

Permitting decisions

Bespoke permit

We have decided to grant the permit for Chessgrove Farm Poultry operated by Mr Robert Batt, Mr Thomas Batt, Mr Stephen Batt and Mrs Elaine Batt trading as S K Batt.

The permit number is EPR/AP3349QB.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

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

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

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

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

Key issues of the decision

New Intensive Rearing of Poultry or Pigs BAT Conclusions document

The new Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) was published on 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 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 installation in their document reference '008 Establishing Best Available Technical Standards' and dated 20/05/22, 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 3 - Nutritional management - Nitrogen excretion	The Applicant has confirmed it will demonstrate that the installation achieves levels of Nitrogen excretion below the required BAT-AEL of 0.6kg N/animal place/year by an estimation using manure analysis for total Nitrogen content. Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 4 - Nutritional management - Phosphorous excretion	The Applicant has confirmed it will demonstrate that the installation achieves levels of Phosphorous excretion below the required BAT-AEL of 0.25kg P ₂ O ₅ /animal place/year by an estimation using manure analysis for total Phosphorous content. Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 24 - Monitoring of emissions and process parameters - Total nitrogen and phosphorous excretion	Table S3.3 concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.
BAT 25 - Monitoring of emissions and process parameters - Ammonia	Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

BAT measure	Applicant compliance measure
emissions	
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 – <ul style="list-style-type: none"> Daily olfactory monitoring conducted by the farm manager first thing in the morning to reduce risk of adaptation – results are logged.
BAT 27 - Monitoring of emissions and process parameters - Dust emissions	Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions. The Applicant has confirmed they will report the dust emissions to the Environment Agency annually by multiplying the dust emissions factor for broilers by the number of birds on site.
BAT 32 - Ammonia emissions from poultry houses - Broilers	The BAT-AEL to be complied with is 0.08 kg NH ₃ /animal place/year. The Applicant will meet this as the emission factor for broilers is 0.034 kg NH ₃ /animal place/year. The installation does not include an air abatement treatment facility, hence the standard emission factor complies with the BAT-AEL.

More detailed assessment of specific BAT measures

Ammonia emission controls

A BAT Associated Emission Level (AEL) provides us with a performance benchmark to determine whether an activity is BAT.

Ammonia emission controls – BAT conclusion 32

The new BAT Conclusions include a set of BAT-AEL's for ammonia emissions to air from animal housing for broilers.

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

All new bespoke applications issued after 21st February 2017, including those where there is a mixture of old and new housing, will now need to meet the BAT-AEL.

Industrial Emissions Directive (IED)

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 Chessgrove Farm Poultry (submitted on 21/12/22) 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:

- Daily olfactory monitoring conducted by the farm manager first thing in the morning to reduce risk of adaptation – results are logged.
- Use of heat exchangers in the bird houses to reduce humidity, ammonia and odour emissions.
- All feed delivery systems are sealed, and condition of the feed bins checked weekly for damage or leaks. All spills immediately cleaned up.
- High velocity roof extraction fans in place on all houses to aid dispersion and keep litter dry and friable. Ventilation adjusted to remove moisture from the houses and ensure dry litter. Insulation in the walls and ceiling to prevent condensation.
- Bird water delivered via nipple drinkers fitted with drip cups to reduce spillage and leaks. All drinkers checked daily.
- During house cleanout, all used litter placed into sheeted trailers and exported from site. No used litter is stored on site; it is exported to a third party for spreading on land. All houses washed using high-pressure hoses with the dirty water being directed to underground storage tanks.
- Fallen stock placed into sealed containers daily and collected as a minimum every seven days.
- Dirty water tanks emptied by tanker at the end of each cycle. Checks on the full drainage system completed during and following house clean-out.
- All working areas concreted to aid effective cleaning.

Odour Management Plan Review

We have assessed the OMP and the H1 risk assessment for odour and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 4 'Odour Management at intensive livestock installations'. We are

satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of odour pollution / nuisance. 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.

The operator is required to review the OMP at least every year (as committed to in the OMP), prior to any major changes to operations (to ensure effectiveness) and/or after the Environment Agency has notified the operator that it has substantiated a complaint, and make any appropriate changes to the OMP identified by the review.

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".

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

There are two sensitive receptors within 400 metres of the installation boundary as stated above. The operator has provided an NMP as part of the application supporting documentation. The following key measures are contained in the NMP to minimise noise pollution:

- Bird housing ventilation – these are well maintained and gable end fans only used during hot weather conditions.
- Feed deliveries – no idling of vehicles, vibration isolation pads and silencers used, audible reversing alarms only used during day time hours unless at de-stocking times, roads well maintained, 10mph speed limit enforced on site.
- Feeding operations – all infrastructure inspected daily to prevent augers running empty, regular maintenance.
- Bird catching – catch-time duration minimised and catch teams trained to minimise noise.
- Clean-out – litter removal and wash-down between 7am-7pm.
- All electrics and equipment routinely maintained.
- Stand-by generator and alarm system tested weekly during working hours and restricted to maximum 10 minutes to minimise disruption.
- In the event of a noise complaint, the operator will conduct noise monitoring during investigating the cause.

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.

The NMP will be reviewed annually, prior to any major changes to operations (to ensure effectiveness) or following a substantiated noise complaint.

Ammonia

There are two Special Areas of Conservation (SAC) sites located within 5 kilometres of the installation. There are thirteen Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also seventeen Local Wildlife Sites (LWS), and eight Ancient Woodlands (AW) within 2 km of the installation.

Ammonia assessment – SAC

The following trigger thresholds have been designated for the assessment of European sites:

- If the process contribution (PC) is below 4% of the relevant critical level (CL_e) or critical load (CL_o) 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 10 km of the SACs.

Screening using the ammonia screening tool version 4.6 has determined that the PC on the SACs for ammonia emissions and acid deposition from the application site are under the 4% significance threshold and can be screened out as having no likely significant effect. See results below.

Table 1 – Ammonia emissions

Name of SAC	Critical level ammonia $\mu\text{g}/\text{m}^3$	Predicted PC $\mu\text{g}/\text{m}^3$	PC % of Critical level
Wye Valley & Forest of Dean Bat Sites – England	3*	0.088	2.9
Wye Valley & Forest of Dean Bat Sites – Wales	3*	0.088	2.9

* Critical level values taken from Air Pollution Information System (APIS) website (www.apis.ac.uk) – 18/02/2022

Table 2 – Acid deposition

Name of SACSite	Critical load keq/ha/yr. [1]	Predicted PC keq/ha/yr.	PC % of critical load
Wye Valley & Forest of Dean Bat Sites – England	1.123	0.033	2.9
Wye Valley & Forest of Dean Bat Sites – Wales	1.123	0.033	2.9

Note [1] Critical load values taken from APIS website (www.apis.ac.uk) – 18/02/2022

Screening using the ammonia screening tool version 4.6 has determined that the process contributions of nitrogen deposition from the application site is over the 4% significance threshold. As such, it is not possible to conclude no adverse effect alone. Where the PC falls between 4% and 20%, Environment Agency guidance indicates that an in-combination assessment should be undertaken. See results below.

Table 3 – Nitrogen deposition

Name of SAC	Critical load kg N/ha/yr. [1]	Predicted PC kg N/ha/yr.	PC % of critical load
Wye Valley & Forest of Dean Bat Sites – England	10	0.457	4.6
Wye Valley & Forest of Dean Bat Sites – Wales	10	0.459	4.6

Note [1] Critical load values taken from Air Pollution Information System (APIS) website (www.apis.ac.uk) – 18/02/2022

However, the SACs are designated for bats and following internal consultation, we have concluded that nitrogen deposition will not adversely impact bat roosts viability nor the insect levels which could affect their feeding and no further assessment is needed.

Ammonia assessment – SSSI

The following trigger thresholds have been applied for assessment of SSSIs:

- If the process contribution (PC) is below 20% of the relevant critical level (CLE) or critical load (CLO) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required. An in-combination assessment will be completed to establish the combined PC for all existing farms identified within 5 km of the SSSI.

Initial screening using the ammonia screening tool version 4.6 has indicated that emissions from Chessgrove Farm Poultry will only have a potential impact on SSSI(s) with a precautionary CLE of $1\mu\text{g}/\text{m}^3$ if they are within 1,048 metres of the emission source.

Beyond 1,048 metres the PC is less than $0.2\mu\text{g}/\text{m}^3$ (i.e. less than 20% of the precautionary $1\mu\text{g}/\text{m}^3$ CLE) and therefore beyond this distance the PC is insignificant. In this case all SSSIs are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of $1\mu\text{g}/\text{m}^3$ is used and the PC is assessed to be less than 20%, the site automatically screens out as insignificant and no further assessment of CLO is necessary. In this case the $1\mu\text{g}/\text{m}^3$ level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely damage to these sites.

Table 4 – SSSI Assessment

Name of SSSI	Distance from site (m)
Aston Ingham Meadows	4,777

Blaisdon Hall	3,118
Puddlebrook Quarry	2,997
Hobb's Quarry, Longhope	1,891
May Hill	2,591
Edgehills Quarry	2,818
Westbury Brook Ironstone Mine	1,808
Stenders Quarry	1,794
Wigpool Ironstone Mine	1,808
Wood Green Quarry and Railway Cutting	3,061
Scully Grove Quarry	1,896
Longhope Hill	1,806

It should be noted that the Land Grove Quarry, Mitcheldean SSSI is 596m away, however this has not been considered as part of this assessment as it is designated only for geological features.

Ammonia assessment – LWS and AW

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

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

Initial screening using ammonia screening tool version 4.6 has indicated that emissions from Chessgrove Farm Poultry will only have a potential impact on the LWS and AW sites with a precautionary CLe of $1\mu\text{g}/\text{m}^3$ if they are within 359 metres of the emission source.

Beyond 359 metres 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 LWS and AWs are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 3 – LWS and AW Assessment

Name of LWS/AW	Distance from site (m)
Howley Grove LWS	1,561
Marshall's Grove LWS	836
Mountjoy Wood LWS	649
Old Farm Wood (Oldmoors Wood) LWS	1,598
Ash Wood LWS	1,859
Beech Grove (Longhope) LWS	1,953
Kiln Woods LWS	1,863
Sculchurch, Parish Woods LWS	1,473
Land Grove Wood LWS	429
Coleman's Wood LWS	1,728
Hobb's Quarry LWS	1,885
Flaxley Woods (South) LWS	1,983
Hope Wood (Flaxley Woods) LWS	1,167
Scully Grove LWS	1,808
Stenders Quarry LWS	1,794

Lady Grove Bank LWS	1,721
Wilderness Field Centre LWS	1,904
Flaxley Woods AW	984
Unnamed AW	893
Beech Grove AW	1,951
Cornage Wood AW	1,530
Howley Grove AW	1,560
Land Grove AW	428
Old Farm Wood AW	1,596
Scully Grove AW	1,808

Decision checklist

Aspect considered	Decision
Receipt of application	
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.
Consultation	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement. The application was publicised on the GOV.UK website. We consulted the following organisations: Food Standards Agency (FSA) Health & Safety Executive (HSE) Director of Public Health & UKHSA (DPP & UKHSA) Local Authority Environmental Health Department – Gloucestershire County Council. No responses were received from the FSA, HSE or the Local Authority Environmental Health Department and the Director of Public Health. The comments and our responses from the UKHSA are summarised in the consultation section .
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	We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility' Appendix 3. The extent of the facilities is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.
The site	
Extent of the site of the facility	The Operator has provided plans which we consider are satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	The Operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports.
Biodiversity, heritage,	The application is within the relevant distance criteria of a site of heritage, landscape or

Aspect considered	Decision
landscape and nature conservation	<p>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> <p>We have sent a Habitats Regulations Assessment to Natural England ‘for information only’.</p>
Environmental risk assessment	
Environmental risk	<p>We have reviewed the Operator's assessment of the environmental risk from the facility.</p> <p>The Operator’s risk assessment is satisfactory.</p>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the Operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</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 include the following:</p> <ul style="list-style-type: none"> • Bird houses are insulated and all ventilated using high velocity roof fans of an efflux speed of 11m/s. • Use of gable-end fans during periods of hot weather. • Water for the bird is provided using non-drip nipple drinkers. • Dirty and contaminated water directed into sealed underground tanks. • Clean roof water is directed via filter drains into an attenuation pond prior to discharge. Clean drainage systems are not contaminated – during clean-out or in times of incident, divert valves direct potentiall contaminated waters to the underground dirty water tanks. • Litter is placed in trailers following clean out after crop depletion. Once full, trailers are covered and litter is removed from site. Used litter is not stored at the installation. • No manure is being stored on-site. • Carcasses are stored in sealed, vermin-proof containers and collected a minimum of twice weekly, by a licensed collection agent. • All working areas around the poultry houses are concreted to prevent emissions to ground. <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 BREF.</p>
Odour management	We have reviewed the odour management plan in accordance with our guidance on

Aspect considered	Decision
	<p>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	Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.
Emission limits	<p>ELVs based on BAT have been set for the following substances:</p> <ul style="list-style-type: none"> • 0.6 kg N excreted/animal place/year • 0.25 kg P₂O₅ excreted/animal place/year • 0.08 kg NH₃/animal place/year <p>See key issues.</p>
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p> <p>These monitoring requirements have been imposed in order to implement the IRPP BAT Conclusions dated 21/02/17.</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	<p>We have specified reporting for emissions of ammonia, dust, nitrogen and phosphorus in the permit.</p> <p>We made these decisions in accordance with IRPP BAT Conclusions dated 21/02/17.</p> <p>See key issues.</p>
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	

Aspect considered	Decision
<p>Section 108 Deregulation Act 2015 – Growth duty</p>	<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 on 01/11/22 from:
UK Health Security Agency
Brief summary of issues raised
<p>Note that the main emissions of potential public health significance are emissions to air of bioaerosols, dust including particulate matter, and ammonia. Also note that the EA does not require an assessment for ammonia or bioaerosol emissions for this application.</p> <p>Consider the proposed mitigation and management to be adequate given the rural and relatively isolated location.</p> <p>Assume the installation will comply in all respects with the requirements of the permit, including the application of Best Available Techniques (BAT), which should ensure that emissions present a low risk to human health.</p>
Summary of actions taken or show how this has been covered
<p>The operator has confirmed the installation will be designed and operated in accordance with BAT requirements. The Environmental Risk Assessments, OMP and NMP have been reviewed and we are satisfied that appropriate measures have been proposed to manage fugitive emissions, in accordance with our technical guidance note for intensive farming, including ammonia, dust, bioaerosols and particulates and we are satisfied that the proposed measures will minimise the potential for emissions from the installation.</p> <p>Standard conditions 3.2.1 and 3.2.2 concerning fugitive emissions have been included in the permit. ELVs, monitoring and reporting permit conditions have been included in-line with BAT. Key operating techniques have been included in Table S1.2 of the permit.</p>