

Permitting decisions

Variation

We have decided to grant the variation for New House Farm operated by M.E. Furniss & Sons (Farms).

The variation number is EPR/XP3539XH/V003.

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
- shows how we have considered the [consultation responses](#)

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

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

Key issues of the decision

New Intensive Rearing of Poultry or Pigs BAT Conclusions document

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

The BAT Conclusions document is as per the following link

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

Now the BAT Conclusions are published all new housing within variation applications issued after the 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 for ammonia emissions which will apply to the majority of permits, as well as BAT associated levels 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 are published.

New BAT conclusions review

There are 33 BAT conclusion measures in total within the BAT conclusion document dated 21st February 2017.

The Applicant has confirmed their compliance with all relevant BAT conditions for the housing, in their document reference Non-Technical Summary: New House Farm in their variation application 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 it achieves levels of Nitrogen excretion below the required BAT-AEL of 13.0 kg 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 it achieves levels of Phosphorous excretion below the required BAT-AEL of 5.4 kg 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 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions.
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 27 Monitoring of emissions and process parameters -Dust emissions	Table S3.3 Process monitoring requires the operator to undertake relevant monitoring that complies with these BAT conclusions. The Applicant has confirmed that emissions will be monitored and demonstrated from each animal house, by use of emission factors.
BAT 30 Ammonia emissions from	The Applicant has confirmed it will demonstrate it achieves levels of ammonia below

BAT measure	Applicant compliance measure
pig houses	<p>the required BAT-AEL for the following pig types:</p> <p>Pigs > 30kg: 2.6 kg NH3/animal place/year.</p> <p>The Installation does not include an air abatement treatment facility, hence the standard emission factor complies with the BAT AEL.</p>

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 30

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

More detailed assessment of AEL's

Pig housing

Not all current emission factors are lower than the relevant BAT AEL. The standard emission factor for pigs>30kg on FSF with a vacuum system is 3.11, whereas the BAT AEL is 2.6. However, we have used an emission factor of 2 - this assumes that slurry depth below the slats is less than 800mm and that slurry is removed at a frequency of 12 weeks or less. This has been confirmed by the applicant.

Slurry store

There is an existing slurry storage tank with a total surface area of 380.1m² within the installation boundary, which is currently uncovered. We have included an Improvement Condition (IC3) in the permit to ensure that the existing slurry storage tank is covered in order to ensure compliance with the BAT Conclusions, specifically BAT 16.

The condition reads:

“A written plan shall be submitted to the Environment Agency for approval detailing proposals for covering the existing uncovered slurry storage tank to comply with best available techniques (BAT) conclusions as defined in the intensive rearing of poultry or pigs (IRPP) BAT conclusions document, dated 21/02/17, and in-line with EPR 6.09 Sector Guidance Note.

The plan shall include the cover type, a timetable for the works, and written confirmation that the operator shall provide written notification to the Environment Agency at least 14 days prior to the commencement of the installation works.

The operator shall implement the plan in accordance with the Environment Agency's written approval and within the timescale agreed.”

Industrial Emissions Directive (IED)

The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 were made on the 20 February 2013 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 New House Farm (dated May 2023) 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

There are no sensitive receptors (excluding residential properties associated with the farm) within 400m of the installation boundary and therefore an Odour Management Plan (OMP) was not required or submitted.

Noise

There are no sensitive receptors (excluding residential properties associated with the farm) within 400m of the installation boundary and therefore a Noise Management Plan (NMP) was not required or submitted.

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 is a sensitive receptor within 100m of the Installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is adjacent to the Installation.

Guidance on our website concludes that applicants need to produce and submit a dust and bio aerosol risk assessment 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 risk assessment in this format.

In the guidance mentioned above it states that particulate concentrations fall off rapidly with distance from the emitting source. This fact, together with the proposed good management of the Installation such as keeping areas clean from build-up of dust, and other measures in place to reduce dust and risk of spillages (e.g. litter and feed management/delivery procedures) all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed the following measures in their operating techniques to reduce dust:

- No feed milling undertaken on-site. All feed systems are fully enclosed and automated, and feed blown in through sealed pipe.
- Potentially dusty spillages are cleaned up promptly.
- Roofs are kept clear of dust build-up, reducing risk of contamination of roof water to clean water drainage.
- Bedding material is stored under cover to ensure it is kept clean and dry to prevent wastage and deterioration.

Conclusion

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

Ammonia

The applicant has demonstrated that the housing will meet the relevant NH3 BAT-AEL.

There is one Ramsar sites located within 5 kilometres of the installation. There are two Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are no Special Area(s) of Conservation (SAC) or Special Protection Area(s) (SPA) sites located within 5 km of the installation. There are no other designated nature conservation sites within 2 km of the installation.

Ammonia assessment – Ramsar

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 Ramsar.

Screening using the ammonia screening tool version 4.6 has determined that the process contributions of ammonia emissions, nitrogen deposition and acid deposition from the application site are over the 4% significance threshold. As such, it is not possible to conclude no adverse effect alone.

However, comparison between the impacts on the Midland Meres & Mosses Phase 2 Ramsar from the existing installation scenario and the proposed installation scenario indicates that the impacts from the proposed installation scenario are significantly lower than those of the existing installation scenario, for ammonia emissions, nitrogen deposition and acid deposition. On this basis we agree that the permit can be granted based on a reduction of impacts on the Midland Meres & Mosses Phase 2 Ramsar.

Table 1 – Ammonia emissions comparison

Site	Critical level ammonia µg/m ³	Predicted process contribution µg/m ³	% of critical level
Existing Scenario	1*	0.176	17.6
Proposed Scenario – with slurry store uncovered	1*	0.082	8.2

Proposed Scenario - With slurry store covered**	1*	0.08	8.0
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* Ramsar overlain by Aqualate Mere SSSI so APIS data for this site used. A precautionary critical level of 1 µg/m³ has been assigned to this site.

** Used low tech cover for highest emission factor for comparison (to demonstrate worst-case scenario).

Table 2 – Nitrogen deposition

Site	Critical load kg N/ha/yr*	Predicted PC kg N/ha/yr.	PC % of critical load
Existing Scenario	10	0.912	9.1
Proposed Scenario – with slurry store uncovered	10	0.426	4.3
Proposed Scenario - With slurry store covered**	10	0.414	4.1

* Critical load values taken from APIS website (www.apis.ac.uk) – 23/08/23.

** Used low tech cover for highest emission factor for comparison (to demonstrate worst-case scenario).

Table 3 – Acid deposition

Site	Critical load keq/ha/yr*	Predicted PC keq/ha/yr.	PC % of critical load
Existing Scenario	1.238	0.065	5.3
Proposed Scenario – with slurry store uncovered	1.238	0.03	2.4
Proposed Scenario - With slurry store covered**	1.238	0.03	2.4

* Critical load values taken from APIS website (www.apis.ac.uk) – 23/08/23.

** Used low tech cover for highest emission factor for comparison (to demonstrate worst-case scenario).

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 (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 5 km of the SSSI.

Screening using the ammonia screening tool version 4.6 has indicated that the PC's for Aqualate Mere SSSI and Newport Canal SSSI are predicted to be less than 20% of the critical level for ammonia emissions therefore it is possible to conclude no damage. The results of the ammonia screening tool version 4.6 are given in the tables below.

Table 4 – Ammonia emissions

Site	Ammonia Cle (µg/m ³)	PC (µg/m ³)	PC % critical level
Aqualate Mere SSSI	1*	0.88*	8.8
Newport Canal	1*	0.126*	12.6

* A precautionary level of 1 µg/m³ has been used during the screen. Where the precautionary level of 1 µg/m³ is used, and the process contribution is assessed to be less than the 20% insignificance threshold in this circumstance it is not necessary to further consider nitrogen deposition or acid deposition critical load values. In these cases the 1 µg/m³ level used has not been confirmed, but it is precautionary.

** For the proposed scenario, the emission factor for uncovered slurry store was used to show a worst-case scenario.

No further assessment is required.

Improvement Conditions:

For clarification and ease of regulation, as they have been replaced by a new Improvement Condition, the improvement conditions from the original permit (EPR/XP3539XH/A001, issued 31/03/08) and variation V002 (issued 26/04/21) which relate to covering the slurry store have been removed. These improvement conditions are listed below:

Reference	Requirement	Date
IC1	<p>A written plan shall be submitted to the Agency for approval detailing proposals for replacing or covering existing uncovered slurry stores and lagoons to comply with the requirements of section 5.3.1 of TGN How to Comply, Version 1. The proposals shall include a timetable for the replacement and refurbishment work. The notification requirements of condition 2.4.2 shall be deemed to have been complied with on submission of the plan.</p> <p>The plan shall be implemented by the operator from the date of approval in writing by the Agency subject to such amendments or additions as notified by the Agency.</p>	30/09/08
IC4	<p>A written plan shall be submitted to the Environment Agency for approval detailing proposals for covering the existing uncovered slurry storage tank to comply with best available techniques (BAT) conclusions as defined in the intensive rearing of poultry or pigs (IRPP) BAT conclusions document, dated 21/02/17, and in-line with EPR 6.09 Sector Guidance Note.</p> <p>The plan shall include the cover type, a timetable for the works, and written confirmation that the operator shall provide written notification to the Environment Agency at least 14 days prior to the commencement of the installation works.</p> <p>The operator shall implement the plan in accordance with the Environment Agency's written approval and within the timescale agreed.</p>	<p>Written plan 21/02/21</p> <p>Plan implementation 21/08/22</p>

The completed Improvement Conditions relating to a drainage and housing review have therefore been renumbered in the permit to IC1 and IC2 respectively.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on confidentiality.
Consultation	
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: <ul style="list-style-type: none"> • Local Authority – Planning • Local Authority – Environmental Health • Health and Safety Executive • Director of Public Health/ UK Health Security Agency (formerly Public Health England) The comments and our responses are summarised in the consultation section .
The facility	
The regulated facility	We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility'. The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit. The Anaerobic Digester Plant is permitted under a SR2012 No10 permit (reference EPR/BB3603MK, EAWML 401434).
The site	
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports.
Biodiversity, heritage, landscape and nature conservation	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat. 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

Aspect considered	Decision
	<p>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 not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p> <p>For more details refer to the key issues section.</p>
Environmental risk assessment	
Environmental impact assessment	In determining the application we have considered the Environmental Statement.
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>
Permit conditions	
Updating permit conditions during consolidation	We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit(s).
Improvement programme	<p>Based on the information on the application, we consider that we need to impose an improvement programme.</p> <p>We have included an Improvement Condition (IC3) in the permit to ensure that the existing slurry storage tank is covered. This replaces Improvement Condition 1 from the original permit and Improvement Condition 4 from Variation Notice V002.</p> <p>For more details refer to the key issues section.</p>
Emission limits	We have decided that emission limits are required in the permit. BAT-AELs have been added in line with the Intensive Farming sector BAT conclusions document dated 21/02/17. These limits are included in table S3.3 of 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	<p>We have specified reporting in the permit.</p> <p>We made these decisions in order to ensure compliance with the Intensive Farming sector BAT conclusions document dated 21/02/17.</p>
Operator competence	
Management system	There is no known reason to consider that the operator will not have the

Aspect considered	Decision
	management system to enable it 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 grant 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
Telford & Wrekin Council – Planning (response received 11/07/23)
Brief summary of issues raised
No comments to make in respect of the application.
Summary of actions taken or show how this has been covered
No action required.

Response received from
UK Health Security Agency (UKHSA) on 13/07/23
Brief summary of issues raised
<p>The main emissions of potential public health significance are emissions to air of bioaerosols, dust including particulate matter, ammonia and associated odour. The submitted ammonia assessment indicates that predicted concentrations for the proposed development are lower than the current installation and significantly lower than Environmental Assessment Levels. A dust and bioaerosol management plan is included within the application and the applicant notes that no complaints regarding the impact of emissions from the installation have been received during previous operation.</p> <p>The nearest receptor (the permit holders residence) is adjacent to the eastern boundary of the site and beyond this other residential receptors are over 400m distance.</p> <p>Bioaerosols</p> <p>The Environment Agency screen intensive livestock rearing units using a distance of 100m to the nearest sensitive receptor(s). This is based on a 2009 DEFRA report. Should it be identified by the applicant that there are sensitive receptors within 100m from the boundary of such units the applicant is required to carry out a bioaerosol risk assessment.</p> <p>UKHSA is currently updating its Intensive Farming position paper as part of wider work on the health impacts on exposure to bioaerosols from intensive farming. The evidence base for human exposure to bioaerosols from intensive livestock rearing units remains limited, compared to composting facilities. The nature of the evidence that is available however indicates that there are differences between both sources (pig or poultry). The nature of the bioaerosols (fungal or bacteriological) is also important.</p> <p>In relation to intensive farming and bioaerosols, a recent systematic review describes the evidence base which clearly demonstrated that published studies have so far detected inconsistent results with studies reporting no effect, mixed effects, harmful effects and protective effects. In addition, studies conducted to date have typically been cross-sectional in design, hindering the ability to assign effects to farming exposure.</p> <p>It is assumed by UKHSA that the installation will comply in all respects with the requirements of the permit, including the application of Best Available Techniques (BAT). This should ensure that emissions present a low risk to human health.</p>
Summary of actions taken or show how this has been covered
The site has a Dust and Bioaerosol Management Plan (DBMP) in place. 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. Please refer to the key issues section for further details.

Response received from
Telford & Wrekin Public Health on 14/07/23
Brief summary of issues raised
<p>The following comments were raised:</p> <ol style="list-style-type: none"> 1. We ask that adherence to Guidance Document EPR 6.09 (including applicable appendices) for the control of Noise, Odour and Dust be included in any conditions and the use of Best Available Technologies (BAT) be recommended to meet those conditions. 2. The application site is within a nitrate vulnerable zone (NVZ). We ask that adherence to Guidance Document 'Storing organic manures in nitrate vulnerable zones - How to provide enough storage and keep storage records of organic manures in a nitrate vulnerable zone (NVZ)' be included in any conditions and the use of Best Available Technologies (BAT) be recommended to meet those conditions. 3. The Ammonia modelling conducted for the proposed scenario predicts that there would be exceedances of 1% of the Critical Level and/or the Critical Load over Aqualate Mere SSSI/Ramsar site, Newport Canal SSSI and Loynton Moss SSSI. We suggest that consideration be given to the inclusion of additional measures to further reduce emissions from point sources on the site (e.g., the uncapped high speed ridge mounted fans) with the goal of meeting the Environment Agency's Critical Level and/or the Critical Load over Aqualate Mere SSSI/Ramsar site, Newport Canal SSSI and Loynton Moss SSSI.
Summary of actions taken or show how this has been covered
<ol style="list-style-type: none"> 1. As there are no sensitive receptors within 400m of the installation boundary or a history of complaints associated with the site, an Odour Management Plan (OMP) or Noise Management Plan (NMP) was not required or submitted. Standard conditions 3.4.1 and 3.4.2 concerning noise and standard conditions 3.3.1 and 3.3.2 concerning odour are contained within the permit. A DBMP was requested and submitted with the variation application, which is listed in Table S1.2 of the Permit and the Operator is required to comply with it as stipulated in Condition 2.3.1 of the Permit. Standard condition 3.2.1 concerning emissions of substances not controlled by emission limits is contained within the permit. 2. The Applicant has confirmed that they have 6 months slurry storage within their Technical Standards document. The Environmental Management System (EMS) for the site includes records relating to NVZ Regulations. Standard condition 2.3.5 concerning disposal or recovery of slurry is contained within the permit. 3. Loynton Moss SSSI is over 5km from the Installation boundary and outside of the relevant screening distance. Screening using the ammonia screening tool version 4.6 has indicated that the PC for Aqualate Mere SSSI and Newport Canal SSSI are predicted to be less than 20% of the critical level for ammonia emissions therefore it is possible to conclude no damage. <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>Please refer to the key issues section for further details.</p>

No responses were received from the following:

- Members of the public via web publication.
- Health and Safety Executive.