

Permitting decisions

Bespoke permit

We have decided to grant the permit for Bank Farm Poultry Unit operated by Stonegate Agriculture Limited.

The permit number is EPR/HP3107LE.

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.

This decision document provides a record of the decision making process. It:

- highlights [key issues](#) in the determination;
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account; and
- shows how we have considered the [consultation responses](#).

Unless the decision document specifies otherwise we have accepted the Applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

Key issues of the decision

New Intensive Rearing of Poultry or Pigs BAT Conclusions document

The new Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) was published on the 21st February 2017. There is now a separate BAT Conclusions document which sets out the standards that permitted farms will have to meet.

The BAT Conclusions document is as per the following link:

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D0302&from=EN>

Now the BAT Conclusions are published, all new installation farming permits issued after the 21st February 2017 must be compliant in full from the first day of operation.

There are some new requirements for permit holders. The Conclusions include BAT-Associated Emission Levels (BAT-AELs) for ammonia emissions, which will apply to the majority of permits, as well as BAT-AELs for nitrogen and phosphorous excretion.

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

New BAT Conclusions review

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

The Applicant has confirmed their compliance with all BAT conditions for the new installations in their document reference 'BAT Assessment' and dated 23/03/21 which has been referenced in Table S1.2 Operating Techniques of the permit.

The following is a more specific review of the measures the Applicant has applied to ensure compliance with the above key BAT measures:

BAT measure	Applicant compliance measure
BAT 25 Monitoring of emissions and process parameters - Ammonia emissions	Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 26 Monitoring of emissions and process parameters - Odour emissions	The approved odour management plan (OMP) includes the following details for on Farm Monitoring and Continual Improvement: Daily sniff tests will be undertaken by site personnel at the main gate (TF29540 41687) and the site boundary to the east of the poultry houses (TF 29527 41510). This are located at the boundary of the installation and between the poultry houses and the identified sensitive receptors, in the direction of the most common prevailing wind. A daily check sheet will be completed to record the sniff tests and any follow up action required.
BAT 27 Monitoring of emissions and process parameters	Table S3.3 concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions. The applicant will report dust emissions using estimates based on published poultry

BAT measure	Applicant compliance measure
- Dust emissions	dust emission factors (0.1 kg dust/animal place/year).

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 pullets and therefore an ammonia emission limit value has not been included within the permit.

Industrial Emissions Directive (IED)

The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 were made on the 20 February and came into force on 27 February 2013. These Regulations transpose the requirements of the IED.

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

Groundwater and soil monitoring

As a result of the requirements of the Industrial Emissions Directive, all permits are now required to contain a condition relating to protection of soil, groundwater and groundwater monitoring. However, the Environment Agency's H5 Guidance states **that it is only necessary for the operator to take samples** of soil or groundwater and measure levels of contamination where there is evidence that there is, or could be existing contamination and:

- The environmental risk assessment has identified that the same contaminants are a particular hazard; or
- The environmental risk assessment has identified that the same contaminants are a hazard and the risk assessment has identified a possible pathway to land or groundwater.

H5 Guidance further states that it is **not essential for the operator** to take samples of soil or groundwater and measure levels of contamination where:

- The environmental risk assessment identifies no hazards to land or groundwater; or
- Where the environmental risk assessment identifies only limited hazards to land and groundwater and there is no reason to believe that there could be historic contamination by those substances that present the hazard; or
- Where the environmental risk assessment identifies hazards to land and groundwater but there is evidence that there is no historic contamination by those substances that pose the hazard.

The site condition report (SCR) for Bank Farm Poultry Unit (dated 23/03/21) 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, 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 as follows:

- Odour from delivery and storage
- Odour arising from problems with housing ventilation system
- Odour arising from manure and slurry management
- Carcase disposal
- Removal of dirty water and manure
- Odour arising from manure/slurry spreading
- Odour arising from used litter and slurry

Odour Management Plan Review

The Installation is located within 400m of a number of sensitive receptors, as listed below (please note, the distances stated are only an approximation from the Installation boundary to the assumed boundary of the properties):

1. Conifers, Silvertoft Lane – approximately 41m to the north east of the Installation boundary.
2. Redvers, Cuthbert's Lane – approximately 183m to the south west of the Installation boundary.
3. Ponderosa, Silvertoft Lane – approximately 193m to the east of the Installation boundary.
4. Orange House Farm – approximately 277m to the east of the Installation boundary.
5. The Cottage, Silvertoft Lane – approximately 324m to the east of the Installation boundary.
6. ATC, Fen Road – approximately 384m to the north east of the Installation boundary.
7. Bellview Yard, Fen Road – approximately 389m to the north east of the Installation boundary.

The operator has provided an OMP (V2, July 2021) and this 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 because it complies with the above guidance, with details of odour control measures, contingency measures and complaint procedures described below.

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 such as manufacture and selection of feed, feed delivery and storage, ventilation and heating systems, litter management, carcass disposal, house clean out, used litter, washing operations, fugitive emissions, dirty water management, abnormal operations, waste production storage and materials storage. The operator has identified the potential sources of odour (see risks bullet pointed above), as well as the potential risks and problems, and detailed actions taken to minimise odour including contingencies for abnormal operations. It should also be noted that having consulted with the Local Authority (please see consultation response below) there are no history of odour complaints at this existing site which is currently operating below threshold.

The OMP also provides a suitable procedure in the event that complaints are made to the Operator. The OMP is required to be reviewed at least every year (as committed to in the OMP) and/or after a complaint is received, whichever is the sooner.

The Environment Agency has reviewed the OMP and considers 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.

Odour modelling was referred to in the Odour Management Plan, however, odour modelling for the intensive farming sector has high uncertainties associated with it. These uncertainties increase when considering receptors nearby to the site. This is due to a number of reasons including the peak to mean ratio for odour concentrations being high for this sector which when assessed against the benchmark value makes it unreliable. When considering this along with the model uncertainties, it makes predictions made by the model not defensible for permit making decisions. Emphasis is therefore put on having a robust Odour Management Plan.

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 H4 Odour management guidance note. Although there is the potential for odour pollution from the Installation, the Operator's compliance with the Permit and its OMP 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.

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 400 metres of the Installation boundary as stated in the 'Odour' section above. The Operator has provided a noise management plan (NMP) as part of the Application supporting documentation, and further details are provided in 'Noise Management Plan Review' below.

The risk assessment and management plan for the Installation provided with the Application lists key potential risks of noise pollution beyond the Installation boundary. These activities are as follows:

- Vehicles to and from site
- Vehicles on site
- Feed transfer from lorry to bulk storage bins
- Operation of fans
- Alarm system and standby generator
- Livestock
- Site personnel
- Repairs

Noise Management Plan Review

Sensitive receptors have been listed under 'Odour' section.

The sensitive receptors that have been considered under odour and noise do not include the operator's property and other people associated with the farm operations as odour and noise are amenity issues.

A noise management plan (NMP) has been provided by the operator as part of the application supporting documentation (V2, July 2021).

The NMP also provides a suitable procedure in the event of complaints in relation to noise. The NMP is required to be reviewed at least every year (as committed to in the NMP), however the operator has confirmed that it will be reviewed if a complaint is received, whichever is sooner.

Operations with the most potential to cause noise nuisance have been assessed and control measures put in place for all vehicles accessing the site and manoeuvring around, vehicles and machinery carrying out operations on site. This includes the delivering of feed and birds, and to remove used litter and dirty water. Other operations with the potential to cause noise nuisance for which control measures have been put in place include: ventilation fans, feeding equipment, alarm system and stand-by generator, building works and repairs, and animal noise.

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 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 (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.

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 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.

There are sensitive receptors within 100m of the Installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 41 metres to the north east of the installation boundary.

Guidance on our website concludes that applicants need to produce and submit a dust and bio aerosol 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-dust-and-bioaerosols.

As there are receptors within 100m of the Installation, the Applicant was required to submit a dust and bio aerosol management plan 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 following measures (for full control measures please refer to the relevant plan) in their operating techniques to reduce dust, which will inherently reduce bio aerosols:

- Covers placed over silo feed pipes when not in use
- No milling undertaken on site
- Wood shavings have dust removed prior to delivery
- Ventilation is computer controlled using manufacturer's specifications
- Medium velocity side wall fans prevent dust from depositing on the roof

- Areas where dust can settle in the poultry houses are cleaned between flocks
- Fans/ventilation outlets are pressure washed during clean down operations

Conclusion

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

Ammonia

There are four Local Wildlife Sites (LWS) within 2 km of the installation.

Ammonia assessment - LWS

The following trigger thresholds have been applied for the assessment of these sites:

- If the process contribution (PC) is below 100% of the relevant critical level (CLe) or critical load (CLo) then the farm can be permitted with no further assessment.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Bank Farm Poultry Unit will only have a potential impact on the LWS sites with a precautionary CLe of $1\mu\text{g}/\text{m}^3$ if they are within 678 metres of the emission source.

Beyond 678m the PC is less than $1\mu\text{g}/\text{m}^3$ and therefore beyond this distance the PC is insignificant. In this case all LWSs are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 1 – LWS Assessment

Name of LWS	Distance from site (m)
South Forty Foot Drain	1861m
Westgate Wood and Meadow	875m
Botolphs Park Pond	2003m
Tytton Lane West Pits, West	1995m

No further assessment required.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
Consultation	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <p>Health and Safety Executive (HSE)</p> <p>Director of Public Health (DoPH) / Public Health England (PHE)</p> <p>Environmental Health – Boston Council</p> <p>The comments and our responses are summarised in the consultation section.</p>
Operator	
Control of the facility	We are satisfied that the Applicant (now the Operator) is the person who will have control over the operation 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 facility	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility'.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
The site	
Extent of the site of the facility	The Operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	The Operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p>

Aspect considered	Decision
Environmental risk assessment	
Environmental risk	<p>We have reviewed the Operator's assessment of the environmental risk from the facility.</p> <p>The Operator's risk assessment is satisfactory.</p>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the Operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the Applicant must use are specified in table S1.2 in the environmental permit.</p> <p>The operating techniques are as follows:</p> <ul style="list-style-type: none"> • Both poultry houses are ventilated via roof air inlets and the air removed using medium velocity fans within the long side walls. There are no gable end fans. • Roof water will be channelled into a soakaway, which sit adjacent to the poultry houses. • Run-off from the open hardstanding areas (excluding during periods of litter removal and washout) will be discharged to surface water drainage ditches adjacent to the site. At the end of the growing period the houses are depopulated, the litter is removed, the houses and equipment washed and disinfected before being restocked. • Litter is exported in covered trailers and wash water is conveyed to one above ground storage tank for temporary storage before being exported off-site • There will be one stand-by generator with integrated diesel storage tank and storage tanks for liquid petroleum gas (LPG) for heating. • Mortalities are removed daily and stored in secure containers for removal under the Fallen Stock Scheme. <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs.</p>
Odour management	<p>We have reviewed the odour management plan in accordance with our guidance on odour management.</p> <p>We consider that the odour management plan is satisfactory.</p>
Noise management	<p>We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.</p> <p>We consider that the noise management plan is satisfactory.</p>
Permit conditions	
Use of conditions other than those from the template	<p>Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.</p>

Aspect considered	Decision
Emission limits	We have decided that emission limits are not required in the permit.
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.
Reporting	We have specified reporting in the permit.
Operator competence	
Management system	<p>There is no known reason to consider that the Operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Relevant convictions	<p>The Case Management System has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The Operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to vary this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the Operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Boston Borough Council – Received 19/05/2021
Brief summary of issues raised
<p>Boston Borough Council have no objections to this permit application in principle.</p> <p>As a local authority we have responsibilities for air quality under the provisions of Part IV of the Environment Act 1995 and PM10 can be an issue from intensive poultry rearing houses in terms air quality where there are residential receptors close to the units. However having considered the Local Air Quality Management Technical Guidance (TG16) April 2021 the establishment, number of birds and distance to receptors fall outside of the parameters that require screening for PM10 (Table 7.3 of the guidance).</p> <p>In terms of noise or other nuisance related complaints from the site the LA only keep records for a period of six years. During this period only one complaint which related to noise has been received from a local resident. This was in 2015. A local resident alleged nuisance from fan noise at the site. An investigation was carried by means of visits and the installation of noise monitoring equipment within the resident's property. No excessive noise was observed or recorded. In fact levels within the residential property were well below WHO guideline noise criteria within dwellings. No statutory nuisance was established and the complaint was subsequently closed.</p>
Summary of actions taken or show how this has been covered
N/A

Response received from
Public Health England – Received 03/06/2021
Brief summary of issues raised
<p>PHE recommends that the following concerns be taken into account:</p> <ul style="list-style-type: none"> - Limited details have been provided in relation to the potential public health impacts from point source emissions from the diesel generator and LPG used for heating purposes. It is recommended that the documents be updated to include pollutants of concern, likely emissions profile based on their use (including worst case conditions) and an assessment against air quality standards. The Environment Agency should ensure they are satisfied with the details submitted. - The Environmental Risk Assessment report advises that the probability of exposure to odour from buildings as a result of is likely, with manure removal taking place infrequently (approximately every 16 weeks). It is recommended that the EA consider whether additional mitigation measures should be proposed; for example, more regular manure removal would help minimise odour impacts to the local residents. - Limited details have been provided in the Odour Management Plan regarding the SCAIL assessment, for example what constitutes 'normal' operating conditions (i.e. the source and parameters employed) and whether abnormal and worst-case conditions were also assessed and what the findings showed. It is recommended that further details are provided and where necessary further mitigation measures proposed. The Environment Agency should ensure they are satisfied with the approach and findings. - Better consistency is recommended across documentation regarding water emissions from the site; for example, the Management System document describes a discharge to a septic tank from a toilet facility which is different to the system description in the BAT Assessment report.

- An Accident Management Plan has not been submitted with application, though referenced in the Environmental Risk Assessment. The Environmental Agency should ensure they are satisfied with its contents.

Summary of actions taken or show how this has been covered

- Emissions from the LPG tanks evaporate and it is therefore deemed unnecessary to include them in the emissions table of the permit. This is based on a generic review of such emissions for the intensive farming sector having negligible environmental impact. The standby generator is captured with the permit along with the diesel tank and would only be used infrequently.

- Having consulted with the Local Authority (please see consultation response above) there are no history of odour complaints. Moreover, the birds on site are pullets and given the housing type, it would not be possible to scrape manure out with any greater frequency.

- Odour modelling for the intensive farming sector has high uncertainties associated with it. These uncertainties increase when considering receptors nearby to the site. This is due to a number of reasons including the peak to mean ratio for odour concentrations being high for this sector which when assessed against the benchmark value makes it unreliable. When considering this along with the model uncertainties, it makes predictions made by the model not defensible for permit making decisions. Emphasis is therefore put on having a robust Odour Management Plan.

- Inconsistencies within the documentation has been noted and where required, this has been raised with the applicant and clarifications provided, where relevant.

The Health and Safety Executive and the Director of Public Health were also consulted but provided no response. There were also no responses received after the application was advertised on www.gov.uk