site stores and uses a number of potentially polluting substances that could pose a risk to groundwater and soil. The risks and improvements required have been discussed above.

No baseline samples have been taken. We therefore assume that the existing level of contamination at the site is zero and the operator will be responsible for any necessary remediation when the ground is surrendered.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations.

A number of Local Wildlife Sites lie within the vicinity of the installation. The nearest being Denham Churchyard which lies 768m to the west.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

There are no European Sites or SSSI’s within the statutory screening distance.

See key issues section for further information.

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 adaptation

We have assessed the climate change adaptation risk assessment.

We consider the climate change adaptation risk assessment is satisfactory.

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.

Operating techniques for emissions that screen out as insignificant

Emissions of NOx and PM_{10} have been screened out as insignificant, and so we agree that the applicant's proposed techniques are Best Available Techniques (BAT) for the installation.

We consider that the emission limits included in the installation permit reflect the BAT for the sector.

Dust management

We have reviewed the dust and emission management plan in accordance with our guidance on emissions management plans for dust.

We consider that the dust and emission management plan is satisfactory and we approve this plan.

We have approved the dust and emission management plan 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.

The applicant should keep the plans under constant review and revise them 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.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

We have included an improvement programme to ensure that:

There is sufficient protection of surface water from storage operations undertaken in external yard areas which drain to surface waters.

That only uncontaminated surface waters are discharged from the site.

The operator provides a noise impact assessment report and odour management plan to the environment agency for approval. Assessing the impact of the installation for odour and noise at residential receptors and identifies and implements any improvements.

See key issues section.

Emission Limits

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on BAT have been set for the following substances:

A BAT-AEL of 5mg/Nm^3 has been set for dust from the grinder and 20 mg/Nm^3 from the cooler.

This is in line with BAT for new plant.

An ELV of 200 mg/Nm^3 Oxides of Nitrogen (NO and NO_2 expressed as NO_2) has been set for the boiler.

This is in accordance with the Medium Combustion Plant Directive for this type of plant.

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 included in order to ensure particulate emissions and NOx are controlled and demonstrate compliance with the emission limits specified in the permit.

We made these decisions in accordance with BAT for the sector and MCP technical guidance.

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.

Reporting

We have specified reporting in the permit.

We made these decisions in accordance with BAT for the sector.

Management System

We are not aware of any 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.

Previous performance

We have checked our systems 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.

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.

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 Responses

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 (PHE)**

Brief summary of issues raised: The main emissions of potential concern are nitrogen dioxide, particulate matter and sulphur dioxide. Based on the H1 Environmental Risk Assessment and the Air Quality Report these are not considered to pose a significant health concern.

Based on the information contained in the application PHE has no significant concerns regarding the risk to health of the local population from the installation.

Response based on the assumption that the permit holder shall take all appropriate measures to control pollution in accordance with the relevant sector guidance and industry best practice.

Summary of actions taken: Air emissions assessed as part of the permit determination. See technical assessment above.

Response received from the local planning authority; **Babergh and Mid Suffolk District Council.**

Brief summary of issues raised: No concerns raised. The local officer confirmed they had no records of historic complaints or enforcement action taken against the site.

Summary of actions taken: No action

Response received from the local authority Environmental Health Department; **Babergh and Mid Suffolk District Council.**

Brief summary of issues raised: No concerns raised. The local officer confirmed they had no records of historic complaints regarding emissions of noise, odour or dust from the site.

Summary of actions taken: No action

Representations from local MPs, assembly members, councillors and parish/town community councils

Response received from **Denham Parish Council**.

Brief summary of issues raised:

- Concerns regarding the accuracy of some of the information provided within the application.
- Potential impacts of expanding operations and the exponential increase of intensive chicken farming in the area.
- Reports of historic odour and noise issues arising from operations within the mill.
- Noise emissions, volume and timing of HGV movements from the site.
- Risks associated with the transportation of harmful chemicals from/to the site.
- Reduction in air quality in the vicinity of the mill from the operation – NOx, SOx.
- Amenity dust issues and impacts of grain dust on health.
- Light pollution.

Summary of actions taken: The Environment Agency can only consider issues within their remit. Vehicle movements off site, light pollution and wider planning concerns have not been considered.

We are satisfied the measures on site to mitigate dust, odour and noise meet BAT. Given the concerns raised we however consider there is a need for the operator to investigate why the measures in pace may not be working. We have therefore included improvement conditions 4 and 5 requiring the operator to investigate potential sources of odour and noise emissions, produce management plans and identify and implement improvements as appropriate.

Response received from: **Horham and Athelington Parish Council**

Brief summary of issues raised: Support the issues raised by Denham Parish Council above.

Summary of actions taken: See response above.

Response received from: Hoxne Parish Council

Brief summary of issues raised:

- Site address incorrect.
- Inconsistencies in the application with regards to vehicle movements to and from the site.
- Disagree with the route vehicles take to the site as detailed within the application.
- Concerned with the arrival/departure times of HGV vehicles and definition of “standard business hours”

Summary of actions taken: No action

Response received from: **Stradbrook Parish Council**

Brief summary of issues raised:

- Industrial rather than agricultural complex. Operation will not be limited to 90 days operations (as stated in the S6.8 of the EPR when processing over 600 tonnes per day)
- Contaminated water will be disposed of via site lagoon.

Summary of actions taken: An Environmental Permit is required as the applicant has confirmed production capacity is expected to rise to 550 tonnes per day.

No effluent is generated by the production process. Uncontaminated rainwaters falling on the site surfacing (not in contact with any operational processes) are directed to the lagoon as is boiler blowdown. This is not a waste operation and requires no formal consent. However we have concerns repeated application to land may pose some issue. We have therefore included IC 3 above requiring the operator to risk assess this more thoroughly.

Representations from individual members of the public

Brief summary of issues raised: Representations from 11 members of the public. Common responses have been considered and summarised together:

- change of use has/will continue to cause a major increase in HGV traffic leading to pollution from vehicle emissions, noise and damage to roads/verges.
- Inappropriate routing of vehicles entering/leaving the site.
- Light pollution after dark.
- Lack of screening/landscaping at the mill resulting in visual intrusion.
- Odours arising from “cooking” at the mill.
- Noise nuisance emanating from operations on the site.
- Querying whether the lagoon is a natural pond.
- Cross referencing the planning application with the permit.

Summary of actions taken: Off-site vehicle movements and there impacts are planning issues not for consideration by the Environment Agency. As is light emissions and screening.

Odour, noise and dust emissions perceptible beyond the site boundary are material considerations key to our determination. We considered given the measures in place to limit emissions and distance to receptors there was a reduced risk of nuisance however considering the concerns raised we have included Improvement Conditions 4 and 5 within the permit requiring the operator to investigate potential sources of amenity emissions and to identify and implement improvements as required.